

Statement by Huntingdonshire District Council
19th August 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 Second Round of Written Questions

A14 Cambridge to Huntingdon Improvement Scheme – TR010015

Examining Authority's Second Written Questions – 29 July 2015

EXTRACTED QUESTIONS FOR HUNTS DC TO PROVIDE ANSWERS

Ref No.	Respondent:	Question:
Q2.1.1	Applicant Local Authorities	<p>How would mitigation to manage air quality impacts during construction be secured through the Code of Construction Practice (CoCP) (APP-752) section 6 and Requirement 3 (now 4). (Ref Q1.1.4 and Q1.1.17 REP2-002)</p> <p>The CoCP requires the applicant/contractors to obtain a Section 61 Control of Pollution Act (COPA) consent notice before operating. The application should contain all details of the contractor's intention on reducing air quality impacts. The regulator can decide if they consider these are effective and acceptable and grant the consent. If they do not consider them to be effective the regulator will refuse and the applicant will have to reapply.</p>
Q2.1.4	Applicant Local Authorities	<p>SCDC are seeking an appropriate baseline for post construction monitoring of PM₁₀ and NO₂ to be agreed and secured by Requirement. Can the applicant comment? (Ref Q1.1.5 REP2-002)</p> <p>An appropriate baseline for post construction monitoring of PM10 and NO2 is essential to be able to determine if the improvements/deterioration of air quality are as predicted. Baseline data used in the ES will be 6+ years old by the time scheme is finished (assuming it is granted) so up-to-date information will be vital.</p>

Q1.2 5

Applicant
Local Authorities

The applicant has indicated that post completion air quality monitoring is not necessary (Comments on response to SCDC re Q1.1.1 REP2-002 (REP4-018)). What is the reasoning for this? Local Authorities may wish to comment?

The scheme, if granted, will locate the A14 closer to properties where, currently, HDC does not have any issues over air quality in those locations, nor have we been undertaking any monitoring. The scheme has already resulted in many objections being made by residents stating that they will suffer from reduced/poorer air quality levels as a result of the scheme and have requested monitoring to be undertaken to ensure that the Applicant's predictions are correct. HDC will also have to assess emissions from the new road as part of the Local Air Quality Management regime (LAQM). As the original A14 will not be completely removed we will also have to continue to monitor the air quality in the current Air Quality Management Areas until such data has been obtained to prove that the scheme has reduced air quality to below levels in the LAQM. This means that HDC will have to pay for more monitoring and we consider that the monitoring to prove the schemes predictions should be funded by the Applicant.

Q2.1.6

Applicant
Local Authorities

What are the sanctions if best practice measures to control dust during construction prove ineffective and impacts become unacceptable? Local authorities may wish to comment. (Ref Q1.1.17 REP2-002)

The main provision open to local authorities is the statutory nuisance legislation under the Environmental Protection Act 1990. If a local

authority determines that an activity is a statutory nuisance then they have a duty to issue an abatement notice usually requiring work to be undertaken to abate the nuisance. Failure to adhere to the notice can result in prosecution which can result in a fine of up to £20k.

An investigation into statutory nuisance usually involves the aggrieved individual/s logging down when and how they have been affected by the dust. The local authority then assesses the log to determine if they consider the dust to be a statutory nuisance. They then contact the alleged source of the creation of the dust and make an assessment of the practices being employed. If they consider that the company is not meeting best practice then the local authority has 7 days to enter further discussions to informally resolve the nuisance. If the nuisance is still occurring or the company does not want to change their practices then the LA issues an abatement notice requiring the nuisance to be abated. The company has 21 days to appeal the notice and if the notice has not been adhered to the LA can start legal proceedings against the company.

HDC considers that securing Section 61 consent notices would significantly speed up this process as if consent has been given and the LA is satisfied that the most appropriate measures have been proposed then following any complaint an immediate investigation can be made to see if the consent notice is being adhered to. If it isn't, then the company is liable for a £5K fine and a maximum penalty of £50 for each day the offence continues after conviction.

