

**A14**  
**Cambridge to Huntingdon  
improvement scheme**  
Development Consent Order Application

HE/A14/EX/145

**TR010018**

HE/A14/EX/145

Comments on Deadline 8 Submissions

September 2015

The Infrastructure Planning (Examination Procedure) Rules 2010



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**10 September 2015**



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# 1 Introduction

## 1.1 Purpose of this report

1.1.1 A total of nine Interested Parties, in addition to Highways England, provided submissions at deadline 8 of the Examination, as listed below:

- Anglian Water
- Bond Dickinson on behalf of Network Rail
- Brampton A14 Campaign Group
- Cambridgeshire County Council
- David Tucker Associates
- Hilton Parish Council
- Landro Group and Hinchingsbrooke Water Tower Limited (HWT Ltd)
- Natural England
- South Cambridgeshire District Council

1.1.2 Highways England has reviewed all submissions by Interested Parties at Deadline 8, and this report provides a response to those which it is considered have not been addressed in previous representations submitted by Highways England. Those that have been responded to are:

- Hilton Parish Council
- South Cambridgeshire District Council

1.1.3 In a separate document, Highways England has provided an interim response to the Joint Local Impact Report Version 2 and Cambridgeshire County Council's Deadline 8 submission (*Comments on supplementary documents to update the Joint Local Impact Report*, Applicant reference HE/A14/EX/146).

## 2 Comments on Hilton Parish Council's deadline 8 submission (REP8-005)

### 2.1 Introduction

- 2.1.1 Highways England's response to ExA second round written question 2.10.10 (PINS reference REP7-023) provided an update on the dialogue between the applicant and Hilton Parish Council and Hilton Action on Traffic (HAT).
- 2.1.2 The response set out the meetings that had been held specifically with regard to noise that built on the previous dialogue as noted in the SoCG (REP8-016) and Highways England's responses to Hilton Parish Council and HAT Relevant and Written Representations (PINS reference REP1-035 and PINS reference REP4-012, REP4-016).
- 2.1.3 The independent noise report submitted by the Hilton Parish Council to the Examining Authority was also discussed (prepared by Sound Barrier Solutions – SBS) in meetings with the interested parties and this report was provided to ExA as a late Deadline 5 submission (PINS reference REP5-031).
- 2.1.4 Highways England's response to ExA Q2.10.10 set out the principal reasons why it does not accept the findings of the assessment provided on behalf of Hilton Parish Council, nor the recommendations contained in the report.
- 2.1.5 As committed to in the response, Highways England has provided a note on the technical matters raised in the independent noise report to Hilton Parish Council and to HAT (the matters covered in the note are also covered by this report and SBS report submitted at examination deadline 8). The note was provided to allow their noise specialist to consider the technical matters raised and to form the basis for further engagement.
- 2.1.6 Further dialogue has progressed with SBS since the note was issued.
- 2.1.7 Hilton Parish Council provided comments on Highways England response to ExA question 2.10.10 and also provided a further technical report from SBS as a submission at Deadline 8. The SBS report responds to the matters raised by Highways England both in its response to Q2.10.10 and as set out in the technical note subsequently sent to Hilton Parish Council and HAT.
- 2.1.8 This chapter provides a technical response the SBS report submitted at deadline 8 of the examination timetable.

- 2.1.9 The statements of Common Ground with HAT and Hilton Parish Council have been updated and submitted to the ExA at deadline 9 of the examination timetable in parallel with this report.

## **2.2 Hilton Parish Council's position on the justification for a barrier**

- 2.2.1 Hilton Parish Council's contention is that the A14 Cambridge to Huntingdon Improvement Scheme will result in significant adverse noise effects on the village of Hilton and those effects are capable of being mitigated. Moreover, the Parish Council claims that these assertions are supported by the SBS noise report. In fact the report by SBS dated 17 July 2015 does not contain any claims whatsoever that the proposed scheme will give rise to significant adverse effects. In addition, the further note from SBS (PINS reference REP8-005) explains:

*"As stated above therefore we were not carrying out a noise impact assessment in line with the DMRB, nor were we trying to. We were seeking to offer enhancements to the proposed basic mitigation design."*

- 2.2.2 Hilton Parish Council has not therefore presented any information to support its claim that the proposed scheme would give rise to adverse impacts. It follows that Hilton Parish Council has not provided any information that can be used to justify the incorporation of additional mitigation over and above that already set out in the environmental statement.

