

APPENDIX B

PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

A14 CAMBRIDGE TO HUNTINGDON IMPROVEMENT SCHEME
DEVELOPMENT CONSENT ORDER

WRITTEN REPRESENTATION BY
HUNTINGDONSHIRE DISTRICT COUNCIL

1. Introduction/Reason for Representation

- i. This representation is made in respect of the A14 Cambridge to Huntingdon Improvement Scheme (the scheme) Development Consent Order (the Order), and is made in accordance with the Infrastructure Planning (Examination Procedure) Rules 2010, Rule 10. It must be read in conjunction with the Statement of Common Ground and the Joint Local Impact Report.
- ii. This Council is a Tier 1 Local Authority and a Statutory Consultee for the scheme under S.56 of the Planning Act 2008. Highways England (the Applicant) has consulted with the Council during the pre-application stages of the proposal and many representations and requirements of the Council have been included as part of the Order now made.
- iii. A Relevant Representation was submitted to PINS on 12th March 2015 outlining a number of matters relating to the proposed scheme that were subject to continuing discussions with the Applicant in order to seek satisfactory resolution. The purpose of this Representation is to report on the matters outlined previously, matters still to be resolved and other matters that the Council considers worthy of note and that the Council wishes to have considered as part of the Examination.

2. Background

- i. The Council has consistently supported calls for the improvement of the A14 between Cambridge and Huntingdon since the publication of the Cambridge to Huntingdon Multi-Modal Study (CHUMMS) recommendations in August 2001.
- ii. The Council originally gave its backing to proposals to upgrade the A14 between Cambridge and Huntingdon in September 2001 when Council resolved to support a number of elements arising out of the CHUMMS study options, including matters relating to the Huntingdon Viaduct, the urgent need for the A14 to be upgraded, including a new off-line route to be created and implications for the A1 between Alconbury and Brampton.
- iii. Since this date, the Council has further considered a range of further emerging options relating to the upgrading of the A14, as promoted by the Department for Transport and the Highways Agency (now Highways England) until the previous scheme, to the one currently being considered, was cancelled as part of the 2010 Spending Review. As part of all the A14 options considered by the Council, it has always resolved to support options that upgrade the A14 on a new route alignment and include for the removal of the current A14 Viaduct within Huntingdon, the downgrading of the existing A14 route and the creation of a new local road network within Huntingdon.

See Conclusion 9 (i) – The Council has consistently supported the need for improvements to be carried out to the A14, given its strategic importance, since the CHUMMS recommendations in August 2001

3. The Current Proposal

- i. This project is one of national and local importance that this Council has resolved to support and we remain a committed partner in the development and delivery of the scheme, including as a funding partner, for which formal agreement has been entered into between this Council and the Secretary of State for Transport.
- ii. This Council is a statutory consultee under the terms of S.56 of the Planning Act 2008 and considers that the project remains vital to the delivery of the growth agenda across Huntingdonshire and the Greater Cambridge area, relieving current congestion, reducing journey times and addressing current safety issues.
- iii. Since the emergence of this scheme arising from the Department for Transport 'A14 Study' that followed the cancellation of the previous scheme, this Council has supported the route now proposed, including the removal of Huntingdon Viaduct (see Section 4 below). The route now proposed has been subject to considerable levels of public consultation and engagement, and we have enjoyed a close and professional working relationship with Highways England and their J2A consultants in developing the scheme now submitted in our role as a Tier 1 stakeholder under the terms of the Planning Act 2008.
- iv. While the Council and its Tier 1 partners (Cambridgeshire County Council, Cambridge City Council and South Cambridgeshire District Council) have sought to reach agreement on as many matters as possible as outlined with the Environmental Statement, there are inevitably those topic areas where it has not been possible to reach agreement at this stage and we wish to make representation to the Examination in Public on these matters. However, while these still exist at the time of writing this representation, it is still our intention to agree as many matters as possible prior to the Examination, during it sitting and thereafter, which may entirely or proportionately mitigate away any outstanding matters.