However, if the applicant is using the best practicable means and is still causing dust problems then the local authority has no powers available to them to reduce the dust further.

Q2.1.7

Applicant
Local Authorities

How would agreement be reached with the local authorities regarding their request for post implementation air quality monitoring in locations where air quality is predicted to decline?

HDC would either like to agree the location of several sites where the applicant would install NO2 diffusion tubes, in the event that any of these sites shows exceedances of the NO2 air quality standards then the applicant would look to install an automatic monitoring station and/or undertake a revised air quality model to assess the extent of the exceedance.

HDC does not consider that PM10 monitoring is required unless specific complaints are received and a similar assessment to the NO2 can be undertaken.

Q2.1.11

Applicant
Local Authorities

SCDC has raised concerns about air quality monitoring during construction. Would an air quality monitoring strategy address this concern?

HDC considers that dust is likely to be the main air quality issue that will arise during construction. This is likely to be especially present where the construction, including borrow pits, is near residential properties. HDC consider that the use of Section 61 COPA consent notices will be sufficient to protect sensitive receptors.

Q2.2.14

Applicant
Natural England
HDC

How would the detailed design of the restoration and enhancement of the Buckden Gravel Pits CWS be developed in consultation with the owner and NE and how would this be secured in the DCO?

HDC has no qualified Ecology Officers. There is a Service Level Agreement between HDC and the Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trust and the WT provide HDC with advice on ecological issues where this is appropriate within the planning process. The WT also has a non-statutory advisory role the CWS at Buckden Gravel Pits (and Fenstanton Lakes CWS) with the landowners. For the A14 LIR the sections on ecology issues within Huntingdonshire were provided by the CCC Ecology Officer. Bearing all these points in mind it would seem sensible that NE, WT and CCC jointly produce an agreed plan for restoration/enhancement/mitigation and/or compensation.

If the EA, as a result of the DCO process, decides that such proposals are appropriate then they could be carried out as an addition to the construction of the Ecological Mitigations Areas – presumably when highway and bridge construction in this area has been completed.

Q2.2.18

Applicant
Local Authorities

The local authorities are concerned about a lack of assessment work undertaken on the County Wildlife Sites particularly the Buckden Gravel Pits CWS and the Fenstanton CWS. Please provide a detailed response setting out how this matter is to be addressed.

Again [as at Q2.2.14] the LIR response on ecological issues at these CWSs was provided by the CCC Ecology Officer.

HDC suggests that CCC [liaising with the local Wildlife Trust who have a non-statutory advisory

role for the CWS with the landowners] produce a report detailing the shortcomings of the ES assessment of baseline conditions and impacts at these sites, plus [see Q2.2.14 above] a scheme for restoration/enhancement/mitigation and/or compensation.

If the EA, as a result of the DCO process, decides that such proposals are appropriate then they could be carried out as an addition to the construction of the Ecological Mitigations Areas.

Q2.6.2

Applicant
Local Authorities

At the first DCO hearing the ExA raised the matter of discharge of requirements and whether local planning authorities would be better placed to discharge requirements. The applicants response is captured in its written submission (REP5-028). Do the local authorities wish to comment?

HDC is content with the suggestions made by the Applicant in Section 2 of its written submission. HDC does not have the necessary expertise and resources to discharge the DCO requirements within its administrative area and it considers that as the overall scheme is split over three local planning authority areas, to take this approach would lead to a potentially disjointed and ineffective role during the DCO requirements discharge process.

HDC does support the suggestion as outlined at Sec. 2.5, that LPA's would be consulted on such matters and HDC would strongly support that approach in order to ensure that full public scrutiny exists with regard to the discharge of those requirements.