- 2.2.3 The SBS report simply considers noise from the new bypass in isolation. Its starting point is to consider the scheme with the proposed 2 metre high landscape bund and then to predict the noise reductions with different mitigation options. On this basis, SBS recommend:

*"We would recommend the construction of the OPTION 3 solution. The analysis has shown that this would be capable of improving the noise climate of the village of Hilton by at least 3dB in most cases and will significantly out-perform the current intended bund design. If built during the construction stage of the new road and in place of the current bund design, costs could be kept to a minimum and in fact may prove to be far more cost effective than the current design."*

- 2.2.4 Option 3 is a 2,725 m, 4 metre high barrier. The recommended structure is a back-filled Gabion block system. It is also suggested that:

- 2.2.5 *"there is also undoubtedly a cost element to the construction of earth bunds however we would suggest that it may be no more expensive to construct the proposed Back-filled Gabion barrier system from this report than it would be to build the earth bunds. However, the benefit to the residents of Hilton would be significant."*

2.2.6 Furthermore is it claimed that the recommended barrier option:

*“would be capable of improving the noise climate of the village of Hilton by at least 3 dB in most cases and will significantly out perform the current intended bund design”.*

2.2.7 It is wrong to suggest that the proposed barrier option would improve the overall noise climate in Hilton, because SBS has not considered the relative contribution from other roads in addition to that from the new road. This is clear in the SBS report as the stated approach is noted as:

*“produce a three-dimensional computer model to examine how the noise would spread from the new A14 to the housing.”*

## 2.3 Landscape and visual effects

2.3.1 Hilton Parish Council suggest that the 4m barrier option would provide a benefit in terms of landscape and visual effects.

2.3.2 In Highways England's application, the current proposed bund north of Hilton would be 2m higher than the highway and would conceal most traffic, although the tops of high vehicles and the tops of two variable message signals (VMS) would be seen above the crest of the bund in Year 1 (at completion of construction). By Year 15 the tree planting on the bund would have grown to achieve total screening of traffic and VMS in summer and partial screening in winter. At approximately 1km distance from the village, and taking into account the existing trees and hedges in the area between the village and the proposed route, the bund would be partially effective at screening the traffic and the VMS in Year 1 and would be completely effective by Year 15.

2.3.3 The bund itself and the embankment for the Potton Road overbridge (and traffic on the overbridge) would still produce a residual slight adverse effect on views from 27 residential properties at the edge of Hilton and along Hilton Road in Year 15. The residual effect on the view from Bridleway Hemingford Grey 14 (Receptor P28) would also be Slight Adverse.

2.3.4 By comparison, in SBS Option 3, the proposed bund and stone-filled gabion wall would achieve a marginal improvement in traffic screening by concealing all traffic in views from the south including Hilton in Year 1 and Year 15. The tops of the VMS would still show slightly above the bund in Year 1. However the structure itself would dominate local views being approximately 5 to 6m higher than existing ground level. The bund can be disguised with planting on the south side but the 4m high gabion wall on the north side would be intrusive and out of character with the local landscape in views from the highway and from the countryside to the north. The 2m bund proposed as part of the scheme on the north side of the highway would partially conceal the gabion wall in ground level views from receptors north of the highway.

- 2.3.5 The gabion wall would be intrusive in the view from upstairs windows at Topfield Farm approximately 300m north of the proposed highway. The effect of the proposed scheme on the view at Topfield Farm is assessed as Very Large Adverse in Year 1, reducing to Large Adverse in Year 15. Taking into account the proposed planting on the bund north of the highway, the assessed visual effect levels for that property in SBS Option 3 including the 4m high gabion wall would not change. Nevertheless SBS Option 3 would increase the intrusiveness of the highway in views from the property. Assessed residual effects on views from the south would be the same as for the proposed scheme.
- 2.3.6 The SBS Option 3 bund and gabion wall would extend east of Hilton Road to an area where the proposed screening would achieve marginal benefits to oblique north-easterly views from three properties (Fields View, Clayfield Farm and Hilton End Farm at 0.9-1.4km distance). In the proposed scheme these views would be screened by a proposed belt of trees (without mounding) in addition to existing retained hedges.
- 2.3.7 Assessed levels of visual effect for these properties would not change with SBS Option 3.
- 2.3.8 Compared to the proposed scheme, SBS Option 3 would make no difference to the visual effects of the Potton Road and Hilton Road over-bridges.
- 2.3.9 In summary, the higher bund and gabion wall of SBS Option 3 would not achieve a significant improvement in traffic screening, but would increase intrusion on views from Topfield Farm (without changing the assessed visual effect levels). The gabion wall would dominate views from the highway and appear out of character with the local landscape. The increased cost of building the structure would achieve very marginal and temporary benefits in traffic screening for some properties to the south and significant dis-benefits to the character of the landscape as seen from the highway.