See Conclusion 9 (viii) – The Council has always supported the need for improvements to be carried out to the A14 due to the long-term benefit and the future well-being of the region to secure economic growth, jobs and new homes

4. Huntingdon Viaduct

- i) Since the publication of the original CHUMMS study, the Council has consistently supported the de-trunking of the current A14 route through Huntingdon, the removal of the existing Viaduct and its replacement with a new local road network serving Huntingdon and the Council continues to support that position as a result of the DCO now submitted
- ii) The Applicant has consistently advised the Council that the structure is in poor condition and despite the introduction of structural remediation work to it over recent years, that the

Value for Money (VfM) position is that whatever the outcome of the proposed Scheme, that the structure would require replacement.

- iii) Given the need to provide extra capacity on the Trunk Road, the Council has never supported calls to rebuild the Viaduct in order to provide extra capacity on the existing route through Huntingdon through various alternative scenarios that emerged from the CHUMMS work. The Council has never considered that this represents a viable solution to the strategic needs of the A14, that it would do nothing to address the environmental, air quality and noise blight that the current route creates through the town and would do nothing to address accessibility issues and traffic relief within Huntingdon and Godmanchester.
- iv) The Council, together with other partners, part-funded a study during 2005/06 that concluded that a proposal to demolish the viaduct and replace it with a junction that was beneficial to Huntingdon, Godmanchester and the wider surroundings. This study assessed a wide range of options and alternative layouts, and concluded that a junction between the de-trunked A14 and Brampton Road would have a beneficial impact on traffic in the town, albeit with some negative impacts on the section of Brampton Road in the immediate vicinity of any new road layout.
- v) This study also concluded that a link from a de-trunked A14 to the ring-road at Mill Common was an essential part of the proposals as it would reduce traffic demand on Brampton Road in order to reach Huntingdon town centre and also in reducing the need for traffic to access Huntingdon from the east from having to pass through Godmanchester and over the historic Town Bridge. A further key element of the proposals was the creation of the West of Town Centre Link Road, which opened to traffic in 2014, now known as Edison Bell Way, and which was designed and future-proofed to accommodate any emerging proposals arising from the removal of the A14 Viaduct.
- vi) Following this work, the Huntingdon & Godmanchester Market Town Transport strategy (H&GMTTS), adopted by the Council and the County Council, supported the removal of the Viaduct and the creation of a new local road network as this *would 'significantly reduce the amount of traffic in Huntingdon, Godmanchester and surrounding villages and remove current rat-running (that) avoids the existing route. Huntingdonshire District Council and Cambridgeshire County Council have indicated to the Government that the removal of the A14 viaduct over the East Coast Main Line is a vital component to the scheme in terms of improving local traffic flows. The removal of the viaduct would allow for the creation of new access roads into the town centre, improving accessibility for all modes and allowing the existing A14 alignment to serve as a high quality local road. This in turn would ease pressure on the Spittals interchange, the A141 bypass and main thoroughfares in Godmanchester'*.
- vii) The Council also adopted the Huntingdon West Area Action Plan in 2011, which covers the redevelopment and regeneration of this part of Huntingdon and recognised the need to adopt a formal policy to ensure that development takes place in a manner which benefits the existing town centre and the surrounding area. This included the provision of the now

completed Edison Bell Way and Department for Transport (then) proposals for options relating to the removal of the Huntingdon Viaduct.

- viii) As part of the current proposals to remove the existing Viaduct, the Council is aware that the Applicant has undertaken operational assessments of the replacement road network that would be created. These have concluded that, with the exception of Edison Bell Way, all elements of the junction function with an acceptable flow to capacity ratio of less than 85%. Edison Bell Way currently has junction capacity issues without the scheme, which were known and agreed at the time that the road was planned and formally approved. With the Scheme, it is known that these issues remain although there is a slight overall improvement and that the Scheme does not make the current situation worse. The County Council, as local highway authority, will review this assessment when final agreement on traffic flows on local roads is reached with the Applicant and these will also be subject to the agreement of the Council.
- ix) An important element of the new local road network is that only by removing the Viaduct is demand to use the existing A14 route constrained. However a connection between the two sides of the route is desirable for the reasons already stated but it needs to dissuade strategic traffic from using it as a 'through-route'. The proposed junction layout achieves this by incorporating in its geometry and signals an element of demand management. It is also crucial that by creating this new layout, that it is taken into the existing 7.5T weight limit zone in Huntingdon.
- x) Based on the assessment work to date as undertaken by the County Council and, subject to the completion and verification of final modelling work, the Council does consider that the removal of the Viaduct and the creation of the new local road network to be an acceptable solution to serve Huntingdon and the surrounding area and it is for this reason that this is supported by the Council in the H&GMTTS, its own Huntingdon West Area Action Plan and the creation of the now opened, Edison Bell Way.

