

**A14 DRAFT ORDERS
HA 65/2/138 (HIGHWAYS ACT 1980)**

FORMAL OBJECTION

HISTON & IMPINGTON PARISH COUNCILS

CAMBRIDGESHIRE

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To:

Secretary of State for Transport at the offices of the Highways Agency,
Woodlands, Manton Lane,
Manton Industrial Estate, Bedford MK41 7LW

1 Background

Histon & Impington are a settlement to the north of Cambridge, in the District of South Cambridgeshire. They are regarded as a single settlement for planning purposes.

The A14 splits Impington Parish, and many Histon residents have an unobstructed view of the road.

As with previous strategic matters, therefore, the two Councils have agreed to make a joint submission in response to this matter.

2 Summary

The Councils support the need for upgrading the A14 but find there are aspects of the plans which are seriously flawed. The Councils objections cover the following areas:

- scope - the scheme should extend, at the least, to the Quy Interchange
- traffic modelling
 - the figures used for the Histon Interchange (north) are a significant underestimate, and indicate flaws in the model
 - a number of the committed developments are not modelled and this significant under-estimate will affect noise and pollution calculations
- noise
 - there are no processes to validate either the current figures or whether the "after" forecasts correctly predict what will be
 - there is no consideration of night time noise
 - there is insufficient mitigation, and increases in noise levels for residents are unacceptable
 - there are no mitigation plans should the forecasts not be met
 - mitigation is below best practice/European standards, and is inconsistent across the scheme
- air quality
 - there are no processes to validate whether the "after" forecasts correctly predict what will be
 - there are no mitigation plans should the forecasts not be met
- construction
 - specified routes through Histon & Impington are unacceptable for construction traffic
 - details of the haul road from Girton at its Impington end are critical, and could have a significant negative impact on residents

- drainage should be installed and operational prior to the commencement of construction
- provision of facilities for HGVs
- drainage
 - the total volume discharged into the drainage system as are important as flow rates and are unacceptable
 - SCDC Award drain 164 (draining the Impington balance pond) is unable to accept any increase in volume
- cycling - there is no provision of a segregated crossing for pedestrians and cyclists at the A14/B1049 junction

3 Scope

The A14 carries a significant volume of local traffic, and the Councils are deeply concerned about the reduction in capacity eastbound through the Milton intersection and before the final junction (Quy) providing access to Cambridge.

Particularly with the planned growth to the east of Cambridge, this is unacceptable.

4 Traffic modelling

4.1 The figures Cambridge Road North indicate flaws in the model

From the Environmental Report, para 8.4.35 *On the B1049 Cambridge Road North (point 31 on Figure 8.1.7), the forecast change in AADT is from 14,300 AADT in the DM case to 15,300 AADT in the DS case.*

Point 31 is north of the Cambridge Road junction, and therefore does not give a full picture of the AADT for the B1049 north of the A14 (based on the Councils' own traffic survey from September 2008 traffic at this point is 86% of that just south of the Cambridge Road junction).

The County Council has just completed a speed limit review of the B1049, and for the link immediately north of the A14, gives the AADT as 24,100.

This is a major discrepancy, and the Councils must therefore **object** in principle to the model being used, and the validity of the modelling.

4.2 A number of the committed developments are not modelled

In order to meet government-identified housing shortfall in South Cambridgeshire, the Site Specific Policies Development Plan Document (adoption: January 2010) will allocate an additional 220 houses to Orchard Park and an additional 1100 houses to land between the NIAB site and the A14 (referred to as NIAB Extra).

These have not been modelled, nor the implications (particularly for the Histon interchange) of schooling provision (or lack thereof) and travel to work traffic in these developments considered.

4.3 NMUs

The traffic flow predictions see a reduced growth in vehicles using the roads that feed into the A14 Histon junction: *"The 2015 AADT (Annual Average Daily Traffic) traffic flows within...Histon...are predicted to decrease slightly"*. This forms the basis for the *"summary of provision"* conclusion: *"the current junction arrangement at Histon junction would be retained and the existing cycle path would be unaffected resulting in overall 'neutral effects'"*.

