

Appendix 2

PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

A14 CAMBRIDGE TO HUNTINGDON IMPROVEMENT SCHEME

DEVELOPMENT CONSENT ORDER

**WRITTEN REPRESENTATION BY
CAMBRIDGESHIRE COUNTY COUNCIL**

DRAFT

1. INTRODUCTION

- 1.1.1 This Written Representation, in respect of the A14 Cambridge to Huntingdon Improvement Scheme (the scheme) Development Consent Order (the Order), 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 Local Impact Report.
- 1.1.2 Cambridgeshire County Council (the County Council) is a Tier 1 Local Authority and Statutory Consultee, and the scheme is entirely within the County of Cambridgeshire. Highways England (the Applicant) has consulted with the County Council in the pre-application stage, and has adopted many, but not all, of the requirements and recommendations of the County Council in developing the Order. The County Council is a part funder of the scheme, and strongly supports the scheme.
- 1.1.3 There are, however, a number of issues which the County Council wishes to have considered in Examination of the Order. These relate to matters of detail, local impact, and compliance with local and national policy. In some respects the County Council considers elements of the proposals fall somewhat short of the expectations of the County Council, or may create a risk of future cost to the Council in a time of restraint on spending by Local Government. In respect of these matters of detail or local impact, the County Council will put before the Examining Authority proposals for changes to the scheme or the Order for consideration and recommendation to the Secretary of State.

2. NEED FOR THE SCHEME

2.1. Role in the Local Transport Network

- 2.1.1 The A14 is a key link in the strategic road transport network as part of the M1/M6 to Felixstowe A14 road, and linking the A1 to the M11. It carries above average levels of large commercial vehicles reflecting this importance, particularly between Cambridge and Huntingdon where recorded levels are 25% of total flow.
- 2.1.2 It is also a key local transport link, connecting the A1, the market towns of Huntingdon and St. Ives and numerous villages on the corridor, and the city of Peterborough to Cambridge. A significant number of local commuting trips are made using the A14 as a result of this local demographic.
- 2.1.3 The geography of Cambridgeshire limits alternative routes to the north as crossings of the River Great Ouse are infrequent, and the A428 is the only significant alternative to the south. The A428 links the A14 Cambridge Northern Bypass to the A1 at St Neots. It forms part of an east west route with the A14 and A421 between Ipswich and Milton Keynes. A short busy stretch of the A1 at Wyboston is used to link the A428 and A421.
- 2.1.4 Major growth is planned on the A428 corridor, including at St Neots, Cambourne, Bourn Airfield and West / North West Cambridge. Congestion already occurs on the approaches to the Caxton Gibbet roundabout, around the south of St Neots, and on the A1303 which takes traffic from the A428 into Cambridge and onto the M11 southbound.
- 2.1.5 The Cambridge Sub-Region has a strong economy, and an efficient and effective transport network is vital to its continued success. It is essential that infrastructure is provided to support and grow the economy, helping to provide much needed new jobs and homes in the area. The Greater Cambridge area is an economic success story that links to the national economy and is a driver for growth elsewhere.
- 2.1.6 The growth of the local economy has brought many new jobs and people to the region but population growth of over 20% since 1981 has placed a significant pressure on the county's housing supply. This has resulted in people having to move further and further away from Cambridge in order to be able to afford to buy or rent a home.

- 2.1.7 Increasing prosperity and the demand for travel has also contributed to an increase in the number of cars on our roads, with overall traffic levels in the county continuing to rise year on year. The consequence of this is that the length of commuter journeys across Cambridgeshire is double the national average, placing increasing pressure on the county's transport network and its environment.
- 2.1.8 The Cambridge to Huntingdon section of the A14 links with the A1(M) to the west, and to the M11 in the east, and currently forms a significant bottleneck in the national strategic road network. The A14 carries large amounts of international freight traffic, but it is also a key route for local and regional commuter, business and freight traffic.

2.2. Scheme History

- 2.2.1 An improvement of the route between the A1 and M11 along what is now known as the A14 was first proposed in the 1989 "Roads for Prosperity" White Paper.
- 2.2.2 Scheme development was shelved in 1995 on grounds of cost, but it was included in the 1998 White Paper where it was announced that it would be subject to a Multi-Modal Study to establish its need. The Cambridge to Huntingdon Multi-Modal Study (CHUMMS) Final Report was published in 2001. This identified the A14 improvement scheme as part of a range of multi-modal solutions to the transport problems of the corridor.
- 2.2.3 The CHUMMS recommendations included public transport improvements (the now completed Cambridgeshire Guided Busway), rail freight improvements between Felixstowe to Nuneaton, additional demand management measures in Cambridge, and traffic calming measures in villages along the corridor. The latter was funded by central government as a solution to increasing use of unsuitable routes to bypass congestion on the A14.
- 2.2.4 CHUMMS recognised that the A14 between Cambridge and Huntingdon was a growth corridor and part of its work identified and allowed for significant development in the travel demand forecasts. This recognised the significant expected growth of Cambridge, and the demand for new homes in the Cambridge sub-region. A major development known as Northstowe is planned for the old Oakington Airfield for which the primary road access would be from the A14, although the development would also be served by the Cambridge Guided Busway.

This is in addition to developments at the former RAF Alconbury at Huntingdon. It can be seen that development pressures along the A14 corridor, and in the area around Cambridge and Huntingdon are significant.

- 2.2.5 The Cambridgeshire Guided Busway opened in 2011 and has become a highly successful public transport system, including connections beyond the Guideway to Huntingdon and Peterborough. The guided busway runs along the former Cambridge to St Ives railway line to St Ives, but services continue on road to as far as Peterborough. The southern terminus of the guided busway is the Trumpington Road Park and Ride Site close to junction 11 on the M11 south west of Cambridge. The guided busway links to Cambridge Science Park adjacent to the A14 at Milton, Orchard Park adjacent to the A14 at Histon, and Cambridge Station. It was however always a complementary to the A14 not a replacement, and has had little effect on traffic volumes on the A14 despite significant users on the Guided Busway. It satisfied suppressed demand for public transport, rather than mode transfer from the A14. The Guided Busway
- 2.2.6 Traffic calming within villages in the A14 corridor was implemented in 2003 and 2004, funded with £4.5m from the Department of Transport, with the aim of reducing the use of unsatisfactory routes to avoid congestion on the A14. However, while addressing some of the adverse impact of rat running, this remains a significant problem. Indeed, the Applicant's traffic modelling shows traffic flow changes that are the result of traffic on local roads switching back to the improved A14 and/or the Local Access Road.
- 2.2.7 In Cambridge a range of measures to manage travel demand in the city centre have been introduced, including the Core Traffic Scheme where access to the core area is limited for general vehicular traffic by using rising bollards and extension of the Cambridge Park & Ride network. In addition, strategies for the market towns of Huntingdon, St Ives and St Neots have all had to deal with the local implications of the impact of the current congested A14, particularly during the numerous incidents that occur on an almost daily basis when local routes within these areas become the only viable alternative routes.
- 2.2.8 A second Multi-Modal Study, the London to South Midlands Multi-Modal Study recognized the importance of the scheme, especially the Cambridge Northern Bypass and A428 as part of a new east west route from Ipswich to Milton Keynes (what has now become the A421/A428 route).

- 2.2.9 Highways England appointed consultants in 2003 to examine options to improve the A14 and conducted public consultations in 2005 and 2006. In 2005 Highways England consulted on two options – the so called CHUMMS option (dual 3 lane south of Huntingdon and the Huntingdon viaduct demolished and the route de-trunked) and the so called Alternative proposal (dual 2 lane south of Huntingdon for east / west movements with the viaduct repaired and the route remaining open as a Trunk Road for north / south movements). As a result of a legal challenge a further consultation into a wider range of route options was held in 2006.
- 2.2.10 In 2008 work started on scheme development leading to publication of relevant Orders in 2009. However, as part of the 2010 Comprehensive Spending Review the proposed £1.1 billion A14 Ellington to Fen Ditton scheme was deemed to be unaffordable in its current form and a review of the scheme would be undertaken. Work on this important and critical scheme in Cambridgeshire was once again stopped.
- 2.2.11 In December 2011, the Department for Transport (DfT) undertook to identify ‘cost effective and practical proposals which bring benefits and relieve congestion’. The ‘A14 Challenge’ was launched to identify potential options across various travel modes and also explore the opportunity for private sector involvement in developing schemes.
- 2.2.12 The A14 Study which emerged alongside this work identified a range of interventions, which comprised a series of packages including public transport, rail-freight package, and one for road. Following the completion of this work Highways England were asked in 2012 to take forward the further development of the A14 Cambridge to Huntingdon improvement scheme. In June 2013 the Government announced it would provide £1bn to upgrade the A14, with a requirement that local authorities contributed £100m to the project. Local authorities, led by Cambridgeshire County Council agreed a local contribution to the scheme.
- 2.2.13 Formal consultation on the proposed scheme was held between April and June 2014. As a key Tier 1 Stakeholder, Cambridgeshire County Council has supported the scheme proposals through these stages of the process as being essential to the future of growth and economic propriety of Cambridgeshire.
- 2.2.14 It can be seen that a considerable number of years have been spent preparing proposals for road improvement, which have in the past, on occasion, been abortive. Considerable public funds have been spent developing the proposals,

which in many key respects remain similar to the original conception in 1989 of a bypass of Huntingdon and on-line improvement towards Cambridge. It is a key proposition of the County Council that the scheme has been exhaustively studied, the proposals extensively consulted upon, and the time has now come for delivery. To this end the County Council desires there to be no delay in delivering the scheme, but the County Council is also acutely aware of the need for the scheme to deliver a positive legacy in the County. It is in relation to this legacy that the County Council seeks minor improvements and changes to the proposals by the Applicant.

2.3. Policy Context

- 2.3.1 The need for the improvement scheme was included in various editions of Regional Planning Guidance for East Anglia to 2016 (2000) and the East of England Plan (2008). Regional Planning Guidance Note 6 (2000) included “Improvements to the A14” as number 2 priority in terms of improvements required to the strategic road network. RPG 6 identified that a multi-modal study between Cambridge and Huntingdon would consider solutions to congestion and safety problems in the corridor around the A14 which is subject to substantial development.
- 2.3.2 The East of England Plan (2008) included the A14 Ellington to Fen Ditton Improvement as a scheme programmed for delivery, to be funded by Central Government through Applicant National network.
- 2.3.3 The first Local Authority policy document to include the A14 scheme was the erstwhile Cambridgeshire and Peterborough Structure Plan 2003. This incorporated the scheme along with other major development policies that focused on accommodating sustainable growth in the Cambridge Sub-region. Here a locational hierarchy of development was advocated that would minimise the need to travel and take advantage of sustainable modes, public transport, cycling and walking. This represented a major change from the previous long- standing development approach of fully protecting the Cambridge Green Belt from housing development and encouraging development away from Cambridge by placing it in the market towns and villages.
- 2.3.4 A sequence of locational development policy was accorded:
- Within Cambridge,
 - Within the Green Belt,
 - Within the Market Towns,

- Within larger villages and pre-existing new settlements
- Within a new settlement close to Cambridge and well connected by public transport to Cambridge

2.3.5 This approach was incorporated into the subsequent Local Plan Development. This approach has been followed and continued by the Local Authorities, after the abolition of the Structure Plan. This approach is incorporated in the current Local Transport Plan documents.

2.3.6 The Local Transport Plan 3 (2014 refresh) includes a section on the A14 corridor, refers to CHUMMS and the previous Ellington to Fen Ditton scheme, and includes the Cambridge to Huntingdon scheme as a committed scheme to be delivered by 2020. The LTP3 notes that the improvement will provide some relief to traffic problems in the wider Huntingdon area as have a positive impact on air quality particularly in Huntingdonshire.

2.3.7 The Third Cambridgeshire LTP 2011-2031: Long Term Transport Strategy includes the “A14 Cambridge to Huntingdon Improvement” scheme made up of capacity enhancements including a Huntingdon Southern Bypass. The scheme is identified as a “critical intervention to support development at Alconbury Weald, Wyton Airfield, Northstowe and North West Cambridge”.

2.3.8 The population of Cambridgeshire and Peterborough is forecast to grow by another 23-24% over the next two decades to around 1,000,000, with demand for new homes and employment significantly increasing.

2.3.9 In a diverse area like Cambridgeshire, this brings a range of transport challenges to be addressed in the longer term. The overriding challenge that this strategy seeks to address is to provide the transport infrastructure that will unlock the growth potential of the county and sustain economic growth for the longer term.

2.3.10 Current and emerging Local Plans include allocations for around 72,500 new houses to be delivered across Cambridgeshire to 2031. Investment in transport infrastructure is critically important to help sustain this growth and economic prosperity. This has been recognised by the partners in developing a Long Term Transport Strategy for Cambridgeshire to ensure that growth is planned for the long term in an integrated way with supporting infrastructure.

2.4. Regional Growth

- 2.4.1 The southern part of Cambridgeshire has traditionally been the economic hub of the county, with economic growth in the Cambridge city region driving growth in the wider area. Major employment growth is occurring on the northern and western fringes of the city, in the station area and on the Cambridge Biomedical Campus around Addenbrooke's Hospital, where around 10,500 new high value jobs are being created. Major housing growth is also occurring on the southern and northern fringes of the city. The Cambridge Northern Fringe site is expected to bring around 5900 homes to the area.
- 2.4.2 The high tech and biotech sectors remain strong, and employment growth is continuing at major research parks and campuses on the outer edge of the green belt around Cambridge. In late 2014 Astra-Zeneca announced that it would be locating its global headquarters in Cambridge recognising the dominance of Cambridge as a centre for life sciences.
- 2.4.3 Cambridge University is world renowned and attracts technology companies to the area. The University is a key reason to the choice of innovative, leading edge and "blue chip" research and development companies to locate in Cambridge.
- 2.4.4 This growth will create additional demand for trips in and to the Cambridge area, which will need to be accommodated by sustainable modes, as parts of the network, particularly on the approaches to Cambridge are at capacity.

2.5. Northstowe New Town

- 2.5.1 Northstowe is a proposed new town of 9,500 houses in Cambridgeshire. The Northstowe site is located five miles northwest of the city of Cambridge, on a disused airfield between the villages of Oakington and Longstanton
- 2.5.2 For Northstowe, the Busway has already been constructed and is successfully carrying passengers. A new Busway loop will also be provided through the town centre. Access roads will link the town to the A14 trunk road. In addition, the improvements to the A14 and the new local road between Fenstanton and Girton that will be delivered by the A14 Cambridge to Huntingdon scheme are required to provide capacity for Northstowe.
- 2.5.3 The Busway and the A14 Cambridge to Huntingdon improvement were both recommendations of the Cambridge to Huntingdon Multi-Modal Study (CHUMMS)

that identified them as parts of the package of measures to address the strategic role and local capacity constraints of the route.

2.6. Waterbeach New Town

- 2.6.1 Waterbeach Barracks lies to the north of the village of Waterbeach between the A10 and the Ely to Cambridge railway line. Approximately 8500 homes are planned on this site.
- 2.6.2 The new town will be developed to high standards of design and layout which draw on its Fen edge location. The new town will be kept separate from Waterbeach village by an extension to the Cambridge Green Belt.
- 2.6.3 It will be developed to maintain the identity of Waterbeach as a village close to but separate from the new town. Appropriate integration to be secured by the provision of suitable links to enable the residents of Waterbeach village to have convenient access to the services and facilities in the new town without providing opportunities for direct road access from the wider new town to Waterbeach other than by public transport, cycle and foot.
- 2.6.4 The A10 to the north of Cambridge is one of the more congested outer radial routes into the city, and some additional capacity will be needed on the section of the route between Waterbeach Barracks and the A14 to cater for the traffic demand of the new town and also of development in Ely. However, the primary focus will again be on public transport, walking and cycling.
- 2.6.5 The railway line will provide one high quality public transport option, and with the new station at Cambridge Science Park, there is great potential for significant growth in rail patronage into the north of the city, relieving pressure on the A10. In addition, a link to the Busway from Waterbeach New Town will provide direct public transport links to other key employment sites in the city without the need for interchange.

2.7. West Cambourne / Bourn Airfield

- 2.7.1 West Cambourne and Bourn Airfield lie to the south of the A428 trunk road to the west of Cambridge. The West Cambourne site will host 1500 homes and Bourn Airfield will include 3500 homes.
- 2.7.2 The trunk road itself has ample capacity past the sites, but is congested on the eastbound approaches to the Caxton Gibbet roundabout to the north west of

Cambourne. Comprehensive improvements to address the problems on the A428 corridor between the A1 and Caxton Gibbet, and some interim works may be needed at Caxton Gibbet as a result of the development of these sites and of Wintringham Park St Neots.

- 2.7.3 The A1303 that forms the inner radial route between the A428 and Cambridge is frequently congested, and bus trips have no competitive advantage over a car trip on the route. As improvements to the overall capacity of the A1303 would still feed traffic into a congested city centre with no capacity to take additional car trips, the strategy for this corridor focuses on getting buses past the congestion that occurs between the A428 and central Cambridge.

2.8. Huntingdon, St Ives, Alconbury Weald and Wyton Airfield development, Huntingdonshire

- 2.8.1 The Alconbury Enterprise Zone, Alconbury Weald (5000 homes) and Wyton Airfield (3750 homes) developments will drastically change the economic profile of the local area around Huntingdon and St Ives, acting as a major economic hub, and leading to new travel patterns and new pressures on the transport network. The A14 Cambridge to Huntingdon improvement will provide some relief to traffic problems in Huntingdon, Godmanchester, Brampton and St Ives, but new transport links and improvements will still be needed to cater for this level of new development.
- 2.8.2 Alconbury Weald and Wyton Airfield will together deliver over 8,500 new dwellings by 2036, with potential for more development at each site in the longer term. In addition, the Enterprise Zone at Alconbury Weald has 150 hectares of land for employment development. Further development is also planned around Huntingdon, and to a lesser extent St Ives. Significant levels of investment in transport infrastructure and services are needed to provide capacity for this growth.
- 2.8.3 A range of transport strategy options have been tested using the Cambridge Sub Region Model alongside the development of the Huntingdonshire Local Plan. As a starting point it has been assumed that the new sites will achieve high levels of public transport usage, and that new busway links and interchanges including a new station on the East Coast Main Line will be provided.
- 2.8.4 Traffic conditions around Huntingdon and St Ives can be very congested at peak periods, particularly at times when the A14 is busy or when incidents occur. In this

context, as with Northstowe, the A14 Cambridge to Huntingdon scheme is a critical intervention that will release transport capacity on the local road network around Huntingdon and provide capacity for development's travel demand.

- 2.8.5 With the A14, conditions on the A141 around Huntingdon is expected to markedly improve. However, in order to accommodate future planned growth, it is also considered necessary to safeguard a possible new alignment for the A141 around the north of Huntingdon, should further capacity be needed in future. If such a route were provided in future, the intention would be to separate the longer distance strategic and shorter distance local distributor roles of the current route.

3. POLICY CONTEXT

3.1.1 The Local Impact Report details the local policy context of the A14.

3.1.2 The following local plans / policy documents are relevant to the scheme:

Plan / Policy	Type
County	
The Cambridgeshire Local Transport Plan 2011 - 2031 (LTP3) including Cambridgeshire Long Term Transport Strategy (LTPS) Cambridgeshire County Council (2014)	County Transport Plan
Transport Strategy for Cambridge and South Cambridgeshire, Cambridgeshire County Council (2014)	Area Transport Plan
Huntingdon and Godmanchester Market Town Transport Strategy, Cambridgeshire County Council (2014)	Area Transport Plan
Cambridgeshire and Peterborough Minerals and Waste Core Strategy, Cambridgeshire County Council and Peterborough City Council (July 2011)	Minerals and Waste Plan
Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan, Cambridgeshire County Council and Peterborough City Council (February 2012)	Minerals and Waste Plan
Rights of Way Improvement Plan - Rights of Way: the Way Ahead, Cambridgeshire County Council (2005)	Rights of Way Plan
Cambridgeshire Green Infrastructure Strategy, Cambridgeshire Horizons / Cambridgeshire County Council (2011)	Green Infrastructure Strategy
Cambridgeshire Highways Policies and Standards (2014)	Highways Policies
Cambridgeshire's Local Flood Risk Management Strategy (2013)	Flood Risk Management Strategy
Cambridgeshire Landscape Guidelines (1993)	Landscape policy
Cambridgeshire Advisory Freight Map (2012)	County wide Advisory Freight Map
District	
South Cambridgeshire Local Plan 2011-2031: Submission, South Cambridgeshire District Council (March 2015)	Local Development Plan
South Cambridgeshire Development Control Policies, South Cambridgeshire District Council (July 2007)	Local Development Policies
South Cambridgeshire Local Development Framework Northstowe Area Action Plan (Adopted 2007)	Area Action Plan
South Cambridgeshire Local Development	Area Action Plan

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Framework Cambridge East Area Action Plan (produced jointly with Cambridge City Council) (Adopted 2008)	
South Cambridgeshire Local Development Framework North West Cambridge Area Action Plan (produced jointly with Cambridge City Council) (Adopted 2009)	Area Action Plan
Cambridge Local Plan 2014 proposed submission document (2014)	Local Development Plan
Cambridge Local Plan, Cambridge City Council (2006)	Local Development Plan
Huntingdonshire Draft Local Plan to 2036, Huntingdonshire District Council (2013)	Local Development Plan
Huntingdonshire Core Strategy, Huntingdonshire District Council (2009)	Local Development Plan
Saved policies from the Huntingdonshire Local Plan 1995 and the Local Plan Alteration 2002, Huntingdonshire District Council (2002)	Local Development Plan
Huntingdon West Area Action Plan, Huntingdonshire District Council (February 2011)	Area Action Plan
Cambridgeshire Joint Air Quality Action Plan (2010)	Air Quality Plan

3.2. Compliance with Local Policy Objectives

3.2.1 The following section includes a detailed review of compliance with local planning documents. An appraisal of the scheme against specific local policies contained within the planning documents is included in Appendix A.

