


**From:** Ann Goodridge [<mailto:>  ]  
**Sent:** 13 May 2015 10:50  
**To:** A14 Cambridge to Huntingdon  
**Subject:** Registered party representation

Dear PINS people,

I enclose my own detailed representation on the topic of air quality, with regard to **A14 Cambridge to Huntingdon Improvement Scheme (TR010018)**.

Given the level of investment that has gone into the design of re-routing the A14, it is sad and unimpressive that we end up with a solution that on many levels runs counter to other claims our Government makes and takes such little account of local impact.

I enclose my representation on the subject of air quality and advise you to take full account of the Supreme Courts recent ruling on UK air pollution before making a judgment on its worth.

Many people are dependent on you making a thorough, challenging and incisive analysis of what has been submitted by HA/HE and I urge you to do so looking not only at the disaggregated parts but also the overall impact.

Kind regards,

Ann

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Ann Goodridge



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## **A14 Cambridge to Huntingdon Improvement Scheme (TR010018) Registered Party = Ann Goodridge, 10030407**

### **Detailed representations to PINS on Air Quality implications for Hilton**

In presenting my views on the potential impact on the village of Hilton from the A14 proposals, I indicate below that the combination of factors ranging from road height and proximity, rat-running, heritage and the apparent value put on our local countryside will lead to unacceptable levels of pollution to our air quality from the time the work begins.

Given the latest Supreme Court ruling that requires the UK Government to tackle air pollution levels, based on the 2010 EU air quality directive, I believe that all currently proposed infrastructure schemes should be reviewed in light of the tighter standards across all air quality measures.

#### **Road height and proximity**

HA claimed that *“no significant residual adverse effects from noise or air pollution are predicted for Hilton.”* The fact that the proposed road will be nearly 2Km closer to the village and elevated by 3 metres lead me to conclude that there will be significant adverse effects on air quality on Hilton parish, even if in general terms the region will have lower pollution levels, as claimed by the now Highways England organisation.

#### **Traffic: rat-running**

Traffic from the North of Hilton intending to travel to the west currently joins the A14 at Galley Hill. Under the proposals, no similar junction will be available and this traffic will need to join the new A14 at Godmanchester. It has been pointed out to HA/HE that traffic will now travel into Hilton and turn right onto Graveley Way as this route is at least a mile shorter than the “official route” via the old A14 and the A1198.

As the through traffic, particularly of heavy vehicles, is already high (eg. 575 HCVs over 7.5 tonnes in one day) within Hilton parish, pollution will get worse – there can be no doubt.

However, the HA/HE have declined to recommend any form of traffic calming or other mitigation. Given the reducing funds at local Government level, I have been lead to believe that any traffic calming would not be funded locally. Furthermore, HA/HE are operating to a traffic model which I believe to be flawed, as indicated by the example above. I understand that Cambridgeshire County Council is currently validating the traffic modelling especially with regard to the roads surrounding the A14 and I expect their information to support this view.

#### **Heritage**

Many residents of Hilton parish have expressed concern that the Heritage of the village needs to be preserved, given the historical relationship with ‘Capability Brown’, the presence of a rare, world-recognised Turf Maze, dating from the restoration of the monarchy in 1660, and the existence of 10 listed Heritage properties of particular note. English Heritage did provide HA with requirements over air pollution levels with respect to our buildings. However, no there is no acknowledgement of these concerns nor of the perceived loss of such amenity in the consultation, let alone in any amendments to the DCO.

#### **Preference of Huntingdon over the countryside**

HA refer to a *“challenge that undue weight is given to environmental impacts at Huntingdon rather than the surrounding countryside”* but fail to address the question in their application.

HA also states that *“It is acknowledged that some mitigation measures will not be fully effective immediately (for example tree and shrub planting). The use of larger planting stock would be used where appropriate (for example within Huntingdon town centre) to provide an immediate landscape effect.”* This is clear evidence that Huntingdon is to be preferred over Hilton and other villages, and our environmental concerns are being ignored.

