

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

HE/A14/EX/250

TR010018

HE/A14/EX/250

Highways England's comments on other Deadline 14 Submissions

November 2015

The Infrastructure Planning (Examination Procedure) Rules 2010



A14 Cambridge to Huntingdon improvement scheme

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1 Introduction

1.1 Purpose of this report

1.1.1 A total of eleven interested parties, in addition to Highways England, provided submissions at deadline 14 of the Examination, as listed below:

1. Ann Goodridge
2. Barker Storey Matthews
3. Bidwells on behalf of Maria Hugh
4. Cambridge City Council, South Cambridgeshire District Council and Huntingdonshire District Council
5. Cambridgeshire County Council
6. Environment Agency
7. Jonathan Djanogly MP on behalf of Maria Hugh
8. Michael Alexander
9. Michael Alexander on behalf of Everdell and Lenton Farms
10. National Grid Gas
11. Trevor Lee

1.1.2 Highways England has reviewed all submissions by Interested Parties at deadline 14 and this report provides Highways England's comments on these submissions. For some submissions this includes a signpost to other relevant documents where details are provided, whilst some responses are included in this document.

1.1.3 In addition, this report provides Highways England's response to the late deadline 13 submission by Sam Swaine accepted by the Examining Authority on 5th November 2015.

2 Comments on late deadline 13 submission

2.1 Sam Swaine

Table 2-1: Highways England comments to Sam Swaine deadline 13 submission

Interested Party	Written Representation	Highways England Comments
Sam Swaine	<p>Non-motorised Users</p> <p>Questions the need for the proposed extra lane from Fen Drayton turn off to Cambridge Services for non-motorised users only.</p> <p><i>“The proposed layout would mean commuting cyclists/NMU’s would have to deviate off the detrunked A14, turning onto the Fen Drayton turn off Road, then stop to cross the road to access the NMU road to continue to Cambridge”</i></p> <p><i>“Horse riding is purely for leisure and recreation, like off road motorbikes and as such should negotiate privately with land owners and not be given compulsory purchased land to ride over at the tax payer’s expense and detriment of the former land owner. The use of NMU lane for equine recreational use also happens to be discriminatory against off road motorcyclists”.</i></p> <p>Suggests that the fly tipping community are the only people to benefit from implementation of a proposed NMU Road.</p>	<p>Highways England's response to this submission is contained in Part 2 of its Deadline 15 Compulsory Acquisition report (Applicant reference HE/A14/EX/251).</p>

3 Comments on deadline 14 submissions

3.1 Ann Goodridge

Table 3-1: Highways England comments to Ann Goodridge deadline 14 submission

Interested Party	Written Representation	Highways England Comments
	Air Quality	
Ann Goodridge	<p>Requests that the Examining Authority takes more positive action in supporting the demands on the UK in terms of meeting air quality standards.</p> <p>Suggests that the Secretary of State delay decision on the A14 proposals given changes in approach to air quality and road transport.</p> <p>Raises concern regarding air quality implications for Hilton <i>“In terms of Hilton and the proposed A14, many residents are commuters - workers and school children - already experiencing highly polluting journeys. More lanes may speed the flow a little for a while, but we know that the volume of traffic will increase with a wider motorway and we could also end up with lowered speed limits. So those of us who commute will not necessarily enjoy better air quality, rather it seems inevitable that it will be worse – breaching the requirement to protect public health and not to worsen existing air quality levels”.</i></p>	<p>Ann Goodridge raises a number of points concerned with air quality, however, they are mostly general points that do not relate directly to the proposed scheme. She refers to locations on the motorway network that exceed air quality objectives and states that this may have serious implications for government plans to spend £15 billion on UK Roads. However, the A14 scheme has demonstrable benefits to air quality in the area and the air quality assessment has shown that there is no risk of any exceedance of air quality objectives. On the contrary, by removing traffic from more populated areas, the Scheme will improve air quality in three of the Air Quality Management Areas close to the proposed scheme and reduce the local population exposure to air pollutants.</p> <p>Air quality in Hilton has been assessed and the results reported in the Environmental Statement. Pollutant concentrations were shown to be well below the relevant air quality objectives with or without the scheme. It is not inevitable that commuters will experience worse air quality, as emission controls reduce pollutant emissions our exposure to air pollutants will reduce in the future with or without the scheme.</p> <p>The Government’s new draft Air Quality Plan acknowledges the contribution that road investment can make to improving air quality. It notes that traffic that moves more freely improves air</p>

		<p>quality. The Plan includes road investment as part of the strategy to achieve compliance with limit values in the shortest possible time. The A14 scheme is therefore compatible with the Government's latest Air Quality Plan.</p>
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3.2 Barker Storey Matthews