See Conclusion 9 (vii) – The Council has always strongly supported the removal of Huntingdon Viaduct as part of any overall A14 solution. The current route through Huntingdon is part of its downfall and its sub-standard design, elevated route and environmental blight without mitigation, is completely at odds with 21st Century design standards

5. Statement of Common Ground

- i) The Council has an 'agreed in principle' Statement of Common Ground with the Applicant and the final version will be agreed and updated during the Examination process, subject to normal democratic approval processes at the Council.
- ii) These represent common understanding with the Applicant and are not therefore repeated within the Representation.

6. Joint Local Impact report

- i) The Joint Local Impact Report (together with Cambridgeshire County Council, Cambridge City Council and South Cambridgeshire County Council) is the main document for setting-out the primary impacts of the Scheme on the local environment. Issues reported in that document are not repeated within this Representation.

7. Code of Construction Practice

- i) The Council has noted that the Applicant has agreed to consult with Tier 1 stakeholders as this document and Local Environmental Management Plans (LEMP) are developed. The Council wishes this consultation to be secured as a Requirement on the Secretary of State as this would contain matters that the Council has currently agreed with the Applicant as 'to be agreed as part of the Code of Construction Practice (CoCP)'. The Council therefore wishes that this is stipulated as a Requirement of the Applicant to ensure that such matters are properly agreed with the Council.

8. Outstanding Issues

As part of our representation to the Preliminary Meeting, we advised that the following are the topic areas where there are matters that are currently outstanding and subject to final resolution, as follows;

- Environment, Landscape and Visual Impact
- Noise, Vibration & Air Quality
- Land Contamination
- Heritage
- Borrow Pits – Restoration, Future Maintenance & Legacy
- Rights of Way relating to community integration
- Local off-line traffic impacts/traffic modelling outputs/highway design
- Drainage
- Legacy

See Conclusion 9 (vi) (vii) (ix) – Many of the topic areas relate to the overall 'Legacy' of the proposed scheme and the Council recognises that the overall aim continues to be that the best possible mitigation measures are secured to minimise the scheme effects. The Council will continue to negotiate these in its role as a Tier 1 stakeholder

a) Environment, Landscape and Visual Impact

- i) For matters relating to Borrow Pits, see 9e below

- ii) The current proposals provide no mitigation to the east side of the new A14 (on the line of the old A1) north of Grafham Road and the Council considers that this may impact on Brampton and users of Lenton Lakes (fishing area) immediately to the east as well as potential 'shared open spaces' relating to Borrow Pits 1 and 2 and noise affecting song bird habitat
- iii) While the Applicant has confirmed their design criteria are primarily for protecting where people live, community facilities, designated 'quiet' areas etc. they have noted that Lenton Lakes are not a designated 'quiet' area and that there would be no adverse effects on shared open spaces and therefore there was no sustainable case for further mitigation as the cost (of mitigation) would far outweigh any slight benefit
- iv) However, the Council remains of the view that this stance is unacceptable and reiterates the view that there can be nothing but significant adverse noise and visual effects, especially at Lenton Lakes given its close proximity to projected traffic flows. Likewise, while protection is noted for nearby residential areas, there are none proposed for existing and proposed recreation areas and those potentially associated with Borrow Pits 1 & 2. Therefore the proposals need to consider an amended scheme with greater screening to address visual impacts and to address noise impacts now