Q2.6.5

Applicant
Local Authorities

At paragraph 4.52 of HEs written submission following the first DCO hearing (REP5-028), the applicant refers to noise issues being 'fundamentally a trunk road design issue' and that 'this matter is not something that it is appropriate for the local authorities to be consulted on prior to the mitigation details being approved by the Secretary of State.' Do the local authorities wish to comment?

HDC considers that noise from any development/application that can have any effect on residents within their designated area to be an issue that is appropriate for local authorities to be consulted on. Unlike the County Council, SCDC and HDC have employees with acoustic knowledge and part of their Environmental Health department's statutory remit, is to assess the noise implications of any application in their district and to give an impartial view of the effect of the scheme and the noise assessment, as well as any mitigation. Therefore, HDC considers it very appropriate that it is consulted to ensure that an adequate assessment is undertaken.

HDC also considers that to understand and properly assess the mitigation proposed and its suitability in relation to the proposed scheme, that the Council has to understand where and how the figures are obtained. HDC considers that once the mitigation has been approved by the Secretary of State then it will be too late to obtain any changes to protect, if required, any adversely affected properties.

Q2.6.6

Applicant
Interested Parties

At paragraph 5.7 of HEs written submission (REP5-028) the applicant comments that 'except to the extent already covered by the proposed requirements... detailed design issues such as the River Great Ouse crossing including its structures, were intended to be approved by the applicant itself.' Do Interested Parties wish to comment?

At the River Great Ouse crossing there would be inevitable adverse impacts on landscape character and visual amenity – these have been highlighted in the Joint LIR at paras 9.1.12, 9.1.18-19, 9.1.27-28, 9.1.31 and 9.1.47. Impacts on landscape character and visual amenity result mainly from the alignment of “embankments and bridges [structures] ... at right angles to the south/north alignment of the broad river valley, creating a unnatural pinchpoint.” [LIR 9.1.19] Generally speaking, the narrower this pinchpoint the greater this impact on landscape character. The greater the obstruction to views along the river valley produced by incongruous embankments and bridge structures, so the scale of landscape and visual impacts will increase accordingly – especially for users [walkers, cyclists, boaters] of the valley corridor. To minimise these impacts on landscape character the optimum bridge structure would allow maximum views along the river valley corridor. It would be a low structure with minimum associated embankments and maximum distance between vertical supports – which would themselves be designed to be of minimum bulk. Obviously there are engineering, hydrological, and other matters involved, but the issue of landscape and visual impact must be a factor when the final design is considered.

Q2.6.7

Applicant
Local Authorities

How would reasonable costs associated with the discharge of requirements be determined? If the local

planning authorities were to have a role in the discharge if requirements, what arrangements could be put in place to provide funding for this to take place in association with the scheme?

As outlined in the answer to Q.2.6.2 above, HDC does not consider that the LPA's should be the body to discharge DCO requirements. HDC supports the principle of being consulted on any proposed discharge of requirements but clearly given the scale of the scheme, this could place a significant resource burden on the authority. As part of the continuing development of Shared Service arrangements between HDC, SCDC, Cambridge City and the County Council, HDC considers that a shared service arrangement could be considered where the discharge consultation could be led by one of the existing four Council's within the scheme area and funding for this role agreed between the Shared Service and the Applicant.

Q2.6.8

Applicant
Local Authorities

How would the appeal process for non-determination of requirements operate?

HDC considers that this is a matter that requires further discussion between the Applicant and the Secretary of State for Transport, particularly given the role that the Applicant now has as a separate legal entity from the Department for Transport.