Table 3-2: Highways England comments to Barker Storey Matthews deadline 14 submission

Interested Party	Written Representation	Highways England Comments
Barker Storey Matthews	<p>Compulsory Acquisition</p> <p>The first submission confirms satisfaction with the response received from representative of Highways England regarding Mill Common car park.</p> <p><i>“We have received a further email from Jon Lewell on the matter (copied below) and are satisfied with his response in that the land boundary will be properly defined following detailed design. We accept that the current red/green boundary simply allows design flexibility and cannot sensibly be positioned until the detail is agreed. Regardless of the inconsistency with the Land Plans Sheet Jon has confirmed that under the scheme our clients will only be faced with the loss of 4 car parking spaces”.</i></p> <p>The second submission confirms that the issues and action points referred to in the 30th October submission have been discussed by Mr Gredley and Highways England and have been settled. It is also confirmed that a statement of common ground have been agreed.</p> <p><i>“The remaining concern of Mr Gredley relates to the proposed planting along the northern boundary of the site on the hatched area on the attached plan”.</i></p>	<p>Highways England's response to this submission is contained in Part 2 of its Deadline 15 Compulsory Acquisition report (Applicant reference HE/A14/EX/251).</p>

3.3 Bidwells on behalf of Maria Hugh

Table 3-3: Highways England comments to deadline 14 submission by Bidwells on behalf of Maria Hugh

Interested Party	Written Representation	Highways England Comments
	Compulsory Acquisition	
Bidwells on Behalf of Maria Hugh	<p>Comments regarding design change - introduction of a bridleway around the boundary of Mrs Hugh's property with the A1.</p> <p><i>"We have the following points for the Inspector to consider:</i></p> <ol style="list-style-type: none"> <i>1. The need for a bridleway (surely not for horses immediately against the A1) , either for general public recreation or for access to Huntingdon Life Sciences property is not justified , since there is already an adequate public road servicing this property</i> <i>2. The presence of a bridleway around the boundary of Brooklands House, where at present there is no access, introduces a significant security risk, both from the bridleway itself and from anyone using the drive to Brooklands House (and Brooklands Bungalow) to gain access to the start of the proposed path</i> <i>3. If the path is removed from the design we are concerned that HE will also remove the noise fence now proposed due to the need to protect the path from the A1, but which is also important to mitigate the effect of noise on Brooklands House"</i> 	<p>Highways England's response to this submission is contained in Part 2 of its Deadline 15 Compulsory Acquisition report (Applicant reference HE/A14/EX/251).</p>

3.4 Cambridge City Council, South Cambridgeshire District Council and Huntingdonshire District Council

Table 3-4: Highways England comments to Cambridge City Council, South Cambridgeshire District Council and Huntingdonshire District Council deadline 14 submission

Interested Party	Written Representation	Highways England Comments
	Air Quality Monitoring and Mitigation	
<p>Cambridge City Council, South Cambridgeshire District Council and Huntingdonshire District Council</p>	<p>The Councils have undertaken further discussion with Highways England to try to reach agreement on the wording of an air quality monitoring requirement.</p> <p>Suggested text for a requirement for the DCO agreed by the three councils is provided.</p> <p><i>“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.</i></p> <p><i>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”.</i></p>	<p>Highways England's response to this representation is provided in the <i>Air Quality Monitoring Update Statement</i> (Applicant reference: HE/A14/EX/265).</p>

3.5 Cambridgeshire County Council

Table 3-5: Highways England comments to Cambridgeshire County Council deadline 14 submission

Interested Party	Written Representation	Highways England Comments
Cambridgeshire County Council	<p>Comments to deadline 13 submissions by Highways England:</p> <p>The Council has no comments to make with regards to the Draft DCO, Code of Construction Practice, and Rule 17 Requests for Information and all other Highways England deadline 13 submissions with the exception of those below:</p> <p>The Council highlights some drafting errors with regards to the Written Scheme of Investigation but notes that these are not material to the examination.</p> <p>Borrow Pits Restoration and Aftercare Strategy Update: <i>“Paragraph 3.3.2 is unclear in regard to what will happen if there are unexpected circumstances arising which would trigger the need to modify the objectives of the Strategy; or indeed if it can be modified when it is certified as part of a statutory instrument”.</i></p> <p><i>“Programme – Table 6-1, there is no stage for confirming the aftercare works are satisfactory and for ‘signing off’ the aftercare period / works. An arrangement for should be incorporated into the individual Plans”</i></p> <p>Book of Reference REP13-046 <i>“The Council has drawn the attention of Highways England to some remaining discrepancies in the Book of Reference concerning land in the control of the Council. It is understood that Highways England intends to correct these before the end of Examination”.</i></p> <p>Copy of the statement of common ground is attached.</p>	<p>Highways England have discussed this points with the Council and agree that these matters will be addressed in the individual borrow pit plans, which Highways England are committed to producing as part of the restoration and aftercare phases. Furthermore, the Council and Highways England agree that there will not be a further revision to the Borrow Pits Restoration and Aftercare Strategy Update (Applicant reference HE/A14/EX/207, PINS reference REP13-027).</p> <p>Highways England's response to the representation relating to the Book of Reference (REP13-046) is provided in the revised <i>Book of Reference</i> (Applicant reference: HE/A14/EX/260) together with a marked up version (Applicant reference: HE/A14/EX/261) which shows in redline the changes made since the previous revised <i>Book of Reference</i> was submitted at Deadline 13 (HE/A14/EX/226).</p>