We believe our submission (below) shows that the effects will not be neutral – they will in fact decrease opportunities for NMUs to access the wider network. We consider the traffic flow predictions to be incomplete in analysing all the factors, and that the Highways Agency should reconsider its obligations for NMU provision at the A14 Histon junction.

4.4 Two lanes eastbound through Milton A10 interchange

The plans show a reduction eastbound from 4 lanes to 2 lanes within the 2km leading to the Milton interchange. Experience with the A10 interchange with the M25 demonstrates this will cause significant congestion. Traffic will learn and leave one junction early at the B1049

Histon and Impington interchange and go either southwards via Histon Road or Kings Hedges Road for destinations in Cambridge, or northwards on B1049 and/or Butt Lane to Milton increasing local traffic

4.5 Behavioural changes

Currently local traffic is reduced from using the A14/M11 as a Cambridge ring road because of the uncertainty of the congestion at the Girton interchange. This scheme will remove that disincentive and the current building of a quick access from the M11 to Addenbrookes Hospital (the hospital in Europe with the largest daily number of vehicle movements) will both result in changes in behaviour for local traffic: this has not been included in the model

4.6 Impact

These significant under-estimates need to be reflected in the noise and pollution modelling

5 Noise

The Councils **strongly object** to

- the increase in noise levels for some local residents
- the limited mitigation proposed
- the lack of consideration of night time noise levels
- loss of trees that add to the current mitigation
- the lack of proposals to monitor and rectify issues as they arise

And additionally seek a more precautionary approach, specifically a speed limit reduction to 50 mph for the whole Cambridge Northern Bypass (ie Girton - Fen Ditton).

5.1 Increase in noise levels

Residents in Impington are predicted to suffer increased levels, and this is unacceptable.

The Councils challenge the 200m-300m limits artificially imposed, recognising that in parts of the scheme (eg Brampton) improvements are proposed for properties outside this distance.

Furthermore, when the noise barrier at Orchard Park (a reflective, not absorptive, barrier) was constructed, residents up to 1.5km distant rapidly complained of increased noise levels.

5.2 Night time noise

There is no consideration of night time noise levels.

5.3 Mitigation

The Councils recognise that some changes (eg absorptive barrier at Orchard Park) will have a significant effect for some residents.

The Councils note that elsewhere in the scheme (eg Brampton) noise barriers (higher, and with earth bunds) have been proposed that will decrease noise levels over a significantly further distance.

The proposed mitigation for Histon & Impington is currently inadequate and should be based on a consistent approach.

5.4 Loss of trees

Para 4.5.12 indicates that approximately 2340m of hedge and areas of native tree and shrub planting between Woodhouse Accommodation bridge and the Impington Guided Bus bridge (Figure 4.5.6).

Para 9.6.11 recognises that the size of the tree barrier at Impington (Histon interchange, northwest around grid reference 544148, 261781) could (at between 69m and 16m thickness) be making a significant impact to noise reduction. Its loss may well therefore impact housing over a significant distance, and must be replicated by enhanced barriers/bunds.

5.5 Failure to meet forecasts

The Councils are concerned that there is a possibility that forecast noise levels may not be met, and that whilst the Highways Agency has a small budget (a very small budget) for improvements found necessary this is not the appropriate approach for a new scheme.

The Councils therefore seek a more precautionary approach, to increase the likelihood that forecasts will be achieved, by limiting speeds to 50 mph for the Cambridge Northern Bypass.

5.6 Before and after measurements

As was shown by the Orchard Park barrier (erected to the specification of the Highways Agency) the impact of poorly specified barriers, and potentially unknown features, can have a significant adverse impact.

The whole scheme is, of necessity, based on forecasts, computer models and simulations. These may, when the necessary works are complete, not fully match to reality.