Q2.6.9

Applicant
Local Authorities

Cambridgeshire County Council's suggested revised wording for Requirement 3 (now 4) (WR para. 9.2.1 REP3-006) would mean that no part of the authorised development could take place until written details of the CoCP for that part, together with the CEMP and LEMP were submitted to and approved by the Secretary of State, following consultation with the relevant planning authority. In its response to Written Representations (REP4-011) and its written response to oral questions

at the DCO Hearing (REP5-028) the applicant indicated that it is not required because the CoCP is proposed to be secured through a Requirement in the draft DCO and would become a certified document. Furthermore, the applicant considers that the CEMP and LEMP which would be produced in response to the CoCP would provide extensive opportunities for engagement with relevant local authorities and therefore no need to include a consultation obligation within the Requirement. What has the applicant concluded, having given further consideration to the wording of this Requirement, on the basis of other DCOs? Would the local authorities wish to comment?

During negotiations with Tier 1 stakeholders, the Applicant has placed a considerable degree of weight behind the contents of the CoCP and that certain significant requirements of the County Council as local highway authority and Cambridge City, SCDC and HDC as LPA's would be met through the CoCP.

In the Applicant's response to Paragraph 4 of Schedule 2 at 4.35 – 4.38, it is suggested by the Applicant that there is no need to include a consultation obligation as it is the Applicant's intention to finalise the CoCP by the end of the Examination and that this would enable local authorities to be consulted on the CoCP, before it is 'certified'

HDC would stress to the Examining Authority the importance of this consultation taking place because there are significant measures that need to be contained within the CoCP, particularly relating to Noise and Air Quality matters, that must be agreed with the local authorities prior to it being finalised. Additionally, a number of agreements contained within our SoCG are predicated on reaching agreement on the contents and requirements of the CoCP.

While we note the Applicant's intention to finalise the CoCP by the end of the Examination, at present we have had no direct consultation with the Applicant on the CoCP or its contents in order to reach agreement.

HDC would suggest that the Examining Inspectors must satisfy themselves that if the CoCP is not made a Consultation Obligation as part of the DCO process, that they are satisfied that the Applicant will undertake the consultation with the local authorities in order to agree the CoCP by the end of the Examination period as it is indicating and that it will continue to undertake that level of consultation through the life cycle that the CoCP will take throughout the Scheme.

Q2.6.10

Applicant
Local Authorities

The County Council suggested an amendment to Requirement 10 (now 11) (Written Representation para. 9.2.1 (REP3-006)) which would have prevented excavation until the details of works, including aftercare proposals, were submitted to and approved in writing by the Secretary of State following consultation with the relevant planning authority. The applicant rejected the proposed amendment in its response to Written Representations (REP4-011) on the basis that the borrow pits restoration plan would be developed during the Examination and be secured under a Requirement. In the light of its comment in its written response to oral questions at the DCO Hearing (REP5-028) could the applicant indicate what progress has been made in the development of the borrow pits restoration plan? Would the local authorities wish to comment?

The borrow pits, in particular BP1 and BP2 near Brampton, represent a significant opportunity to create a positive legacy for the scheme. Alleviation of local flooding, creation of priority habitats and enhanced biodiversity, and the provision of community resources for passive recreation, which

would be a beneficial contribution to public amenity, would all be potential outcomes of borrow pit restoration. There are other outcomes [eg return to agriculture], but those listed above are the ones which have the greatest legacy component.

Flooding issues will be covered in other responses, but the long term future of such publicly accessible community resources with their associated habitat and biodiversity functions should be a guaranteed part of such a major infrastructure scheme which promoted its legacy credentials right from the start. To ensure this future there needs to be a 10 year aftercare and management programme funded and put in place which, together with new public rights of way, can deliver these benefits. This is no more than would be required of a minerals extraction permission and restoration under current national and CCC planning policy. Not all the borrow pits are appropriate for such treatment, but nevertheless such issues were raised at the outset of the liaison meetings between the applicant and the relevant local authorities. Unfortunately, especially in relation to BP1 and BP2, there appears to have little progress. A "Borrow Pits Task and Finish Group" was established in November 2014, and met for the first time in December 2014. It has not met since as far as we are aware.