3.6 Environment Agency

Table 3-6: Highways England comments to the Environment Agency’s deadline 14 submission

Interested Party	Written Representation	Highways England Comments
Environment Agency	<p>Provides response to questions within the Rule 17 letter and updated position on hydrological issues associated with the A14 scheme.</p> <p>Code of Construction Practice – confirms agreement with Highways England regarding revision to bullet point 10 within section 14.1.1 of the CoCP. The agreed wording is included in the submission.</p> <p><i>“We have had no response to our statement 3.2 (DL13) that the maintenance access for main rivers should be 9 metres (in accordance with byelaw distance). Therefore our concern that there is a potential conflict with what we would be prepared to approve under our protective provisions remains and we again request the applicant to delete this wording from the CoCP”.</i></p> <p>Additional DCO Requirement Welcomes inclusion of requirement regarding flood risk at Oakington Bridge</p> <p>Flood Risk Assessment Notes that whilst the FRA as a whole is deemed appropriate there hasn’t been sufficient time to review important sections of the FRA. Prepared to accept the FRA and Annexes in good faith as being accurate but expect full model reviews to be undertaken at the detailed design phase.</p>	<p>Highways England has responded to the representations of the Environment Agency at Deadline 14 via an <i>updated Flood Risk Assessment Position Statement</i> submitted at Deadline 15 (HE/A14/EX/264). This Statement has been informed by further discussions between the two parties post Deadline 14 of the outstanding items for agreement in relation to flood risk.</p>

	<p>Cock Brook – Notes that modelling issue has still not been resolved and needs to be investigated further. Suggests that this takes place at detailed design stage with inclusion of requirement.</p> <p>Beck brook – Highlights outstanding modelling issues that could have implications for flood levels. <i>“We consider a requirement would suffice in order to ensure that there will be no increase in flood levels from those stated within the certified FRA”.</i></p> <p><i>“With regard to Utton’s Drove Drain and Longstanton Brook, we have not had sufficient time to check whether the dimensions of the crossings set out in the FRA dated November 2015 are in accordance with the relevant hydraulic models we have already reviewed”.</i></p> <p>Highlights inaccuracies regarding River Great Ouse and Buckden marina.</p>	
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3.7 Jonathan Djanogly MP on behalf of Maria Hugh

Table 3-7: Highways England comments to deadline 14 submission by Jonathan Djanogly MP on behalf of Maria Hugh

Interested Party	Written Representation	Highways England Comments
Jonathan Djanogly MP on behalf of Maria Hugh	<p>Compulsory Acquisition</p> <p>Highlights noise impacts to Mrs Hugh's listed residential property and requests further considerations is given to the need for an acoustic bund.</p> <p><i>"This noise has been of great concern to my constituent who strongly maintains that without a bund her quality of life will be significantly reduced. The trouble is very much exacerbated by the fact that her property is old and not suitable for double glazing. In addition, Mrs Hugh now understands that here is a proposal to construct a bridleway across the A1 boundary with her property. Again Mrs Hugh does not feel this is an appropriate proposal in the context of her property and her right to privacy as her property is very close to the proposed works".</i></p>	<p>Highways England's response to this submission is contained in Part 2 of its Deadline 15 <i>Compulsory Acquisition Submission</i> (Applicant reference HE/A14/EX/251).</p>

3.8 Michael Alexander

Table 3-8: Highways England comments to deadline 14 submission by Michael Alexander