b) Noise, Vibration & Air Quality

- i) In relation to Borrow Pits, the County Council considers that these should be treated as minerals extraction sites. Therefore, assessing the noise implications relating to the borrow pits should be done in accordance with the National Planning Policy framework guidance, not BS5228 as stipulated by the Applicant
- ii) The Council considers that the Examination needs to consider the regulatory framework under which the development of Borrow Pits would be taken forward in order to enable this Council to properly assess the noise implications arising from such development. In this regard it is noted that there is a potential 42-month operational period for Borrow Pits and the Council does not consider it acceptable for an individual/s to have to be subjected to an unacceptable level of significant noise impact for 3 ½ years of an affected person's life
- iii) The Council accepts that noise is an issue that will be potentially managed through the CoCP and LEMP processes but it does consider that for the reasons outlined in (b) (ii) above, that this matter must be examined through the Examination process.

- iv) The Council has been in lengthy discussion with the Applicant relating to affected properties and while these remain ongoing, the Council considers that it is necessary that affected properties must be properly highlighted.
- v) With regard to National Policy Statement for National Networks (NPSNN) and Government Noise Policy as defined in the Noise Policy Statement for England (NPSE), and with particular reference to 5.195 of NPSNN, the requirement is that adverse effects are minimised as far as sustainably possible (not avoided or prevented)
- vi) It should be noted that at 2.24 of the NPSE, Government's Noise policy *"requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development. This does not mean that such adverse effects cannot occur."*
- vii) To ensure that all sustainable mitigation has been included in the scheme, and as set out in the Environmental Statement, the provision of noise mitigation has been subject to the following tests:
- viii) Benefit (monetised benefit of noise reduction evaluated using WebTAG) compared to cost of the mitigation;
 - Engineering practicability;
 - Other environmental effects potentially caused by the mitigation (for example landscape or visual effects); and
 - Stakeholder engagement and consultation responses
- ix) The Council therefore agrees that the above considerations confirms our view why it is not sustainable to provide further mitigation for each of the (non-significant) adverse effects highlighted by the Council and fully appreciate that legally (because the noise levels that are being predicted are within threshold standards) the Council cannot insist on greater protection on the properties that have been classified by the Applicant as not requiring further mitigation
- x) However the Council continues to predict that a number of properties will be affected and although not within mitigation thresholds, it is the Council's opinion that a monitoring regime should be introduced to measure any possible situation where an affected property might become an adversely affected property requiring suitable mitigation within the future design year period for the scheme and that this should be considered as part of the Examination process
- xi) Appendix B/1 provides details of the Adversely Affected Properties referred to

c) Land Contamination

- i) The Council has identified potential areas of contamination relating to the sub-strata of existing farm tracks. While the Applicant has noted these and suggested that the relevant Contractor assesses the risk at these locations, the Council considers that this should be a stipulated requirement for investigation prior to any construction works given the potential for further contamination

d) Heritage

- i) It has been agreed in principle that historic milestones should be reinstated but no timescale for this has been agreed. Given the important historic value of these features, the Council considers that an agreed timescale should be stipulated
- ii) The main Huntingdon Rail Station building is a listed structure and the Council considers that this is of such significant merit that, as requested as part of on-going Stakeholder discussions prior to the DCO submission, that greater work should have been undertaken relating to the consideration of the setting of the listed building. This also relates to comments made under (g) off-line traffic impacts/traffic modelling outputs/highway design, Sec. (g) (x to xv) below and how that layout affects or contributes to the setting
- iii) The setting of Mill Common within Huntingdon is an important heritage feature within the town and together with the improvement of the visual impact that the removal of the Viaduct will bring, together with the downgrading of the slightly elevated existing road to a lower level, this will have a significant improvement to the setting of the Common. The Council has consistently lobbied for the proposed link road between what would be the old A14 and Huntingdon ring-road to have as minimal possible impact on Mill Common as feasible. This has been subject to continued discussions between the Applicant, the Council and the County Council and as outlined in Sec. (g) (xviii), the Council considers that the Applicant's suggested layout, known as Option 4, should be adopted
- iv) Other matters relating to the Cultural Heritage of Mill Common are considered by the County Council as part of their Written Representation, including a programme of archaeological work and investigation
- v) The Council contends that a significant legacy of the Scheme as submitted by the Applicant, relates to the proposed reduction in traffic through Godmanchester and this is strongly welcomed. Sec. 9 (i) (iii & iv) below outlines the Council's view that in considering the overall Legacy of the Scheme, that the Applicant