Q2.9.1

Applicant
Local Authorities

Requirement 7 provides for the approval and implementation of a landscaping scheme, but sets no time by which such a scheme should be submitted. Should the Requirement be amended to begin 'No part of the authorised development shall commence until a written landscape scheme applicable to that part of the scheme has been submitted to and approved in writing by the Secretary of State, following consultation with the

relevant planning authority'. How would this requirement be monitored and enforced?

The requirement should be for a landscape scheme for the whole of the project to be submitted and approved by SoS after consultation with relevant LPAs.

As outlined in Q. 2.6.2 above, HDC does not have the necessary expertise and resources to discharge the DCO requirements within its administrative area and it considers that as the overall scheme is split over three local planning authority areas, to take this approach would lead to a potentially disjointed and ineffective role during the DCO requirements discharge process.

Monitoring and enforcement would be made easier by requiring regular meetings between applicant, contractor, and relevant LPA officers. Such meetings would report on works progress, works completed, problems and variations etc, plus regular site inspections.

HDC does support the suggestion as outlined at Sec. 2.5, that LPA's would be consulted on such matters and HDC would strongly support that approach in order to ensure that full public scrutiny exists with regard to the discharge of those requirements.

Q2.10.1

Applicant
Local Authorities

Post-construction noise monitoring has been requested by the local authorities particularly in relation to the impacts on Brampton Primary School and at Stewart Close, Brampton, RAF Brampton, Pear Tree Close, Fenstanton, Rhadegund Cottages, Cambridge, Hackers Fruit Farm, Lolworth and Catchall Farm Cottages, Cambridge. How would this be secured in the DCO? (CCC para 7.1.3/4, REP3-006)

The DCO can implement a series of actions that the applicant has to undertake following completion of the scheme. HDC would recommend that locations that have already been assessed within areas of concern be re-assessed using a suitable sound level meters to determine if the predictions in the ES are correct.

It would also be beneficial for the local authority to understand how HE intends to investigate any complaints received from residents claiming they are being adversely affected by the completed road? Please note that statutory nuisance legislation does not cover noise from roads. The local authority will have no powers to investigate complaints and will pass any complaints received straight to HE.

Q2.10.2

Local Authorities

A new Requirement to address noise mitigation has been included in the revised draft DCO submitted for Deadline 4 (Requirement no.12). Do local authorities and others wish to comment?

The ES advises that there are several properties that are predicted to experience an adverse noise climate following the completion of the proposed scheme. HDC notes and supports that noise mitigation has been included as we consider that it is vital to ensure that where appropriate noise mitigation is installed and where mitigation is not suitable, e.g. due to cost/benefit analysis, that this information is disseminated to interested parties to ensure public scrutiny and transparency.

Q2.10.3

Local Authorities

The County Council has indicated that the noise impacts with regard to the borrow pits have been assessed using criteria appropriate for road construction and not those appropriate for mineral extraction. The County Council has requested that noise impacts be appropriately mitigated in relation to the borrow pits. The applicant's view is that the CoCP establishes control measures that would provide the most effective level of protection to ensure that the noise standards for mineral sites would be met in the majority of, if not all, cases. Would the local authorities wish to comment?

The CoCP requires the applicant/contractor/s to obtain a Section 61 Control of Pollution Act (COPA) consent notice before operating. The application should contain all appropriate details of how the contractors intend to reduce noise impacts on sensitive receptors (i.e. undertaking best practicable means). The regulator can decide if they consider these are effective and acceptable and grant the consent. If they do not consider them to be effective, the regulator will refuse and the applicant has to reapply.

HDC considers this to be most appropriate control method to preventing noise from affecting any sensitive receptors.