The Councils ask, therefore, that noise levels readings, taken over a broad area, are available for before and after comparison in order to assist in the resolution of any disputes that may arise.

6 Air quality

The Councils **strongly object** to

- the increase in pollution levels for local residents
- the increase in CO₂
- the lack of PM_{2.5} monitoring. The A14 could potentially become a multi-lane queue of stationary traffic which will do nothing for the health of people who live nearby. A wider road may still be congested in the event of a serious accident
- no provision for remedial action if forecasts prove to be inaccurate

And additionally seek a more precautionary approach, specifically a speed limit reduction to 50 mph for the whole Cambridge Northern Bypass (ie Girton - Fen Ditton).

6.1 Before and after measurements

The whole scheme is, of necessity, based on forecasts, computer models and simulations. These may, when the necessary works are complete, not fully match to reality.

The Councils ask, therefore, that detailed air quality readings, taken over a broad area, are available for before and after comparison in order to assist in the resolution of any disputes that may arise.

6.2 Failure to meet forecasts

The Councils are concerned that there is a possibility that forecast air quality improvements may not be met, and therefore the AQMA removed.

The Councils therefore seek a more precautionary approach, to increase the likelihood that forecasts will be achieved, by limiting speeds to 50 mph for the Cambridge Northern Bypass.

6.3 PM_{2.5}

The ES correctly identifies the limits and concerns regarding PM_{2.5} but does not consider monitoring. The Councils seek the appropriate measurements for this pollutant in the Histon & Impington area.

- The model for PM_{2.5} given in the Road Widening report suggested values close to the 25µg /m³ limit in both the “do minimum” and “do something” scenarios. This was downplayed by comparing the measured Bar Hill PM_{2.5} values with predicted ones - the monitored values were significantly lower. This indicates that there is a problem with the confidence of the results. Public fears might be assuaged if this were investigated, to determine if the modelling is faulty, or that there is an issue with calibration.
- Lack of provision of mitigation against particles entering residential areas: this could be considered in conjunction with noise barriers. Trees are said to be an effective barrier against pollution and it is crucial that loss of trees is minimised during construction, and that vegetation should be an integral part of the scheme.

7 Construction

The Councils are deeply concerned about the construction process, the use of haul roads and the potential for rat-running.

The Councils would **strongly object** to the use of:

- Milton Road/Burgoynes Road and either Impington Lane or New Road
- Park Lane, High Street

as routes for **any** construction traffic. The former because of the lack of pedestrian footpaths, the narrow roads with tight bends, and the grade 1 listed St Andrew’s Church at risk from vibrations from heavy traffic, and the latter because of its residential nature, and the busy and crowded shopping centre.

Furthermore the Councils **object** to the use of the B1049 as a route for construction traffic. The B1049 is identified as a “local route” on the current draft County HGV route map, is one of the busiest Cambridge radials, and has significant pedestrian traffic from the village schools.

The Councils are further deeply concerned regarding the haul road from Girton. There is no indication of the location of the eastern (ie Impington) end of the road, though CPOs indicate the vicinity of Lone Tree Avenue. The impact on residents of Lone Tree Avenue, and the southern end of Cambridge Road (adjacent to the A14) must be minimised.

The Councils would **ask** to be involved in the preparation of the construction management plan for the Histon & Impington area.

8 Provision of facilities for HGVs

The Councils recognise that adequate provision for HGV and HGV drivers is more than simple lay-bys, and that rest, catering and toilet/shower facilities are essential. The lack of adequate parking for HGVs results in unauthorised parking in villages, and whilst steps have been taken in Histon & Impington to prevent this, this merely moves the problem elsewhere.

The Councils **urges** the Highways Agency to increase the off-site provision for HGVs.

9 Drainage

There have already been two significant flooding events in 2001, 2005 that have affected Award Drain 164 (which will drain the Impington balance pond), and properties adjacent to it (South Road, and thence through the village).