3.3. Cambridgeshire Local Transport Plan 3 (2014)

3.3.1 The Cambridgeshire Local Transport Plan 3 (LTP3) includes a section on the A14 corridor, refers to CHUMMS and the previous Ellington to Fen Ditton scheme, and includes the A14 Cambridge to Huntingdon scheme as a committed scheme to be delivered by 2020. The LTP3 notes that the improvement will provide relief to traffic problems in the wider Huntingdon area and have a positive impact on air quality particularly in Huntingdonshire. The LTP3 concludes that delivery of a development strategy for Cambridgeshire is hampered by current conditions on the A14. Without the scheme, the current severe congestion on the A14 would worsen and growth of the Eastern region would be restricted, with negative consequences for jobs, housing development and regional businesses.

3.3.2 LTP3 identifies the negative impacts of the current A14 on the local transport network in Cambridgeshire. These include:

- The negative impact of congestion on the ability to deliver development at Northstowe, the Cambridge fringe sites and at Huntingdon
- Rat-running through villages along the route of the A14, leading to localised congestion in roads and settlements that are not designed for strategic traffic, and to negative social and environmental impacts
- The Air Quality impacts from traffic on the A14 which have led to the declaration of Air Quality Management Areas (AQMA) in the vicinity of Brampton, Hemingford, Fenstanton, Bar Hill, Girton, Histon and Impington

3.3.3 The Third Cambridgeshire LTP 2011-2031: Long Term Transport Strategy includes the “A14 Cambridge to Huntingdon Improvement” scheme made up of capacity enhancements including a Huntingdon Southern Bypass. The scheme is identified as a “critical intervention to support development at Alconbury Weald, Wyton Airfield, Northstowe and North West Cambridge”.

3.4. Transport Strategy for Cambridge and South Cambridgeshire (2014)

3.4.1 The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) forms part of the Local Transport Plan (LTP3) (2). The TSCSC identifies key locations where there are existing congestion problems and major intervention is planned for. Page 4-31 of the TSCSC refers to the A14 Cambridge to Huntingdon improvement scheme and states that:

‘This scheme will provide additional capacity on the A14 including a Huntingdon Southern Bypass, widening between Fenstanton and Bar Hill, and parallel local roads between Fenstanton and Girton. It will address existing capacity problems on this nationally and internationally important route, as well as providing capacity that will allow new development at Alconbury, Godmanchester and Northstowe’

3.5. Huntingdon Market Town Transport Strategy (2014)

3.5.1 The objectives of the Market Town Transport Strategy (3) are to:

- Support strategic sustainable development in and around Huntingdon

- Keep Huntingdon moving
- Ensure that the transport network supports the economy and acts as a catalyst for sustainable growth.
- Ensure good transport links between new and existing communities, and the jobs and services people wish to access.
- Enhance the transport linkages within Huntingdon
- Make travel safer
- Protect the historic and natural environment.

3.5.2 The scheme supports these objectives, primarily as it re-routes strategic traffic away from Huntingdon town centre and Godmanchester and through changes to the local road network, including the removal of the Huntingdon viaduct, provides the opportunity to deliver significant public realm improvements in the future.

3.6. Cambridgeshire's Local Flood Risk Management Strategy (2013)

3.6.1 The strategy sets out the roles and responsibilities of Flood Risk Management Partners within the County, highlighting the position of the County Council as the Lead Local Flood Authority under the Flood and Water Management Act 2010.

3.6.2 There are 5 key objectives within the strategy:

- Understanding flood risk in Cambridgeshire
- Managing the likelihood and impact of flooding
- Helping Cambridgeshire's citizens to understand and manage their own risk
- Ensuring appropriate development in Cambridgeshire
- Improving flood prediction, warning and post flood recovery.

3.6.3 A review of the scheme has not identified any areas where the scheme contradicts the strategy approach.

3.7. Cambridgeshire Landscape Guidelines (1993)

3.7.1 The Guidelines set out the following relevant objectives:

- Mobilise care and action amongst the main bodies who play the most active role in generating tomorrow's landscapes.
- Improve overall visual quality and strengthen the contrasts between landscapes in different parts of the County (emphasising a sense of place).

- Integrate wildlife conservation into landscape action at all scales from planning at a county level, through site planning, design and management, to the detailing of “hard” and “soft” features at the smallest scale.
- Protect and enhance historic features.
- Conserve existing features and create landmarks and ‘personality’ in the landscape.

3.7.2 On the whole the detailed landscape mitigation detailed in Ch. 10 – “Landscape” of the Environmental Statement reflects the principles set out in the Cambridgeshire Landscape Guidelines.

4. THE APPLICANTS PROPOSALS

4.1. A14 and A1 Trunk Road

- 4.1.1 With respect to the proposed new Trunk Road described in the DCO Schedule 3 Part 6, Articles 1, and 8, the County Council considers these to be on an acceptable route, the location of which has been the subject of considerable public consultation and study. The County Council is satisfied that the route has been chosen after careful study of alternatives and deliberation. In the case of the proposals presented in the Cambridge to Huntingdon Multi-Modal Study (CHUMMS 2001) and the A14 Challenge (2013) the County Council was a partner in the process.
- 4.1.2 With respect to the slip roads and connector roads described in the DCO Schedule 3 Part 6, Articles 2, 3, 4, 5, 6, and 7 the County Council considers these to be a necessary element of the proposals to provide interchange of traffic between intersecting roads.

4.2. Local Roads

- 4.2.1 The proposals involve de-trunking of approximately 22km of current dual carriageway trunk road. This is the existing A14 between Swavesey and Alconbury, and the A14 from Spital's to Brampton Hut.
- 4.2.2 The County Council is entering into a legal agreement with the applicant to protect the interests of the County Council in respect of assets for which the County Council will become the local highway authority. In addition to the 22km of de-trunking, a further 12km of new and improved local roads is to be constructed as part of the project.
- 4.2.3 The County Council is in general agreement, subject to the legal agreement, that on completion of the scheme existing sections of A14, which no longer serve a strategic purpose, are to be de-trunked to become local roads. These roads are, however, of a scale and type that are not present in the County's highway inventory for care and resources will be needed towards additional operational and maintenance costs. While additional resources will be required to operate and maintain these, the related Government grant is reducing overall. Discussions are being held with Department for Transport and Highways England regarding this,

and asset condition data will need to be assessed to determine ongoing future costs and whether there will be any additional funding.

- 4.2.4 Before de-trunking the applicant has agreed to carry out a programme of repair and renewal to bring the roads and bridges up to a standard where abnormal maintenance is unlikely to occur for a minimum of 10 years after handover (longer in the case of major structures). Existing safety cameras, VMS, and other redundant infrastructure will be removed and signs replaced.

A1307 Local Access Road to Swavesey

- 4.2.5 The proposed Local Access Road described in the DCO Schedule 3 Part 6 Article 10, Paragraph 1 (a to g) the County Council considers to be necessary part of the project to provide access for local traffic, and reduce local trips on the A14. The limited junction strategy of the A14 is acceptable to the County Council in so far as access to local destinations is provided by the A1307 Local Access Road.

A1307 Local Road to Alconbury

- 4.2.6 The sections of Local Road referred to in DCO Schedule 3 Part 6 Article 10, Paragraph 1 (h to l), 2, and 3 are agreed in principle as roads to be de-trunked (and new works to provide connectivity).

A141 Trunk Road (existing A14)

- 4.2.7 This road between Spittals Interchange and A1 Brampton Hut in Schedule 3 Part 6, Article 9 is incorrectly described as being the A141 Trunk Road. The County Council has agreed with the applicant that this section of A14 be de-trunked. This appears to be an error in the Development Consent Order.
- 4.2.8 The County Council agrees with the proposal to renumber the A14 Trunk Road between A14 Spittals Interchange and A1 Brampton Hut as the A141, as described in Schedule 3 Part 6, Article 9. It further agrees in principle with the proposal in Schedule 3, Part 3 to de-trunk this section.

Local Roads to be Diverted or Improved

- 4.2.9 The sections of classified road described in Schedule 3 Part 6, Article 11 to 20 are agreed by the County Council as necessary for construction of the A14.

4.3. A14 Huntingdon Railway Viaduct

- 4.3.1 There is a substantial concrete structure carrying the existing A14 over the B1514 Brampton Road and the East Coast Mainline Railway, known as the Huntingdon Railway Viaduct. This viaduct is understood by the County Council to be in poor condition, and it has had considerable work done on it. Currently the B1514 Brampton Road is realigned to provide headroom to steel “fingers” that support the concrete half joints and prevent the possibility that the suspended centre span could fall onto the road and railway below.
- 4.3.2 The County Council has been assured by the Applicant as to the poor condition of the viaduct. While the County Council believes that it may be possible, at some cost and difficulty, to repair or replace the viaduct, it accepts that there is a value for money argument given the need to construct, in any case, a new Huntingdon Southern Bypass to provide adequate road capacity. There is also the matter that demolition has a positive impact on Huntingdon.
- 4.3.3 Severing the existing A14 at this location was first proposed in the Cambridge to Huntingdon Multi-Modal Study (CHUMMS) . CHUMMS Strategy 2 was adopted as the preferred plan. Strategies 1 and 6, which maintained the existing A14 through Huntingdon, were both considered to fail to provide relief over existing traffic conditions. Strategy 6 which proposed a northern new strategic route bypassing both Huntingdon and Cambridge, and Strategy 1 (public transport improvements only) both failed to address demand between the A1/A14 to the west and A14/M11 to the east. In consequence traffic on the existing A14 remained high, although with some reductions in A14 traffic with Strategy 6.
- 4.3.4 The County Council is aware that the Applicant held public consultation into route options in 2005, offering for comment the “CHUMMS” route (D3 southern bypass and viaduct demolished) and the “Alternative” (D2 southern bypass and viaduct replaced/repaired). In 2006 further consultation was held relating to routes of the southern bypass.
- 4.3.5 The County Council part funded a study in 2005/2006 that concluded that a proposal to demolish the viaduct and replace it with a junction was beneficial to Huntingdon. 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 immediately next to the de-trunked A14.

4.3.6 The study concluded that the Pathfinder Link at Mill Common was an essential part of the proposals as it reduces traffic demand on Brampton Road to reach Huntingdon town centre. A further key element of the proposals was the West of Town Centre Link Road, which opened to traffic in 2014, now known as Edison Bell Way.

4.3.7 With the new A14 existing congestion at the Spittals Interchange is reduced. Traffic that uses Thrapston Road and Brampton Road to reach Huntingdon and avoiding congestion reverts back to Spittals Interchange. As a result there is a 60% reduction in traffic on Thrapston Road (5200 veh/day in 2020) which connects Brampton Road to the A14 north of Brampton. Similarly there is a reduction of 20% of traffic on Brampton Road with scheme. The Applicant has undertaken operational assessments of the junction replacing the A14 railway viaduct. These show 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 capacity issues without scheme. With scheme these issues remain, but there is a slight improvement, the scheme does not make it worse. The County Council will review this assessment when final agreement on traffic flows on local roads is reached with the Applicant. However, based on the assessment work done the County Council considers the proposed new junction to be an acceptable and necessary element (to produce environmental benefits) of the A14 proposals.

4.3.8 The Huntingdon and Godmanchester Market Town Transport Strategy adopted by both the County Council and Huntingdonshire District Council states that

The now completed A14 Study indicates that these schemes will significantly reduce the amount of traffic in Huntingdon, Godmanchester and surrounding villages and remove current rat-running to avoid 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.

- 4.3.9 Huntingdon from the east can only be reached by traffic leaving the A14 at Godmanchester, passing through the historic village of Godmanchester, and crossing the river by a narrow bridge constructed in the 14th Century. The alternative is to bypass Huntingdon, leave the A14 at Spittals interchange and access Huntingdon from the west. Providing a new means of access to the south of Huntingdon reduces traffic in Godmanchester, and on the Huntingdon Ring Road. To avoid congestion at the Spittals interchange traffic passes through Huntingdon (via the Ring Road) that would (but for congestion) have a quicker and more convenient route via Spittals Interchange and the A141. With the southern bypass, much traffic is removed and this traffic no longer needs to be in Huntingdon.
- 4.3.10 Any A14 option which retains the Huntingdon railway viaduct provides a shorter route from the A1 to the A14/M11 and Cambridge. It is therefore impossible to deliver any environmental improvements in Huntingdon as long as this route remains intact. Only by removing the railway viaduct is demand to use the existing A14 route constrained. An option that did not provide a connection between the two limbs of de-trunked A14 is disadvantageous to businesses and residents on the west side of Huntingdon as this traffic is then forced to use the new southern bypass or to pass through Huntingdon. A connection between the two is therefore desirable, but it needs to dissuade strategic traffic from using it. The proposed junction layout achieves this by incorporating in its geometry and signals an element of demand management. It is also crucial that by connecting to Brampton Road traffic is taken into the 7.5T weight limit zone in Huntingdon.
- 4.3.11 The traffic benefit, however, is only part of the benefits from removing the Viaduct. The A14 on its current alignment was constructed in 1977 (as the A604) partly along the route of a disused railway. It intruded onto common land, adversely affecting the setting of Mill Common and Views Common. Next to the river it skirts the site of the former castle, site of a siege in the English Civil War, and impacts at earthwork from that period. It is almost inconceivable, were such a road to be proposed today on such an intrusive and damaging alignment, that it would be approved, however well mitigated. In fact the existing road is mitigated only by dense planting that does little to conceal the noise of the traffic. Air quality in the

vicinity of the A14 is poor, and an area between the A14 and the town centre is currently a designated Air Quality Management Area.

4.3.12 The A14 forms a barrier between the town centre of Huntingdon, Hinchingsbrooke, and the river by Port Holme. The river creates a constraint that limits the opportunity for expansion of the town centre. To the west it is constrained by the mainline railway and to the south by the A14.

4.3.13 The view of the County Council is that on balance the removal of the viaduct and creation of a junction are beneficial to Huntingdon. It is for this reason that the proposed removal of the viaduct has been supported by the County Council in the adopted Huntingdon and Godmanchester Market Town Transport Strategy. Removal of the viaduct is also considered to be a key part of a positive legacy of the A14.

5. STATEMENT OF COMMON GROUND

- 5.1.1 Cambridgeshire County Council has agreed a Statement of Common Ground with the Applicant. This will be developed and updated through the Examination process. Much of the detail of what has been agreed is in the Statement of Common Ground. The County Council, however, considers that it might be useful to the Examining Authority to provide further information in this representation on matters where it is believed there is common understanding with the Applicant.

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6. LOCAL IMPACT REPORT

- 6.1.1 The Local Impact Report is the primary document setting out the impact of the A14 Cambridge to Huntingdon scheme on the local environment. Impacts reported in the Local Impact Report are not repeated in this written representation.
- 6.1.2 The proposals provide for mitigation of adverse noise and visual impacts. The County Council would not wish there to be any dilution of the mitigation provided, and the proposals should be considered a minimum requirement. If the Applicant were in detailed design to provide additional or enhanced mitigation, where possible to do so, this would be very welcomed by the County Council.
- 6.1.3 The County Council is aware that not all adverse impacts have been mitigated, and that there are residual impacts which are reported in the Local Impact Report (2) and Environmental Statement. While there are some communities, such as Brampton, in very close proximity to the proposals, others are more remote. In consequence, while more remote communities may experience negative impacts, these are generally minor or insignificant. There are also other communities which experience significant improvement from the removal of traffic from the existing A14.

7. NOISE

- 7.1.1 The County Council welcomes the provision of noise barriers and mounding at various locations. To ensure these are effective the County Council expects the Applicant to implement noise monitoring after opening, and to address by means of additional or improved barriers noise impacts that exceed those predicted.
- 7.1.2 The noise impacts of the scheme are set out in the Environmental Statement and Local Impact Report. The County Council welcome the improvements in existing Important Areas.
- 7.1.3 With regard to the properties likely to experience an adverse effect from traffic noise, but for which no specific mitigation has been proposed, the County Council would request the applicant to consider if additional mitigation measures are feasible, to mitigate adverse noise impacts further. This is particularly in relation to Stewart Close – Brampton, RAF Brampton and Pear Tree Close – Fenstanton. In any case, post-opening monitoring is required.
- 7.1.4 Properties close to the existing A14 at Rhadegund Cottages, Hackers Fruit Farm, and Catchall Farm will experience a significant observed adverse effect after taking account of mitigation. The County Council requests the Applicant to consider if additional mitigation is feasible to mitigate adverse noise impacts further.
- 7.1.5 With respect to borrow pit operations, the County Council is concerned that the noise impacts have been assessed using criteria appropriate for road construction and not those appropriate for mineral extraction. In particular, noise from screens, weighbridges, conveyors and the like is emitted from fixed locations within a geographically limited area, compared to construction on a linear site with the workforce at varying distance. Further consideration is requested in relation to these operations to ensure that noise impacts will be appropriately mitigated in relation to the borrowpits.

8. AIR QUALITY

8.1.1 The County Council welcomes the improvements in air quality in existing Air Quality Management Areas, largely as a result of removal of traffic from the existing A14 at Huntingdon and Fenstanton. However, the County Council has some concerns regarding the potential for worsening of air quality in Cambridge. This is particularly given that the specific impacts are not yet fully clear as more detailed modelling and analysis is required in the central parts of Cambridge. This matter is reserved for agreement pending the completion of this work to assess traffic changes in Cambridge as a result of the A14 project .

8.1.2 Air quality monitoring should be implemented to ensure that effects on air quality are as predicted.

8.2. Cambridgeshire Joint Air Quality Action Plan (2010)

8.2.1 The Air Quality Action Plan (AQAP) was developed by Cambridge City Council, Huntingdonshire District Council and South Cambridgeshire District Council. It looked at how to improve air quality up to 2015 in order to meet national air quality objectives, setting priority actions for each district, and focuses on reducing PM₁₀ and NO₂ concentrations along the A14 and within each district.

8.2.2 The specific actions related to the A14 and improving air quality are:

- Widening of the A14 carriageway between Fen Drayton and Histon
- Re-alignment of the A14 and the construction of a local road between the M11 and Bar Hill junctions during the A14 Improvement Scheme

8.2.3 The scheme includes proposals that seek to meet the objectives set out in the plan.

8.3. Operational Dust

8.3.1 The County Council will work with the Applicant in developing the Code of Construction Practice and Local Environmental Management Plans to ensure that adequate and effective controls are in place to reduce and control dust from construction, and from operation of the borrow pits.

9. CODE OF CONSTRUCTION PRACTICE

9.1.1 The Applicant has agreed to consult with the County Council as the Code of Construction Practice and Local Environmental Plans are developed. The County Council wishes this consultation to be secured by a Requirement on the Secretary of State and this is covered later in this representation.