## 2.4 Cost Implications

- 2.4.1 Hilton Parish Council's note states:

*"..we would suggest that it may be no more expensive to construct the proposed Back filled Gabion barrier system from this report than it would be to build the earth bunds. However the benefit to the residents of Hilton would be significant."*

- 2.4.2 A costing of the 4m high back-filled Gabion system proposed by Hilton Parish Council has been carried out by Highways England engineers.
- 2.4.3 Compared to the 2m high landscape bund in the existing design, the major additional cost item would be the Gabion wall system itself, which would need to be substantial in order to be structurally sound.
- 2.4.4 Other additional costs are:
- Additional fill material: the 4m back-filled bund design with a 'right-angled triangle' shape cross-section would require approximately double the amount of fill compared to the existing 2m 'pyramid' shaped cross-section bund design; and
  - safety fence.
- 2.4.5 The total estimated cost is £8 million relative to the existing (2m bund) design.
- 2.4.6 The costing above assumes that the gabion wall would follow the alignment of the inner toe of the existing bund and so would not interfere with the drainage swale on the southern side of the bypass.
- 2.4.7 However, if the gabion wall were to be placed closer to the carriageway then the swale on the southern side could not be accommodated, meaning that drainage would need to be implemented using cross-drains. The amount of additional fill required relative to the ES design would also increase in this case. The total estimated additional cost would therefore be approximately £9 million relative to the existing (2m bund) design.

## 2.5 Use and application of CRTN

- 2.5.1 Based upon the advice that it has received from SBS, Hilton Parish Council has raised concerns about the application and validity of the Calculation of Road Traffic Noise<sup>1</sup> method (CRTN).
- 2.5.2 Hilton Parish Council accept that the CRTN should be used as the basis of assessment. However, the Parish Council suggests that it cannot be used in isolation to design environmental noise barriers. Because of the claimed deficiencies in CRTN, SBS has presented an assessment of the noise reduction from different barrier options using an alternative method- ISO9613<sup>2</sup>.
- 2.5.3 There can be no doubt that, at this stage of the development and promotion of a highways scheme, CRTN is the appropriate method and is sufficient for designing the geometrical parameters (distance, height and length) of the noise barriers.
- 2.5.4 The Design Manual for Roads and Bridges<sup>3</sup> (DMRB) clearly states that CRTN must be used. There is no suggestion whatsoever in DMRB that suggests that the use of alternative standards could be considered. In addition, the National Policy Statement for National Networks<sup>4</sup> (NPSNN) states that the "prediction of road traffic noise should be based on the method described in CRTN" (Para 5.191 of the NPSNN).
- 2.5.5 The approach to the design of barriers and how barriers would be secured was explained in Highways England's responses to ExA's First Written Question Q1.10.2 (PINS reference REP2-011) and Second Written Question Q2.10.1. The responses explained that the barriers would be designed in accordance with all the relevant technical requirements set out in the DMRB and how the barriers would be secured. The barriers will also be designed in accordance with other relevant standards and design codes applicable to the design of environmental noise barriers.

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<sup>1</sup> Calculation of Road Traffic Noise, Department of Transport and Welsh Office, 1988

<sup>2</sup> International Standard Organization, ISO 9613: 2 1996 Acoustics – Attenuation of sound during propagation outdoors, Part 2: General method of calculation (1996)

<sup>3</sup> Highways Agency and Welsh Office (2011), Design Manual for Roads and Bridges Volume 11, Section 3, Part 7, HD213/11 Revision 1, Noise and Vibration

<sup>4</sup> <https://www.gov.uk/government/publications/national-policy-statement-for-national-networks>