Thus, there are potential concerns over resilience of the proposed scheme's drainage system under more extreme weather in the future. **A more precautionary approach is required.**

9.1 Volume discharged

The focus of PPS 25 is on flow rates. However, for the drainage network to the east and north of Histon & Impington total volumes are as important, and therefore are relevant to drainage through the villages.

In a study conducted for the Environment Agency (and published in February 2007) by JBA Consulting entitled *SFRM Framework, Fenland Flood Zone Improvements* drainage through the Fens that the north Cambridge area is dependent on was considered.

What differentiates this area from many is its flatness, and the small falls in the drainage to the sea. The study states (section 3.2) *On conventional gravity-draining watercourses, the 1% water level generally corresponds closely to the 1% peak flow. However, in this study area water levels will depend more on the volume and duration of inflows than on their peaks.*

The Councils are therefore concerned that the balance pond north of the A14 in Impington, draining through SCDC Award drain 164, will put undue stress on the Cottenham Lode, and downstream drainage.

The Councils ask the a full assessment of the Award Drains through Histon & Impington (SCDC 164, 165) and their drainage out through Cottenham Lode is undertaken.

9.2 SCDC Award Drain 164 is at capacity

There are a number of significant bottlenecks in Award Drain 164. These start with the culverted section running from the War Memorial to the Brook (at The Green).

These limit the capacity of the system to cope with severe events, and any additional stress without attending to these bottlenecks is unacceptable.

9.3 During the construction period

Having had two severe weather events in 2001, 2005, and flooding events elsewhere in the UK in 2009, there must be a significant chance that another event could occur whilst construction is in process.

The Councils therefore seek the implementation of the drainage plans, necessary improvements to the 164 Award Drain before construction starts so as to minimise the risk to residents and businesses in Histon & Impington from run-off.

9.4 With reference to the Order Documents the Councils specifically OBJECT to the following:-

9.5 Lack of robust consideration or assessment of the effects of discharge of surface water to SCDC Award Drains in Impington and Histon Parishes.

The Councils would refer to the **SCDC Strategic Flood Risk Assessment Map** for Histon and Impington in **Appendix D** and draw attention to their previous comments on this document in their submission to South Cambridgeshire District Council during the LDF consultation. The map and the associated text in the LDF document is flawed and does not form a sound basis for establishing risk to properties in the Parishes. It was previously challenged by photographic evidence of severe flooding events in the village and the Cottenham Lode catchment.

9.6 Lack of detailed consideration of Award Drains 164 and 165 upstream attenuation or storage.

By reference to **Appendix A Flood Risk Assessment & Hydraulic Context Maps, Appendix L Minutes of meetings Nos.3,4 and 5, together with Appendix K , Balancing Ponds**, the Councils will challenge the basis and context of design of discharges to receiving watercourses in the areas between Girton village and the Impington/Milton Parish boundary. In particular the Councils note and regret that the minimal level of detail for surface water run off at Histon and Impington contrasts very sharply with that given to watercourses at the western end of the A14. The dismissal of Strategic Flood Risk, in two short paragraphs 3.4.7.1, 3.4.7.2 , of the Awarded Watercourses North of Cambridge, **is a serious and regrettable omission**. The Councils cannot over emphasise that in terms of ground water saturation, the area between the NW of the City of Cambridge at the 16 metre contour, and Histon village centre at 8 metres, is extremely sensitive to prolonged or heavy rainfall. At the time of writing, surface water is accumulating on the south side fields of the A14 between Impington and Girton. Whilst the prospect of further housing development in this area is not the responsibility of the Agency, the fact that they have **withdrawn previous objections to the NIAB Extra development, is viewed with extreme anxiety and disquiet in Histon and Impington**. The location and capacity of **balancing pond PD 5165**, together with inflow and discharge, needs to be re-assessed with reference to drainage studies proposed or now being developed. The Councils specifically refer to the development of the **Cambridge Water Cycle Strategy** now in progress with Cambridgeshire Horizons, to the pending review of the **SCDC Strategic Flood Risk Document** and to the very recent **Government Flood Risk and Pitt Review** documents. There is no indication that these evolving strategies have been properly considered by the Agency. **The Councils strongly urge the Agency to co-operate with developers and local authorities to find a better solution to attenuation and/or flood storage in this critical location.**