9.1.2 The County Council's comments on the Code of Construction Practice included in the Environmental Statement are:

Section	Paragraph	Comment
Section 1: Introduction	General	It needs to be clear that references to "main contractors" means inter-alia their supply chain. The use of the term "main contractors" is not consistent throughout the CoCP (eg 14.6.3, 5.2.1 and others) and we assume that references to contractor means contractors, and references to contractors means main contractors (and their supply chain)
Section 1: Introduction	1.3.3	Our expectation will be for the HA to adopt Local Authority advice to ensure a consistency of approach between this scheme and regular in-county developments.
Section 1: Introduction	1.1.3	For an ordinary planning application, conditions would be attached requiring detailed schemes to be agreed for the control of noise, dust, etc. The CoCP provides the general principle, but the site specific detail will be provided on the LEMPs. We are pleased to note that consultation will take place on these, but we wish to be assured that local authorities will have control and input.
Section 2: A14 scheme description	General	Although references are made in other sections to multiple contracts underway simultaneously, we understand that Section 6 will be after completion of at least Sections 2 and 3. A timeline of construction would be helpful in order that cumulative effects are fully understood and effectively

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		managed.
Section 2: A14 scheme description	2.7.5	The scheme description specifically mentions borrow pits and sections refer to other groundworks that will have potential archaeological impacts. Contractors will need to know how they will need to incorporate potential hold points in their schedule to allow for proper archaeological investigation. We expect this to form part of the works contract and for the risk of finds to be properly allowed for in order to safeguard cultural heritage.
Section 2: A14 scheme description	2.7.5	We welcome the reference to borrow pits here, but would suggest there should be a separate heading before this paragraph and that a brief description of the borrow pits should be included (purpose, sites, types of mineral, etc).
Section 3: Environmental management and implementation	General	We consider the CoCP to generally be inadequate in management of cumulative effects of multiple contracts although we note the coordination role in 3.2.
Section 3: Environmental management and implementation	3.2	It is not clear if the Employers Representative role will also be split. It seems impractical that one ER can manage multiple contractors on this scale effectively and hence provide effective control on implementation of the CoCP and other commitments
Section 3: Environmental management and implementation	3.3.1	The CEMP needs to be developed before construction starts, not (as shown in Figure 1) once construction starts.

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Section 3: Environmental management and implementation	3.3.5	The detailed provisions of the CEMP must be tested against the minimum requirements to be set out in the CoCP, LEMP and ES. It is therefore important that the CoCP, LEMP and ES contain between them adequate detail to be an effective control on the construction phase.
Section 3: Environmental management and implementation	3.9.4	This should state minimum experience requirements in number of years. A minimum of 5 years' experience on similar projects should be required (10 for senior positions).
Section 3: Environmental management and implementation	3.4	The County Council remains concerned about the fact that the Developer (Highways England) will be self-policing. We do not mean to infer any lack of trust in Highways England and the Employer's Representative, but this does not provide for public transparency and accountability. We require to be further consulted on processes for dealing with complaints from the public/businesses, and expect to be consulted on effective resolution. With regard to borrow pits in particular, we will require an agreed schedule of monitoring visits by the Local Authority during the extraction, restoration and aftercare phases.
Section 5: General site operations	5.1.5	Start up and close down periods are open to abuse. The restrictions are welcomed, and must be enforced.
Section 5: General site operations	5.1.7 and 5.1.8	It seems likely that other works of a substantial nature related to removal of the suspended span and cantilevers would also require possessions. The complexity of works at this location are generally inadequately addressed in the CoCP and the relevant planning authority will require to be consulted as the detailed works planning progresses and the method of demolition decided.

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Section 5: General site operations	5.1.9, 5.1.10, and 5.1.11	These extend the scope of work outside the core working hours and have too wide a scope. We would prefer to see extensions by exception rather than rule, to be considered case by case.
Section 5: General site operations	5.1.10	The delivery of imported materials along the scheme in periods of reduced traffic is another area that might merit special consideration and could usefully be mentioned here. We refer also to the potential use of the Chesterton railhead to deliver locally unobtainable aggregates.
Section 6: Air quality	6.6	This appears to be inadequately developed to deal with the demolition of bridges and the Huntingdon viaduct.. Water sprays and screening may not be feasible in these situations. The requirements seem more suited to demolition of buildings.
Section 6: Air quality	6.9	This section is somewhat brief given that this type of plant is particularly likely to cause nuisance if not satisfactorily controlled.
Section 15: Traffic and transport	15.7.2	Requirements for condition surveys and strengthening/widening of secondary (B, C and unclassified) roads used for access should be added. A requirement to carry out repair works to restore secondary roads to pre-construction condition should be added. Use of residential roads should be by consultation with the communities affected and with implementation of all mitigation measures so agreed.
Section 15: Traffic and transport	15.5.3	An NMU/ROW Access Management Plan is needed which should form part of the Traffic Management Plan. The County Council requires a 'master plan' and programme of any proposed temporary closures/diversions to be agreed with them, stakeholders and users before works start.

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Section 15: Traffic and transport	15.5.3	The County Council requires all works to comply with the County Council's 'Guidance for construction traffic when crossing public rights of way (PROW)'. This was developed and successfully implemented for the building of large developments such as Cambourne and the Cambridgeshire Guided Busway.
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10. TRANSPORT ASSESSMENT

10.1. Traffic Modelling

- 10.1.1 The Applicant has developed a traffic model (CHARM – Cambridge to Huntingdon A14 Road Model) which is based in part on the County Council's CSRM (Cambridge Sub-Regional Model). The Applicant has augmented and developed CSRM to create a traffic model for forecasting traffic on the A14. Part of the traffic modelling process is validation, comparing modelled flows to actual count data. The Applicant, as this is a strategic road project, has focussed validation on the traffic on the A14 and in the immediate environs.
- 10.1.2 The Applicant has, in the opinion of the County Council, given insufficient weight in the traffic modelling to the impacts on local roads away from the trunk road in validation. That is not to say that the forecasts are in any way invalid, only that it has not been proved to the County Council that they can be fully relied upon. The impact of congestion on the A14 is felt in a wide area, and consequently the area of influence of the A14 is extensive.
- 10.1.3 The assessment of the Applicant's traffic modelling was based on the CHARM2 version of their traffic model, which has been superseded by an updated version called CHARM3A. CHARM3A was provided to the County Council on XXXX and the County Council reserves further comment on traffic modelling until examination of CHARM3A has been completed.
- 10.1.4 The Applicant and the County Council has agreed a programme of local impact testing to improve the level of confidence in the forecast traffic changes on the local road network. When this local impact testing is completed, a further statement of common ground will be agreed with the Applicant and deposited into Examination, together with any additional written representations that the County Council wishes to make.

10.2. Transport Assessment

- 10.2.1 The Applicant has issued a Transport Assessment with the Application. The County Council is pleased to note that traffic on the local road network is generally reduced as a consequence of the A14 improvement, significantly in some cases. There are, however, some increases.

- 10.2.2 The Transport Assessment contains anomalies which the County Council has brought to the attention of the applicant. The Transport Assessment is also based on the CHARM2 model. In view of the ongoing work with CHARM3A and local impact testing, the County Council does not consider it useful to make further comment until this work is completed.
- 10.2.3 Until local impact testing and analysis of CHARM3A is completed, the County Council reserves its position on the local traffic impacts of the A14. However, the County Council is broadly content with the work undertaken by the Applicant, and that the traffic modelling approach in general is sound and appropriate. It is expected that the County Council will reach agreement with the Applicant in respect of local road impacts, following completion of the work above, and will be able to deposit this agreement into Examination, along with the County Council's position on those traffic impacts.
- 10.2.4 The County Council will need to agree with the Applicant a programme of post completion monitoring of traffic flow on local roads, and the Applicant has agreed in principle to funding minor works if necessary to mitigate impacts of the A14 should monitoring suggest adverse impacts as a consequence of the scheme.

11. MINERALS AND WASTE

- 11.1.1 Material requirements are dealt with in chapter 13 of the ES. Paragraph 13.6.8 indicates that 5.8M m³ of material will be required from the borrow pits. Sourcing these materials from local borrow pits where possible is an essential mitigation strategy to reduce the need for road haulage of materials. The existing roads are congested in many cases and many local roads unsuitable or subject to weight limits. It is assumed that there will also be a significant volume of other minerals such as crushed rock to be imported, since this material is not available within Cambridgeshire.
- 11.1.2 The location of the borrow pits broadly accords with the areas search identified in the Minerals and Waste Core Strategy: three sites being totally consistent, two being partly within and partly outside the allocated site and one being outside but immediately adjacent to the allocated site. The County Council worked with Highways England to identify suitable areas for borrow pits and included them in the Minerals and Waste Plan which was subject to Examination in Public in 2011. The recommendation of the Inspector was to accept the Minerals and Waste Plan, including the identified borrow pit sites. The sites were identified solely to construct the A14, and cannot be used for commercial mineral extraction, or for other projects.
- 11.1.3 The outline proposals for restoration and potential after uses are generally acceptable to the County Council, being based upon restoration to agriculture where possible (borrow pit 3 and part of borrow pit 6) and an informal recreational and/or wildlife after use in other cases.
- 11.1.4 The application addresses climate change issues in relation to the road scheme and borrow pits and, where appropriate, makes use of the borrow pits to assist in providing flood attenuation in relation to the road scheme itself.
- 11.1.5 The Soil Management Scheme (ES Appendix 12.2) provides a sufficient basis for the removal, storage, handling and replacement/utilisation of soils arising from the borrow pits. The County Council considers this to be a minimum requirement, and would not wish to see these requirements reduced in any way.
- 11.1.6 Subject to detailed comments within this representation (particularly in relation to noise mitigation), the Code of Construction Practice (ES Appendix 20.2) forms a sufficient basis for the control of operations on the borrow pits and the mitigation of

environmental effects. However, it is noted that this is an evolving document and the County Council will expect to be fully consulted as the document develops.

11.1.7 The borrow pit proposals do not directly impact upon any existing public rights of way, but fail to take opportunity to enhance and complement existing rights of way as part of the legacy of mineral extraction.

11.1.8 The DCO and Environmental Statement do not contain the level of detail that would normally be expected within a minerals consent application. However, matters such as detailed landscaping and aftercare schemes should be capable of acceptable resolution at a later stage. Further to Para 120 (2) of the Planning Act 2008 the County Council is seeking to secure Requirements on the Secretary of State similar to the Conditions that would have been imposed on a minerals application were it not for the intervention of the 2008 Act.

11.1.9 The County Council requires the borrow pits sites to be restored to an acceptable standard, commensurate with the standards expected of commercial mineral extraction operations in Cambridgeshire. The County Council, irrespective of the destination of the materials, does not consider the borrow pit operations to be significantly different from commercial extraction. Consequently, while the County Council is keen to facilitate local extraction to reduce road haulage, it does not consider that the normal conditions on mineral extraction in the County should be significantly eased. Were it to do so, the County Council would expect commercial operators to seek the same level of easing. The longer term environmental impacts of such a decision could be far reaching.

11.2. Scope of Planning Policy Assessment

11.2.1 The County Council is seeking full compliance with the Cambridgeshire and Peterborough Minerals and Waste Core Strategy. Whilst some chapters of the ES make reference to this document, this is not consistent throughout, and there are significant policy requirements at risk of being ignored.

11.2.2 Paragraph 6.3.6 of the ES advises that:

The draft National Policy Statement for National Networks (NPSNN) (Department for Transport, 2013) sets out the proposed policy against which the Secretary of State for Transport will make decisions on applications for nationally significant infrastructure projects on the road and rail networks.

11.2.3 However, para. 1.18 of the published NPSNN (December 2014) states that:

The NPPF is also likely to be an important and relevant consideration in decisions on nationally significant infrastructure projects, but only to the extent relevant to that project.

11.2.4 The NPSNN does not give specific advice in relation to borrow pits since it was not designed for that purpose. Government advice on mineral extraction is contained in the NPPF, and associated Minerals Planning Practice Guidance which is found online on the Planning Portal. Para. 144 of the NPPF requires that the determining authority should:

- ensure, in granting planning permission for mineral development, that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;
- ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, 31 and establish appropriate noise limits for extraction in proximity to noise sensitive properties;

11.2.5 Paragraph 143 of the NPPF requires that, in preparing Local Plans, local planning authorities should:

Set out environmental criteria, in line with the policies in this Framework, against which planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health.

11.2.6 The purpose of Local Plans is therefore to translate Government Policy into relevant advice at the local level and provide a sound policy framework. The Cambridgeshire and Peterborough Minerals and Waste Core Strategy does that, and is therefore the appropriate specific policy document against which to assess the environmental impacts and acceptability of the proposed borrow pits.

11.2.7 Para. 3.11.9 of the ES draws support from the fact the borrow pit sites are earmarked in the Plan, specifically for facilitating the A14 improvements, but the sites have been allocated on the assumption that relevant policies in the Plan will be complied with. Policy CS1 of the Core Strategy sets out the Strategic Vision for sustainable minerals development, including borrow pits to provide material for the A14 Project.

11.2.8 The key issues which need addressing in relation to the allocated borrow pits are listed within the site profiles in section 7 of the Cambridgeshire and Peterborough Site Specific Proposals Development Plan Document (referred to hereafter as SSP Document), which allocates the specific borrow pit sites. In each case, the supporting text states:

Detailed assessment of development impacts and mitigation techniques will be required as part of any individual development proposal through the planning process.

11.2.9 The submitted application fails to address some of these key issues which were critical to the County Council's original allocation of the sites.

11.2.10 The County Council has set out in the Local Impact Report the impacts that the pits are likely to have at the local level. It is an important part of mitigation of construction impacts that materials are locally sourced where possible, and the County Council fully supports this principle. The County Council notes (and welcomes) the objectives of the Applicant to provide a long term positive legacy to local communities and businesses. Restoration of the borrow pits is considered by the County Council to be an element of securing this legacy in respect of nature conservation, flooding, rights of way, and where appropriate, amenity use by local communities.

11.2.11 Requirement 10 on the Secretary of State in Schedule 2, Part 1 of the Development Consent Order requires only that restoration of the borrow pits complies with the borrow pits restoration plan. Unlike other Requirements in Schedule 2 there is no obligation on the Secretary of State to consult with the relevant local planning authority at the detailed design stage. The County Council considers it to be entirely reasonable that it should be consulted in the detailed design of the borrow pits and restoration. It is believed that the Applicant has no objection to this.

11.3. Review of Established Policy

11.3.1 Policy references in the headings below relate to the Minerals and Waste Core Strategy.

Policy CS22 – Climate Change

11.3.2 This policy requires proposals to take account of climate change for the lifetime of the development. Flood compensation for the road scheme is designed having regard to this and some of the borrow pits play a part in providing surface water attenuation for the scheme, which is an approach the County Council entirely supports.

11.3.3 However, recognising that mineral extraction proposals provide the opportunity to assist in addressing the broader climate change agenda within the local area, Policy CS22 states:

In the case of mineral workings, restoration schemes which will contribute to addressing climate change adaptation will be encouraged e.g. through flood water storage, and biodiversity proposals which create habitats which act as wildlife corridors and living carbon sinks.

11.3.4 Several areas along the route, at Brampton, Fenstanton and Girton, already have significant flood risk issues and the Local Authorities and the Environment Agency have, throughout the pre-application consultation period, highlighted the potential for borrow pits to assist in alleviating local flooding issues. This approach is consistent with Policy 100 of the NPPF, which advises Local Authorities to consider, 'using opportunities offered by new development to reduce the causes and impacts of flooding.'

11.3.5 Given the overall environmental impacts of the scheme on local communities, particularly Brampton, it is considered that the possibility of providing long term legacy benefits to those communities as part of the scheme is all the more important, and entirely consistent with the stated objectives of the Applicant to secure a positive legacy. In this context the County Council considers a positive legacy to mean that the scheme leaves the local environment in a better condition than existed beforehand, and that the impacts of the scheme are more than neutral.

11.3.6 The County Council therefore welcomes the agreement of the Applicant to consider in detailed design providing, where feasible to do so, measures to reduce risk of flooding.

Policy CS25 - Restoration & Aftercare

This policy requires sites to be restored, 'in a phased manner to a beneficial afteruse, with aftercare arrangements'.

11.3.7 The application scheme does not consider the need for phasing. Given an operational period of up to five years (see table 14.9 of ES chapter 14), this is considered to be an important issue. The phasing and direction of workings can be designed to afford benefits in terms of minimising nuisance on sensitive receptors. Phased restoration can also minimise the duration of impacts and ensure beneficial restoration of the site at the earliest opportunity. At the same time a careful phasing programme can minimise the duration for which soils need to be stored. These may be matters that can be better considered at the detail design stage, but the County Council looking for a commitment to implement these principles where feasible in the context of the programme of works.

11.3.8 The application includes provisional drawings showing proposed restoration schemes for the borrow pits, and the County Council has no issue with the general principles proposed.

11.3.9 Para. 1.1.2 of ES Appendix 3.3, states:

The restoration designs for the borrow pits have been developed broadly according to two main objectives:

- restoration to agriculture where possible; or
- provision of quiet informal recreation such as walking and fishing and also for biodiversity with the balance determined by local factors.

11.3.10 The proposals for restoration and after use broadly align with the proposals in the SSP Document. However, in pre-application consultation with the Applicant, it became apparent that informal recreation and biodiversity are merely 'potential' after uses and that there is no commitment to implementing them. Details of such uses are not in the Applicant's proposals, for example no rights of way are included by which means walking could be facilitated, nor is access for fishing provided. The Applicant has quite rightly acknowledged that these proposals are not taken into account as mitigation of the scheme. However, the relevance of including in the ES a statement that restoration designs have been prepared based on proposals that are not secured is open to question.

11.3.11 Para. 144 of the 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."

11.3.12 The footnote to this section of the NPPF advises that, “Technical Guidance on Minerals published alongside this Framework sets out how these policies should be implemented”. Para. 037 of the Minerals Planning Guidance advises:

The most appropriate form of site restoration to facilitate different potential after uses should be addressed in both local minerals plans, which should include policies to ensure worked land is restated at the earliest opportunity and that high quality restoration and aftercare of mineral sites takes place, and on a site-by-site basis following discussions between the minerals operator and the mineral planning authority

11.3.13 With regard to those sites (or parts of them) proposed to be restored to agriculture, it is accepted that this can be achieved through good working practices and a five year aftercare scheme. However, where the end use is proposed to be for nature conservation, simply restoring and landscaping the site and leaving it to develop on its own, will not guarantee the satisfactory development of the habitat. Standard practice in such cases is to require a minimum aftercare period of 10 years.

11.3.14 This has become local authority and industry practice across the UK in relation to important schemes involving nature conservation and legislation makes provision for extended aftercare periods by agreement. It is considered to be particularly important in this case, given that the Applicant appears to intend disposing of sites after restoration. It is therefore possible that ecological restoration could be disturbed by a subsequent landowner before it even becomes established. 10 year after-care requirements are considered appropriate for borrow pits 1, 2 & 3, and in the case of shorter periods the view of the County Council is that nature conservation and biodiversity objectives are at risk.

11.3.15 Para. 11.4.5 of the ES classifies borrow pit restoration as being ‘temporary’ because it cannot be guaranteed beyond a five-year period. The Applicant thus recognises that there is insufficient certainty that wildlife habitats will develop and, for this reason, does not include them as habitat gain within the assessment.

11.3.16 The lack of commitment to the development of new habitat is particularly disappointing given that this fails to take the opportunity to provide compensation for the unmitigated ecological impacts of the road scheme, through the restoration and aftercare of borrow pits. It is understood that the Applicant is actively considering proposals for 10 year aftercare periods for borrow pits 1, 2 and 3, and the County Council welcomes this.

11.3.17 With regard to those sites identified as being suitable for informal recreation, there is no clear commitment to achieving this. The situation is easily resolvable by creating new public rights of way across sites to link in to the existing rights of way network. This is considered appropriate for borrow pits 1 & 2 which are close to the urban area of Brampton and, new rights of way around the restored lakes coupled with the proposed aftercare agreements above, will thus provide some long term legacy benefit for a community severely affected by the road proposals.

Policy CS34 - Protecting Surrounding Uses

11.3.18 Policy CS34 requires the protection of residential amenity with mitigation measures including, where appropriate, buffer zones.

11.3.19 This is fully consistent with para. 144 of the NPPF, which requires the following principles to be applied in determining applications:

- ensure, in granting planning permission for mineral development, that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;
- ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties.

11.3.20 Noise impact from the proposed road scheme is assessed in chapter 14 of the ES, and para 14.1.31 notes that construction noise has been assessed against the Code of Practice for noise and vibration control on construction and open sites. This has been applied to the borrow pits as well as the road scheme itself. However, this presumes that the nature of noise from mineral extraction and restoration operations is identical in nature to that arising from road construction and can be assessed on the same basis. This not the case, and the Government has established separate guidance for mineral operations which is contained within the Technical Guidance for Minerals, published alongside the NPPF.

11.3.21 A number of the borrow pits are in close enough proximity to residential property to cause potential concern in relation to noise. Borrow pit 2, for example, sits immediately adjacent to residential units on the former Brampton RAF housing area. Table 14.9 of ES chapter 14 predicts that the operation of borrow pits and soil storage compounds could give rise to monthly noise levels of approximately

67dBLpAeq,12hr. for an assumed period of 42 months, which is concluded to be acceptable (see table 14.9 of ES chapter 14). This is treated as being a 'significant effect'.

