



Cambridgeshire
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Campaign to Protect Rural England

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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

With reference to our original letter to you dated 26 February 2019 and the Highways England (HE) letter dated 4 April 2019 addressed to Natasha Kopala, Head of TWA Orders Unit, Department for Transport Zone 1/14 - 18, and its comments on our letter.

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

Appearance and Effect on the Countryside

In our original letter, we expressed our concern at the paucity of information about the additional signage required for a variable mandatory speed limits (VMSL) motorway when compared to those required for an A-road dual carriageway expressed by HE in the Application Statement dated January 2019. In doing so we quoted the requirements for VMSL motorways expressed in HE's own documents. We note that HE have erroneously summarised our concerns. We expressed no opinion about the change in colour of the signs.

We note that in response to our concerns HE have stated *"As detailed within our application, the scheme was previously designed to future proof for future upgrades. Accordingly there are no additional gantries or control signal structures added as a result of adopting this change."*

We have searched the original documents relating to the scheme that were issued to the public and those submitted to the Public Inquiry including the Case for the Scheme, the Transport Assessment and Chapters 1 - 4 of the Environmental Statement. We can find no mention of future-proofing for future upgrades to motorway standard in those documents. We did however, find that the proposed gantry spacing at some locations in the original application could be considered consistent with motorway signage distances.

Indeed in their response to public comments about the original scheme design study HE wrote *"Variable speed limits have been applied on other parts of the road network in an attempt to increase capacity and safety while maintaining the road width. The A14 scheme will include sufficient capacity within the layout to minimise periods of congestion so there should be no need for variable speed limits. However, we will consider the use of some of*

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the new technology available, such as matrix signs that can display text and pictograms. We also plan to review the full range of technology solutions that could be applied to this scheme and will be able to provide more details about this as the scheme is developed."

We are therefore very concerned that HE appear to have been fundamentally dishonest with the public, local stakeholders and local elected representatives when putting forward the original scheme.

We hope that the response that has been made to ourselves is not disingenuous and that the proposed changes to the scheme will not require any additional signage of significant size or requiring additional lighting.

Traffic Modelling and Effects on Local Roads

In response to our concerns about the effects upon local roads HE stated: *"Traffic modelling to understand the impact of the change to motorway status was undertaken over the same area modelled to support the original DCO application. The traffic impact on the roads referred to by CPRE are discussed in turn below. Traffic figures were reviewed for the years 2020 and 2035, compared against those presented for the original application:"*

We can find no evidence to support this statement beyond the claims made in the Application Statement and apart from the sources referred to in our original letter. Therefore, we cannot place any reliance on HE's latest response.

For example, it stretches our credulity when documentation issued to the public for the original application for a non-motorway upgrade indicated an 8% increase in traffic due to the scheme on the B1050 through Willingham. Yet in the response to our letter, HE now states *"B1050: small decreases in traffic through Willingham throughout the day, of up to 20 vehicles per hour (2% decrease in traffic)."* We simply, cannot believe that the extra traffic that was previously predicted to drive through Willingham really wanted to drive on a motorway and now that wish is to be satisfied.

Our concerns about effect on the critical flood defence structures north of Willingham and the real impact on other traffic flows on all local roads remains.

We reiterate our request that the applicant 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. Alternatively, if further modelling has been carried out as claimed, we request that the full details of that modelling, including the assumptions made, be published in order that it can be independently reviewed.

Air Quality

In response to our concerns, HE have stated *"Locally for the scheme, PM2.5 monitoring is undertaken at one continuous monitoring station, in Girton. In 2016 (the latest data), PM2.5 at Girton was 16ug/m3 (compared to the annual mean EU limit value of 25µg/m³)."*

As far as we are aware, this statement is inaccurate in two respects:

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1. The continuous monitoring station at Girton is not "for the scheme" it is operated by South Cambridgeshire District Council (SCDC) as part of the protection of the Air Quality Management Area (AQMA) already declared bordering and to the south of the A14 at Orchard Park.
2. The current and historical measurements registered by that device are publicly available on-line and can be downloaded. So 2016 is not the latest data. Indeed formal annual Air Quality Status Reports for 2017 and 2018 are also available on the SCDC web site.

We would further point out in relation to the Girton Road site, that because of its primary task which is to monitor effects on the AQMA, it is positioned to the south east of the A14 Girton interchange. This means that the prevailing south-westerly wind takes much of the pollution away from the device and north-east towards Histon. Correlation of the device readings with local wind direction readings shows that when the wind direction is from the north-west, the device regularly displays much higher readings, presumably because the air reaching it crosses the A14/M11 junction.

