



14 May 2015

Ms Frances Fernandes
Lead Member of the Panel of Examining Inspectors
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

Dear Ms Fernandes

Following our registration as an interested party, we are now pleased to submit our detailed representations. Many of our concerns were covered in our letter of objection to Highways Agency ("HA") dated 14 May 2014 and we are incorporating the contents of that letter in this submission.

Summary of our representations

We are long-standing residents of Hilton and object to the proposed routing of the new A14 and the impact it would have on our lives in the village of Hilton. In our view:

- The political will to proceed with this project is causing it to be steamrollered through with scant regard for due process.
- The case has not been made for a completely new road.
- The consultation process was a box-ticking exercise and not in compliance with the Planning Act 2008.
- The proposed route causes the road to pass unnecessarily close to Hilton.
- The project represents poor value for money.
- There will be a significant, adverse visual effect of the elevation of the road by 3 metres as it passes Hilton and there will be consequent noise, air and light pollution which we do not currently suffer.
- Failing mitigation, the construction phase will add intolerable levels of heavy goods vehicles through the village.

- As residents who have been flooded in the past, we are concerned as to whether the flood risk has been rigorously and expertly assessed.
- Post-completion of the road, we will suffer intolerable levels of rat-running, contrary to the modelling carried out by HA.

Political will

The political will behind the proposals is immense and we are concerned that government, in its various forms, is intent on proceeding with this scheme, regardless of due process. Here are some concrete examples:

- On 8 May 2014, Jacobs, on behalf of HA, stated that “there is no realistic chance of the route being changed at this late stage”. At that time, there were over 5 weeks remaining of the consultation period.
- On 7 May 2014, The Hunts Post carried a headline "Highways Agency urged to 'get on with it' over the A14". In this article, Mike Evans, senior project officer for the A14 scheme, was quoted as saying "Overall, the response has been very positive.....by and large there is lots of support for the scheme.....". The purpose of his comments can only have been to influence people during the remaining 5 weeks of the consultation period, when HA should have been listening to the views of others.
- Between 14 May 2014 and 20 August 2014, we sent three emails to the Secretary of State, setting out our concerns over the consultation process (we can make these available to the Panel). None were answered but they were sent to HA for action – the very body which we were criticising. There was no intent to take the concerns seriously.
- On 22 April 2015, Jonathan Djanogly MP was quoted in the Hunts Post as saying “...the decision has been taken. This road is now happening...”. He obviously believes the examination process is a formality.
- The hasty submission by HA of a DCO which, by their own admission, contained known errors, omitted data such as sectional drawings and did not have the benefit of important data such as traffic modelling, which must be key to any decision on preferred routing.

We were encouraged by the Panel’s statement of independence at the Preliminary Meeting and the challenging approach to HA’s requests for timetable extensions.

The case for a completely new road

We acknowledge that there are regular problems with the current A14 and that some form of enhancement is desirable. However, we do not believe that a new road is the answer and note that most new roads simply attract more traffic and rapidly become congested. In any event, HA does not have a good record of accurate forecasting and we doubt that it reflects properly, the rapidly-changing working methods of people in this country.

Much of the congestion is caused by freight and we are not satisfied that other options, such as moving freight onto rail, have been properly considered.

Currently, we have the A428 and the A14 serving E/W and N/S traffic. It seems to us to be wanton destruction to plough another six-lane highway through the countryside between them, when it is

perfectly feasible to upgrade the existing roads. Indeed, there is a plan to upgrade the A428 but this seems to be in complete isolation to the A14 proposals. The removal of the Huntingdon viaduct is quoted as being a key requirement, yet we understand that large sums have been spent on this, which have increased its estimated useful life very substantially.

The consultation process

We set out below, some extracts from "Planning Act 2008 - Guidance on the pre-application process" issued by the Department for Communities and Local Government and highlight some which we believe were not being followed, based on the evidence we set out later in this section:

- “Many proposals will require detailed technical input, especially regarding impacts, so sufficient time will need to be allowed for this.”
- “Local people have a vital role to play at the pre application stage. People should have as much influence as is realistic and possible over decisions which shape their lives and communities.”
- “Because they live, work and socialise in the affected area, local people are particularly well placed to comment on what the impact of proposals on their local community might be; or what mitigating measures might be appropriate”
- “To realise the benefits of early consultation on a project, it must take place at a sufficiently early stage to allow consultees a real opportunity to influence the proposals. But equally, consultees will need sufficient information on a project to be able to recognise and understand the impacts.”

In our view, the consultation process can only be described as a sham.