- **The assessment of noise to comply with the minerals extraction guidance will be undertaken using a series of assumptions as the applicant has not employed any contractors so specific plant of interest, e.g. heavy plant, is not yet known. This means that no matter how competent the acoustic consultant is, the assessment will only be an estimate and could be liable to a range of**

inaccuracies

- **For the County Council to investigate the complaint (as the minerals authority) they would have to engage an acoustic consultant to assess noise levels and this could take a number of weeks to organise. This would also require the consultant to have the correct weather conditions for the assessment to be undertaken as well as the time taken to compile the report. Due to this timescale, the works associated with the noise levels reported may have been completed**

- **The assessment of noise to comply with mineral extraction guidance does not take into account statutory nuisance. A statutory nuisance can occur even if the Contractor/s are meeting the minerals extraction guidance on noise levels. Therefore, the applicant may be causing a noise issue to the local community but if they are meeting the levels set by the minerals extraction guidance then the County Council cannot take any further action**

- **For the local authority to assess the complaint against statutory nuisance legislation, the procedure is to request the complainant to keep a log of the reported noise and how it affects them. The local authority routinely asks for this to be kept for two weeks and returned which is then assessed to see if the log identifies that a nuisance could be occurring. If this is the case, then the LA contacts the applicant to ascertain if they are undertaking the best practicable means to minimise noise as part of the ongoing works.**

Q2.6.11

Applicant
Local authorities

The additional benefit of this is that the LA consider that any complaint can be investigated promptly and in a way that the local community can see that action is taken promptly

- If the LA receives a complaint relating to a scheme subject to a Section 61 consent notice, then the LA can carry out an immediate assessment to ascertain if the works being undertaken adhering to the terms of the notice and to instigate action and appropriate measures if terms are not being met**

A new proposed Requirement (12) does not provide for consultation with local authorities on the basis that noise issues are considered by the applicant to be a technical trunk road design issue on which the applicant has the necessary expertise. Does the applicant and local authorities wish to comment?

HDC would like to request that we are consulted on any proposals for acoustic mitigation as set out by Requirement 12 under Schedule 2 Requirements (Part 1 Requirements).

While the District Council appreciates and acknowledges that the scheme is going to have a beneficial effect for a significant number of our residents, we are also aware that the scheme will have a negative effect on a number of properties. This is covered in our submitted 'Written Representation' and our request that noise monitoring is considered and required for 'any possible situation where an affected property might become an adversely affected property requiring suitable mitigation within the future design year period for the scheme and that this

should be considered as part of the Examination process’.

Section 8 (b) (x) of our submitted Written Representation refers.

Q2.12.16

Applicant
Local Authorities

What are the available options for an improvement scheme at this junction? (REP2-013, para 452)

As this relates to a possible public highway layout at the A1096 Galley Hill junction with the existing A14, this is a matter which we do not wish to comment on and will leave to the Applicant and the County Council.

Q2.12.17

Applicant
Cambridgeshire County Council
Huntingdonshire District Council

What would be the specific consequences of the omission of the removal of the existing A14 Huntingdon viaduct and the associated road works from the scheme?

This is a fundamental aspect of the position that HDC has taken in regard to the proposed scheme and the support of the Council for it.

HDC would also like to confirm that the resolution of this Council’s Cabinet to support the A14 Cambridge to Huntingdon scheme is predicated on it including the proposed removal of the Viaduct, including HDC’s agreed financial contribution to the scheme as part of an existing legal agreement between HDC and the Secretary of State for Transport. If there is to be a consideration of the possibility of retaining Huntingdon Viaduct and a Trunk Road route through the town on the existing alignment, then the Council would wish to place on record that it would reserve its position and would need to reconsider its support for the current Scheme and the current level of financial contribution without the possible inclusion of the Viaduct removal. Likewise, the Council would also need to consider the position that it has currently

reached with the applicant as part of the SoCG relating to any retention of the route through Huntingdon. Additionally, this would also impact on HDC's position relating to any future consultation and agreement relating to the CoCP.

We would draw the Examining Inspectors attention to the Written Representation of HDC that has been submitted as part of the Examination process. Sec. 2 of this document outlines the background to HDC's position relating to the Viaduct and our support for its removal as a key element of the scheme as a whole package.