## 2.6 Comparison between CRTN and ISO9613

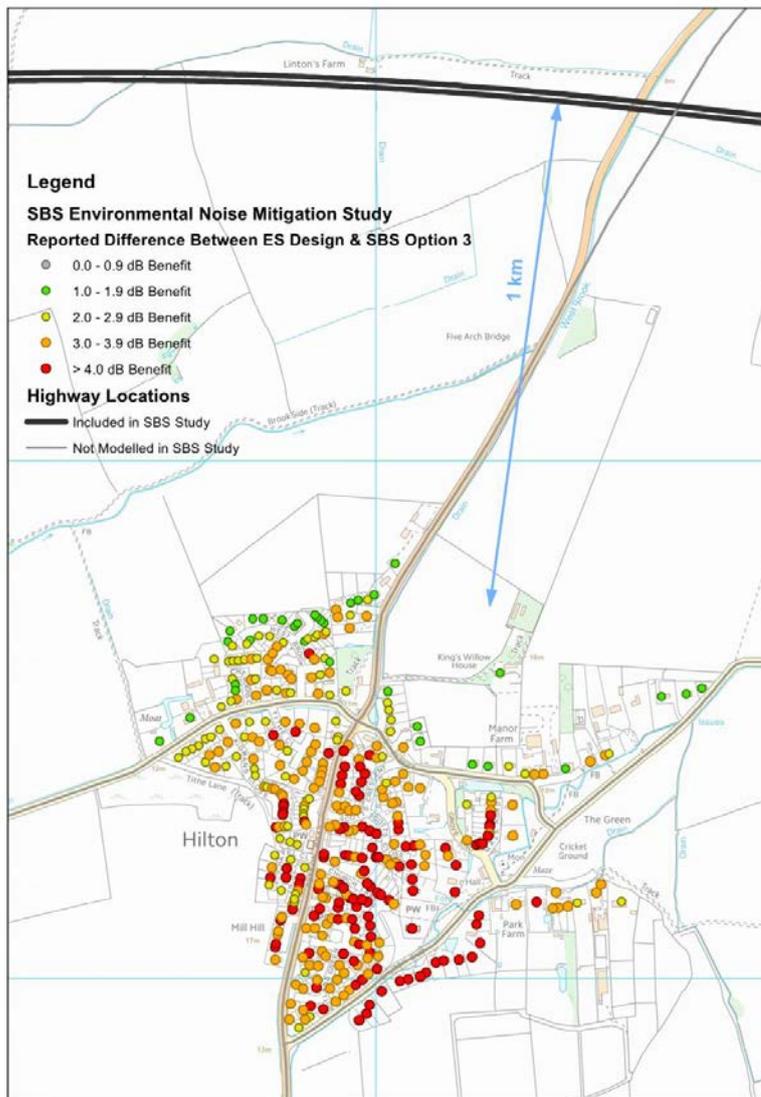
- 2.6.1 SBS has used the ISO9613 general prediction method as an alternative to CRTN. Like CRTN, the ISO method is a method for predicting environmental noise under downwind conditions favourable to propagation.
- 2.6.2 ISO9613 is a general method that can be applied to the propagation of noise in "*most situations concerning road or rail traffic, industrial noise sources, construction activities and many other ground-based noise sources.*" The standard presents a set of equations "*for the attenuation of sound from point sources*" and therefore represents line sources, such as road and rail traffic "*by a set of sections (cells), each having a certain sound power and directivity. Attenuation calculated for sound from a representative point within a section is used to represent the attenuation of sound from the entire section.*"
- 2.6.3 SBS's main criticism of CRTN is that it does not enable it to be used for detailed design. They state that mitigation design "*is outside its scope of use since it does not include some of the basic calculation parameters for noise mitigation (as stated above). Its sole use cannot be regarded as industry best practice.*" The basic calculation parameters for noise calculation referred to are sound insulation or absorption. They even go as far to suggest that CRTN "*assumes that a concrete barrier is as effective as a sheet of paper.*"
- 2.6.4 The criticisms made of CRTN are unfounded and demonstrate a lack of understanding of the CRTN method. CRTN states that the barrier correction is for a 'massive barrier' and presents a formula to calculate the minimum superficial mass per unit area required to approximate this condition for a given potential barrier correction (see CRTN footnote on page 14 referencing Chart 9 Potential Barrier Correction as a Function of Path Difference.). In other words, the basic assumption is that the barrier will be designed to ensure that the sound transmission across the barrier itself is negligible in comparison to the sound that is transmitted over the barrier. This is a reasonable assumption, given that the DMRB sets out a number of technical requirements for environmental barriers (*DMRB Volume 10 Environmental Design and Management, Section 5 Environmental Barriers Part 1 HA 66/95 and Part 2 HA 66/95*). This information has been presented to ExA and hence has been available to Hilton Parish Council in Highways England's response to EXA question 1.10.12.

- 2.6.5 What is more of a surprise about the criticisms made by SBS is that the ISO9613 incorporates similar assumptions and does not allow the sound insulation of barriers to be calculated either. There are no equations in ISO9613 that take account of noise passing *through* a barrier. The attenuation of a barrier in ISO9613 is given by equation 14 of Section 7.4 of the standard and is a function of the wavelength of the sound and the path difference *over* and *around* the barrier. The only reference to the requirements for screening objects (Section 7.4) that the method states that they should have a surface density of “*at least 10kg/m<sup>2</sup>*”, a “*closed surface without cracks or gaps*” and normal dimensions “*larger than the acoustic wavelength at the nominal midband frequency for the octave band of interest.*”. This is a similar underlying assumption to that used in CRTN.
- 2.6.6 The ISO9613 also heeds caution when applying the method to calculate the performance of barriers over large distances. Note 14 in Section 7.4 suggests that for “*large distances and high barriers, the insertion loss calculated by equation 12 is not sufficiently confirmed by measurements.*” It is not surprising that the ISO9613 has not been validated for calculating barrier loss from highway barriers given that it is a general method developed to predict noise from point sources and was validated for that purpose.
- 2.6.7 Unlike CRTN, we are not aware of any validation exercises that have validated the use of the ISO9613 method for road traffic noise, especially for situations where barriers and large separation distances are involved.
- 2.6.8 Hilton Parish Council are quite alone in raising matters about CRTN. No other party has raised any such concerns about its use and application. As we have demonstrated, a number of the technical points made by Hilton Parish Council about the CRTN are simply incorrect.

## **2.7 Considerations of the predictions reported by SBS**

- 2.7.1 The SBS report presents predicted noise levels for each of the barrier options, including the proposed design for the landscape earth bund. The results are presented as contours and in tabular form.
- 2.7.2 The results presented in the report have been taken and used to derive differences between the noise levels with the SBS recommended barrier Option 3 and the 2 m high landscaped earth bund. The results are shown in Figure 1 below. SBS have reported their results as integer values, however to be consistent with the results of the following comparisons their results have been presented below with the same legend.