9.7 Lack of detail and omissions at site specific locations.

By reference to **Appendix I Asset Drawing Nos. A742311 (15 & 16)** the Councils **object** to the lack of detailed consideration, of surface water run off from/adjacent to the B1049 intersection in the area of Lone Tree Avenue, Impington and to the foul drain running underneath the A14 at this point. There are capacity and maintenance issues concerning the culverted drain running from the boundary of 76 Cambridge Road/1 Lone Tree Avenue to the boundary of 23/25 Lone Tree Avenue. It is noted the proposed haul road will run alongside this drain. The effect upon existing discharge from the **Lone Tree Avenue balancing pond at outflow hydrobrake 0851** and any increased risk of flooding needs to be clearly

quantified. The comments at 9.3 above are particularly relevant to this location, which may see the passage of heavy construction traffic. The maintenance and condition of the Cambridge Road 225mm gravity foul drain running underneath the A14 from **manhole 2702 (north) to 2602 (south, Impington Farm)**, is of vital importance to Impington residents. This was originally installed in the 1950s using materials and technology then current. Due to high ground water conditions these older installations are prone to movement and surface water surcharge. The Councils will demand, on behalf of their residents, to see any current or proposed condition surveys, together with any schedule of repair work/replacement that may become necessary prior to or during construction.

10 Cycling

The Councils **strongly object** to the lack of provision of a segregated crossing for pedestrians and cyclists at the B1049 junction:

- There will be increased local traffic around the A14/B1049 junction.
- And increased numbers of cyclists crossing due to improved cycleways up to the A14/B1049 junction.
- There are no improved facilities for NMUs in the scheme.
- Phasing of the traffic lights on the junction is of no use to NMUs.
- The Guided Busway has no effect on the junction as it is traffic is going in a different direction.

10.1 Traffic Flows

According to the A14 Environmental Statement Non-Executive Summary (Fold Out 2), traffic flows are forecast to rise to between 51,400 and 85,400 vehicles a day on the new A14 and to between 16,300 and 36,400 per day on the parallel access roads. This will be accompanied by an increase in vehicle kilometres - thus the Summary acknowledges the Scheme will encourage vehicle use.

Currently *“Flows are characterised by high volumes of traffic, much of which is through traffic”* (Need for A14 Scheme 2.2.10). The new A14 will see increased traffic from 3 sources:

- the rerouting of longer distance traffic (eg. from the A1 & M25)
- the rerouting of local traffic into the A14 corridor
- new traffic (Fold Out 2).

This analysis seems to confirm that local drivers will actively choose the new A14 when travelling around the greater Cambridge region.

Yet *“traffic flows on radial routes into Cambridge would not change significantly”* (Fold Out 2); and *“The 2015 AADT (Annual Average Daily Traffic) traffic flows within...Histon...are predicted to decrease slightly”* (14.5.56, Chapter 14).

The B1049 and A10 are the main access points onto the A14 Cambridge Northern Bypass from Cambridge and from the northern necklace villages. If local drivers, old and new, actively choose the A14 as their local route, then surely it follows that heavy use will be made of these 2 radial routes, and of their junctions with the A14. Equally drivers travelling from other parts of the region to key destinations in the Cambridge area may choose to use the new A14, rather than local roads such as the B1049 through Cottenham and Histon, but

they will still exit the A14 at the Histon and Milton junctions. Congestion at the eastbound A10 junction as it narrows could result in increased traffic, including HGVs, on the roundabout

10.2 No Improvements for Cycling Facilities at the A14 Histon Junction

Under the heading of “Pedestrians, Cyclists, Equestrians and Community Severance” in the Non-Executive Summary, “*the Scheme would include improved facilities at the local road junctions for pedestrians, cyclists and equestrians*” between Fen Drayton and Fen Ditton.

