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To: A14CambridgetoHuntingdon@pins.gsi.gov.uk
Cc: ["Tracey Hipson"](#)
Subject: APPLICATION TO MAKE A NON-MATERIAL CHANGE TO DEVELOPMENT CONSENT ORDER (SI 2016 No 547)
A14 Cambridge to Huntingdon Improvement Scheme
Date: 26 February 2019 18:21:03
Attachments: [20190226 - A14 Motorway Transition - FINAL.pdf](#)

Dear Sirs,

With reference to the above application please accept the attached letter from CPRE Cambridgeshire and Peterborough.

A signed paper copy can be provided if required.

Kind Regards

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Chairman
CPRE Cambridgeshire and Peterborough
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26 February 2019
Our Ref: 2019/0202/ADJ

CPRE Cambridgeshire and Peterborough is our
local branch of CPRE, a national charity. We
speak up for the English countryside: to
protect it from the threats it faces, and to
shape its future for the better

Dear Sirs

Application for a non-material change to the A14 Cambridge to Huntingdon Improvement Scheme Development Consent Order

CPRE Cambridgeshire & Peterborough has strong reservations about this application for the following reasons.

Appearance and Effect on the Countryside

The Application Statement dated January 2019 states:

2.3 *These sections of road would be renamed the A14(M) and A1(M) and be subject to Motorway Regulations and would also be subject over the majority of the lengths to variable mandatory speed limits (VMSL) to manage traffic flow when appropriate.*

and

2.6. *Road signs on the motorway sections would be blue rather than green.*

and

2.10 *As stated above in section 2.6 road signing on the A14(M) and A1(M) would be in accordance with Motorway Regulations and would be blue rather than green. Figures 2 and 3 show the difference between all-purpose trunk road and motorway signs.*

We believe these statements on their own with no other explanation of signage to be incomplete.

Motorways subject to VMSL are required to have regularly spaced speed limit signage along their entire length and at all joining and exit points. This may be by overhead gantry or roadside, overhanging, electronic signals. In relation to VMSL signalling the following are relevant:

Interim Advice Note 161/15 states in 2.7.23 paragraph c) *"mandatory control signals shall be spaced between a minimum of 600m and up to a maximum of 1500m apart, subject to the provision of a minimum unobstructed visibility of the signal"*

and

Interim Advice Note 87/07 which relates to 4-lane motorways states in paragraph 4.3 *"Inter junction gantries shall have a desired spacing of 800m, a maximum spacing of 1000m and a minimum spacing 600m"*

So the requirement for control signals approximately every 1000 metres along a VMSL controlled motorways is well known and well documented in Highways England publications. Yet it is not mentioned in the Application Statement.

President
Christopher Vane Percy

Chairman
Alan James

Vice-Chairman
Lawrence Wragg

Registered charity number 242809

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We believe this will have a deleterious effect upon the appearance of the road across the Cambridgeshire countryside and that this will be a **material change**.

Traffic Modelling and Effects on Local Roads

We are concerned that the revised traffic modelling as indicated in the Application Statement seems to have been confined to the flows upon the new A14, the old A14 and Huntingdon. There is no evidence of the effects of the proposed change, positive or negative, on the rest of the local highway network.

We have concerns about the effects upon the A141, the A1123 especially around St Ives, the A1198 and the B1040 through Hilton caused by vehicles either not allowed to join or not wanting to join a motorway. Previous traffic modelling showed an 8% increase in traffic due to the scheme on the B1050 through Willingham. Given this route crosses critical flood defence structures when it heads north, CPRE is very concerned by any further increase in traffic flow along it.

These are rural roads running through rural communities and we believe the applicant should be requested to fund a repeat of the A14 Traffic Assessment Review overseen by SYSTRA for Cambridgeshire County Council in 2015 in order that the full effects of this latest change can be made known to local authorities, including the local highway authority. This change could well effect their planning decisions and the costs of maintaining local roads. As was stated in that review *"The scheme is supported by Cambridgeshire County Council, but as it is expected to have impacts on the local road network and they need to have confidence that the transport modelling underpinning the application represents the likely impacts on local roads."*

Air Quality

Reported speed increases due to the scheme in the Application Statement are between 8.9 and 10.5 km/hr. As a general rule, the faster traffic flows, the greater the volume of polluting exhaust emissions that are generated.

We are concerned that the consideration of air quality in the Application Statement is confined to modelling of nitrogen dioxide emissions. We believe that there should also be a full analysis of the expected levels of small particulates less than 2.5 micron (PM2.5) in the Statement.

Indeed it is even more worrying that the Highways England document Interim Advice Notes 174/13 "Evaluation of Significant Local Air Quality Effects" and 175/13 "Risk assessment of compliance with the EU Directive on ambient air quality" make no mention whatsoever of PM2.5.