- 11.3.22 However, para 021 of the Technical Guidance for Minerals (found online on the Planning Portal) prescribes a maximum daytime noise limit not exceeding 55dB (A) LAeq, 1h (free field). Lower limits are set for night-time operations. Even on the basis of the day-time noise limit, and allowing for difference in noise weightings, there appears to be potential for noise nuisance, with effects of borrow pit working being of greater significance than identified in the noise assessment.
- 11.3.23 It is noted that there is a significant difference between the potential 42 month operational period for the borrow pit and the assumed duration of between 1 and 2 months for other particularly noisy elements of the road related construction activities that are identified in the same table. Being disturbed by a significant noise effect for a month may be acceptable if the purpose is understood and the end of it is in sight. However, to have to endure such a level for three and a half years is a significant period out of someone's life and could potentially impact adversely.
- 11.3.24 It is accepted that working programs have yet to be developed and that noise will be managed through the CoCP, and Local Environmental Management Plans (LEMP) which are yet to be developed. However, noise assessment for the borrow pits should be based upon the criteria set out in the national Technical Guidance for Minerals. This has been published as separate guidance because noise from mineral sites is of a different nature to general construction noise.
- 11.3.25 Road construction will take place on a linear site, with various stages of activity passing close to individual properties only for a short space of time. Borrow pit operations will involve the use of heavy earth moving machinery, excavators and dump trucks within a confined static area for significant periods of time. Plant such as conveyors, hoppers, weigh bridges and screens will be at fixed locations. It would be wrong to treat borrow pits differently to other mineral workings on the basis that they are part of the road scheme. Many mineral sites have a life of only three or four years (comparable to the proposed borrow pits). Because of the more intensive working over a shorter time period, it is often these sites that have the greater noise impact.
- 11.3.26 Para. 14.1.15 of the ES draws attention to the Government's Planning Practice Guidance for noise, but the document fails to have regard to para. 009 of that

Guidance, which advises that National Planning Practice Guidance for Minerals is the relevant tool to use in the assessment of noise from mineral workings.

11.3.27 Para. 5.191 of the NPSNN is fairly wide reaching in its advice, stating:

“Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. The prediction of road traffic noise should be based on the method described in Calculation of Road Traffic Noise..... For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies.”

11.3.28 It is the County Council’s contention that the Planning Practice Guidance for Minerals is both relevant and appropriate to the consideration of noise impacts from the borrow pits.

11.3.29 With regard to dust mitigation, it is accepted that this will be dealt with through the CoCP and LEMP. However, as well as the actual borrow pit excavations, this needs to give careful consideration to the associated soil storage areas. This is of particular concern in relation to borrow pits 1 & 2 where soil storage areas are shown immediately adjacent to residential property.

Policy CS35 - Biodiversity and Geodiversity

11.3.30 Consistent with para 118 of the NPPF this policy aims to conserve and enhance biodiversity. However, the level of assessment for the borrow pits has not been as detailed as might normally be expected. This is particularly true in relation to potential impacts upon designated nature conservation sites. Para. 5.22 of the NPSNN states:

“Where the project is subject to EIA the applicant should ensure that the environmental statement clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological conservation importance (including those outside England) on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity and that the statement considers the full range of potential impacts on ecosystems.”

- 11.3.31 Nature Conservation is covered by chapter 11 of the ES. Para 11.5.8 identifies Brampton Wood SSSI and Fenstanton County Wildlife Site (CWS) as designated sites for which potential adverse effects have been screened out as neutral as a result of design mitigation. Table 11.5 states that Brampton Wood is 550m from the proposed borrow pit works. On plan, the distance appears to be nearer 425m.
- 11.3.32 The adequacy of assessment of the impact of dust and de-watering on CWS is discussed in the section on Ecology and Nature Conservation

Policy CS36 - Archaeology and the Historic Environment

- 11.3.33 Policy CS36 seeks, amongst other things, to prevent adverse impacts on features of archaeological importance, but allows the possibility for development to be permitted where satisfactory mitigation measures have been defined following consideration of the results of prior evaluation. This approach is consistent with para. 128 of the NPPF and para. 5 127 of the NPSNN. The site schedules in the SSP Document note that all of the sites have been allocated subject to further archaeological assessment.
- 11.3.34 Chapter 9 of the ES generally recognises the potential archaeological significance of the borrow pit sites and includes proposals for targeted excavation on parts of borrow pits 1, 2, 3 & 5. However, the County Council considers that further information (physical evidence) is required to assess whether the proposed mitigation is sufficient and appropriate.
- 11.3.35 Without further assessment there is a possibility that not all mineral is winnable if archaeological remains sterilise part of the site. This issue is covered in more detail in the Council in the Cultural Heritage section of the Council's representation

Policy CS37 - Public Rights of Way

- 11.3.36 This policy requires applications to make provision for enhancing the public rights of way network where practicable. This is consistent with Paragraph 75 of the NPPF, which states:

“Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

11.3.37 As identified under policy CS25 above, there is the opportunity to provide legacy benefits from the scheme in relation to borrow pits 1 and 2, and the creation of rights of way is considered essential to guarantee public access and justify the identified after-use of informal recreation. The SSP Document proposes within the site schedules that both borrow pits 1 and 2 should be restored to a biodiversity after-use and should include public access. The potential for public access has only been identified on these two sites as they are the only ones in close proximity to large areas of population.

11.3.38 The sketch drawings at Appendix 3 were provided to the applicant on 28th January 2015 and show the approximate routes that CCC would like to see created on each site.

Policy CS39 - Water Resources

11.3.39 This policy aims to prevent adverse effects on the water environment as a result of operations including dewatering. In this case the Council has concerns about the potential effects of dewatering on two designated nature conservation sites.

11.3.40 Potential effects on dewatering at Brampton Wood SSSI are covered at para. 17.4.45 of the ES, which states:

‘It is envisaged that the sand and gravel deposits do not extend to the Brampton Wood SSSI, with glacial till being the only superficial deposits. The entire area is underlain by Oxford Clay and the woodland located on higher ground some 500m away from borrow pit 1. On that basis, there would be no impact on the hydrogeological functioning of the Brampton Wood SSSI as a consequence of the scheme.’

11.3.41 The County Council believes the distance to be closer to 400m. Para. 17.4.38 of the ES defines the Zone of dewatering influence as being up to 450m, which suggests that there may be the possibility of an effect upon the SSSI.

11.3.42 There are also the potential effects of dewatering borrow pit 3 on the immediately adjacent Fenstanton Gravel Pits CWS. This is most certainly within the potential zone of influence defined in the ES and yet there appears to be no consideration of the potential effect on this important wildlife site.

Issues with Specific Borrow Pit Sites

11.3.43 More information on individual borrow pits is included in Appendix B

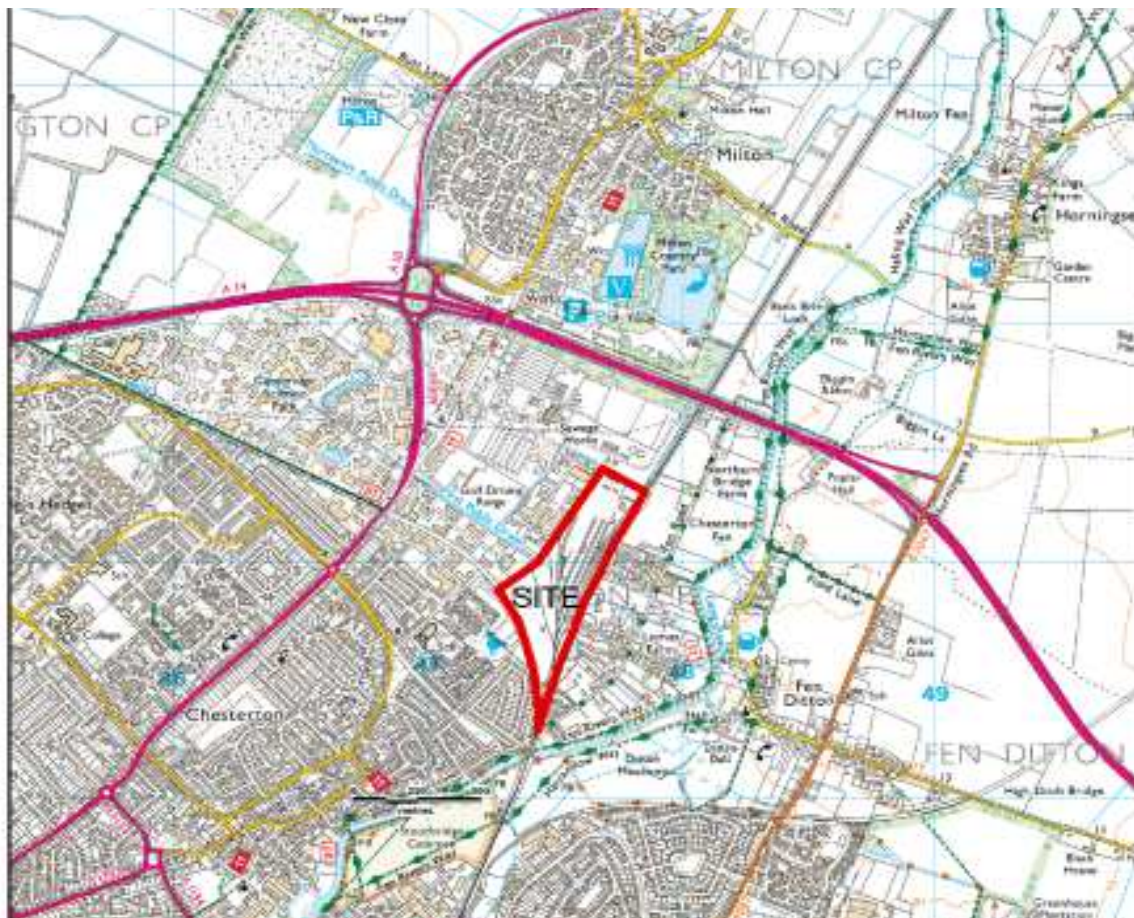
11.4. Sourcing of Material Not Available Locally

11.4.1 Table 13.10 notes that there will be a need for importing materials, including blacktop, crushed rock sub base, and concrete, involving the use of materials that would need to be sourced off-site. This would have a potentially moderate/large adverse impact.

11.4.2 Policy CS1 sets out the strategic vision and objectives for sustainable minerals development and specifically includes the following statement:

“Major infrastructure projects will be facilitated through the supply of mineral. In the case of the future improvements to the A14 (Ellington to Fen Ditton), specific provision will be made through sand and gravel and clay borrowpits close to the scheme. Where essential minerals cannot be supplied from the Plan area e.g. granite, the use of sustainable transport of this material will be encouraged, including railheads. Sustainable transport facilities will be safeguarded through the designation of Transport Safeguarding Areas”

11.4.3 The County Council has suggested that the Applicant should investigate the potential use of the Chesterton Rail sidings on the northern edge of Cambridge (see Figure 1 - Location of Chesterton Rail Sidings) to supply aggregate that cannot be sourced locally, including the possibility of providing a temporary access directly to the A14. At the same time, however, consideration needs to be given to local amenity impacts, including any implications of night-time operation.



11.4.4 Figure 1 - Location of Chesterton Rail Sidings

11.4.5 The County Council considers that the Applicant has made considerable effort to reduce transport impacts on the road network, but it is not clear whether these have been secured by means of a contractual obligation on the contractor to make use of the facilities provided (such as borrow pits). It is understood that the Applicant may wish to retain the operation of free market in the supply of aggregate and obtain best prices.

11.4.6 The County Council would prefer that there is a presumption on the Applicant to source materials locally, and to use non-road haulage for those materials not available locally. As public money is being spent, value for money and best price must be a criterion, but it is not the only criterion. Many of those living in communities close to the scheme will be taxpayers who stand to be impacted by the haulage of materials to build the A14.

11.5. Required Changes to the Proposals of the Applicant

11.5.1 The proposals contain inadequate detail of the operation and restoration of the borrow pits. The County Council requires the Applicant to provide detailed proposals when available at the appropriate stage in development, for the Applicant to consult with the County Council in developing these proposals, and for the reasonable requirements of the County Council to be implemented.

11.5.2 The County Council requires these changes to ensure that the working and restoration of the borrow pits is carried out to an appropriate high standard, consistent with the relevant policies in the Cambridgeshire and Peterborough Minerals and Waste Core Strategy.

11.5.3 The County Council will expect the applicant at the detailed design stage to consider:

- Phased working and restoration schemes to provide for the orderly working and progressive restoration of sites in a timely and effective manner.
- Dewatering and artificial drainage of the sites during the period of operations.
- Measures to prevent groundwater pollution.
- Noise mitigation based on 'Technical Guidance for Minerals', together with proposals for the control and monitoring of noise.
- The potential impact of borrow pits and soil storage areas on adjacent residential properties.
- The potential for providing temporary screening arrangements during the period of operations.
- Protection and enhancement of biodiversity interests on each site.
- The potential effects of dust from borrow pit 3 on Fenstanton CWS.
- The potential effects of dewatering of borrow pit 1 on Brampton Wood and of borrow Pit 3 on Fenstanton CWS
- Proposals for the creation of additional public rights of way in borrow pits 1 and 2 in order to support the proposed recreational afteruse.
- Schemes for the aftercare and management of restored sites, including a 10-year aftercare programme for those sites with an ecological after use (borrow Pits 1, 2 and 3) and 5 years in other cases.
- A strategy for the sourcing and transport of crushed rock and minerals not available locally.

12. ROAD DRAINAGE AND FLOODING

- 12.1.1 The County Council agrees to the inclusion of prescribed consents under the Land Drainage Act 1991 being dis-applied by the Development Consent Order and has agreed with the Applicant a Protective Provision in Schedule 8 of the Development Consent Order whereby the County Council will be provided with details of proposed works for approval.
- 12.1.2 The County Council has classified watercourses as low or high risk (important) with low risk watercourses being dealt with by a “bulk” consent process. Important watercourses will require individual consents. This is dealt with in the Protective Provision.
- 12.1.3 The Applicant has provided for mitigation of flooding to the extent that this is required by the proposals. This preserves the baseline flood storage before construction of the new road. However, a number of communities are currently affected by flooding before the A14 is constructed. The proposals by the Applicant do not currently reduce either the risk or severity of flooding in the baseline.
- 12.1.4 Cambridgeshire County Council has created a County wide surface water management plan that identifies settlements in the County that are at significant risk of flooding. Many are located near the A14. Figure XX shows those settlements at most risk. Girton, Brampton, Fenstanton and Histon and Impington have all been identified as being of significant risk of flooding.
- 12.1.5 In the Applicants Statement of Reasons (Section 4.1, Volume 4) it is stated that an objective of the scheme, and a strategic aim is “creating a positive legacy” which is described as securing wider benefits of the road improvement scheme for local communities and businesses. This objective is further stated in the Environmental Statement (at 2.4 – Objectives). The view of the County Council is that a positive legacy of the A14 Cambridge to Huntingdon scheme would be to ameliorate or mitigate existing flooding. The County Council considers that the Applicant is carrying out the necessary works in any case and the opportunity could be taken to provide the desired mitigation at minimal additional cost. In some cases the existing flooding is caused by the existing A14 in the control of the Applicant.

12.2. Bar Hill

12.2.1 Any culvert on all tributaries off Oakington and Longstanton Brook's which run under the A14 must not be altered in diameter. Many of these culverts under the A14 near to Bar Hill currently create a throttle to flow. These may have contributed to flooding in Bar Hill as current upstream storage in Bar Hill is insufficient to store the water; currently it provides an estimated 1 in 50 year event capacity. Replacing or enlarging this culvert is likely to cause downstream flooding in Oakington as the downstream watercourse is unable to take the increased flow. The County Council supports the retention of this culvert in consequence. The Applicant is proposing to construct over the existing storage pond at the Bar Hill junction with the A14, and is therefore proposing to alter the existing drainage regime. The County Council requests the Applicant to provide additional measures to mitigate the existing flooding in Bar Hill as a contribution to a positive legacy for the scheme.

12.3. Brampton

12.3.1 Extensive borrow pits are proposed by the Applicant at Brampton. Some of these borrow pits 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 could be sized to provide mitigation of existing flooding.

12.4. Histon and Impington

12.4.1 The village has been identified to be at significant risk of flooding, and is dependent on drainage from two awarded watercourses, Award 164 and Award 165. There are concerns that the volume of runoff from ponds being creating (next the Histon junction) may increase the volume of runoff into Award 164. The applicant will need to demonstrate that any works will not increase the runoff rate or volume into the awarded watercourse 164, thus not increasing flood risk to the community of Histon and Impington.

12.5. Policy Context

12.5.1 The Applicant is an agent of the Department for Transport, a Government Department. Two other Government Departments – DEFRA and DCLG are committed to managing and reducing flood risk. A legacy of the A14 Cambridge to Huntingdon project that managed and reduced flood risk would be aligned to the stated objectives of three Government Departments.

12.5.2 A Memorandum of Understanding (MoU) between the Environment Agency and Highways England (signed by Paul Leinster and Graham Dalton, Chief Executive of Highways England in November 2009) stated the purpose of the refreshed MoU as: To minimise flood risk, ensure compliance with relevant legislation and reduce the environmental impact of the road network.

12.5.3 Key Benefits to External Customers:

- Reduced environmental impact on the existing network by promoting sustainable design and Build
- New roads are planned and developed to minimise the impact on the environment
- A quicker and more efficient response to incidents that threaten the environment and safety of road users

12.5.4 Key Benefits for Addressing Future Challenges:

- Adapting to climate change
- Implementation of the Water Framework Directive
- Joint initiatives on environmental crime
- Further developing the use of sustainability and sustainable drainage techniques

12.5.5 In relation to the National Flood and Coastal Erosion Risk Management Strategy for England (2011) utility and infrastructure providers, for example Highways England, already maintain plans for the future development and maintenance of the services they provide. In doing this, it is essential that they input to FCERM plans, for example by providing information and advice, and take account of FCERM plans in their own planning process. This will ensure that their assets and systems are resilient to flood and coastal risks and that the required level of service can be maintained in the event of an incident. Utility and infrastructure providers may wish to invest time and resources into developing and delivering the local flood risk management strategy, to realise the significant benefits for them and their customers that follow from flood risks being effectively managed.

12.6. Required Changes to the Proposals

12.6.1 The Applicant has agreed with the County Council to address in detailed design existing flooding problems in the areas described, where reasonable and feasible to do so.

13. CULTURAL HERITAGE

- 13.1.1 CCC is the relevant authority to be consulted on the impact of the A14 Cambridge to Huntingdon Improvement Scheme where it stands to affect non-designated heritage assets. Historic England and the District Councils (specifically the Conservation Officers) are the relevant authorities to advise on designated assets, including Scheduled Monuments and their settings, Listed Buildings and their curtilages. This representation specifically deals with non-designated assets, and the general and rich archaeological heritage of Cambridgeshire.
- 13.1.2 CCC has agreed with the Applicant that the scoping of programmes of archaeological works will be jointly appraised by CCC and Historic England, while scoping, and fieldwork monitoring for evaluation and mitigation investigation phases will be conducted by CCC, supported by EH where remains considered to be of national importance are revealed during fieldwork, or where fieldwork takes place in close proximity to Scheduled Monuments (such as at Mill Common).
- 13.1.3 There is agreement with the Applicant that mitigation by controlled archaeological excavation will take place well in advance of construction of the off-line sections of the route. Save for certain barred-access areas, the off-line route has been subject to a very dense array of evaluation trenches and non-intrusive surveys, and its archaeological character is understood. Focused archaeological excavations can be, but have not yet been, quantified and resourced for inclusion in the scheme's forthcoming mitigation strategy.
- 13.1.4 Sites of newly discovered nationally important remains, or other significant sites such as cemeteries, shrines or complex settlements found during pre-construction archaeological investigations or during monitored construction works, will need to be subject to detailed excavation in advance of construction, as the potential to preserve for posterity remains of this nature in situ is unlikely to be achievable once the detailed design of the route has been completed.
- 13.1.5 The removal of the viaduct at Huntingdon and the embedding of the old A14 at lower level in what will become a local road will remove an eyesore in Huntingdon and enhance the significance of general and designated heritage assets in the area. The realignment of the new, slighter, link road at Mill Common to join the new local road to the Huntingdon ring road, and the removal of numerous large roundabouts that were initially planned for this area is very welcome, as this historic landscape

area (in single ownership for 1000 years by the Freemen of Huntingdon) will no longer remain swamped by imposing road structures and motorway scale signage.

13.1.6 It is noted that a Requirement¹ provides for consultation with the relevant authority with regards to acceptance of Written Schemes of Investigation. As noted above, for non-designated assets, Cambridgeshire County Council has been periodically consulted by the Applicant, but the Applicant has shown reluctance to act on the recommendations of the County Council. In consequence the County Council is concerned that some aspects of the Applicant's approach to understanding the heritage resources of this large swathe of the County, and the concomitant resourcing implications for the archaeological programme of investigation for the entire scheme are inadequate. This is set out in more detail below.

13.1.7 Where access could be arranged, the Applicant undertook only non-intrusive surveys in parts of some archaeologically-rich areas, including those in which the potential for the presence of archaeological remains has been considered to be high. It is not considered by the County Council that non-intrusive survey (aerial photograph transcription work for crop and soil marks; geophysical survey) is sufficient evaluation of, for instance, the large borrow pit areas, some of which contain known and extensive archaeological remains.