Despite the A14 Histon junction being already at capacity, non-motorised users (NMUs) will not be benefiting from any “*improved facilities*”.

John Clarke of Costain Skanska stated in an email (20/01/09): “*There are no works proposed to Histon junction roundabout as part of our scheme, this falls outside the scheme limits and is operated and maintained by CCC. The proposed widened A14 mainline carriageway ties into the existing slip roads at the top of each slip road....The slip road proposals...should not affect the crossing length for pedestrians and cyclists. If any alteration is made at a latter stage the crossing facilities will be reviewed to ensure a safe crossing facility is provided in the future*”.

It would seem then that the roundabout itself falls outside the “*scheme limits*”, but one could argue that the pedestrian/cyclist crossings, located as they are at the top of the slip roads, do indeed fall within it. Yet John Clarke’s final statement, whilst far from reassuring that the crossing length will remain as it is, does seem to accept some measure of responsibility.

10.3 Policy – National and Local

Cycling England and its Cycling Demonstration Town project are partly funded by the Department for Transport (DfT) and, more recently, by the Department of Health.

In “A Sustainable Future for Cycling” (2008), the DfT sets out priorities and objectives for funding and promoting cycling infrastructure and makes clear the role cycling plays in tackling some of the major challenges facing Britain today: road casualties, climate change, air pollution, congestion and obesity. Indeed, the cost to the national coffers of obesity is the same as that of congestion.

The “Policies and Plans” section of the A14 Environmental Statement Non-Executive Summary, states that, following publication of the DfT document, “*Cambridge and its ‘necklace’ of villages including Girton and Milton was chosen as one of the Cycling Towns. Funding from the DfT, Section 106 contributions and the LTP is predicted to deliver improvements and increase safety and participation*”.

One again senses a lack of will to acknowledge that cyclist and pedestrian safety at the A14 Histon junction falls within the new A14’s remit. Not only is there no proposed Government funding on the table for improved infrastructure at this location, but the Guided Bus cycleway and the Cycle Cambridge cycleway improvements planned for Histon and Cottenham will undoubtedly encourage more cycling - including cycling into Cambridge across this junction.

But the Cycle Cambridge team are constrained from making improvements to the crossings by the Highways Agency’s concern that any measures which may delay traffic flow would impact on the A14 (see below). This goes against Highways Agency national policy, quoted in “Policies and Plans”, “*To work in partnership with Local Authorities and other bodies, in order to play a full role in supporting non-motorised elements of travel*” and “*to provide improved facilities for cyclist (and for pedestrians) along and across trunk roads, and*

improve links to other key destinations” (Encouraging Sustainable Travel: Highways Agency Strategic Plan for Accessibility, 2000).

So we have a situation where cycling numbers across the A14 Histon junction are expected to grow as a result of infrastructure improvements along the B1049 through Histon to Cottenham; where vehicle numbers will grow exponentially at this same junction as local traffic accesses the upgraded A14, and A14 traffic exits the trunk road to reach key destinations in Cambridge, but **no** “works” will be carried out on the NMU crossings at this location.

Thus, we would dispute the claim in the section “Integration with Non-Motorised User policies” that “*The Scheme has been designed to include direct provision of, or scope in the future, to provide improvements to the provision of public rights of way and cycle routes and is regarded as **beneficial**, facilitating the objectives of non-motorised user policies*” (7.4.86).

10.4 Pedestrians, Cyclists, Equestrians and Community Effects - Environmental Statement Non-Executive Summary, Chapter 14

Perception & Reality for NMUs at the A14 Histon junction

In a chapter on NMUs, it would be reasonable to conclude that “*phased traffic signals at the Histon junction*” (14.3.79) would cater for not only vehicle traffic but pedestrian and off-road cyclist movements too. But in reality there are no phases for users of these shared paths.

