

FAO: Case Manager – Nicholas Coombes

**A14 IMPROVEMENT SCHEME UPGRADE - Deadline 10 - BMRA  
Summaries/Submission**

Dear Nicholas,

Please find attached the summaries required by Deadline 10 from the Buckden Marina Resident's Association and thank you for your advice regarding submission by the deadline.

Please note that some key information from Highways England has either not been provided to me before the deadline (latest SoCG, which they may submit without me having seen the complete document) or only one hour before the deadline (coherence assessment).

This makes the process extremely difficult when the Applicant is not able to give interested parties sight of key information in time, or allow them sufficient time to assimilate it; this may be an issue with the overall process, as we discussed at the recent Hearings.

Therefore, I am submitting this on time to meet Deadline 10, but it may be that a further update can be provided particularly on the latest SoCG content and position (which I have not seen and is neither finalised nor agreed yet). I appreciate that such an update would be at the discretion of the Examining Panel to accept, but this may be helpful where agreement with Highways England can be reached.

*Mark Williams*

Registrations of interest numbers 10030711 and 10030713

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**A14 Improvement Scheme TR0100015 - Summary of oral submissions by Mark Williams and Buckden Marina Resident's Association (Registrations of Interest 10030711 and 10030713 put at the Issue Specific Hearings on Noise and Detailed Design on 15<sup>th</sup> and 17<sup>th</sup> September 2015**

1. Please find below a summary of the matters and issues raised at the Issue Specific Hearings on noise and detailed design by the Buckden Marina Resident's Association (BMRA), representing the associated owners of 81 private residential properties. Subsequent developments are noted in italics. *The SoCG between Highways England and the BMRA has continued to develop since the Hearings but, as at submission of this note on 28 September 2015 to meet Deadline 10, while the BMRA has amended its wording to reflect its view of progress of ongoing work to date, no response from Highways England has yet been received to discuss or agree/disagree with.*

**Noise Hearing - 15<sup>th</sup> September 2015**

2. Introduction. Since Highways England's recent acceptance that the 81 private properties at Buckden Marina are residential, there has been positive engagement on the noise issues raised in the BMRA's initial representations, public hearing and second representation. Earlier issues over noise methodology, modeling, assumptions and measurements had been resolved satisfactorily. Moreover, the noise data for L3 location measured separately by Highways England and the BMRA had been exchanged, discussed and mutually agreed as valid representations of ambient noise levels at the time they were measured. Highways England has included both sets, with their data presented as a "summer" baseline and the BMRA's as a "winter" baseline (reflecting the time of year that each had been measured) in their response E/A14/EX/143. In that response, Highways England has also acknowledged that there would be: a minor or moderate adverse impact from increased noise levels depending on the data set used; significantly changed noise characteristics; and, an adverse impact on quality of life. Highways England assessed that, of all the scheme's areas where the present environment is not characterised by traffic noise, the area of the Marina properties is unlike the other similar areas and would be affected to a greater degree than them because of surrounding water and elevated structures of the scheme design in that area. Nevertheless, their initial sustainability appraisal calculations led to a conclusion by Highways England that further mitigation measures beyond those in the ES design was not sustainable and that they would not be included. *Highways England has subsequently shown that levels of reductions in noise that could be achieved by the inclusion of further noise mitigation measures (a vNLS and a 2m high noise barrier at appropriate locations adjacent to, and along, the bridge across the River Great Ouse and ECML railway) which show significant achievable decreases in noise level increases.*

3. Concerns Remaining on Noise Levels. The results of both L3 noise measurements are appreciably different; the BMRA "winter" measurement shows noise levels consistent with the site characteristics and the difference normally expected between levels in the day and night hours, with the former higher than the latter. However, the Highways England measurements not only shows higher noise levels, but also slightly greater levels at night than by day; this is highly unusual and, because their measurement was not attended, the reasons for this cannot be ascertained and are supposed to an effect from summer wildlife. Moreover, the differences between the respective increases against the modelled noise levels of the scheme are significant - up to +5db for the Highways England measurement yet up to +9db for the BMRA measurement. The statements by Highways England

regarding prevailing wind and occupancy of the properties are misleading and appear to present Highways England's position in a better light (that of a lesser effect of the scheme on the properties) than is the case: firstly, the prevailing wind is described as southwesterly, as is generally the case for UK, but the condition of a northerly wind component (which places the Marina downwind of the scheme) is more prevalent on the eastern side of UK and exists around 40% of the time, representing the worst case; and, secondly, the level of occupancy of the properties is pure supposition and is, in any event, irrelevant because the properties are private residences in which, as with any private residence, occupancy is a matter of personal choice for each owner. The sustainability appraisal is calculated against 7 properties that lie within the ES boundary, yet Highways England acknowledges that more of the properties are also likely to be affected.