13.1.8 Specialist providers of non-intrusive survey techniques endorse the need to validate such survey results through trial trenching or other physical tests in their own reports, as it is only through ground truthing the data that the significance and character of archaeological remains can emerge.² The presence or absence, character, extent, date, integrity, state of preservation and quality are tests outlined in the Chartered Institute for Archaeologists' professional standard ³ for evaluation to aid decision-making as to whether or not sites/remains should be conserved for

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¹ Development Consent Order Schedule 2 Part 1, Requirement 7

² For geophysical survey: EH, 2008, *Geophysical Survey in Archaeological Field Evaluation* "2.4 Data Interpretation Any reference to 'negative evidence' must be fully qualified and explained. Lack of geophysical anomalies cannot be taken to imply a lack of archaeological features, and in such cases an alternative evaluation procedure – eg trial trenching, or the use of a different geophysical technique – should be considered."

³ CIFA 2014 (rev) Standard and guidance for archaeological field evaluation

future generations to enjoy (NPPF paragraphs 129 and 139 apply), or if they can be subject to suitable mitigation strategies and thus be preserved 'by record', following analysis, synthesis and publication (NPPF paragraph 141).

13.1.9 Areas of the Scheme footprint that have not been subject to appropriate or sufficient evaluation cannot be considered to have been adequately characterised and their archaeological significance remains unknown, lacking compliance with the cultural heritage evaluation principals (3.3 and 3.9) published in the Design Manual for Roads and Bridges (2007)⁴. This is an important consideration as resourcing pressures can be anticipated post consent, should unexpected remains be found during further evaluations and stripping exercises. Unscheduled or inadequately scoped archaeological excavations risk the unrecorded loss of archaeological evidence and are considered unacceptable by the County Council.

13.1.10 The archaeological study of Mill Common has been overly reliant on non-intrusive survey and the character of the archaeological remains in this multi-faceted historic landscape area has consequently been understated. Further work to develop an appropriate archaeological mitigation strategy is needed in order for it to become acceptable to CCC. Mitigation of construction impacts of all groundwork types will be required where archaeological evidence is present within the scheme. Aside from the off-line route (see agreed matters above) these will include:

1. Balancing ponds
2. Ecology Ponds
3. Ecological Mitigation areas
4. Soil Storage Areas
5. Construction Compound Sites
6. Borrow Pits
7. Flood Compensation areas
8. Link and new access roads and new junctions
9. Any areas where as yet unspecified ground works will occur.

1.1.1 _____

⁴ DRMB HA 208/07 Chapter 2 Defining Cultural Heritage, Volume 11 Section 3 Part 2

13.1.11 An appropriate mitigation strategy needs to be designed that will allow for an appropriately resourced programme of archaeological works that will include:

1. the full excavation of remains in advance of extraction in borrow pits for materials, or the construction of the road and all other associated groundworks (pertaining to roadwork excavations or compression sites, eg bunds and embankments where archaeological remains are present); and/or
2. the suitable preservation in situ of remains considered to be of national importance (possibly requiring a moderate design change) should these be found and where this can be achieved;
3. a strategy for examining the excavated gravel units in Borrow Pit 3 – an area of known Palaeolithic remains;
4. the analysis and publication of the results of all of the archaeological surveys and fieldwork schemes relating to the project (two formats: technical and popular);
5. provision for the long-term display of discoveries in suitable public places as this scheme will generate very large archaeological assemblages of public interest. This should include museum funding assistance; interpretation boards in publically accessible legacy areas (eg restored borrow pits, appropriate places along public rights of way), fuel stations/service stations (new and/or existing, as appropriate) and other public places such as libraries and dedicated websites;
6. the preparation and storage of the archive in Cambridgeshire's archaeological archive facility following the transfer of title to CCC of retained assemblages and records (preferred, but as agreed).
7. an appropriate policy for Treasure finds.
8. a public engagement outreach scheme.
9. the deposition of reports to, and provision of GIS layers in suitable formats to the Cambridgeshire Historic Environment Record.

13.1.12 The County Council were provided with draft Written Schemes of Investigation (WSI) on 21 April 2015. These have been reviewed and the position of the County Council with respect to the draft Written Schemes of Investigation are as follows:

- 13.1.13 The draft WSI research objectives fail to indicate to the curator how the archaeological framework will be set for this significant, extensive archaeological investigation across the south central part of Cambridgeshire. Consequently, there is no focus on how the archaeologies of the different landscape character areas (Gt Ouse river valley/terraces; Cambridgeshire clay plain; urban fringe) may differ along the route and how the excavation priorities of 'site areas' will be directed.
- 13.1.14 A significant omission is the inclusion of the methods and results of the previous tranche of A14 work (2008-9), the archive and results of which should be integrated into any investigation.
- 13.1.15 The specific aims of the WSI are extremely brief and do not extend to validate or critically assess the methods of evaluation (both intrusive and non-intrusive) in all phases of evaluation work for the A14 scheme. There seems to be no differentiation of approach between the methods of Targeted Excavation, Strip Map and Sample Excavation and Watching Brief, why or when these methods would be used. The repetitious approach in each method outline conveys a lack of understanding of method selection, of the character of the archaeology and or the construction impacts, and inevitably the consequences for the overall resourcing of the investigation.
- 13.1.16 Detailed comments on the draft WSI were provided to the Applicant on 22 April 2015 (3)

14. ECOLOGY AND NATURE CONSERVATION

14.1. Ecological Mitigation Principles

14.1.1 Ecology and nature conservation are dealt with in chapter 11 of the ES and this is where the Applicant rightly identifies a number of principles for mitigating impacts of the scheme. These include, et al, the creation of new habitats along the highways estate and in the restored borrow pit areas together with appropriate management programmes in order to achieve a net habitat gain.

14.1.2 This is in line with the NPPF which advocates minimising impacts and providing net gains in biodiversity (para 109) through restoration and re-creation of priority habitats (para 117). However, the Applicant is proposing that, with regards to the borrow pits, this will only be temporary mitigation as the permanence of the restoration of these areas is not secured beyond 5 years. This is insufficient time for the satisfactory development of habitat and the County Council is concerned that there is no longer term commitment by the Applicant for the establishment of these areas.

14.1.3 The County Council considers restoration of the borrow pits to be an essential element in securing a positive legacy and for the proposals to comply with Policy CS25 – Restoration & Aftercare of the Minerals & Waste Core Strategy (for further details see section 11.5). It is disappointed that no longer-term management of the borrow-pits has been secured or that these areas should be permanent. This significantly diminishes the ability of the scheme to fully mitigate the adverse impacts of the scheme or to achieve any long-term biodiversity gain. The County Council would like a commitment of at least a 10 year management plan.

14.1.4 Although such a proposal has been indicated by the Applicant to be under consideration the County Council does not consider that the Requirement 10 in Schedule 2 Part 1 of the Development Consent Order is sufficient to ensure that this will be secured. The County Council is seeking an appropriate Requirement on the Secretary of State to consult with the local planning authority on detail restoration design for the borrow pits.

14.1.5 The Applicant has identified various Ecological Mitigation Areas (ES Figure 11.13) which are aimed at addressing the adverse impacts on ecology. However, these only address impacts on protected species and meet statutory requirements for

licensed species, such as Great Crested Newt. The County Council is disappointed with this approach. These areas should be designed to mitigate and compensate for loss of habitat that will have an impact on species of county, district and local importance (e.g. breeding / wintering birds and invertebrates at Buckden Gravel Pits County Wildlife Site (CWS), dragonflies at Fenstanton Pits CWS, Palmate Newts and large populations of Common Toads at Debden Farm, Godmanchester).

- 14.1.6 The County Council would like to see the Applicant taking all opportunities to enhance biodiversity value and the failure to do this is disappointing.

14.2. Designated Sites

- 14.2.1 The importance of Buckden Gravel Pits CWS for its ability to support a rich variety of breeding and wintering birds, including species of county and district value, and its comparatively high invertebrate value (seven Nationally Scarce species recorded in the wetland area) is recognised by the Applicant. The site is also of value for its bat foraging habitat and high levels of bat activity.
- 14.2.2 Buckden Gravel Pits is the only designated site to be directly affected by the scheme in terms of land loss but, despite this, a Phase 1 habitat survey of the entire site was not undertaken. In the County Council's view this is unacceptable and as a result there is a risk that adverse impacts on the CWS have not been identified.
- 14.2.3 Small areas of habitat will be permanently lost but the Applicant feels that these are unlikely to have a significant effect on the overall functioning/integrity of the CWS and effects on the site's designated features. Also that there will be only minimal disturbance to shallow groundwater flows as a result of construction of the viaduct with no significant effects expected on the hydrogeological functioning of the Buckden Gravel Pits (ES 11.5.53).
- 14.2.4 These assessments are based on insufficient evidence rather than any detailed assessment of the habitats present at the site and identification of the key features for which the CWS is designated. It is known that the site contains areas of varying ecological value (Wildlife Trust Survey 2014), with some lakes of significant quality to support aquatic flora whereas others are of minimal value. The current habitat quality has not been assessed adequately with the result that potential opportunities to provide mitigation / compensation within the County Wildlife Site, for example the

creation of new, ecologically-rich water bodies or remedial works to enhance the poorer quality habitats, have not been identified.

- 14.2.5 Whilst the Applicant claims that the loss of breeding bird habitat at Buckden Gravel Pits is offset by the creation of breeding habitats throughout the scheme, the County Council does not agree that this would be sufficient to mitigate impacts on the CWS. Without more detailed botanical/habitat assessment it is impossible to ascertain whether the designatory features will be adversely impacted by the proposals. The scheme fails to confirm whether the scheme will result in the loss of the best (or indeed the poorest) standing water habitat.
- 14.2.6 The Applicant has stated that they are willing to engage with the County Council prior to the DCO examination in order to discuss the design of pre-construction surveys and monitoring. The County Council considers that neither Requirement 4 nor Requirement 6 in the Order at Schedule 2, Part 1 binds the Secretary of State to consult with the relevant local planning authority, and hence seeks the imposition of an appropriate Requirement similar to that at Requirement 4 and Requirement 6.
- 14.2.7 With regards to Brampton Wood SSSI and Fenstanton Pits CWS the County Council are concerned that hydrological impacts on these site have not been fully assessed or that the scheme complies with Policy CS39 – Water Resources (for further details see section 11.5).
- 14.2.8 At Brampton Wood there would be a local reduction in groundwater levels caused by the dewatering of Borrow Pit 1, whilst at Fenstanton Pits CWS there could be disruption to surface water flows due to groundwater dewatering at Borrow Pit 3. The County Council is concerned that the construction/operational phases of mineral works at these Borrow Pits will impact on these sites and that this impact has not been assessed within the ES.
- 14.2.9 In addition, there is no specific assessment of potential dust impacts on species, including dragonflies, at Fenstanton Pits CWS from workings at Borrow Pit 3 or any potential dust impacts on Brampton Wood SSSI. All potential impacts should be assessed and must be mitigated in order to comply with Policy CS35 – Biodiversity and Geodiversity (for further details see section 11.5).
- 14.2.10 The Applicant has agreed to consult with the County Council in respect of development of the Code of Construction Practice (CoCP) where such matters can be addressed and this is welcomed.

14.3. Protected species

- 14.3.1 The importance of breeding and wintering birds, including species of county value (bittern, cuckoo, Cetti's warbler, goldeneye and shoveler.) and district importance (corn bunting, kestrel, green woodpecker oystercatcher, pochard and song thrush) in the scheme's study area is recognised by the Applicant. Buckden Gravel Pits CWS is recognised as supporting the highest numbers and species richness of breeding birds of all the areas surveyed and also as the best area for wintering birds
- 14.3.2 The Applicant feels that impacts arising from habitat loss would be fully mitigated by creating habitat suitable for breeding birds, widespread planting of native shrubs and trees, and the creation of water bodies. All planting is envisaged as being sufficiently mature 15 years after opening providing foraging and nesting habitat that will offset any reduction in breeding bird habitat. Whilst some of these areas would be managed by the Applicant as highway estate, the restoration of the Borrow Pits, also designed to provide additional bird breeding habitat, does not have maintenance guaranteed beyond 5 years. As previously stated this is insufficient time for the development of habitat. The County Council feels that opportunities have been missed within the red-line boundary of the Scheme to fully mitigate and compensate for loss of habitat and disruption.
- 14.3.3 Bats of local, district and county importance are to be found along the route. Roosts have been valued from local up to county level and the overall value of the study area for foraging and commuting bats as of district value. The River Great Ouse and Buckden Gravel Pits are identified as key foraging and/or commuting areas together with several key areas that cross the alignment of the road. Bats are present in the hedgerow running through Borrow Pit 1 and high levels of bat activity (pipistrelle and barbastelle) were monitored on a hedgerow and along a tree line on a water course/ditch which link the Scheme with Brampton Wood. These provide connectivity with the wider area.
- 14.3.4 The Applicant states that overall the scheme would have a neutral effect on bats with Table 11.32 indicating that from disturbance and mortality there would be a moderate adverse permanent (probable) impact and a moderate beneficial permanent (probable) impact as a result of habitat gain.

- 14.3.5 The County Council considers that the impacts of the scheme on bat populations and the need for mitigation, particularly at Borrow Pit 1 and the hedgerow linking Brampton Wood with the surrounding area, have not been properly considered. This is a serious omission which does not accord with the scheme's ecological mitigation aims (ES 11.4.3) to maximise existing habitat linkage and designates sites, including Brampton Wood SSSI and Buckden Gravel Pits CWS (for further details see section 11.5).
- 14.3.6 The County Council feels there is scope within the red line boundary and at Borrow Pits 1, 2 and 3 to mitigate impacts on bats and enhance habitats. More new habitat could be created along with replacement of habitat through planting trees and woodland, provision of tall screen planting to elevate flight paths of bats, provision of bat boxes and bat hop-overs, plus maintenance of important bat commuting routes and foraging areas.
- 14.3.7 The Applicant has rightly assessed the impact of the Scheme on protected species such as Great Crested Newts but has failed to give consideration to locally important amphibian populations. This is particularly concerning given that sites supporting good / exceptional sized populations of both Palmate Newts and large populations of Common Toads are known to exist at Debden Farm, near Godmanchester. These are considered to be of county importance and a County Wildlife Site is likely to be designated under the County Wildlife Site Selection Criteria 2014 (version 6). The importance of these local sites has not been demonstrated in the ES or that mitigation is adequate to support these species.
- 14.3.8 With regards to terrestrial invertebrates the Applicant bases findings on surveys carried out in 2013 when four localised areas of interest were identified containing species of local and county importance. However, the 2013 walkover survey excluded the A1 widening as that was not part of the scheme at the time (Es Table 11.2). Despite this change no further surveys have been undertaken.
- 14.3.9 The County Council is concerned that impacts have been assessed on recordings made in 2013 which should have been updated to take account of Scheme changes. It does not agree with the findings and in particular the impacts of habitat loss and changes in environmental conditions which impact on terrestrial invertebrates.

15. PUBLIC RIGHTS OF WAY

- 15.1.1 The diversions to public rights of way (PROW) in the vicinity of the scheme, including reconnecting routes that were previously severed by road improvements, are supported by the County Council. Connectivity of rights of way, as well as provision for Non-Motorised Users (NMU) is provided by a new route along the Local Access Road. This is strongly supported by the County Council.
- 15.1.2 There are, however, significant omissions in provision of PROW access which impact on network connectivity including severance of a bridleway from the highway network near Alconbury. Numbers shown in square brackets after details of each omission refer to the Rights of Way and Access Plan on which the issue has been identified.
- 15.1.3 The Stukeleys Bridleway 6 [2]
- 15.1.4 The existing PROW connects to a layby on the east side of the A1. This layby is a loop of road left from improvement of the A1 in the past. The Applicant proposes to close this layby. The layby provides safe off-road parking from which it is possible to access the countryside. The Applicant has not proposed a replacement layby, nor has any provision been made to connect the severed The Stukeleys 6 PROW to the remainder of the PROW network. This is in conflict with the proposals the Applicant has made elsewhere to reconnect severed PROW.
- 15.1.5 This proposal does not comply with RoWIP SOA1 – Making the Countryside More Accessible, as it will decrease the accessibility of the countryside in this location. The County Council expects development to accommodate and make improvements to existing PROW wherever possible.
- 15.1.6 This proposal does not comply with RoWIP SOA2 – A Safer Activity, as having a dead end bridleway next to the dual carriageway may lead to some users attempting to walk along the carriageway once they get to the end of the bridleway.
- 15.1.7 This proposal does not comply with RoWIP SOA5 – Filling in the Gaps, as it will result in an additional gap in the network which being identified as a problem.
- 15.1.8 This proposed change is in breach of section 130 of the Highways Act 1980 in that it will be contrary to the County Council's duty to prevent, as far as possible, the stopping up or obstruction of PROW. Whilst section 130 excludes trunk roads of

which the layby is part, this will impact on the PROW network and statutory obligations of the County Council.

15.1.9 This could easily be addressed by providing a connection to either Woolley Lane on the western side of the carriageway or to the road at Alconbury Junction via the new private access road.

15.1.10 Omission of a link between Brampton Bridleway 3 and Grafham Road [6]

15.1.11 RAF Brampton is situated adjacent to Borrow Pit 2 and is scheduled to be closed and redeveloped as residential housing over the next five years. A request was made for a Public Footpath link to provide an off-road link between the estate and the countryside served by Grafham Lane, however the HA have said that although they will make the land available they will not create the path. This is a missed opportunity to provide easy and safe access to the countryside to the west of Brampton from the new development.

15.1.12 This does not comply with RoWIP SOA1 – Making the Countryside More Accessible. The County Council expects development to accommodate and make improvements to existing PROW wherever possible and although many public rights of way have been created and reconnected in the area through this scheme, it is felt that this would be an easy opportunity to establish a valuable link on land which will be restored by the HA after use as a borrow pit. Further, that this link will provide a positive legacy of the A14.

15.1.13 The redevelopment of the former RAF base as housing will result in increased public demand for access to the surrounding countryside which this footpath link would facilitate. The siting of borrow pits at this location means that there is a window for establishing a link for future residents of the planned housing estate to gain easy and safe access to the local PROW network through existing Public Footpaths Brampton 3 and 4 and by linking to Grafham Road which connects with a minor road giving access to Brampton Woods Nature Reserve, other PROW and on to Grafham Water. Currently the only way to access Grafham Road from Brampton Park is for NMU users to use the B1514 Buckden Road which is a busy exit road off the A1. Access via a Public Footpath across the former borrow pit site would therefore be substantially safer for users who will be more likely to access the countryside via this route than if the only available route was via a busy B road. There is clearly a demonstrable public need for this link to be provided, which will increase substantially with the redevelopment of the RAF base.

- 15.1.14 The absence of a PROW link at this location does not comply with Cambridgeshire Health and Wellbeing Board Policy 3– Encourage healthy lifestyles and behaviours in all actions and activities while respecting people’s personal choices. Nor does it comply with Huntingdonshire Sustainable Community Strategy – Seeks to promote health and well-being through improving access to the countryside and green space. Whilst it is acknowledged that many substantial improvements are being effected to the local PROW network by the A14 scheme which complement these policies, it is felt that the proximity of this potential link to a planned new estate of 437 dwellings is an opportunity to make it easier for residents to engage in healthy activities without the need to make a car journey to a suitable location.
- 15.1.15 Residents of the new development will not have the opportunity to access the surrounding countryside on foot without using the busy B1514 Buckden Road to gain access, which will make visits to open space for recreational purposes less likely. Existing Brampton Footpaths 3 and 4 do not provide easy links to the surrounding countryside as Footpath 3 leads to the B1514 and Footpath 4 leads to the village, which although very useful for amenity purposes does not provide a direct link to the countryside. Users wishing to access Grafham Lane could do so via Footpath 4 however this would be via a circuitous route going north into the village and then south again via Park Road. Those who do wish to access the countryside are much more likely to do so by car given the lack of a nearby connection to the PROW/minor roads network and the associated absence of an easy opportunity to do so on foot.
- 15.1.16 Eastern end of NMU route between Girton Grange Accommodation Bridge and Weavers Field, Girton [24]
- 15.1.17 This NMU route is shown as terminating where it meets Girton Grange Accommodation Bridge. It had been agreed with the HA that this would be shown as extending along the existing Girton Footpath No. 4 to meet the adopted road known as Weavers Field in Girton.
- 15.1.18 This does not comply with RoWIP SOA1 – Making the Countryside More Accessible. We expect development to accommodate and make improvements to existing PROW wherever possible. Girton had a recorded population of 4500 at the 2011 census and connectivity for residents of the village on pedal cycle and horseback between the 6 mile long NMU route from Swavesey Junction to Girton Grange Accommodation Bridge and the public road (Weaver’s Field) at Girton

should be established as part of the scheme to enable full use to be made of this route.