Northbound pedestrians on the east side of the junction, for instance, have to wait till the traffic on the A14 off-slip has stopped at the lights, in order to know it is safe to cross (pedestrians cannot see the lights and have no dedicated crossing). They then have to cross the A14 on-slip (again there is no dedicated crossing) and in doing so, judge at what point in each sequence (for on-roundabout or B1049 vehicles entering the on-slip), it is safe to cross. Drivers rarely indicate they are turning left onto either of the 2 on-slips; and the traffic signals are phased so that there is no delay for waiting vehicles.

The dangers, real and perceived, of these A14 on-slips are the most frequently cited reasons why Histon and Impington residents will not cycle into Cambridge, and those who do cycle regard this area as the least safe part of their journey.

The 2008 survey carried out for the Scheme found that the A14 Histon junction was the “*busiest NMU crossing over (the) existing A14*” (Table 14.16). Of the 1802 NMUs using this junction each day, 1130 were cyclists.

When opened, the Guided Busway cycleway will encourage new cycling, and will also offer an alternative route for cyclists heading to Cambridge Regional College, the Science Park and Milton Road. But it does not represent a direct, desire-line route for those heading to the City Centre. In a 2007 survey carried out by Cambridge Cycling Campaign at the junction of King’s Hedges Road and the B1049, two-thirds of cyclists in the morning peak went straight ahead down Cambridge (Histon) Road (towards the City Centre), whilst only one third turned left into King’s Hedges Road (towards east Cambridge).

The A14 Histon junction will remain heavily used by cyclists.

10.5 Key Destinations & Local Travel Patterns

DMRB (Design Manual for Roads and Bridges), 2.1: “*in assessing how a scheme might affect duration or distance of NMU journeys, existing local travel patterns should be established*”.

Table 14.10 in Chapter 14 of the Environmental Statement Non-Executive Summary, lists community facilities in Histon and Impington.

It contains several inaccuracies: Histon has 3 primary schools, not 5, and the 2 villages have one GP surgery between them (located in Histon); the secondary school is just in Impington.

Histon and Impington are also omitted from the “A14 used for School Travel column” though Fen Ditton, Milton and Longstanton are included. This omission does not sit well with the following statement in 15.4.40: “*The junction at Histon was identified through public consultation as being well used for school traffic, which is also supported by the NMU high flows recorded during the 2008 surveys*”.

The list of community facilities, in Chapter 14, also omits the hospital, Histon Football Club, Impington Sports Centre and the recreation ground with its many amenities serving a large area.

New Developments

DMRB again: “*If it is known that new developments in the locality are due to take place, then an estimate should be made of likely increases in flows of pedestrians and others*”.

In the “Land Uses” chapter of the Summary, two new developments are flagged up: Orchard Park with its 900 new homes and the NIAB development, between Huntingdon and Histon Roads, with its 1800 new houses.

But a more up-to-date analysis would also show that, in order to meet the government-identified housing shortfall, the Site Specific Policies Development Plan Document (adoption: January 2010) will allocate an additional 220 houses to Orchard Park and an additional 1100 houses to land between the NIAB site and the A14 (referred to as NIAB Extra). No new secondary school is included in these proposals, so the afore-mentioned “*school traffic*” – ie. NMUs – will in the future greatly increase at the A14 Histon junction.

10.6 What is ‘safe’?

In providing new cycle routes, the Summary judges the Scheme to be “*beneficial*”.

We welcome the new cycleway between Girton and the A14 Histon junction, along the north side of the A14.

“*This route would also provide a safer alternative to using the A14 or the roads through Histon junction, resulting in ‘positive effects’ on amenity for users*” (14.5.39).

“*...a safer alternative to using...the roads through Histon junction*”: is this the only admission within the A14 Draft Orders that the cycling and pedestrian crossings over the A14 slip roads are not as safe as they could or should be? Certainly John Clarke, in his email, seems to regard the crossings as **currently** safe.

One needs to remember that these are the “*busiest*” crossings - “*well used by school traffic*” - over the “*existing A14*”.