We find HE's response in respect of our concerns about the air pollution effects of their proposals in the area of the Girton junction somewhat bizarre. We did not suggest that *"The interchange and the AQMA to the East would not form part of the road network proposed to be amended by this application"*.

We did suggest and we maintain that the pollution levels in area around the interchange and the AQMA bordering the mainline A14 will be negatively affected by this proposal due to increased traffic volume and speeds.

HE also stated in their response *"Combining a maximum increase in roadside PM2.5 of 1µg/m³ with the maximum recently measured PM2.5 concentration of 16µg/m³, would result in a maximum total PM2.5 concentration of 17µg/m³. This is significantly below the EU limit value for PM2.5."*

This statement is highly misleading. HE will be well aware that for many years the EU resisted issuing limit values for PM2.5 because they considered such values would be misused and misrepresented as "safe". That is why, and we make no apology for repeating this, the EU Air Quality Directive (2008/50/EC) implemented in the UK as the Air Quality Standards Regulations (2010) 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."* It is also why the current limit values for PM2.5 are expressed as reducing limits to be regularly reviewed.

It is very, very worrying that a public body like HE should be advocating a proposal which it agrees will increase local and hence background levels of PM2.5 when national government is being prosecuted for failing to meet emission standards and London has just implemented a world-first system to reduce traffic pollution by limiting traffic flows of polluting vehicles.

In our last letter we also expressed concern about the impact of traffic pollution on eco-systems. That concern related to the effects of PM2.5. In this respect by limiting their response to the effects of the oxides of nitrogen on eco-systems, NOx, HE have not addressed our concerns.

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Climate Change

Road transport is well recognised as major emitter of carbon dioxide as well as other pollutants. We did not raise this particular pollutant in the context of this project because the majority of those emissions would be created by original scheme.

However, now that Parliament has declared a Climate Emergency in the country, we believe that the additional carbon dioxide emissions that will undoubtedly occur, due to higher traffic volumes and higher average speeds, as a consequence of this proposal should be considered. We can find no consideration of climate change in the Application Statement.

Noise

As we noted previously, expected average speed increases reported in the Application Statement are between 8.9 and 10.5 km/hr. With the removal of various types of restricted vehicle and from experience, we expect this to be nearer 16.09 km/hr (10 mph).

We did not make any statement that the national 70 mph speed limit would be increased as obfuscated by HE in their response.

We also stand by our rule of thumb that an increase in the speed of a vehicle by 10 mph roughly doubles the noise energy level experienced.

We remain very concerned by the expected increase in road noise and we have asked our own independent consultant for an opinion. That opinion cannot be delivered by the deadline of 7th May and therefore we request acceptance of a submission after this date.

Effect on the Farming Community

The consultation responses have enabled CPRE to see the concerns of others in the rural community. This includes the response of the National Farmers Union and those of individual farmers concerning the difficulties of moving farm machinery along alternative routes and the lack of information provided.

We have also seen the responses of HE to these concerns. In each case it is dismissive and seems to be based on two factors, the frequency of such movements and the fact that HE can drive an empty tractor and trailer along the routes they suggest as alternatives with claimed additional journey times no more than 10 minutes.

There are two flaws with the HE arguments:

- 1) The most significant and heaviest farm machinery is moved infrequently because farming is a seasonal activity but when the season is on and the weather is right speed and ease of movement of machinery can be critical to the success of a crop.
- 2) The additional times quoted seem to assume average journey speeds between 20 - 24 mph. The national speed limit for agricultural vehicles is 25 mph. Heavy equipment such as a combine harvester, a set of rolls, a tracked vehicle or even a heavily loaded trailer cannot be expected to travel at such speeds especially in urban situations or along narrow lanes/roads. It is dangerous to do so.

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We therefore support the concerns of the farming community and the NFU and recommend that there should be further detailed and informed consideration of this matter before any decision is made.

Change Process

We note that HE has not responded to our concerns about the effect that the additional expenditure of undertaking a build to motorway standard without proper and transparent approval has had on local authority 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.

We are further concerned at HE's apparent arrogant assumption that they will complete this project by the fact that they have already amended the motorway gantry signage on the A1M southbound to read "A14M" when displays are turned on.

This is no way for a publicly funded body to behave.

Conclusion

We continue to 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 and necessary 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