### **The consequence on Air quality for Hilton and surrounding area**

The residents of the Hilton parish are being ignored on their expressed concerns over environmental pollution in general and air quality in particular. This is unacceptable and denies the view that their consultation process was adequate or effective.

The following data are sound evidence for changes to be made to current proposals to assure sufficient mitigation for the immediate and long term and protect this environment from significant air pollution.

#### **1. Hilton area has not been covered or even acknowledged in the HA application**

The DCO Application refers to concerns over air quality, particularly around Brampton and the Offords but does not acknowledge that the same concerns were expressed by many Hilton residents. Subsequent relevant representations to the Planning Inspectorate from Hilton residents on the same subject are further evidence of Highways Agency’s lack of consultation in this important area.

#### **2. Specific concerns are:**

##### *a. Standards used by HA to determine acceptability levels of air pollution:*

The standards adopted by HA to measure expected air quality do not comply with the World Health Organisation (2005), *Air quality Guidelines for Europe*, as follows:

- Particulate matter levels - for PM<sub>10</sub> HA use a higher standard annual mean, 40µg/m<sup>3</sup>, rather than WHO 20 µg/m<sup>3</sup>
- Particulate matter levels - HA do not measure PM<sub>25</sub> as suggested by WHO.
- HA do not measure Sulfur / sulphur dioxide, or ozone. Yet these feature in reported incidents of UK high air pollution (see box below).

##### *b. Evidence of unacceptable pollution currently*

From European Respiratory Society, the following example of air pollution incidents in our region were cited:

April 2014

**People with health problems are being warned to avoid strenuous activity after forecasts that air pollution will reach high levels in parts of England.**

Defra issued warnings as high pollution levels were recorded on Tuesday.

The pollution - a mix of local and European emissions and dust from the Sahara - is forecast in parts of south England, the Midlands and East Anglia.

The elderly and those with lung or heart disease are among those warned against exercising outside.

In February, the European Commission launched legal proceedings against the UK for failing to reduce levels of nitrogen dioxide (NO<sub>2</sub>) air pollution.

On Wednesday, Defra (the Department for Food, Agriculture & Rural Affairs) admitted it was a "challenge" to meet air pollution targets near busy roads but said air quality had "improved significantly" in recent decades.

Defra has a 10-point scale for measuring air quality - with level one implying a "low" risk of air pollution and 10 warning of "very high" levels.

Levels are determined by the concentration of five pollutants in the air, including NO<sub>2</sub>, sulphur dioxide (SO<sub>2</sub>) and ozone.

High levels of air pollution are usually reached about five times a year, Defra said.

On Wednesday, levels were recorded at six - meaning moderate - in East Anglia and south-east England, with pollution readings reaching level five in London and areas of north-east England.

However, forecasters say pollution levels could reach high levels later in the day and on Thursday, before clearing on Friday.

Furthermore, in September 2014, The European Respiratory Society called for urgent action to tackle air pollution in Europe following the release of new data underlining the link between air quality and lung health:

"The study entitled 'Long-term exposure to air pollution and lung function in adults: multicentre cohort study and meta-analysis' evaluates the correlation between air pollution and lung function in adults from eight countries – the UK, Switzerland, France, Germany, Italy, Belgium, Spain and Sweden.

The researchers used indicators of traffic in the area and modelled the exposure levels to different pollution measures including nitrogen oxides (NO<sub>2</sub> and NO<sub>x</sub>) and particulate matter (PM). Lung function data were collected from 7,613 participants through spirometry testing in adults.

The study says that the results confirm previous findings that children growing up in areas with higher levels of pollution will have lower levels of lung function and a higher risk of developing symptoms such as cough and bronchitis symptoms. Additionally, it reports that people suffering from obesity are particularly vulnerable to the negative effects of air pollution, possibly due to an increased risk of lung inflammation.

Commenting on the results, Professor Peter Barnes, president of the European Respiratory Society (ERS) said: "The findings of this study demonstrate the importance of educating about clean air and the negative effects of air pollution. Urgent action is needed to tackle air pollution in Europe. It is crucial that policymakers in Europe take note of these findings and update guidelines in Member States to meet the WHO recommended air quality standards. This will ensure equal protection of all citizens' health across the continent."