- 15.1.19 This is a missed opportunity to provide easy access for all classes of NMU to the adjacent countryside for the residents of the south end of Girton and if the link is not provided then cyclists and equestrians will have to travel south along Girton Road, north-west along Huntingdon Road and then around the Girton Interchange and along the NMU route running alongside the new Dry Drayton to Girton LAR before being able to link back to the A14 NMU route at the Crematorium/Dry Drayton junction. This would comprise a detour of approximately three miles which could be avoided by the provision of this short link.
- 15.1.20 Nor does it comply with Cambridgeshire Health and Wellbeing Board Policy 3– Encourage healthy lifestyles and behaviours in all actions and activities while respecting people’s personal choices. An opportunity has been missed as described under SOA1 above.
- 15.1.21 The proposals fail to comply with RoWIP SOA2 – A Safer Activity. The long NMU route will terminate at a Public Footpath, making it a dead-end for users on bicycle and horseback as these users cannot legally use a Public Footpath. It will deter cycle and equestrian users from using the NMU route to gain access to and from Girton as it will not be possible for this route to be promoted to these classes of user. This is likely to result in users on cycle and horseback being forced to use Girton/Cambridge Road and the A1307 main road to gain access to the NMU route via the bridleway to be upgraded Girton Footpath No. 5 resulting in additional potential for conflicts between motorists and NMUs.

15.2. Anomalies in PROW and NMU Routes

- 15.2.1 Numbers shown in square brackets after details of each anomaly refer to the Rights of Way and Access Plan on which the issue has been identified.
- 15.2.2 Footpath No. 15 Brampton [5]
- 15.2.3 This PROW links the proposed diverted route of Bridleway No. 19 Brampton with Brampton village. This is within the scheme boundary and the HA have not agreed to upgrade it to a bridleway to achieve connectivity with the improved Bridleway No. 19. We expect development to accommodate and make improvements to existing PROW wherever possible.

15.2.4 This is not in accordance with RoWIP SOA1 – Making the Countryside More Accessible, as the diverted route of Bridleway No. 19 will not be connected to Brampton village for users on bicycle and horseback. It will prevent cycle and equestrian users from accessing Bridleway No. 19 from Brampton village and discourage sustainable travel modes for access to Brampton Hut Services and the countryside to the west of the A1(T) as it will not be possible for this link to be promoted to these classes of user.

15.2.5 The provision of a bridleway link from the village to this long bridleway would accord with RoWIP SOA2 – A Safer Activity as it would encourage residents of Brampton to use the routes on pedal cycle and horseback and so is likely to remove these classes of user from Thrapston Road which currently forms part of the A14 dual carriageway. This is a very busy stretch of road and is likely to remain so after de-trunking therefore a valuable opportunity to offer a safe alternative route will be lost if this route is not upgraded to bridleway.

15.2.6 The provision of a bridleway link would accord with the following policies:

Cambridgeshire Health and Wellbeing Board Policy 3– Encourage healthy lifestyles and behaviours in all actions and activities while respecting people's personal choices.

Huntingdonshire Sustainable Community Strategy – Seeks to promote health and well-being through improving access to the countryside and green space.

15.2.7 If provided it would provide an easy opportunity for local residents to access the countryside to the west of the A1(T) on pedal cycle or horseback. The omission of this link is a missed opportunity to enable and encourage healthy activities in accordance with the above two health related policies.

15.2.8 Swavesey Bridleway 15 [18]

15.2.9 The route of this PROW on the Rights of Way and Access Plans does not accord with where it is physically on the ground. The Applicant was made aware of this on 1 December 2014 and undertook to correct the plans.

15.2.10 Lolworth Footpath 5 and Bridleway 1 Bar Hill [19]

15.2.11 The new length of Public Footpath to be created by the DCO is not depicted on the part of the route that is within the trunk road boundary. It will be essential for this route to be shown to enable the County Council to update the Definitive Map and

Statement to show the new connection between these routes. If the route is not shown, this will result in the presence of an anomaly on the County Council's legal records.

15.2.12 NMU route running along southern side of Girton Interchange [23]

15.2.13 This NMU route is shown on the DCO Plan as changing direction at right angles to pass around the perimeter of a rectangular area of woodland, which is not ideal for a multi-user route as it will cause safety issues with users being unable to see if the route ahead is clear. Further, the length of deviation is not compatible with encouraging use. It was agreed with the Applicant that there was no requirement for this to change direction in this way and that it would therefore follow the highway boundary through the wooded area. This was agreed at the meeting held on 1 Dec, and is shown this way on General Arrangement Plan Sheet 21 accompanying the DCO, however this change has not been incorporated into the Rights of Way and Access Plan No. 23.

15.2.14 NMU routes that will form part of the trunk/side road

15.2.15 As a general rule, the Applicant has not shown the route of PROW where these lie within public highway. Although the PROW may be legally created as part of public highway, the County Council needs to maintain legal records of the routes in the Definitive Map and legal registers. The routes of PROW within public highway should be shown distinctly on plans to form the basis of legal records. Section 36(6) of the Highways Act 1980 places a duty on Local Authorities to maintain a register of all highways that are maintainable at public expense, including a list showing each individual route.

15.3. Cambridgeshire Green Infrastructure Strategy (2011)

15.3.1 The Cambridgeshire Green Infrastructure Strategy is designed to assist in shaping and co-ordinating the delivery of Green Infrastructure in the county, to provide social, environmental and economic benefits now and in the future.

15.3.2 The Strategy demonstrates how Green Infrastructure can be used to help to achieve four objectives:

- To reverse the decline in biodiversity - The scheme provides new ecological mitigation planting, but as set out below this is not sufficiently extensive.

- To mitigate and adapt to climate change – The scheme is compliant in this objective in that it provides 12km of new NMU routes which provide the opportunities for increased travel by sustainable modes.
- To promote sustainable growth and economic development- The NMU links provide connections between communities across the county and support the growth of communities such as Northstowe.
- To support healthy living and well-being - The scheme is compliant in this objective in that it provides 12km of new NMU routes which provide the opportunities for increased travel by sustainable modes.

15.4. Compliance with Statutory Requirements

Relevant Legislation	Comment	Compliance with Legislation
Wildlife & Countryside Act 1981 s53	The County Council as the Surveying Authority responsible for Public Rights of Way is required to maintain an up-to-date record of all public rights of way (status, extent and maintenance liability), called the Definitive Map & Statement	The County Council expects the Applicant to provide digital data on completion to enable the County Council to discharge its statutory obligations. This will be secured by a separate agreement with the Applicant.
Commons Registration Act 1965 Commons Act 2006	The County Council as the Commons Registration Authority is responsible for maintaining and updating the registers of Common Land and Town/Village Greens.	The County Council expects the Applicant to provide digital data on completion to enable the County Council to discharge its statutory obligations. This will be secured by a separate agreement with the Applicant.
Highways Act 1980 section 36	The County Council as highway authority is responsible for	The County Council expects the applicant to provide

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Wildlife and Countryside Act 1981 section 53	maintaining all public rights of way within its jurisdiction. In order to do this it requires an accurate record of the PROW, required under s53 Wildlife & Countryside Act. Any changes to the PROW network must be certified by CCC as the highway authority before records can be updated.	digital data on completion to enable the County Council to discharge its statutory obligations. This will be secured by a separate agreement with the Applicant.
Highways Act 1980 section 130	The County Council has a statutory duty to ensure that PROW are open and available for use by the public, and if they are to be temporarily diverted or closed, that must be managed safely in accordance with the Act.	The Code of Construction Practice will be expected to include proposals for safe management of PROW across the site.
Road Traffic Regulation Act 1984 section 14	Any temporary closures or diversions or works affecting surface PROW must be notified in accordance with the Act, and reinstated to an acceptable standard.	This is an obligation on the Applicant.
SI 1993 No. 11 The Public Path Orders Regulations 1993	This applies by analogy to any diversions/extinguishments or creations of PROW effected by the DCO. Widths of diverted/created routes must be specified in the Order.	Not compliant as widths for diverted/created PROW are not specified in the Schedule to the DCO.

15.5. Compliance with Established Policies

Relevant policies from Rights of Way Improvement Plan (Local Transport Plan)	Comment	Compliance with Policy
RoWIP SOA1 – Making the Countryside More Accessible	<p>Improvements to PROW that were severed as part of previous road improvements at Bar Hill and Brampton.</p> <p>Provision of long distance NMU route from Swavesey Junction to Girton and to south of A14 from Dry Drayton Junction to Girton</p>	Fully compliant
RoWIP SOA2 – A Safer Activity	Provision of long distance NMU route from Swavesey Junction to Girton and to south of A14 from Dry Drayton Junction to Girton	Fully compliant, as this will separate vulnerable users from A14 and other traffic enhancing safety of users
RoWIP SOA5 – Filling in the Gaps	Provision of new PROW/NMU links to join PROW that were severed by the previous A14 scheme including Lolworth FP5 to Bar Hill BR1 and Brampton BR19 to the highway network to the east of the A1(T)	Fully compliant, providing new connections between communities that have been severed for many years by previous road improvements.
RoWIP SOA7 – Develop	Reconnection of PROW	Compliant in terms of those

Definitive Map and Other Records	links that were severed by previous road improvements improves the legal record by resolving long standing anomalies	routes that are being reconnected but not compliant for two routes – notably - The Stukeleys Bridleway 6 and Brampton Footpath 3.
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15.6. Required Changes to the Proposals

15.6.1 The County Council considers that the Applicant has at this stage provided inadequate detail of proposed changes to the PROW network that have previously been agreed with them. Depiction of NMU routes and PROW on the DCO plans is unclear, with diverted routes of PROW that are situated within the side road boundary not being shown. Where these routes are being physically constructed on the ground this should be clearly indicated in the DCO plans irrespective of whether they are situated within the side road boundary.

15.6.2 RoW and Access Plan Sheet 2

15.6.3 Provide a new PROW connecting the western end of The Stukeleys Bridleway 6 to the new Woolley Lane road on the western side of the A1(T) via an underpass or alternatively if this is not feasible provide a new PROW connecting the western end of the Bridleway with the B1043 at the Alconbury Interchange via a new route running in a northerly direction alongside the A1(T).

15.6.4 RoW and Access Plan Sheet 6

15.6.5 Add a new PROW between Brampton Public Footpath No. 3 and Grafham Lane

15.6.6 RoW and Access Plan Sheet 18

15.6.7 Show Swavesey Bridleway No. 15 on the route on which it is physically present on the ground.

15.6.8 RoW and Access Plan Sheets 19 and 20

15.6.9 Depict Lolworth Footpath No. 5 and Bar Hill Bridleway No. 1 where they are within trunk road boundary.

15.6.10 RoW and Access Plan Sheet 23

15.6.11 NMU route running along southern side of Girton Interchange – route changes direction at right angles to pass around perimeter of wooded area. It was agreed that there was no requirement for this to change direction in this way and that it would therefore carry on straight through the wooded area following the highway boundary, however this change has not been incorporated into the proposals.

15.6.12 RoW and Access Plan Sheet 24

15.6.13 The NMU route is shown as terminating where it meets Girton Grange Accommodation Bridge. It has been agreed with the HA that this would be shown as extending along the existing Girton Footpath No. 4 to meet the adopted road known as Weavers Field in Girton. J2A had agreed to look into this at a meeting held in May 2014 and subsequently agreed that this would be included at a meeting held on 1 Dec 2014.

16. DE-TRUNKING

- 16.1.1 The proposals involve de-trunking of approximately 22km of current dual carriageway trunk road. The County Council has had discussions with the Applicant and is entering into a legal agreement with the Applicant to protect the interests of the County Council in respect of assets for which the County Council will become the local highway authority. In addition to the 22km of de-trunking, there is a further 20km of new and improved local roads to be constructed as part of the project.
- 16.1.2 The County Council is broadly in agreement with the principle that existing sections of A14 that on completion no longer serve a strategic purpose are de-trunked to become local road. However, the Examining Authority are asked to note that these roads are of a scale and type that are not present in the current highway inventory in the County Council's care.
- 16.1.3 To mitigate the burden, the County Council has proposed a legal agreement with the Applicant, and the Applicant has accepted the principle of this agreement. This agreement, which is included in Appendix A, deals with asset condition, design checks, and inspection and testing by the County Council. In addition, it provides for the payment of fees to the County Council and payment of a maintenance contribution in terms of deferred maintenance. The County Council as provided for in the legal agreement, and as proposed by the Applicant, expects the existing A14 to be continued to be maintained, and cleansed up to the date of de-trunking when it will become the responsibility of the County Council.
- 16.1.4 The legal agreement with the Secretary of State dealing with de-trunking, asset condition, handover, maintenance and residual life has yet to be formally agreed and signed. The de-trunking of 22km of trunk road described in Part 3 of Schedule 3 of the DCO will place a significant burden on the County Council's budget. As outlined above, there is no transfer of budget from the Secretary of State to the County Council with which to maintain the de-trunked roads. In consequence the County Council requires the Secretary of State to carry out reasonable works of repair, upgrading and downgrading, and adaptation to reduce the future liability of the County Council in respect of de-trunked roads to a reasonable minimum.
- 16.1.5 The draft DCO in Article 12, paragraph 4 refers to a date of de-trunking to be set by the Undertaker ("On such day as the undertaker may determine,"). It is not acceptable to the County Council that a date for de-trunking can be unilaterally set

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by the Undertaker. The County Council will only agree a date of de-trunking when due diligence processes, and all remedial repairs, alteration, conversion, and improvement works have been completed to CCC reasonable satisfaction, and all redundant assets, cables, services, plant and equipment has been removed.

- 16.1.6 The County Council agrees that it will become responsible for routine planned maintenance from the date of de-trunking, but this does not extend to remedial repairs, defects, and works forming part of de-trunking and carried out by the Applicant. These works will have been carried out by a Contractor under contract to the Applicant, and the provisions of that contract will have set out a defects liability period during which the Contractor will be responsible for defects correction. As the County Council will have no benefit of that contract, it contends that responsibility for defects in construction, repairs, and remedial works carried out by the Contractor rightfully remain with the Applicant for the duration of the defects liability period specified in the contract.
- 16.1.7 Further, the County Council expects the Applicant to consult with the County Council before accepting construction defects in any roads to become the responsibility of the County Council.
- 16.1.8 Unless and until the County Council has been able to evaluate the condition of the sections of A14 to be de-trunked, and the legal agreement has been signed with the Applicant, the County Council does not agree to the de-trunking provisions of the Order. The County Council will deposit into Examination a copy of the signed agreement and relevant Statement of Common Ground when this is available, at which point the County Council will agree to de-trunking of the A14.

17. ASSET DEFINITION (LEGAL RECORDS)

17.1.1 The County Council as the Local Highway Authority is responsible for all highways maintainable at public expense within the administrative area of Cambridgeshire. It is also statutorily responsible for protecting and asserting public rights over all highways whether maintainable at public expense or not. In 2014 the County Council adopted an asset management approach in order to make the best use of its limited resources whilst taking into account taking into consideration customer needs, local priorities, asset condition. This is set out in its Highway Asset Management Policy, Highway Asset Management Strategy, and will be delivered through a rolling ten-year Highway Infrastructure Asset Management Plan ('HIAMP'), reviewed annually. The HIAMP brings together the County Council's Corporate and Local Transport Plan (LTP3) goals and objectives:

- Supporting and protecting people when they need it most
- Helping people to live independent and healthy lives in their communities
- Developing our local economy for the benefit of all

17.1.2 In order to be able to deliver on its HIAMP, the County Council needs to know the extent of its liability. It depends for this upon its statutory highway asset records, which it maintains under its duty under section 36 Highways Act 1980 , and under section 53 Wildlife & Countryside Act 1981. (This duty requires it to maintain the Definitive Map & Statement for Cambridgeshire, which is the legal record of public rights of way).

17.1.3 Any permanent changes to these legal asset registers require a clear evidential audit trail in order that the Authority can be confident as to what it is liable for and what it is not. If they are not, an historic lack of consistency in plans and records is compounded, and significant public resource will be wasted when disputes arise. For example, an investigation in 2010 into the liability for an A1(M) slip road at Alconbury cost over £10,000 and took over a year to resolve. Therefore all changes to highway assets arising from the A14 scheme, including boundaries, extents, class of highway, use of land categories within the highway boundary and boundary features, need to be accurately recorded.

17.1.4 The Draft DCO was published on 30th December 2014 does address concerns about article 11(4) relating to the maintenance of culverts for altered private streets and

highways, and with regard to a consistent and legally acceptable definition of non-motorised user routes wherever they appear in the Order Schedule 1 Authorised Works and in the General Arrangement and Rights of Way & Access Plans. The County Council understands that this is challenging due to the constraints of terminology available in the Highways Act 1980, and accepts the solution proposed for example at Schedule 1 Work 5(y) 'a footway, cycleway and equestrian track', providing this is consistently applied. This is to ensure that the purpose, location and extent of each route is clear to enable the County Council to accurately amend its records and provide advice to the public as to the connectivity and rights that exist, and that anyone interpreting the DCO in years to come will come to the same conclusion.

- 17.1.5 GIS files of the DCO plans requested were received on 3rd February 2015 enabling the County Council to undertake an accurate comparison of asset data for the existing and proposed highway extents. Detailed comments identifying outstanding problems were provided back to the applicant as a Detailed Assessment in the Record of Agreement: Highway Asset Records Rev 0 20.03.2015 (Appendix 1).
- 17.1.6 The County Council has requested that a copy of the made DCO, the associated Plans, and Detailed Designs be provided to the County Council in GIS format, and the Applicant works with the County Council to develop the records of the scheme, and transfer those on completion to the County Council.
- 17.1.7 The principles agreed with the Applicant set out above mean that the County Council will, in general, be able to meet its statutory obligations identified above. They also mean that the County Council will be able to meet its ROWIP Statement of Action 7/1 Map consolidation – accurate interactive map, which requires it to 'Consolidate historic changes onto a single reissued [Definitive] Map, [and to ensure that the Map is] represented electronically on GIS to reach the widest public arena'.
- 17.1.8 The importance of accurate records of rights of way is discussed further in the section on Public Rights of Way.

18. REQUIRED CHANGES TO THE DEVELOPMENT CONSENT ORDER

18.1.1 The following changes to the draft Development Consent Order are considered necessary by the County Council.

Part 3, Article 12, Item 4

18.1.2 Change the words “On such a day as the undertaker may determine” in Article 12, paragraph 4 to “On such a day as may be agreed between the undertaker and the local highway authority and subject to the completion of all agreed remedial works”.

18.1.3 Required to ensure that the date of de-trunking is a date of mutual agreement between the County Council and the Undertaker. Required to protect the County Council as local highway authority, and to ensure that de-trunked roads are transferred to the local highway authority in reasonable and acceptable condition.

18.1.4 The draft legal agreement in Appendix A provides for de-trunking to occur only when a Handover Plan has been agreed, and the necessary works completed. It also provides for the date of de-trunking to be a matter of agreement with the County Council. In consequence, the Development Consent Order requires modification to be consistent with this undertaking.

Part 6 Classification of Roads Section 9

18.1.5 Change “A141 Trunk Road” to “A141 Classified Road”.

18.1.6 Required as this section of the existing A14 is to be de-trunked and reclassified as the A141. It will not be a trunk road. This is agreed between the Applicant and the County Council.

Part 6 Classification of Roads Section 10

18.1.7 Change “A1307 Huntingdon Road Classified Road” to “A1307 Classified Road”.

18.1.8 Required as the A1307 is only known as ‘Huntingdon Road’ in Cambridge.

Schedule 2, Part 1, Requirement 3

18.1.9 Substitute the Requirement as written with:

3.—No part of the authorised development must commence until written details of the code of construction practice for that part have been submitted to and approved by the Secretary of State, following consultation with the relevant planning authority.

18.1.10 Required to secure consultation with the relevant local planning authority in development and approval of the Code of Construction Practice. Consultation with the County Council has been agreed by the Applicant, and the Development Consent Order requires modification to be consistent with this undertaking.

Schedule 2, Part 1, Requirement 7

18.1.11 Substitute “*relevant planning authority*” for “*relevant authority*”. This would make Requirement 7 consistent with other Requirements, and ensure that the County Council was consulted (and reasonable comments adopted) in addition to Historic England. If the Examining Authority considers that Requirement 7 does not need amendment, then a direction by the Examining Authority that Cambridgeshire County Council is a relevant authority for non-designated cultural heritage assets is requested.

18.1.12 Required to secure consultation with respect to Written Schemes of Investigation and protect cultural heritage assets in the County of Cambridgeshire.

Schedule 2, Part 1, Requirement 10

18.1.13 Substitute the Requirement as written with:

10.—(1) No excavation of borrow pits forming part of the authorised development must commence until written details of the excavation, operation restoration, and aftercare for those borrow pits, including means of noise and air quality mitigation, have been submitted to and approved by the Secretary of State, following consultation with the relevant planning authority.