should consider other contributory related measures required in Godmanchester to remove the residual effects of current traffic impact

e) Borrow Pits – Restoration, Future Maintenance and Legacy

- i) For issues relating to noise and visual screening, please refer to 8a (ii, iii & iv) above
- ii) The Council has been party to significant levels of discussion, including at Stakeholder Project Board level, relating to the need for Borrow Pits, and as a source of construction material for the scheme, this is understood and supported. However, the outstanding concern of the Council relates to their long-term future and management in perpetuity. While the constraints of the Applicant are understood in relation to the Compulsory Purchase Order (CPO) process, the Council considers that a long-term management plan must be put into place to cover any periods beyond those set by the CPO process.
- iii) This is particularly relevant as the National Planning Policy Framework (NPPF) requires the determining authority to “provide for restoration and aftercare at the earliest opportunity to be carried out to high environmental standards, through the application of appropriate conditions, where necessary”. The Council contends that this must provide for a long-term solution, particularly if the Borrow Pits were to remain vested in the control of the Applicant after an initial vesting period.
- iv) From a visual and community perspective, these features are likely to be a long-term legacy in the vicinity of the A1/A14 junction immediately west of Brampton. The Council strongly considers that it is vital that a long-term plan is set for their future beyond the 5-year aftercare period suggested by the Applicant. The Council does not consider that this can be left without agreement, particularly given the visual and environmental blight that could occur in this area without a future management regime in place, plus nature conservation and biodiversity objectives of the submission being placed at risk. While the Council understands that the Applicant is considering this element, it is considered that this must be explored in detail and agreed as part of the Examination process.
- v) In addition, the Council, together with the County Council, have sought to re-integrate Brampton with its Parish areas to the west of the proposed A1/A14 alignment as part of the scheme discussions, by the provision of bridleway routes across the planned trunk roads. These original routes were severed as part of previous alignment improvements to the A1. While these are agreed in principle (see f below), the Council also considers that if public rights of way are to be reintroduced, these will be located passing through the designated areas

of the borrow pits and that a comprehensive package of rights of way and borrow pit management is necessary to ensure the safety, management and effective use of both elements

f) Rights of Way relating to Community integration

- i) As part of the Council's engagement regarding to Rights of Way relating to the Scheme, the Council has positively welcomed the Applicant's stated intention to re-create routes previously lost as part of strategic road works in the past
- ii) As part of the discussions relating to the re-creation of routes between Brampton village and Brampton Woods, a proposed route alignment has been agreed in principle with the Applicant, via ramp features and steps and crossing the A1 via the proposed A14 over-bridge
- iii) The Council is concerned that the proposed route via the over-bridge is located very close to A14 eastbound traffic flow. While the Applicant has stated that the bridleway on the bridge will be of sufficient width to conform with appropriate standards and separation of sufficient height to screen horse riders from traffic, the Council does not currently consider that this gives adequate reassurance that this link will be of suitable design
- iv) As well as the route passing close to A14 traffic flow, at the same time the route is also crossing the A1 with its projected traffic flows. The Council is of the view that the cumulative effects of the totality of the traffic flow could result in the use of the bridleway being unattractive to horse riders and that there is a need for more careful and sympathetic design required to meet the specific needs of users of this route
- v) The re-creation of this route is a vital element of achieving community integration and legacy on this part of the proposed route and the Council considers that this element requires a greater degree of certainty of design at this stage as alternative opportunities would not be possible at a future date if the indicative route currently indicated fails to meet the needs of projected users
- vi) The site at RAF Brampton, situated adjacent to Borrow Pit 2, has received Outline Planning Permission for residential development of approx. 400 units. As part of Tier 1 stakeholder discussions, a request was made for a public footpath to be created between this site and the countryside to the west at Grafham Road. The Applicant has agreed to make the land available as part of the proposed scheme but not to create the path itself. Under the Legacy banner, the Council considers that this is a cost-effective measure that would contribute greatly to the well-being of the local community and represents a missed