Yet the EU Air Quality Directive (2008/50/EC) implemented in the UK as the Air Quality Standards Regulations (2010) which both notes reference states in paragraph (11) *"Fine particulate matter (PM2,5) is responsible for significant negative impacts on human health. Further, there is as yet no identifiable threshold below which PM2,5 would not pose a risk."*

Furthermore EU Air Quality Directive (2008/50/EC) paragraph (10) states *"The risk posed by air pollution to vegetation and natural ecosystems is most important in places away from urban areas. The assessment of such risks and the compliance with critical levels for the protection of vegetation should therefore focus on places away from built-up areas."*

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The crisis of particulate pollution in the UK is well documented in the Annual Report of the Chief Medical Officer 2017, the report of the Joint Committees of Parliament "Improving air quality", March 2018 and by two reports by UNICEF "A BREATH OF TOXIC AIR", June 2018 and "HEALTHY AIR FOR EVERY CHILD", February 2019.

We are therefore very concerned that the Air Quality evaluation has not even considered the most potent threat to human health caused by traffic, PM2.5 particulates.

We are particularly concerned by the effects at the Girton interchange, to the east of which an Air Quality Management Area is in place. We are also concerned by the increased negative effect on wildlife, vegetation and natural ecosystems alongside the length of the road which do not seem to have been considered at all. We are particularly concerned in this respect by the impact on Brampton Wood and on the low-lying natural floodplain to the east of Buckden.

Noise

It is a general rule of thumb that every 10 mph increase in traffic speed will double the noise energy experienced at receptor sites. Reported speed increases in the Application Statement are between 8.9 and 10.5 km/hr. So we can expect around a 50% increase in vehicle noise energy along the sections listed in Table B1.

The Application Statement, Appendix C indicates negative changes in the effects of noise at the several of the receptor locations reported. This is consistent with our expectations as described above. However, the terminology used appears to minimise the perception of these effects.

We are concerned that none of these receptor locations considered seems to be in the village of Hilton where there is considerable concern by residents as to the increased noise disturbance they think they are going to experience by the scheme as currently approved.

The Application Statement, paragraph C 3.2 that *"For non-residential receptors, a minor impact (3dB or greater) is taken as an indicator of a potential significant effect."* Noise is measured on a logarithmic scale, so it is misleading to suggest that 3dB is a minor impact. It indicates a 30x increase in the noise energy experienced. Table C4 shows some significant changes to noise levels with the scheme. We are therefore very concerned at the effect this may have on wildlife along the length of the road.

Change Process

The Application Statement dated January 2019 states in paragraph 1.2 *"The A14 Cambridge to Huntingdon Improvement Scheme Development Consent Order 2016 (the DCO) permitted the construction of an all-purpose trunk road. At the time of the original application the road was designed to be "expressway-ready" in anticipation of new design and construction standards for all-purpose trunk roads. However, motorway design has since evolved and the scheme includes all the elements required by a modern motorway."*

We have reviewed the DCO and can find no occurrence of the word expressway in it and the word motorway is only used in the context of A14 junctions with existing motorways. We recall no mention being made at the time of the original consultation or Public Inquiry of the A14 upgrade being designed to motorway standards or of the intention for it to be upgraded to motorway. Although we have not checked all of the 1,644 documents associated with the Scheme.

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Indeed, the Highways Agency document "Public consultation on route options 2013 - consultation report, December 2013" indicates that several members of the public had raised the possibility of this upgrade being built to full motorway standard, to which the Highways Agency response on page 46 was *"The upgrading of short sections in any route corridor to motorway is not generally advocated as it creates an inconsistency in standards and imposes restrictions on certain road-users. In general, it also increases construction costs, although there are improved benefits arising from the provision of hard-shoulders for emergency use."*

Our primary concern, arising from the phrase above, is cost. The following local authorities were asked and agreed to contribute £100 million towards this scheme:

- Cambridgeshire County Council
- Fenland District Council
- Huntingdonshire District Council
- South Cambridgeshire District Council
- Cambridge City Council
- East Cambridgeshire District Council
- Suffolk County Council
- Peterborough City Council
- Norfolk County Council
- Essex County Council
- Northamptonshire County Council
- SE Midlands Local Enterprise Partnership
- New Anglia Local Enterprise Partnership and
- Greater Cambridge/Greater Peterborough LEP.

We are concerned by the effect this expenditure has had on local service funding, consequent service provision and the apparent lack of transparency about the scheme and its end objective when local councils were first asked to contribute to funding it.

Conclusion

We ask the Inspector to very carefully consider the points we have raised and to ensure that where appropriate Highways England is asked to provide additional information and where possible to implement additional mitigating measures.

Finally, please note that our submission is in respect of the proposed scheme. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

Yours faithfully

Dr Alan James
Chairman