4. Concerns Remaining on Coherence with Other Schemes. Other future schemes nearby will potentially affect the properties adversely and these have been set out in previous BMRA representations. They are: firstly, the implementation announced by Network Rail of the European Train Management System by 2020 and their published preferred option for the removal of the Offord Level Crossing (with a road realignment bringing Station Lane only 300m from the eastern side of the properties) which they intend to implement by 2024; and, secondly, the Strategic Study into upgrading the A1 (Highways England had been requested earlier to show how connection to the A14 scheme would be achieved); information provided after the hearing shows that there are two routing options to bypass Buckden village, one of which could place an upgraded A1 between Buckden village and the properties at the Marina. *Subsequently, Highways England has forwarded an assessment of coherence and combined, cumulative adverse effects of the A14 scheme with these other schemes – as this was received by the BMRA only one hour before Deadline 10, it has not been possible to assimilate it in any depth, other than to say that it appears to sustain Highways England's earlier position that other schemes would not impact adversely or are insufficiently advanced to consider; the BMRA does not believe this to be an adequate response. Traffic flows for local roads have been predicted for the A14 scheme in the area and could be used to assess the impact of the preferred Network Rail option for the changed road alignment of Station Lane. Highways England already has a scheme layout drawing (A14-JAC-JP-E1-SK-C-00005 Rev P00.1) which shows the options for connections of a future A1 scheme to the A14 scheme and could model this against assumed future traffic flows. Otherwise, the worst case in the future could be that there is not only a new major trunk road to the north, but also a new one to the west and a realigned local road nearer to the east. This combination would have significant adverse effects and it is not acceptable to take a position that other schemes would have to fall in line with the A14 scheme just because that is at a more advanced stage at present.*

5. BMRA Conclusions and Position. The ES noise levels were predicted using a proprietary model with traffic volumes simply averaged throughout a 24-hour period. The existing A14 traffic noise from a similar location on Portholme Meadow near Godmanchester is highly intrusive (even to the point of being able to hear tyres slapping on bridge expansion joints as well as the roar of traffic) well beyond the distance that the A14 scheme is intended to be built from the Marina. The noise characteristics at the Marina will change significantly. The levels of noise increases are high, with a doubling (against Highways England data) and a further doubling of that (against BMRA data) of the noise levels experienced in an area that currently meets CPRE tranquillity thresholds. The site is also unusual compared to other scheme areas. The Highways England L3 noise measurement results are abnormal. Highways England has sought an approach that does not meet "worst case" and favours maintaining its original scheme design without seeking to minimise adverse

impacts. The approach to coherence with other schemes and their potential cumulative effects remains unsatisfactory. The number of properties assessed as affected is uncertain. The initial sustainability appraisal is but one element of the matter, includes no allowance for diminution in property value, yet has been used to justify omitting additional mitigation measures; *moreover, revision of it by Highways England subsequent to the Hearings has now shown that the additional mitigations could be sustainable*. Therefore, there are considerable and unacceptable levels of doubt and uncertainty surrounding Highways England's conclusions. If the additional mitigation measures are not included (or at the very least, enabling embankments and bridge designs so that they could be incorporated readily at a later date), there is a very high risk that the existing design will prove to be inadequate once the scheme is in operation, resulting in adverse consequences which may be impossible to rectify, or rectifiable only at disproportionate effort, disruption and cost than the straightforward solution of incorporating them now, at the very time when they could be and at negligible cost. **Consequently, the BMRA strongly believes that a vNLS and a 2m high noise barrier mitigations as modeled by Highways England must both be included in the scheme now to minimise the significant adverse impact of the scheme upon the properties.**

#### **Detailed Design Hearing - 15<sup>th</sup> September 2015**

6. Introduction. As with matters regarding noise, there has been positive engagement with the Highways England team on the visual impact issues raised in the BMRA's initial representations, public hearing and second representation. Highways England has provided photomontages from additional viewpoints affecting the properties and assessed the impact as initially moderate, reducing to slight in Year 15.

7. Concerns Remaining on Visual Impacts. The photomontages are illustrative only and do not include representative traffic volumes. Only summer views have been provided despite Highways England having been provided with some winter views by the BMRA, which clearly show how highly visible the scheme would be in the worst case during winter months; it should be possible to model winter views given available technology. Better representations of heights, cross-sections and 3d views of the scheme in the area to assist with understanding the effect of the scheme on the area were also expected, but have not yet been provided. The positioning of an overhead sign gantry is now apparent, which is located at the worst possible point, at the highest point where the scheme crosses the ECML - resulting in a 12m high structure rising above a bridge structure which already breaks the skyline by adding 12-14m above AOD; it is inconceivable that its position cannot be adjusted sufficiently to screen it. The coherence and cumulative visual impacts of other schemes, as detailed at paragraph 4 above, have not been considered by Highways England.

8. Concerns on the Detailed Design Process. The design of the structures crossing the River Great Ouse and ECML remains unimaginative and lacking aesthetic qualities. Previous BMRA and representations by others had highlighted the absence of involvement by the Highways England Design Panel. The BMRA's view is that the Highways Agency has had ample time to plan its transition to Highways England and implement the change requirements placed upon it, such as creating a Design Panel, but that it has not made adequate progress in doing so. Consistent with other questions asked of Highways England at the Hearing, the BMRA view is that, notwithstanding the current stage of the scheme, Highways England need to accelerate implementing the Design Panel and consultation process with stakeholders now and take account of their views during the detailed design

phase of this scheme.

9. BMRA Conclusions and Position. Further representative illustrations of the scheme in winter conditions would help to appreciate the worst case impact on the properties. The sign gantry currently positioned at the crossing of the ECML should be re-positioned to minimise visual intrusion on the properties. Highways England must develop the Design Panel process rapidly to enable the Panel to assess the scheme elements, and engage with the BMRA and other stakeholders in developing the detailed design.

Mark Williams  
BMRA  
28 September 2015