opportunity, particularly failing to provide access to other rights of way within the community including the proposed re-created link to Brampton Woods

g) Local off-line traffic impacts/traffic modelling outputs/highway design

- i) The Applicant has developed a traffic model (CHARM) in order to develop the Scheme, which is, in-part, based on the County Council's own Cambridge Sub-Regional Model (CSRM). This has facilitated the creation of a model to forecast projected traffic flows on the proposed new A14.
- ii) A key element of this modelling work is the process known as 'validation' whereby a comparison is made between modelled flows to actual count data. Given the nature of the Scheme as a strategic road project, this has focussed on traffic levels on the new A14 alignment and local environs.
- iii) The County Council is the local highway authority for Cambridgeshire and they have advised the Council that in their opinion, insufficient weight has been given with regard to traffic modelling the impacts on local roads away from the trunk road in validation terms. They have advised the Council that this is not to say that the forecasts are in any way invalid, only that it has not yet been proved to the County Council that they can be fully relied upon. This is a matter on which the Council agree at present.
- iv) It is well known from work on the CSRM, jointly in relation to local work on the CSRM, that the impact of congestion on the A14 is felt in a wide geographical area, and consequently the area of influence of the A14 is known to be extensive. The Council considers that, even though it is not the local highway authority, it needs to be fully informed on these matters for both the benefit of our Members and residents of the District.
- v) It is the Council's understanding that further modelling updates have been provided by the Applicant to the County Council based on further iterations of their traffic model (CHARM2 & CHARM3A) and it is on these, that the County Council in their role as local highway authority, has been providing professional advice and guidance to this Council on such matters.
- vi) The County Council has agreed a programme of local impact testing with the Applicant to improve the level of confidence in the forecast traffic changes on the local road network, at which the same time, the Council will continue to be advised by the County Council.
- vii) Therefore, until such time as local impact testing is completed, the Council reserves its position on final traffic modelling until such time as work is

complete and agreed and, as necessary, to submit any revised Written Representation and/or SoCG into the Examination process.

Turning to matters of detail outside traffic modelling work, the Council is aware that;

- viii) The proposed junction of Hinchingsbrooke Park Road with Brampton Road is to be fundamentally changed as part of the proposed scheme. Hinchingsbrooke School, this Council and the County Council have all raised the issue of setting-down/picking-up needs of schoolchildren at the beginning and end of the school day.
- ix) At present, there are significant occurrences that affect on-street traffic flows during these times as there are no off-street facilities available to meet these needs. Given the current levels of traffic flow on the highway network, these currently appear to be accommodated. However, the Council is concerned that given the planned increase in traffic flows through this junction as part of the proposed scheme, that the ability to set-down/pick-up will be seriously compromised as a result of the current changes and considers that the Applicant needs to consider this element at this stage of the process. It is considered that this element of drop-off/pick-up has the potential to significantly affect the operational nature of the planned junctions and is of a level of significance that options need to be considered at this stage
- x) The removal of Huntingdon Viaduct and the creation of a new local road network for Huntingdon is supported by the Council, as outlined in Section 4 . A direct result of this is that the current public transport interchange and rail station car parking to the east of Huntingdon rail station buildings will be lost
- xi) The Applicant has stated that rationalisation and reorganisation of the existing parking and drop off areas is a matter of accommodation works to be agreed with the relevant owners/lessees. The Council strongly contends that this is a fundamental principle that needs to be addressed at this stage of the process
- xii) The scheme as proposed will result in the loss of a significant area of car park and, as importantly, the designated public transport hub for bus services between Cambridge and Peterborough, as well as more local bus services, plus taxi rank. This facility was provided at the rail station circa 2007 following its inclusion in the Huntingdon & Godmanchester Market Town Transport strategy as a result of the lack of provision to that date and the ensuing congestion via the sharing of the previously designated area.
- xiii) Since this provision was made, following funding by County & District Councils, this has facilitated both Council's, together with local bus companies and train operating companies, to develop alternative transport access to the rail station

with a significant degree of success, including Guided Busway services integrating with rail services

