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The Planning Inspectorate,  
Temple Quay House,  
Temple Quay,  
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06 November 2015

Dear Sirs

### **A14 Cambridge to Huntingdon Improvement Scheme – Air Quality Monitoring and Mitigation – Deadline 14**

At Deadline 13 the three affected districts – Cambridge City Council, South Cambridgeshire District Council and Huntingdonshire District Council (The Councils) raised the following concerns about suggested text proposed by Highways England (HE) for a proposed DCO requirement for air quality monitoring and mitigation:

- Firstly there is no reference to the specification for monitoring set out in our joint submission at Deadline 10 or reference for the monitoring to be agreed with the Local Authority and therefore there is no reference to quality control and assurance or audit of the monitoring or data produced. Monitoring could end up being inadequate in terms of quality. The monitoring equipment and results need to be independently audited and quality assured as is the case with statutory air quality monitoring.
- Secondly the link to mitigation in the event of future breaches of air quality standards is very vague and only commits to a discussion of mitigation with the local authority. This is unlikely to be adequately robust to secure appropriate mitigation.

The Councils have undertaken further discussion with HE to try to reach agreement on the wording of an air quality monitoring requirement;

We have produced on behalf of the three affected District Councils the following agreed text for a requirement for the DCO which has been shared with HE:

#### A14 Cambridge to Huntingdon Improvement Scheme – Suggested DCO Requirement Air Quality Monitoring and Mitigation

##### ***Monitoring***

***x-(1) No part of the authorised development must commence until the undertaker has installed:***

- a) Continuous air quality monitors in respect of oxides of nitrogen, and fine particles at PM10 and PM2.5 fractions at or close to:***
  - i) The junction of Histon Road and Huntingdon Road in the city of Cambridge to be agreed with Cambridge City Council; and***
  - ii) The historic South Cambridgeshire District Council monitoring location close to Bar Hill to be agreed with South Cambridgeshire district Council; and***
- b) Diffusion tube monitors in eight locations to be agreed with Huntingdonshire District Council in Huntingdon, Brampton, Fenstanton, Alconbury, Offord Cluny and Hilton,***

***And the monitors have subsequently been operated by the undertaker so that data covering an uninterrupted period of at least (3) months has been obtained by the undertaker.***

***c) The specification for installation, operation and data provision should be agreed in writing with the relevant local planning authorities prior to the commissioning of monitoring.***

***(2) The undertaker must operate the monitors installed under sub paragraph (1):***

- (a) during the construction of the authorised development and for a period of at least three years from the opening of the authorised development for public use, and until such time that the monitoring shows a continuous period of 12 months with no exceedances of national air quality objectives or EU limit values for the pollutants monitored, and***
- (b) In accordance with statutory provisions and guidance for Local Air Quality Management in terms of equipment used, calibration, maintenance and quality assurance and quality control for equipment and data, and,***
- (3) c) In line with the agreed specification installation, operation and data provision During the time periods mentioned in sub-paragraph (2a -***
  - a. The undertaker must make all data obtained from the monitors available to the relevant planning authority as agreed under sub-paragraph 1c; and***
  - b. Each relevant planning authority must supply to the undertaker all air quality monitoring data obtained from its existing air quality monitors on an annual basis.***

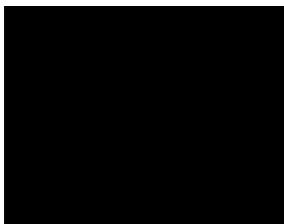
***Mitigation***

- (4) If, following analysis by the undertaker in consultation with the relevant planning authority of the monitoring data mentioned in sub paragraph (3), it reasonably appears that the authorised development has materially worsened air quality or exceedances of national air quality objectives, or EU limit values for the pollutants monitored are recorded at the sites mentioned in Sub paragraph (1), the undertaker will discuss and agree in writing with the relevant planning authority a scheme of mitigation which the undertaker must submit to the secretary of state for approval.***
- (5) Before considering whether to approve the scheme of mitigation, the secretary of state must consult the relevant planning authority taking in to account any local air quality action plans adopted by the local planning authority as part of its local air quality management duties.***
- (6) The scheme of mitigation approved under sub paragraph (4) & (5) must be implemented by the undertaker.***

Unfortunately HE have not yet reviewed and responded to this amended text or provided us with their own response to the concerns raised at deadline 13. They have however indicated that they will review and discuss the wording with the councils with a view to agreeing a position ahead of deadline 15.

Whilst the councils remain hopeful that there will be agreement with HE about the proposed requirement text, submitted above, we are unlikely to accept any further substantial changes at this late stage.

Yours sincerely



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Cambridge City Council