Figure 1 Comparison of the ES result and SBS Option 3 result as reported by SBS



- 2.7.3 The SBS model suggests +4 dB improvement with their 'Option 3' design (4m high bund with 4m barrier extension to the east) over the ES design. It shows how the SBS model predicts increasingly better performance from their option as distance increases from the source. The differences range between 0dB and 6dB (mean 2.9dB, standard deviation 1.1). The large difference reported between the two mitigation scenarios is an unexpected result. A higher level of barrier performance would normally be expected at closer distances to the barrier.
- 2.7.4 Given these somewhat surprising results, Highways England sought further information from Hilton Parish Council and SBS. Further information was provided in the submission by Hilton Parish Council and the response from SBS dated 27 August 2015. A relatively long response was received but did not fully address the question as to why a substantially greater barrier effect is predicted at receptors further back from the front row properties.
- 2.7.5 In order to establish the possible reason for these apparent anomalies, Highways England's advisors have conducted further predictions and analyses.
- 2.7.6 Road traffic noise from the Huntingdon Southern Bypass has been predicted using the ISO9613 method. The results of the predictions are presented with and without the presence of intervening buildings. The results including intervening buildings are shown in Figure 2 below. It can be seen that the differences between the two mitigation scenarios are significantly lower than those reported by SBS. These differences could be explained by a number of differences in the software and the interpretation of the ISO9613. The differences between the 2m earth bund and the 4m barrier option range between 0dB and 3dB (mean of 1.7dB, standard deviation 0.6). Even though the differences are lower a similar trend emerges in that, with the inclusion of buildings, the ISO9613 predicts increasingly better performance from the SBS option behind the first row of buildings. However, Figure 3 shows the results with the presence of the intervening buildings removed. This demonstrates that the effect of the environmental noise barrier is small and uniform across the village.

- 2.7.7 SBS have claimed and continue to claim that the noise reductions reported and summarised in Figure 1 are attributable to their recommended 4m noise barrier. However, the ISO9613 is a complex method that is being used outside its normal scope. For example, the method will account for the barrier losses for multiple screens (in this case the environmental noise barrier and the intervening buildings) using complex algorithms for multiple propagation paths over and around multiple barriers. In simple terms this means that the barrier losses predicted and reported by SBS cannot be attributed to the environmental noise barrier itself. Rather the barrier losses are a combination of the barrier effect given by the environmental noise barrier and the intervening buildings across large distances beyond the recognised upper limit of the standard.
- 2.7.8 Figure 3 compares the ES Design with SBS Option 3 without any local screening from Hilton buildings results in differences of between 0.1 and 0.6 dB (mean 0.3, standard deviation 0.1). This is much closer to what that expected from the ISO barrier attenuation calculation at long distances, which for an infinite barrier would result in around 0.2 dB.
- 2.7.9 Figure 4 shows the additional screening attenuation from a 4m barrier compared to a 2m barrier predicted using the ISO9613 calculation method. This assumes an infinitely long barrier propagating over otherwise unobstructed ground. It can be seen that the effectiveness of the barrier attenuation decreases with increasing distance from the source such that the difference is less than 0.5 dB at about 600m and beyond and reduces to around 0.1 dB at around 1km, the distance between the closest properties at Hilton and the proposed Huntingdon Southern Bypass. This supports Highways England's submissions to ExA that noise barriers will have no benefit at Hilton.

Figure 2 Calculated difference between ES design and SBS Option 3 using ISO9613, as calculated by Highways England