- xiv) During detailed discussions between Tier 1 stakeholders leading to the submission of the current DCO application, the Applicant has been consistently advised that this Council does not accept that this is a matter of 'accommodation works' given the strategic importance of this facility, particularly as the scheme will reduce the area footprint of land in which to replace both the car parking, transport interchange and taxi rank. Indeed, the Council is also on record as advising the Applicant as to possible suggested regimes for the proposed use of the two vehicular/pedestrian accesses shown on the proposals, in addition to suggested on-site design but this has failed to materialise by way of a Technical Note as suggested
- xv) The Council continues to contend that in order to protect and provide for the future sustainability of Huntingdon Rail Station, that these elements are addressed as part of the Examination process
- xvi) As part of the Huntingdon Viaduct removal and the creation of a new local road network within Huntingdon, a new road link between the old A14 and Huntingdon ring-road will be created at Mill Common. As part of the overall package of changes, this is something that the Council has supported, in principle.
- xvii) However, as part of public consultation, this Council, together with the County Council, made representation that the proposed roundabout arrangement on the line of the old A14 results in a significantly detrimental impact on Mill Common, particularly as a result on its heritage status and its importance as an area of Open Space within Huntingdon.
- xviii) As a result, a revised arrangement was submitted as part of the DCO submission but since this date, the Applicant and Tier 1 stakeholders have continued to discuss the proposed road layout at this location in seeking to secure a solution that has the least possible impact on Mill Common in terms of land-take and impact. As part of these discussions, an 'Option 4' arrangement was outlined post-DCO submission and the Council contends that such is the significance of the need to minimise the impact of these changes, that the 'Option 4' arrangement is a fundamental matter that should be considered as part of the Examination

See Conclusion 9 (ii) – A fundamental element of the Scheme, and one which the Council has always supported, is to address the daily congestion caused by the current route alignment and the blight on surrounding communities caused by extensive delays and frequent accidents. The Council will continue to work with partners to agree overall traffic modelling outputs and solutions as part of the overall design

h) Drainage

- i) Both the Council and the Applicant are aware that a number of communities are currently affected by flooding before the Scheme is approved and constructed. While it is understood that the Applicant has provided for the mitigation of flooding to the extent that is required by the proposed scheme, the Council is advised by the County Council that communities within our area at Brampton and Fenstanton are identified as being at significant risk of flooding
- ii) The Council is aware that the proposals do not currently reduce either the risk or severity of flooding in the baseline and while we are aware that the Applicant is seeking to address these local issues as part of the overall scheme design, it is considered that as part of the Legacy objectives of the Scheme, the Applicant should be seeking to ameliorate or mitigate existing flooding issues where practicable at minimal additional cost
- iii) By way of example, at Brampton, extensive Borrow Pits are proposed by the Applicant and some are intended to provide flood storage to mitigate the impact of the A14 and realigned A1. This storage is sized to preserve the baseline flooding but as part of Tier 1 Stakeholder discussions, the Applicant has indicated that these could be sized to provide mitigation of existing flooding, including works to existing watercourses. On the grounds of Legacy, the Council contends that this should be considered through the Examination process as a requirement to any eventual permission

i) Legacy

- i) This is perhaps the biggest issue that the Applicant has grappled with as part of the DCO submission and their overall objective that the Legacy of the proposed scheme should be much greater than physically building a road is laudable. Different tiers of the project have grappled with this meaning and possible outcomes and there is much that can be supported. This includes proposed Apprenticeship training to source locally based staff for the project, working with West Anglia Training Association
- ii) Borrow Pits are perhaps the biggest 'visual' legacy after the road itself and the concern of the Council is outlined at 8(e) above relating to these areas. The Council is also aware that the County Council has made written representation on similar matters and it is our contention that the Legacy of these areas must not be left in any doubt at all should the Scheme be considered for consent.
- iii) The Council has consistently advised that the Environmental Statement relating to the proposed scheme downplayed the significant benefits of the proposed scheme to Godmanchester and therefore a significant opportunity and legacy

message was lost. This particularly relates to the projected and significant decrease in traffic flow through the core part of the town and consequential traffic reductions over the historic 'Town Bridge' linking the town to Huntingdon