Interested Party	Written Representation	Highways England Comments
Michael Alexander	<p>Compulsory Acquisition</p> <p>Provides comments to Highways England submission reference HE/A14/EX/191 dated 30th October 2015</p> <ul style="list-style-type: none"> • Suggests that some representation made at part A, para 2 & 3 may be misleading to the Examining Authority • Para 3.7 – reference to a meeting on 16th December is incorrect • Suggests meeting of 19th February was not one of meaningful negotiations to acquire by agreement it was simply a rehearsal of the justification for why areas had to be included within the CA area. <i>“In essence I would say there was no meaningful attempt by HE to negotiate at either meeting”</i> • Para 8.1 – suggests that the constraints listed were of Highways England’s own making. <i>“the process should have been more ordered and timely in compliance with appropriate planning guidance”</i> • 8.1(c) - <i>there is reference to the multiplicity of interest, this is as a consequence of the size of the scheme, to the extent it was a constraint reflects the lack of HE input in terms of personnel.</i> • 8.1(d) - <i>appears to acknowledge the issues raised at paras 2-7 of this letter namely a failure to conduct meaningful negotiations to acquire lesser interests.</i> <p>Requests that the Examining Authority consider the above to assist their understanding of the shortfalls in the DCO process</p>	<p>Highways England’s response to this submission is contained in Part 2 of its Deadline 15 <i>Compulsory Acquisition Submission</i> (Applicant reference HE/A14/EX/251).</p>

3.9 Michael Alexander on behalf of Everdell and Lenton Farms

Table 3-9: Highways England comments to deadline 14 submission by Michael Alexander on behalf of Everdell and Lenton Farms

Interested Party	Written Representation	Highways England Comments
Michael Alexander on behalf of Everdell and Lenton Farms	<p><i>“On behalf of our clients Everdell and Lenton Farms we have noted the HE response contained in HE/A14/EX/194 relating to Article 7b.</i></p> <p><i>On behalf of our above mentioned clients who are likely to be affected we would resist any change in wording to the published text. Our concerns specifically relate to borrow pits.</i></p> <p><i>Within the HE Article 7 at para 3 there is reference to affected parties having a plan approval role, it is not clear whether this includes landowners. Paragraph 4 infers consultation with the Local Planning authority but no reference to landowners.</i></p> <p><i>We shall be grateful if the ExA will consider the foregoing in the event that borrow pits are included within the DCO”.</i></p>	<p>Highways England's response to this submission is contained in Part 2 of its Deadline 15 <i>Compulsory Acquisition Submission</i> (Applicant reference HE/A14/EX/251).</p>

3.10 National Grid Gas

Table 3-10: Highways England comments to deadline 14 submission by National Grid

Interested Party	Written Representation	Highways England Comments
National Grid Gas	<i>"We are writing to advise you that NGG has reached agreement with Highways England in order to safeguard its apparatus. NGG therefore wishes to withdraw its objection to the application."</i>	Highways England welcomes National Grid Gas's confirmation of its withdrawal of its objection to the application.

3.11 Trevor Lee

Table 3-11: Highways England comments to Trevor Lee deadline 14 submission

Interested Party	Written Representation	Highways England Comments
Trevor Lee	<p>Suggests that the only acceptable change at this stage will be if Highways England scraps the Huntingdon Southern By-Pass section between Swavesey and the A1.</p> <p>Expresses support for rail for the transportation of freights as an alternative.</p> <p><i>"In the meantime, to give some more immediate relief to the congestion problem that is far less expensive than the proposed scheme and much less damaging to the environment is to dual the remaining relatively short section of the A428 from Caxton Gibbet through to the A1. For traffic travelling from Felixstowe and Newmarket on the A14 this would be a direct route to the A1 without having to negotiate Girton and Spittalls interchanges."</i></p>	<p>Through the Examination, some Interested Parties have suggested alternatives to the Scheme, in particular the Brampton A14 Campaign Group. Notwithstanding paragraph 4.27 of the National Networks National Policy Statement, Highways England has responded to responses regarding alternative proposals. This information is provided in Highways England's comments on written representations and responses to written questions provided in the following documents: PINS References, REP4-016, REP4-018, REP8-015 and also Highways England's summary of matters arising from oral submissions, PINS Reference REP10-041, section 5. The position reached between Highways England and the Brampton A14 Campaign Group is recorded in a Statement of Common Ground (PINS Reference REP13-012). None of the suggestions, if pursued, would obviate the need for the Scheme.</p> <p>Another suggestion has been that upgrading the A428 would be preferable. Such upgrading is not an alternative, it would have a negligible effect on traffic on the A14. Further detail on these matters by Cambridgeshire County Council in PINS Reference REP4-005 (page 93) and PINS Reference REP8-010 in which Cambridgeshire County Council agree that it would not act as an alternative.</p>