(2) The borrow pits must be constructed, operated and restored in accordance with the approved details referred to in sub-paragraph (1).

18.1.14 Required to secure consultation with Cambridgeshire County Council as the mineral planning authority, and to ensure the borrow pits meet the operational and restoration standards required for mineral extraction in the County of Cambridgeshire. The County Council considers that the Applicant has provided at

this stage inadequate detail of the proposed restoration of the borrow pits. In consequence, in the view of the County Council, the planned borrow pits are likely to be restored to a lesser standard than mineral workings in Cambridgeshire generally. The Applicant's proposals do not comply with the established policies of the County Council as are normally applied to consents for mineral extraction in Cambridgeshire.

Schedule 2, Part 1, New Requirement 11

18.1.15 Add a new Requirement as follows:

11.—(1) No part of the authorised development is to commence until final pre-construction survey work for that part has been carried out to establish whether County or District important species are present on any of the land affected, or likely to be affected, by any part of the authorised development or in any of the trees and shrubs to be lopped or felled as part of the authorised development.

(2) Where an important species is shown to be, or where there is a reasonable likelihood of it being present, the relevant parts of the relevant works must not begin until a scheme of protection and mitigation measures has been submitted to and approved in writing by the Secretary of State after consultation with the relevant planning authority.

(3) The relevant works must be carried out in accordance with the approved scheme, and under licence where necessary, unless otherwise agreed by the Secretary of State, after consultation with the relevant planning authority

18.1.16 Required to secure protection of species of County or District Importance and to ensure consultation with the County Council and/or District Council concerned.

Schedule 4

18.1.17 Schedule 4 does not provide any detail of the width of PROW and/or new highway to be diverted or created as part of the scheme. This is vital to enable the County Council to effectively take enforcement against encroachment onto the PROW. Any diversion of a PROW undertaken by the County Council or any other Government organisation must specify the width of any alternative route. It is therefore essential that these details are specified in Schedule 4.

18.1.18 This is a requirement of DEFRA Advice Note 16.

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19. CONCLUSION

- 19.1.1 The A14 project is essential to the continued economic success of Cambridgeshire, both in attracting investment and facilitating planned growth, but also in reducing congestion that makes it difficult to do business and work in Cambridge and Huntingdon. Long delays and frequent accidents blight the existing A14 which remains essentially the same as it was in 1993 when the M1/A1 link was completed and the A604 road became part of the A14 from the M1 to Felixstowe.
- 19.1.2 It is not overstating the problem to say that the A14 is notorious and well known as a delay blackspot. Proposals to improve it have been in development since 1989, and the cost of improving it becomes a reason for cancellation and postponement. Often these postponements lead to a study to find an alternative solution, yet the studies consistently find that the best solution is the route currently being proposed. Extensive consultation has been carried out, and the proposals evaluated and re-evaluated, yet the conclusions of these studies remain much the same, a bypass south of Huntingdon and online widening of the A14 to Cambridge.
- 19.1.3 It would be naïve to assume that there is no negative impact of such a huge project, and there are. However, they are generally in the minority compared to those who will benefit from secure jobs, economic growth, and new homes. All these depend on the A14 to happen. The County Council strongly supports the scheme, and is keen to see the issues and missed opportunities addressed, with further clarification on proposals or additional mitigation to address impacts where possible. This will help to ensure that the scheme delivers on the range of benefits sought and a positive legacy for the continued growth and prosperity of Cambridgeshire.

APPENDICES

Documents, Drawings and Policies relied upon in the Written Representation.

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APPENDIX A – LEGAL AGREEMENT

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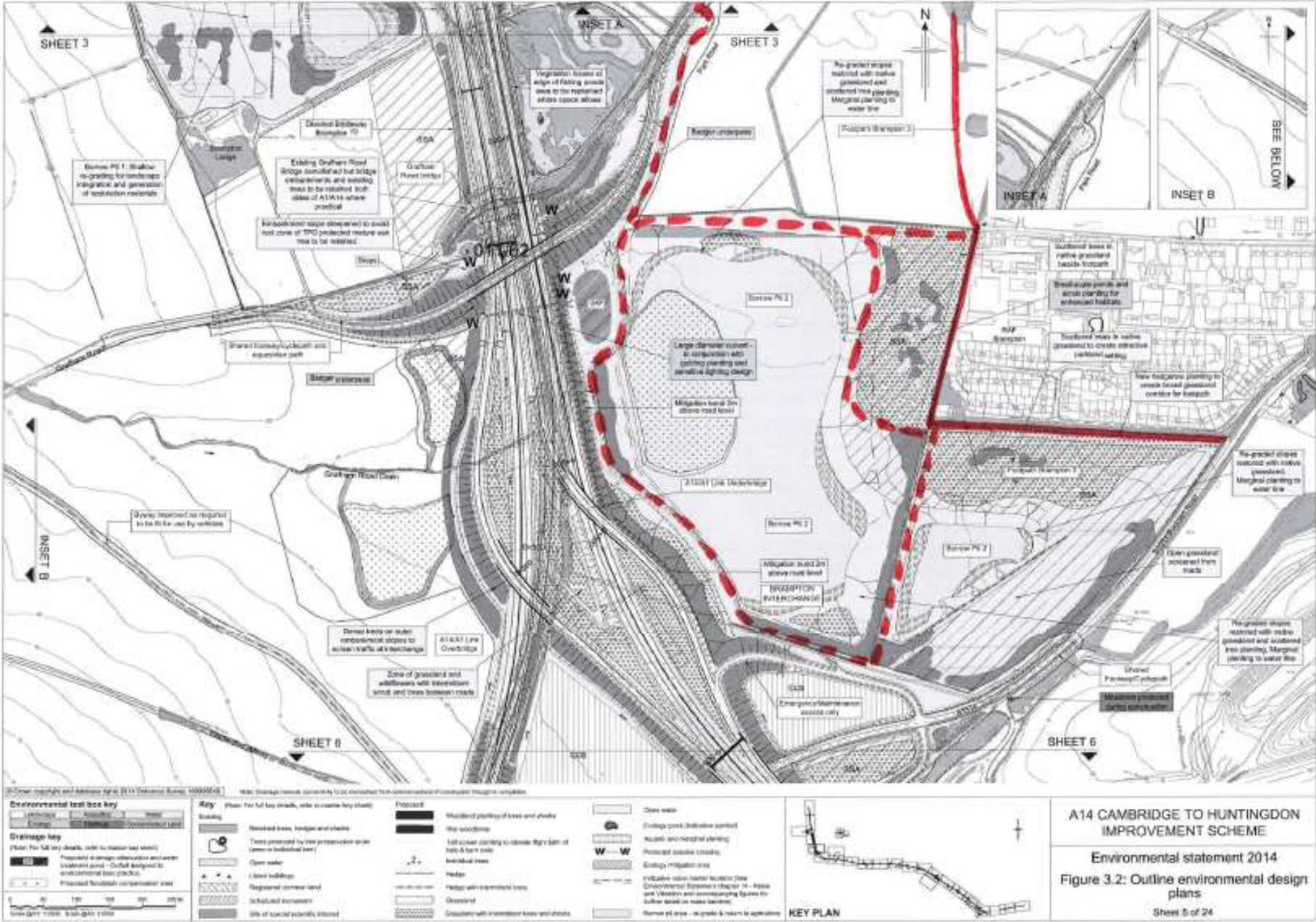
APPENDIX B – BORROW PITS

B1 Public Rights of Way

Proposed public rights of way at borrow pit sites

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B2 Policy Assessment of The A14 Borrow Pits – Degree Of Compliance With Cambridgeshire And Peterborough Minerals And Waste Plan



Compliant with Policy



Currently considered contrary to Policy

Borrow pit	Relevant policies from Core Strategy (CS) and Site Specific Proposals Plan (SSP) (n.b. see Appendix 1)	Review of Environmental Statement	Comment	Compliance with Policy
West of Brampton M9T / Highway Agency Borrow pit No. 1	CS11 Sand and Gravel Borrow pits / SSP M2 Area of Search Allocations for Sand and Gravel Borrow pits	The proposed borrow pit extends northwards beyond the Area of Search identified to the west of Brampton, whilst a substantial part of the southern area remains unused.	The northwards extension is not a concern, provided relevant environmental policies can be satisfied. The road scheme itself sterilises part of the southern area, which together with a fuel pipeline would limit opportunities within this area.	The proposed borrow pit broadly aligns with the area of search.
	CS13 Additional Mineral Extraction	This site extends beyond the Area of Search allocated to the	There is a demonstrated need for the material and, in principle,	The County Council accepts that the extension area can be

		west of Brampton.	the characteristics of the extension area are very similar to the allocated area.	treated as an exception within the scope of Policy CS13.
	CS22 Climate Change	The drainage scheme for the road scheme takes into account the need to design for climate change.	It is disappointing that the borrow pit proposals fail to recognise the potential to contribute to climate change adaptation for the wider area, both in terms of flood water storage and biodiversity.	The site has the potential to make a positive contribution towards resolving local flooding issues in Brampton, via Brampton Brook. A more positive approach to the creation and management of biodiversity habitats would also make a positive contribution to climate change adaption within the County.
	CS23 Sustainable Transport of Minerals and Waste	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS25 Restoration and Aftercare of Mineral and Waste Management Sites	The application proposes the restoration of the site to a series of landscaped lagoons, with	In principle the scheme could satisfy the requirement to provide creation of BAP habitat	At present the application provides no assurance that beneficial afteruses can be

		potential for the development of wildlife habitats and quiet recreation.	i.e. reedbed and wet woodland. However, without a ten-year aftercare management scheme, there is no guarantee that a beneficial after use would be achieved. Similarly no mechanism is proposed to provide public access. The application also fails to provide a phased restoration scheme, which is considered necessary given an operational period of up to 4 years.	achieved and is therefore considered to be contrary to policy. A phased restoration scheme is also required.
	CS32 Traffic and Highways	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS33 Protection of Landscape Character	Changes to the landscape of the area will occur as a result of extensive borrow pit workings.	Subject to the consideration of detailed landscaping schemes, it is accepted that the borrow	Compliant with Policy on the assumption that a detailed landscaping scheme and five-

		Structural planting will help to integrate this with the wider landscape.	pits can be satisfactorily assimilated into the local landscape.	year aftercare programme will be agreed as proposed in the Landscape Assessment.
	CS34 Protecting Surrounding Uses	This is only covered at a high level in the Noise and Vibration Assessment. The noise assessment is not based on appropriate guidance (National Planning Practice Guidance for Minerals) and therefore underestimates the significance of impacts. Dust mitigation would be achieved through the Code of Constriction Practice.	The proposed workings are within 200m of Rectory Farm and Brampton Lodge. These are not specifically mentioned in the ES and noise assessment of these properties will be required together with appropriate mitigation. The proximity of the soil storage area to Rectory Farm is of concern in relation to both noise and dust.	The EIA fails to apply the appropriate standard for noise. Detailed noise assessments are required for Rectory Farm and Brampton Lodge. The soil storage area should be set back further from Rectory Farm. The landscaping scheme should also be designed having regard to long term visual impacts on these properties.
	CS35 Biodiversity and Geodiversity	The EIA notes that works are 550m from Brampton Wood, a SSSI (ancient woodland, with important butterfly and dormice	Borrow pit no. 1 actually appears to be nearer 425m from the edge of Brampton Wood. The hydrological assessment	Potential impacts upon Brampton Wood require some further clarification. More significantly there has been no

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		populations). Effects on the Wood are considered to be neutral. Bats are also identified as being present in the hedgerow running through the borrow pit site.	concludes that dewatering will not affect the Wood. There appears to be no detailed assessment of potential dust impacts, though the distance itself may be sufficient mitigation.	proper consideration of the impacts and need for mitigation in relation to bat populations in the hedgerow between the Wood and the A1. (See also CS39 below)
	CS36 Archaeology and the Historic Environment	The site is recognised as being archaeologically sensitive and the assessment concludes that the borrow pit will have a major impact on multi-period archaeological remains. Targeted excavation is proposed by way of mitigation.	Further information (physical evidence) required to assess whether proposed mitigation is sufficient and appropriate, supported by illustrations showing areas of intended mitigation types. Interpretation of excavated heritage assets and erection of interpretation boards should be considered as part of restoration.	Not compliant with policy as the ES has not defined satisfactory mitigation measures for the Borrow Pits.
	CS37 Public Rights of Way	Existing rights of way within the site are to be retained or	Satisfactory proposals are made for the safeguarding of existing	The opportunity should be taken to improve the rights of way

		diverted.	routes, but the policy also expects developments to take opportunities to enhance the network. The failure to do so is particularly disappointing given that the site is identified as being suitable for informal recreation post restoration.	network within the site.
	CS38 Sustainable Use of Soils	The site is grade 2 agricultural land. A Soil Management Strategy has been prepared which seeks to mitigate potential impacts on soil resources and ensure the sustainable management of soil resources.	It is accepted that the loss of high grade agricultural land is unavoidable and that restoration to agriculture is not viable. In terms of the sustainable use of surplus soils, the HA should approach local mineral and waste operators with a view to using these to assist restoration on other sites.	Compliant with policy on the assumption that the Soil Management Strategy will be applied.
	CS39 Water Resources and Water Pollution Prevention	A long term surface water pattern is proposed and the ES concludes that potential effects from dewatering the borrow pit can be satisfactorily mitigated,	Further assessment is critical to ensure the avoidance of impacts as a result of dewatering. The assurances in respect of Brampton Wood	Some further assessment required of potential impacts, particularly in relation to Brampton Wood.

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		further assessment being required to determine the precise mitigation measures.	appear to be based on speculation rather than fact and this should also be subject to further assessment.	
	CS41 Ancillary Development	None identified		Not an issue
South West Brampton / Highway Agency Borrow pit No. 2	CS11 Sand and Gravel Borrow pits / SSP M2 Area of Search Allocations for Sand and Gravel Borrow pits	The proposed borrow pit sits wholly within the allocated site.		Compliant with Policy.
	CS22 Climate Change	The drainage scheme for the road scheme takes into account the need to design for climate change.	It is disappointing that the borrow pit proposals fail to recognise the potential to contribute to climate change adaptation for the wider area in terms of biodiversity. This site might also have some potential to provide surface water attenuation for the RAF	A more positive approach to the creation and management of biodiversity habitats would make a positive contribution to climate change adaption within the County. The potential for providing surface water attenuation to RAF Brampton is worth investigation.

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			Brampton redevelopment.	
	CS23 Sustainable Transport of Minerals and Waste	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS25 Restoration and Aftercare of Mineral and Waste Management Sites	The application proposes the restoration of the site to two landscaped lagoons, with potential for the development of wildlife habitats and quiet recreation, possibly including a pocket park for Brampton.	In principle the scheme could satisfy the requirement to provide creation of BAP habitat i.e. reedbed and wet woodland. However, without a ten-year aftercare management scheme, there is no guarantee that a beneficial after use would be achieved. Similarly no mechanism is proposed to provide public access. The application also fails to provide a phased restoration scheme, which is considered necessary given an operational period of up to 4 years.	At present the application provides no assurance that beneficial afteruses can be achieved and is therefore considered to be contrary to policy. A phased restoration scheme is also required.
	CS32 Traffic and Highways	The proposed borrow pit is	The proposal accords with the	Compliant with Policy.

		adjacent to the road scheme.	policy in that it will minimise transport distance and traffic movements on local roads.	
	CS33 Protection of Landscape Character	Changes to the landscape of the area will occur as a result of extensive borrow pit workings. Structural planting will help to integrate this with the wider landscape.	Subject to the consideration of detailed landscaping schemes, it is accepted that the borrow pits can be satisfactorily assimilated into the local landscape.	Compliant with Policy on the assumption that a detailed landscaping scheme and 5 year aftercare programme will be agreed as proposed in the Landscape Assessment.
	CS34 Protecting Surrounding Uses	This is only covered at a high level in the Noise and Vibration Assessment. The noise assessment is not based on appropriate guidance (National Planning Practice Guidance for Minerals) and therefore underestimates the significance of impacts. Dust mitigation would be achieved through the Code of Constriction Practice.	The edge of the borrow pit is about 150m from the edge of the RAF Brampton housing area, whilst the proposed soil storage area comes right up to the residential boundary. The noise assessment predicts 'temporary annoyance, to 10 properties for a period of up to 42 months. The dust assessment similarly recognises that there will be negative	The EIA fails to apply the appropriate standard for noise and fails to satisfactorily address potential dust impacts. Detailed noise and dust assessments should be carried out and the proposals reviewed having regard to this. This may show a greater impact and a larger number of properties affected. The landscaping scheme should also be

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			effects but suggests these can be mitigated with best practice measures.	designed having regard to long term visual impacts on these properties.
	CS35 Biodiversity and Geodiversity	No significant features identified within or adjacent to site.	No concerns in terms of protection of existing biodiversity interests.	Compliant with policy.
	CS36 Archaeology and the Historic Environment	The site is recognised as being archaeologically sensitive and the assessment concludes that the borrow pit will have a major impact on multi-period archaeological remains. Targeted excavation is proposed by way of mitigation.	Further information (physical evidence) required to assess whether proposed mitigation is sufficient and appropriate, supported by illustrations showing areas of intended mitigation types. This site is a known location of Palaeolithic material, as found in the gravel body at Woolpack Farm. Such early archaeological evidence is of national importance. As well as prior archaeological investigations before gravel extraction, a strategy will need to include provision for monitoring the gravel extraction	Not compliant with policy as the ES has not defined satisfactory mitigation measures for the Borrow Pits

			process so that any ancient land surfaces or glacial/interglacial rivers are appropriately investigated and recorded.	
	CS37 Public Rights of Way	An existing public right of way around the perimeter of the site is to be retained.	Satisfactory proposals are made for the safeguarding of existing routes, but the policy also expects developments to take opportunities to enhance the network. The failure to do so is particularly disappointing given that the site is identified as being suitable for informal recreation post restoration.	The opportunity should be taken to improve the rights of way network within the site.
	CS38 Sustainable Use of Soils	The site is grade 2 agricultural land. A Soil Management Strategy has been prepared which seeks to mitigate potential impacts on soil resources and ensure the sustainable management of soil resources.	It is accepted that the loss of high grade agricultural land is unavoidable and that restoration to agriculture is not viable. In terms of the sustainable use of surplus soils, the HA should approach local mineral and waste operators with a view to using these to assist restoration	Compliant with policy on the assumption that the Soil Management Strategy will be applied.

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			on other sites.	
	CS39 Water Resources and Water Pollution Prevention	A long term surface water pattern is proposed and the ES concludes that potential effects from dewatering can be satisfactorily mitigated, further assessment being required to determine the precise mitigation measures.	Further assessment is critical to ensure the avoidance of impacts as a result of dewatering.	Compliant with policy on the assumption that mitigation measures will be developed as proposed.
	CS41 Ancillary Development	None identified		Not an issue
Galley Hill Fenstanton (M2A) & Oxholme Farm (M2B) / Highway Agency Borrow pit No. 3	CS11 Sand and Gravel Borrow pits / SSP M2 Area of Search Allocations for Sand and Gravel Borrow pits	The proposed borrow pit sits wholly within the allocated site.		Compliant with Policy.
	CS22 Climate Change	The drainage scheme for the road scheme takes into account the need to design for climate change.	It is disappointing that the borrow pit proposals fail to recognise the potential to contribute to climate change adaptation for the wider area, both in terms of flood water	The site has potential to make a positive contribution towards resolving local flooding issues around Fenstanton. A more positive approach to the creation and management of

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			storage and biodiversity.	biodiversity habitats would also make a positive contribution to climate change adaption.
	CS23 Sustainable Transport of Minerals and Waste	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS25 Restoration and Aftercare of Mineral and Waste Management Sites	The application recognises the potential of this site for wildlife habitat creation, particularly given its location adjacent to the existing Fenstanton Pits County Wildlife Site.	It is agreed that the site is suitable for the creation of BAP habitat, particularly reedbed and wet woodland. However, without a ten-year aftercare management scheme, there is no guarantee that a beneficial after use would be achieved. The application also fails to provide a phased restoration scheme, which is considered necessary given an operational period of up to 4 years.	At present the application provides no assurance that a beneficial afteruse can be achieved and is therefore considered to be contrary to policy. A phased restoration scheme is also required.
	CS32 Traffic and Highways	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise	Compliant with Policy.