- iv) Stakeholder discussions relating to Legacy within Godmanchester have flagged possible opportunities to change the heavily engineered nature of the historic core i.e. Post Street and the partial removal of wall to wall 'black-top' hard surfacing across the street frontage. This route forms one of Huntingdonshire's most historic streets and is of major historical significance located within a designated Conservation Area and containing a wealth of Listed Buildings. Over many years, the route has become more and more traffic-dominated to the detriment of its historic nature and indeed, the street scene is dominated by almost continuous carriageway and footway and stakeholder partners did consider that as part of the A14 legacy, a form of contribution to some form of potential future environmental enhancement scheme may properly reflect a distinctive outcome for Godmanchester and that the historic significance of the town could be part of the overall positive Legacy outcomes? The Council does consider that the Examination should explore this possibility.

See Conclusion 9 (ix) – The Council recognises and supports the view that the Scheme will deliver huge benefits for those who live and work within Huntingdonshire and it will continue to work with partners to secure the best possible 'Legacy' arising from the proposal

9. Conclusions

- i) The Council has consistently supported the need for the improvement of the A14 since our consideration of the CHUMMS recommendations in 2001. It considers that the Scheme as now proposed is vital to the continued economic prosperity of Huntingdonshire, as well as Cambridgeshire and the wider Eastern Region, as well as being of national importance given its links to the East Coast ports and the international markets of Europe and beyond
- ii) The Scheme as now proposed would significantly reduce almost daily congestion, particularly at peak hours, on the existing alignment but, as importantly, on communities and settlements between Huntingdon and Cambridge that are frequently blighted by extensive delays and frequent accidents
- iii) For far too long, the existing A14 has a widely-held reputation as a delay blackspot of significant proportions locally, regionally, nationally and internationally, which has done nothing to enhance the reputation of the locality over far too many years
- iv) There is little doubt that the difficulty of finding an acceptable solution to the sheer scale of these problems since improvements were first proposed in the late 1980's has led to much of the delay to date, not least of which on the grounds of cost becoming a reason for lack of progress
- v) However, the scale of the current problems have been simply too great and too continuous to put off seeking to find an acceptable solution and the patience of the people who live and work in the locality of this part of the A14, in the time taken to seek that solution is to their credit
- vi) While there is little doubt that there can ever be no negative impacts associated with a scheme of this scale, this Council is on record as say that there are 'winners' and 'losers' in relation to this scheme but that the headline objective of the scheme now proposed is to ensure those who are worse off as a result of the scheme are kept to an absolute minimum and that in those circumstances, that the best possible mitigation is sought to minimise those effects
- vii) It can also be of no coincidence that in seeking a range of alternative solutions since the CHUMMS work of 2001, that the investigation work undertaken consistently indicates that the alignment of a new A14 is on the route now proposed to the south of Huntingdon. There can also be little doubt that part of the current A14 alignment's downfall, as well as its now sub-standard design, is its elevated route through the middle of Huntingdon and a significantly sub-standard Viaduct and the huge environmental blight that impacts on the local community, daily, and without any significant mitigation measures that a scheme of this nature would require at today's design standards. Indeed, and as has also been placed on record previously by the Council, if an entirely

new route were being considered today, a route through the middle of an historic market town would not be countenanced and now is the time to redress that mistake of the past for the benefit of many whilst mitigating the impact in the best possible way for those affected by the Scheme proposed

- viii) The Scheme as proposed and demonstrated by this submission would be of long-term benefit to the future well-being of the region and secure jobs, economic growth and much needed new homes. These all require a new A14 and the Council continues to support the proposal as it always has and the Scheme as submitted, subject to the consideration and further clarification of matters that are outlined in this Written Representation and indeed, those of our fellow Tier 1 stakeholders at Cambridgeshire County Council, Cambridge City Council and South Cambridgeshire District Council on which we share many common considerations within our submissions
- ix) On the basis that the above can be achieved, the Council remains firmly of the view that the Scheme will deliver huge benefits for the people who live and work within Huntingdonshire and wider Cambridgeshire and to improve the quality of life and deliver a positive legacy of continued growth and prosperity for all