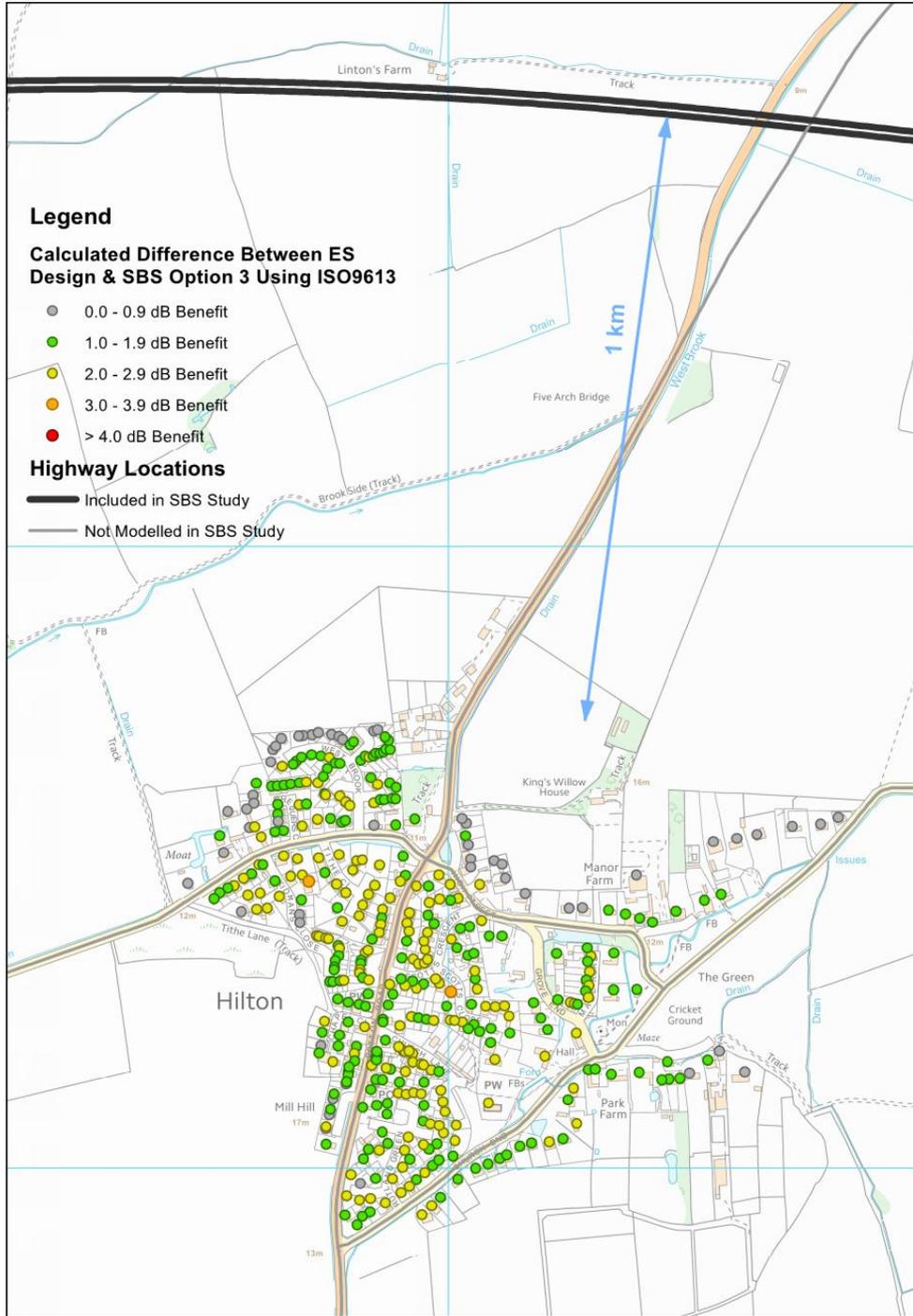


Figure 3 Calculated difference between ES design and SBS Option 3 using ISO9613 excluding local screening effects from buildings in Hilton as calculated by Highways England