Sec. 4 of the Written Representation provides our detailed submission on the need for the removal of the Huntingdon Viaduct set in the context of what would be achieved as a result of its removal, not just in removing the varying strands of blight caused by the current trunk road passing through the middle of Huntingdon but also the wider and significant benefits that the downgrading of this route would engender. In the strongest possible terms, HDC would again draw your attention to that evidence, and that of the Applicant and Cambridgeshire County Council, and we would be willing to provide further evidence and justification to any subsequent questions that may arise following consideration of the elements that we have covered in our Written Representation.

In summary, the likely consequences of the retention of the Viaduct and the route through Huntingdon would depend on the nature of how the remaining route would be operated and in what context i.e. would it remain a Trunk Road and would it carry the same or similar traffic levels as at present? Such retention would prevent any improvement to the noise and air quality blight for which a large part of Huntingdon currently suffers. Indeed, the existing Air Quality Management Area

has primarily occurred due to the presence of the A14 and the noise blight by the same reasoning.

Likewise, the Viaduct and the route through Huntingdon places an unacceptable environmental blight on the town and again, the retention of the Viaduct would render it impossible to redress this situation for the benefit of the wider community.

The Council has noted the Examining Inspectors question to the Applicant relating to the creation of vehicular access between the existing route and the Viaduct and the town centre but based on the work undertaken previously as part of the A14 Viaduct Study, it is difficult to understand how such a scenario could be accommodated without a significantly worsening environmental situation for Huntingdon, including in Noise, Air Quality and Traffic terms.

The removal of the Viaduct has always been predicated on the wider objective of the regeneration of Huntingdon Town Centre and the Huntingdon West Area Action Plan (HWAAP), as referred to within our Written Representation, was structured around the scenario of the removal of the Viaduct and the downgrading of the Trunk Road to local road status. The removal of the route would allow the HWAAP to develop the objectives of better integration of both sides of the current route, including allocated development sites within the footprint of the current trunk road route and the re-creation of better open space at Views Common following the removal of the existing A14 embankment. While the HWAAP was future-proofed to allow the plan to develop while the A14 was still in place, the Council would certainly consider that the retention of the Viaduct and the route through Huntingdon would seriously compromise the regeneration objectives of the HWAAP.

This is no more apparent in that the major objective of the HWAAP and the Huntingdon & Godmanchester Market Town Transport Strategy (H&GMTTS) is that the removal of the Viaduct would allow traffic across the town to be more evenly distributed and to remove the rat-running traffic around Huntingdon that is currently avoiding the A14 and Viaduct. The Council has always been content that the A14 traffic modelling with the Viaduct removed has consistently indicated that traffic levels around Huntingdon & Godmanchester would significantly reduce around the zoned area as a whole. This particularly applies to Godmanchester through its historic core and across the Town Bridge where traffic levels are predicted by traffic modelling to reduce by up to 50%, which the Council has strongly supported. Without the removal of the Viaduct, it is difficult to see how reduced traffic levels and congestion around both towns could possibly be achieved as currently planned?

The Council has always noted that as part of the same modelling, that traffic levels on Brampton Road between Hinchingsbrooke Park Road and the rail station would increase, particularly during peak hours. The Council has always been broadly content with that scenario, subject to the introduction of traffic management measures and traffic control systems that are included by the Applicant as part of the DCO submission.

HDC is aware of the range of detailed questions posed by the Examining Inspectors to the Applicant at Section 5 Design & Engineering Standards relating to the Viaduct. The Council has been significantly involved in discussions relating to these matters since the publication of the CHUMMS Study in August 2001 and the various iterations of the scheme that have emerged since that time.

While the Council considers that it could provide answers and evidence to the questions raised, we have noted that we have not been asked to provide feedback. We would however like to place on record that if there are any matters on which further clarification may be needed, the Council would be pleased to provide commentary if required.