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			transport distance and traffic movements on local roads.	
	CS33 Protection of Landscape Character	Changes to the landscape of the area will occur as a result of borrow pit workings. Structural planting will help to integrate this within the wider landscape.	Subject to the consideration of a detailed landscaping scheme, it is accepted that the borrow pits can be satisfactorily assimilated into the local landscape.	Compliant with Policy on the assumption that a detailed landscaping scheme and five-year aftercare programme will be agreed as proposed in the Landscape Assessment.
	CS34 Protecting Surrounding Uses	This is only covered at a high level in the Noise and Vibration Assessment. The noise assessment is not based on appropriate guidance (National Planning Practice Guidance for Minerals) and therefore underestimates the significance of impacts. Dust mitigation would be achieved through the Code of Construction Practice.	There are several properties within or just over 200m of the site. Noise assessment is required to demonstrate that these properties will not be significantly affected over the working life of the site.	The EIA fails to apply the appropriate standard for noise. Detailed noise assessments are required for the closest residential properties.
	CS35 Biodiversity and Geodiversity	The Assessment concludes that there will be no adverse effect upon the adjacent Fenstanton	There is no specific assessment of potential dust impacts on the County Wildlife Site and this will	Further consideration of potential dust impacts required, together with more detailed

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		County Wildlife Site. The potential for this site to provide biodiversity gain is acknowledged, but not guaranteed beyond the initial 5 year aftercare period.	require careful consideration and mitigation to avoid adverse effects on species including dragonflies. The failure to fully realise the potential enhancements to biodiversity is disappointing.	proposals for restoration and management of the site. (See also CS39 below)
	CS36 Archaeology and the Historic Environment	The site is recognised as being archaeologically sensitive and the assessment concludes that the borrow pit will have a major impact on multi-period archaeological remains. Targeted excavation is proposed by way of mitigation.	Further information (physical evidence) required to assess whether proposed mitigation is sufficient and appropriate, supported by illustrations showing areas of intended mitigation types.	Not compliant with policy as the ES has not defined satisfactory mitigation measures for the Borrow Pits
	CS37 Public Rights of Way	Adjacent footpath on northern boundary not affected.	The site is not suitably located to merit consideration of providing public access.	Compliant with Policy
	CS38 Sustainable Use of Soils	The site is grade 2 agricultural land, but will not be restored to agriculture.	The loss of high grade agricultural land is considered acceptable on this site, given the benefits of the scheme.	Compliant with Policy.

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	CS39 Water Resources and Water Pollution Prevention	A long term surface water pattern is proposed and the ES concludes that potential effects from dewatering the borrow pit can be satisfactorily mitigated, further assessment being required to determine the precise mitigation measures.	The assessment gives no specific consideration to the potential effects of dewatering on the immediately adjacent County Wildlife Site. This needs proper consideration.	Combined hydrological/ecological assessment required of potential effects on Fenstanton County Wildlife Site.
	CS41 Ancillary Development	None identified		Not an issue
Boxworth / Highway Agency Borrow pit No. 5	CS12 Engineering Clay / SSP M7 Area of Search Allocations for Engineering Clay Borrow pits	The proposed borrow pit is adjacent to but completely outside of the Area of Search identified in the Mineral and Waste Plan.	The location just outside of the allocated area is not a concern, provided relevant environmental policies can be satisfied.	The proposed borrow pit broadly aligns with the area of search.
	CS13 Additional Mineral Extraction	This site sits just outside the allocated area of search at Boxworth.	There is a demonstrated need for the material and, in principle, the characteristics of the proposed site are similar to the allocated area, albeit that it sits on slightly elevated ground.	The County Council accepts that this site can be treated as an exception within the scope of Policy CS13.

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	CS22 Climate Change	The drainage scheme for the road scheme takes into account the need to design for climate change.	There are no additional climate change issues in relation to this site.	Compliant with Policy
	CS23 Sustainable Transport of Minerals and Waste	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS25 Restoration and Aftercare of Mineral and Waste Management Sites	The application proposes the restoration of the site to agriculture.	This is considered to be an appropriate afteruse for the site.	Compliant with Policy.
	CS32 Traffic and Highways	The proposed borrow pit is close to the road scheme and provision is made for vehicular access to the site within the red line.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads. On the understanding that access is to be taken in fields alongside Boxworth Road and not use the public highway, there is no objection in terms of this policy.	Compliant with Policy.
	CS33 Protection of Landscape	Changes to the landscape of	Subject to the consideration of	Compliant with Policy on the

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	Character	the area will occur as a result of reducing the current ground contours, but it will be possible to recreate an acceptable landform and landscape.	detailed landscaping schemes, it is accepted that the borrow pit can be satisfactorily assimilated into the local landscape.	assumption that a detailed landscaping scheme and five-year aftercare programme will be agreed as proposed in the Landscape Assessment.
	CS34 Protecting Surrounding Uses	The noise assessment is not based on appropriate guidance (National Planning Practice Guidance for Minerals). Dust mitigation would be achieved through the Code of Construction Practice.	Whilst noise needs to be properly addressed, there is unlikely to be any significant issue given that the closest residential property is 400 metres from the site. Dust mitigation will be required to avoid damage to crops on adjacent land.	Compliant with policy on the assumption that satisfactory mitigation of noise and dust will be applied through the CoCP.
	CS35 Biodiversity and Geodiversity	No identified concerns in relation to this site.		Compliant with Policy.
	CS36 Archaeology and the Historic Environment	There are a number of identified archaeological assets on the periphery of the site and the ES proposes a geophysical survey and targeted excavation.	Further information (physical evidence) required to assess whether proposed mitigation is sufficient and appropriate, supported by illustrations showing areas of intended	Not compliant with policy as the ES has not defined satisfactory mitigation measures for the Borrow Pits

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			mitigation types.	
	CS37 Public Rights of Way	Existing rights of way on boundary to be protected during and after working.	The existing route can be adequately safeguarded and no new routes are considered necessary on this site.	Compliant with Policy.
	CS38 Sustainable Use of Soils	The site is grade 2 agricultural land and will be restored to agriculture. The Soil Management Strategy should mitigate impacts and ensure satisfactory restoration.	Subject to satisfactory implementation of the soil management strategy and a five year aftercare programme, the proposals are considered acceptable.	Compliant with policy on the assumption that the Soil Management Strategy will be applied.
	CS39 Water Resources and Water Pollution Prevention	No significant drainage issues are raised by this borrow pit and the matter is satisfactorily addressed.		Compliant with Policy.
	CS41 Ancillary Development	None identified		Not an issue
North of Dry Drayton Junction, Slate Hall Farm	CS12 Engineering Clay / SSP M7 Area of Search Allocations for Engineering Clay Borrow pits	The proposed borrow pit extends northwards beyond the Area of Search identified.	The extension is not a concern, provided relevant environmental policies can be satisfied.	The proposed borrow pit broadly aligns with the area of search.

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(M7E) / North of Junction 14, Grange Farm (M7F) / Highway Agency Borrow pit No. 6	CS13 Additional Mineral Extraction	This site extends beyond the Area of Search.	There is a demonstrated need for the material and, in principle, the characteristics of the extension area are very similar to the allocated area.	The County Council accepts that the extension area can be treated as an exception within the scope of Policy CS13.
	CS22 Climate Change	The drainage scheme for the road scheme takes into account the need to design for climate change.	To provide a more beneficial afteruse for this site, consideration should be given to the potential to contribute to climate change adaptation for the wider area in terms of flood water storage.	The site may have some potential to assist with flood attenuation problems at Girton via Beck Brook.
	CS23 Sustainable Transport of Minerals and Waste	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS25 Restoration and Aftercare of Mineral and Waste Management Sites	The application proposes restoration partly to agriculture and partly to shallow, landscaped waterbodies.	Given its location and constraints it is difficult to envisage a more beneficial after use for this site.	Compliant with Policy on the assumption that restoration proposals and a five-year aftercare programme will be satisfactorily implemented.

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	CS32 Traffic and Highways	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS33 Protection of Landscape Character	Changes to the landscape of the area will occur as a result of extensive borrow pit workings. Structural planting will help to integrate this with the wider landscape.	Subject to the consideration of a detailed landscaping scheme, it is accepted that the borrow pits can be satisfactorily assimilated into the local landscape.	Compliant with Policy on the assumption that a detailed landscaping scheme and five-year aftercare programme will be agreed as proposed in the Landscape Assessment.
	CS34 Protecting Surrounding Uses	This is only covered at a high level in the Noise and Vibration Assessment. The noise assessment is not based on appropriate guidance (National Planning Practice Guidance for Minerals) and therefore underestimates the significance of impacts. Dust mitigation would be achieved through the Code of Constriction Practice.	There are residential properties within 200 metres of the proposed site, albeit those to the south of the A14 will be heavily influenced by existing road traffic noise. However, some further detailed assessment is necessary to ensure satisfactory mitigation.	The EIA fails to apply the appropriate standard for noise. Some further assessment is required.
	CS35 Biodiversity and	There are no identified concerns		Compliant with Policy.

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	Geodiversity	in relation to this site.		
	CS36 Archaeology and the Historic Environment	The site is recognised as being archaeologically sensitive and the assessment concludes that the borrow pit will have a major impact on multi-period archaeological remains. Targeted excavation is proposed by way of mitigation.	Further information (physical evidence) required to assess whether proposed mitigation is sufficient and appropriate, supported by illustrations showing areas of intended mitigation types.	Not compliant with policy as the ES has not defined satisfactory mitigation measures for the Borrow Pits
	CS37 Public Rights of Way	Rights of way are not affected by this site.	No new rights of way are considered necessary within this site.	Compliant with Policy.
	CS38 Sustainable Use of Soils	The site is grade 2/3 agricultural land. A Soil Management Strategy has been prepared to mitigate potential impacts on soil resources and ensure the sustainable management of soil resources.	It is accepted that the loss of high grade agricultural land is unavoidable and that restoration of the whole site to agriculture is not viable.	Compliant with policy on the assumption that the Soil Management Strategy will be applied.
	CS39 Water Resources and Water Pollution Prevention	No significant drainage issues are raised by this borrow pit and		Compliant with Policy.

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		the matter is satisfactorily addressed.		
	CS40 Airport Safeguarding	The site is within the safeguarding zone for Cambridge Airport. It is proposed that the restoration scheme will seek to minimise the attractiveness of the site for birds.	It is difficult to see how the combination of open water and landscaping will not provide some attraction to birds. Consultation needs to take place with the safeguarding authority to assess the level of any potential concerns.	This issue currently requires more detailed consideration. Some feedback from the safeguarding authority would be useful.
	CS41 Ancillary Development	None identified		Not an issue
Weybridge Farm, Alconbury / Highway Agency Borrow pit No. 7	CS11 Sand and Gravel Borrow pits / SSP M2 Area of Search Allocations for Sand and Gravel Borrow pits	The proposed borrow pit sits wholly within the allocated site.		Compliant with Policy.
	CS22 Climate Change	The drainage scheme for the road scheme takes into account the need to design for climate change.	It is disappointing that the borrow pit proposals fail to recognise the potential to contribute to climate change adaptation for the wider area in	The site has the potential to make a positive contribution towards resolving local flooding issues in Brampton, via Ellington Brook.

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			terms of providing surface water attenuation.	
	CS23 Sustainable Transport of Minerals and Waste	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS25 Restoration and Aftercare of Mineral and Waste Management Sites	The application proposes restoration to landscaped water areas, with some diversification of habitats.	Opportunities are somewhat limited on this site and the proposals are considered to be acceptable. A five year aftercare period is considered acceptable in this case.	Compliant with Policy.
	CS32 Traffic and Highways	The proposed borrow pit is adjacent to the road scheme.	The proposal accords with the policy in that it will minimise transport distance and traffic movements on local roads.	Compliant with Policy.
	CS33 Protection of Landscape Character	Changes to the landscape of the area will occur as a result of borrow pit workings. Structural planting will help to integrate this within the wider landscape.	Subject to the consideration of a detailed landscaping scheme, it is accepted that the borrow pits can be satisfactorily assimilated into the local landscape.	Compliant with Policy on the assumption that a detailed landscaping scheme and five-year aftercare programme will be agreed as proposed in the

				Landscape Assessment.
	CS34 Protecting Surrounding Uses	The noise assessment is not based on appropriate guidance (National Planning Practice Guidance for Minerals). Dust mitigation would be achieved through the CoCP.	There are several properties within proximity to the site. Ambient noise levels are likely to be high due to existing traffic noise, but some check of potential noise impacts against guidance would be useful.	Some further noise assessment required.
	CS35 Biodiversity and Geodiversity	There are no identified concerns in relation to this policy.		Compliant with Policy.
	CS36 Archaeology and the Historic Environment	No specific archaeological assets have been identified within the site, but the need for archaeological assessment is recognised.	Further information (physical evidence) required to assess whether proposed mitigation is sufficient and appropriate, supported by illustrations showing areas of intended mitigation types.	Not compliant with policy as the ES has not defined satisfactory mitigation measures for the Borrow Pits.
	CS37 Public Rights of Way	No rights of way affected.	The site is not suitably located to merit consideration of providing public access.	Compliant with Policy.
	CS38 Sustainable Use of Soils	The site is grade 2 agricultural	The loss of high grade	Compliant with policy on the

		land, but will not be restored to agriculture.	agricultural land is considered acceptable on this site, given the benefits of the scheme.	assumption that the Soil Management Strategy will be applied.
	CS39 Water Resources and Water Pollution Prevention	No significant drainage issues are raised by this borrow pit and the matter is satisfactorily addressed.		Compliant with Policy.
	CS41 Ancillary Development	None identified		Not an issue

19.1.4

B3 Matters in Relation to Individual Borrow Pits

19.1.5 Having regard to the general policy arguments set out above, the County Council considers that the following weaknesses exist in relation to the proposals for individual borrow pits.

Borrow Pit 1: West of Brampton

- Missed opportunity to provide flood attenuation to help resolving local issues.
- Ten-year aftercare scheme required to develop biodiversity after use.
- Creation of new rights of way required to facilitate recreational after use.
- Phased working and restoration scheme required.
- Noise impacts to be assessed in accordance with Minerals Planning Practice Guidance.
- Dust impact from storage areas requires further consideration.

- Further assessment required of potential impacts on Brampton Wood in terms of hydrogeology.
- Further consideration to be given to impact on bat populations on or using the site.
- Detailed archaeological assessment and mitigation scheme required.

Borrow Pit 2: South West of Brampton

- Potential opportunity to provide flood attenuation in relation to ongoing development at RAF Brampton.
- Ten-year aftercare scheme required to develop biodiversity after use.
- Creation of new rights of way required to facilitate recreational after use.
- Phased working and restoration scheme required.
- Noise impacts to be assessed in accordance with Minerals Planning Practice Guidance.
- Dust impact from storage areas requires further consideration.
- Detailed archaeological assessment and mitigation scheme required.

Borrow Pit 3: Fenstanton

- Missed opportunity to provide flood attenuation to help resolving local issues.
- Ten-year aftercare scheme required to develop biodiversity after use.
- Phased working and restoration scheme required.
- Noise impacts to be assessed in accordance with Minerals Planning Practice Guidance.
- Further assessment required of potential impacts on Fenstanton Gravel Pits County Wildlife Site in terms of dust and hydrogeology.
- Detailed archaeological assessment and mitigation scheme required.

Borrow Pit 5: Boxworth (There is no borrow pit 4)

- Detailed archaeological assessment and mitigation scheme required.

Borrow Pit 6: Dry Drayton

- Missed opportunity to provide flood attenuation to help resolving local issues.
- Noise impacts to be assessed in accordance with Minerals Planning Practice Guidance.
- Detailed archaeological assessment and mitigation scheme required.

- Assurances required in respect to potential for birdstrike resulting from restoration scheme.

Borrow Pit 7: Alconbury

- Missed opportunity to provide flood attenuation to help resolving local issues.
- Noise impacts to be assessed in accordance with Minerals Planning Practice Guidance.
- Detailed archaeological assessment and mitigation scheme required.

B4 Summary of most relevant policies and their applicability to borrow pits

Summary of most relevant Core Strategy (CS) and Site Specific Proposals Plan (SSP) Policies

(for definitive wording and all policies see respective adopted Plans)

CS11 Sand and Gravel Borrow pits

An overarching policy applying to all sand and gravel borrow pits. It sets out criteria relating to:

- a) borrow pit location;
- b) not prejudicing the steady supply of material from existing quarries;
- c) related mineral traffic movements;
- d) satisfactory restoration to an approved scheme (including if the site is only partially worked);
- e) no importation of materials from outside the scheme;
- f) not serving the wider market;
- g) mitigation measures for environmental impacts.

With priority being given to maximising use of secondary / recycled aggregates to minimise the use of virgin aggregate.

CS12 Engineering Clay

Where there is a demonstrated need for engineering clay priority will be given to extracting from existing sites, except that borrow pits for the A14 scheme will be allocated through the SSP. Criteria relating to borrow pits apply and relate to:

- a) borrow pit location;
- b) related mineral traffic movements;
- c) satisfactory restoration to an approved scheme (including if the site is only partially worked);
- d) no importation of materials from outside the scheme;
- e) not serving the wider market;
- f) mitigation measures for environmental impacts.

CS13 Additional Mineral Extraction

Additional mineral extraction, lying beyond the scope of the minerals spatial strategy will not be permitted unless it can be demonstrated that there are overriding benefit.

CS22 Climate Change

Requires all mineral and waste management development to take account of climate change for the lifetime of the development. Criteria set out how this will be achieved and proposals are required to demonstrate how this will be achieved.

In the case of mineral workings restoration schemes will contribute to addressing climate change adaptation e.g. through flood water storage and biodiversity proposals which create habitats which acts as wildlife corridor and living carbon sinks.

CS25 Restoration and Aftercare of Mineral and Waste Management Sites

Sites must be restored in a phased manner to a beneficial afteruse. Restoration will be considered on a site by site basis but requirements apply:

- a) restoration must reflect strategic and local objectives for countryside enhancement and green infrastructure
- c) where restoration can assist in achieving the creation of priority habitats and / or Biodiversity Action Plan targets it must do so
- d) important geological faces must be exposed with access
- e) restoration back to an agricultural afteruse may be appropriate where there is high grade land
- f) where a site is suitable for amenity uses (informal and formal, sport, navigation, recreation uses) this must be incorporated in the restoration scheme

An extended period of aftercare will be sought where this is warranted.

CS32 Traffic and Highways

Development will only be permitted where:

- a) it is demonstrated alternative methods of transport have been evaluated and pursued where practicable
- b) access and the highway network are suitable or could be made suitable to accommodate any increase in traffic / nature of traffic involved
- c) any increase in traffic will not cause unacceptable harm to the environment; to road safety; or residential amenity.

CS33 Protection of Landscape Character

Development will only be permitted where it can be demonstrated it can be assimilated into its surroundings.

CS34 Protecting Surrounding Uses

Development will only be permitted where it can be demonstrated there would be no significant harm to the environment, human health or safety,

<p>proposed neighbouring land uses, visual intrusion, residential or other amenity. Mitigation measures will be required including appropriate buffers zones between the development and neighbouring existing / proposed sensitive uses.</p>
<p>CS35 Biodiversity and Geodiversity</p> <p>Development will only be permitted where it has been demonstrated that there will be no likely significant adverse impact on sites of local nature conservation or geological interest, or any landscape feature which is of principal importance to wild flora or fauna. Where it can be shown there are overriding benefits development may be permitted subject to mitigation / compensation measures. Proposals for new habitat must have regard to the Cambridgeshire and Peterborough Biodiversity Action Plan and related habitats and species plans.</p>
<p>CS36 Archaeology and Historic Environment</p> <p>Development will not be permitted where there is an adverse effect on a designated heritage asset, historic landscape or other heritage asset of national importance and / or its setting or where there is a significant adverse impact on a site of local architectural, archaeological or historic importance. Development may be permitted where satisfactory mitigation measures have been defined after conservation of results of prior evaluation.</p>
<p>CS37 Public Rights of Way</p> <p>Development which would adversely affect the permanent use of public rights of way will only be permitted if alternative routes are provided, which must where practicable be of equivalent interest, convenience, quality and interest. Proposals must make provision for enhancement of public rights of way where practicable with a view to providing new routes and links between existing routes. Priority should be given to objectives in the Councils Rights of Way Improvement Plan.</p>
<p>CS38 Sustainable Use of Soils</p> <p>Development which affects the best and most versatile agricultural land will only be permitted where it can be shown there is a need for the development and an absence of alternative lower grade land; it incorporates proposals for the sustainable use of soils; restoration positively</p>

contributes to the long term conservation of soils.

CS39 Water Resources and Water Pollution Prevention

Development will only be permitted where it is demonstrated that there would be no significant adverse impact or risk to the quality and quantity of surface or ground water; of water abstraction rates; the flow of groundwater at or in the vicinity of the site. All proposals must incorporate adequate water pollution control and monitoring measures.

CS40 Airport Safeguarding

Development within safeguarding areas of airport and aerodromes will only be permitted where it can be demonstrated the development, operations and restoration will not constitute a significant hazard to air traffic. A Bird Management Plan may be required.

CS41 Ancillary Development

Ancillary development will be considered against policies and criteria in the development plan. If permitted it will be linked to the life of the existing operations. Permanent retention of facilities may be permitted where it meets criteria relating to its need for health and safety / pollution control; is not detrimental to its surrounding; and is not contrary to policy.

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