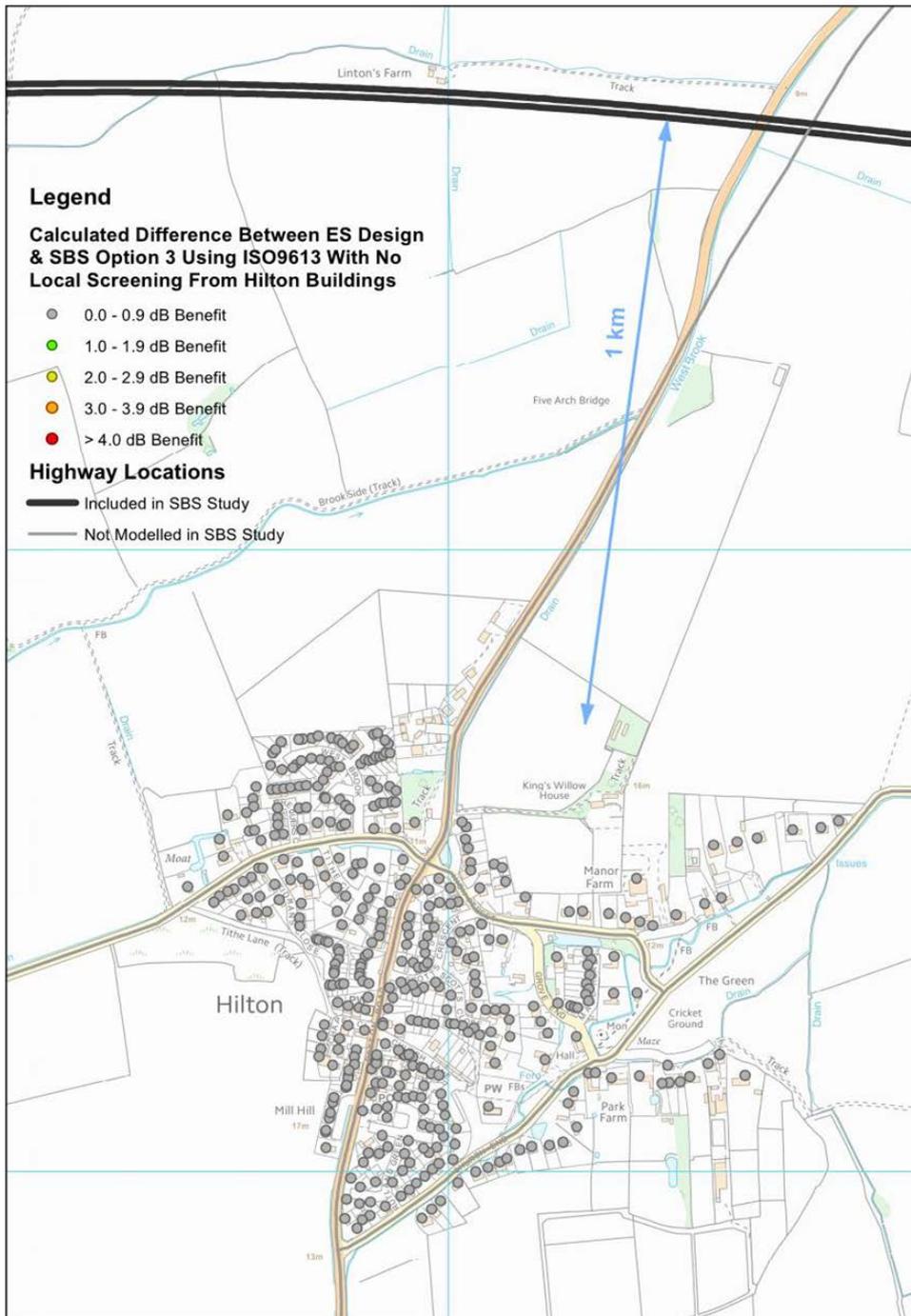
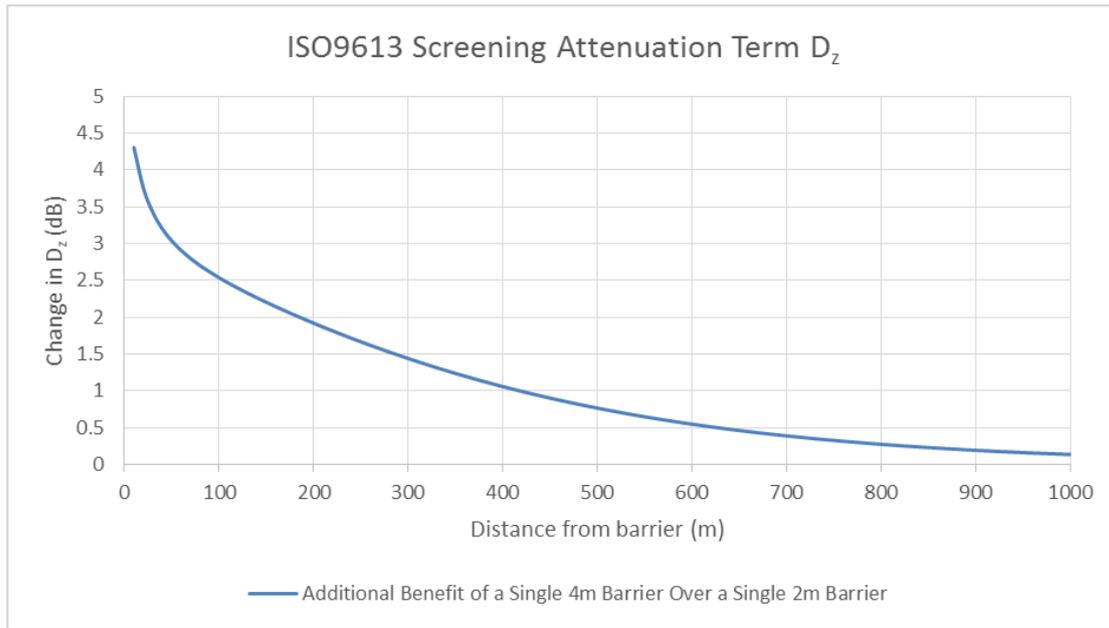


Figure 4 ISO9613 screening attenuation



## 2.8 Conclusions

- 2.8.1 SBS has not undertaken an assessment of the impacts and effects of the scheme. Neither have they claimed to have done so. The SBS report cannot therefore be used to suggest that the results of the scheme will give rise to adverse impacts and mitigation is only required under NPSNN to mitigate adverse impacts / effects on health and quality of life as far as is sustainable.
- 2.8.2 SBS accept the use and application of DMRB as the basis for the impact assessment. An assessment has been undertaken and reported in the environmental statement. The environmental statement, that was prepared in line with DMRB, does not identify any likely significant noise effects on the village of Hilton.
- 2.8.3 Further consideration of mitigation options has been reported by Highways England in the Position Statement on Further Noise Mitigation submitted a deadline 8 of examination timetable (ref). The position Statement demonstrated that the use of vLNS or a 2m high noise barrier option is not justified. It clearly follows that a 4 m high barrier would not be justified given that, as evidenced in this report:
- a 4m barrier would provide no noise reduction benefit in comparison to a 2m high barrier option, and
  - the significant additional costs associated with a 4m high barrier.