*c. Validity of traffic modelling data and understanding the impact on Hilton:*

We have been in correspondence with Cambridgeshire County Council (CCC) and Huntingdonshire District Council (HDC) about traffic modelling, and they confirm that CCC is currently (April 2015) undertaking a verification study on the HA/Jacobs modelling data included in their DCO – so that "we all know what the actual impacts are."

Therefore, the HA cannot make the claims they do regarding the impact on Hilton. They do not take account of additional local traffic changes that will combine with A14-specific pollution levels.

For example, our local Joint Parishes HCV Group states (June 2014) with regard to the proposed A14:

*“No consideration has been given to the provision of an easy route west and south-west which avoids Hilton for traffic travelling out of St Ives. We consider that the current plans will encourage more traffic seeking to reach Papworth, the A428 and beyond to travel through the centre of Hilton. As we have measured, Hilton already endures excessive levels of noise, vibration and exposure to particulates. To increase those impacts is not acceptable”.*

They also reference:

*“There is an undoubted need to reduce the current congestion problems on the A14 and the proposed upgrade may make a significant improvement. My concern, however, is over the harmful effects that the upgrade may create for the vulnerable inhabitants living nearby to the corridor of the proposed route. The number of residents living in these areas may significantly increase in the coming years due to home expansion schemes.*

*Worldwide pollution due to fuel emissions is increasing exponentially and is an alarming health hazard. It is the cause of many diseases and severely exacerbates others. The three major disease states associated with this problem are:*

1. Allergy
2. Cardiopulmonary disease
3. Cancer/Malignancies

*Newer technology may cause significant reduction in emissions but we cannot guarantee that this will occur. Legal emission levels will undoubtedly be reduced over the coming years as we gather more research into the effects of them. My plea in the meantime is to ensure that all new roads are placed well away from habitation wherever possible in order to reduce the diseases already mentioned. This should be routine practice when commissioning a new road. Prevention of disease is always preferable to treatment. If appropriate action is not taken then there will be an increase in human suffering and more pressure on an already over stretched NHS. **Charles Andrew FRCPath.***

[Consultant Biochemist with over 30 years' experience in the field]

The increasing application of molecular biology in routine laboratories is already affecting over 70% of decisions in medical diagnosis and will continue to grow. We can expect that the call for action on air pollution to significantly increase as NHS funding is curtailed. It is not viable that the Government states it will safeguard and invest in the NHS, while encouraging and allowing infrastructure projects which are known to seriously affect health.

The Hilton Action on Traffic group has shown that Hilton is already exposed to high levels of HCV traffic, recording 575 HCVs over 7.5 tonnes in one day, in a recent study (2014). We lie on a route which sees companies such as Mick George (skips) and Marshalls (hard landscaping materials) sending their massive trucks through the village many times a day.

These factors need to be taken together to determine the full impact on Hilton parish in terms of air quality and I contend that the conclusions indicate that air quality levels for our residents / parishioners will exceed what is deemed to be acceptable. Therefore, I request that a full study is made of these combined issues before stipulating the final design, including height levels of the A14 and local roads crossing it, and before stipulating mitigation measures which currently are minimal. I

also recommend, after the study delivers its conclusions, that the construction parameters set for the building contractors are both highly specified and evaluated regularly.

**Conclusion**

Given the means by which HA / HE and Jacobs have undertaken their consultation process, determined the measures to apply and the scope of what is measured, I am left with a very strong sense of not only being 'the losers', as was said to residents at a local HA / Jacobs exhibition, but of being side-lined and treated as insignificant pawns in a game that has already been rigged.

Highways England in picking up this accountability need to be advised that I and others will not rest until proper analysis against EU standards has been undertaken, the solution design is reconsidered and resultant mitigation measures are agreed to appropriately meet the needs of Hilton Parish.

Ann Goodridge

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