- 2.8.4 The criticisms made of CRTN in the SBS report are simply not founded or technically correct. This is especially true for this stage of the development of the scheme.
- 2.8.5 The reductions in noise reported in the SBS report in Hilton cannot be attributed to the 4m high barrier option proposed by Hilton Parish Council. As demonstrated in this document the differences reported by SBS are more likely to result from the application of the calculation method to intervening buildings rather than the proposed barrier per se. As also demonstrated in this document, when applied to just the 4m noise barrier proposed by Hilton Parish Council alongside the proposed scheme, the ISO9613 methodology calculates a negligible (0.2dB) improvement at Hilton compared to the 2m landscape bund included in the scheme.

### 3 Comments on South Cambridgeshire District Council's deadline 8 submission (REP8- 006)

Table 1 Highways England response to SCDC's comments on responses made by Highways England to the Examining Authority's Second Written Questions

Question 2.1.9 What progress has been made in discussions between the applicant and SCDC about the PM10 data from the Impington monitoring station. (Ref Q1.1.1 REP2-002).		
Interested Party	Written Representation	Highways England Comments
South Cambridgeshire District Council	<p><i>“SCDC is reassured that HE accepts that the results from the new equipment at the Impington monitoring station form the basis for agreement of a baseline position, which can then be used to determine if there has been any change in air quality as a result of the scheme, compared to what is predicted by HE.</i></p> <p><i>SCDC is of the view that discussions with HE over historical data from the Impington monitoring station, pre installation of the new equipment in March and October 2014, are of no relevance for the purposes of agreeing a baseline position.</i></p> <p><i>HE has proposed use of data recorded by the new equipment from April 2014, specifically the 12 month period from July 2014, which, in their opinion, best represents PM10 concentrations in the area.</i></p> <p><i>SCDC is unable to agree with HE's proposal as there were a number of data rejection issues during the commissioning of the new equipment, including during the 12 month period from July 2014.</i></p> <p><i>As the new equipment has now been successfully commissioned, SCDC takes the view that the accepted DEFRA annual data cycle January – December, which SCDC has always reported, should be used to determine PM10 concentrations in the area. The next available full year of ratified data from the Impington monitoring station will be available February / March 2016.</i></p> <p><i>SCDC has no record of having received the HE letter dated 31st July 2015, which accompanied the HE's response to the Inspector's</i></p>	<p>Highways England noted in response to second written question 2.1.9 (Applicant reference HE-A14-EX-80, PINS reference REP7- 015) that the monitoring results from the Impington monitor for the most recent 12 month period are considered by Highway England as being representative of the area. This data was analysed in order to help resolve the ongoing discussion with SCDC regarding the reliability of data from the Impington monitor since 2008 as initially discussed in Highways England's response to first written question 1.1.1 (<i>Highways England' Response to ExA's First Written Questions: Report 1 Air Quality and Emissions</i>, Applicant reference HE-A14-EX-28, PINS reference REP2-002).</p> <p>Highways England considers that only data collected since the PM<sub>10</sub> monitor was replaced in April 2014 is representative of the air quality conditions at Impington. This appears now to be accepted by SCDC. Highways England further considers that any data collected from the previous PM<sub>10</sub> monitor (i.e. prior to April 2014) should be disregarded. It would be helpful for SCDC to explicitly state that only data from the new monitoring should now be used to describe air quality conditions at Impington.</p>

	<p><i>questions. SCDC will however be formally responding to the letter in an effort to understand why the HE is unable to accept the full year of ratified data from the Impington monitoring station January – December 2015, which will be available February / March 2016, as the basis for agreeing a baseline position.”</i></p>	<p>Providing that the PM<sub>10</sub> monitor continues to operate satisfactorily for the remainder of this calendar year, Highways England would accept that one calendar year of ratified data would be acceptable to establish the current PM<sub>10</sub> concentrations at Impington. However, Highways England considers that there is already sufficient evidence from the PM<sub>10</sub> data available since April 2014 to show that the concentrations recorded in the period January 2009 to April 2014 were erroneous.</p> <p>SCDC note that historical data from Impington is of no relevance however, Highways England does not agree. As explained in Highways England's response to First Written Question 1.1.1 (and Appendix 1.1) there are large differences in data between historic results (reported to Defra in the LAQM reports) and data recorded since the monitor was replaced in April 2014. Highways England has consistently stated that it believes that data collected by the earlier instrument since 2008 at Impington is incorrect and provides a false impression of PM<sub>10</sub> concentrations at Impington. As noted above it would be helpful for SCDC to explicitly accept that the historical data can be disregarded.</p>
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