There was an exhibition in Hilton in the autumn of 2013, which we attended. We asked many questions about the issues we will refer to below but not a single question was answered. In each case, we were told that the issues would be considered in the detailed design and there would be further consultation in Spring 2014. A booklet was issued in April 2014 and there was a further exhibition in Hilton, which we attended. Again, most of the concerns we expressed were said to be under consideration and no answers were forthcoming. (Anecdotally, a friend was told by a HA representative at that exhibition, that the minimum required mitigating actions would be implemented, and no more. Another friend who questioned HA on quality of mitigation, quoted the HA representative as responding “....even if superior mitigation only cost an extra £1, we wouldn't invest in it...”). On the other hand, the booklet did reveal a number of interesting matters:

- There was no mention of Hilton or the impact of the road on our village.
- The routing had effectively been set in concrete prior to consultations. Four of the six options considered are based on the same "preferred" route and, of the other two, Option 1 was never a serious possibility for HA (because it did not propose the removal of the Huntingdon viaduct). The final option, Option 6 seems to us to be the most obvious as it largely uses existing roads but the reasons for rejection are far from convincing.

- Option 1 was rejected because "...it did not achieve environmental benefits in Huntingdon...". This is not one of the stated objectives of the scheme and, therefore, should not have been a reason for rejection. However, we think it clearly reflects the political influence driven by the Huntingdon vote whereby environmental benefits for Huntingdon will be gained at the expense of environmental dis-benefits for Hilton, among others.

On 8 May 2014, we attended a meeting of the Hilton Parish Council, where representatives of Jacobs were present to answer questions. It is fair to say that Jacobs were well off the pace and were, yet again, unable to address any of our concerns. They did, however admit that "Hilton is one of the big losers" and state that "there was no realistic chance of the route being changed at this late stage". Some "consultation", then.

Further, we refer you to an article in the Hunts Post on 7 May headlined "Highways Agency urged to 'get on with it' over the A14". In this article, Mike Evans, senior project officer for the A14 scheme, was quoted as saying "Overall, the response has been very positive.....by and large there is lots of support for the scheme.....". In our opinion, it is highly inappropriate for a senior official to comment in this way. At the time he made his comments, the consultation period had a further five weeks to run and several exhibitions were yet to be held. The purpose of his comments can only have been to influence people during the remainder of the consultation period. We would point out that the consultation period is designed for HA to listen to the views of the community, not to tell the community what their views should be.

The consultation period closed on 18 June. Various studies related to environmental and noise impacts etc were not completed by then and it is impossible to see how we could have reached a proper view of the overall impact of the proposals.

Overall, we concluded that the consultation process was rushed through and no serious consideration was intended to be given to the points raised by the community. We felt so strongly on this matter that, between 14 May 2014 and 20 August 2014, we sent three emails to the Secretary of State, setting out our concerns over the consultation process (we can make these available to the Panel). None were answered but they were sent to HA for action – the very body which we were criticising. There was clearly no intent to take the concerns seriously.

Subsequently, the whole process has been put into doubt in our minds as, on 22 April 2015, Jonathan Djanogly MP was quoted in the Hunts Post as saying "...the decision has been taken. This road is now happening...". He obviously believes the examination process is a formality.

Value for money

We understand that the scheme is forecast to cost £1.487Bn, or nearly £100m per mile. We are staggered that such an amount can be committed to this one project given the state of government finances. In addition, a large amount has been expended in maintaining and improving the A14 and the Huntingdon viaduct over the last few years and this would presumably have to be written off – a considerable waste of public money, in our opinion.

To exacerbate the problem, HA has a poor record of forecasting. In 2007, this scheme had a forecast cost of £700m, so that forecast has doubled in a period of 8 years during which inflation has been very low. As taxpayers, we are very concerned that the actual costs will balloon even further.

There is an advanced plan to upgrade the A428, which we support. This will have a limited effect on the surrounding countryside, will be (relatively) cheap and provide access to the west and north via the A421 and A1/existing A14. In this context, the proposed A14 is unnecessary.

If required, the existing A14 could easily be upgraded relatively cheaply by comparison. HA has made the removal of the Huntingdon viaduct a centrepiece of this project, yet we understand that considerable sums have been invested in extending its life substantially.

Our final point on value for money is that we were surprised to see that HA was represented by an expensive London law firm at the Preliminary Meeting. Why are they not able to present their own case and what are they afraid of?

The proposed route and resulting pollution

The proposed A14 will be much closer to Hilton than the existing one. We believe it could have been designed to be further to the North without affecting adversely, other communities. None of the consultations have explained adequately, the reasons why the road needs to come so close to our village, resulting in more noise and more pollution. There will also be significant, adverse visual impacts from the raised road and bridges which will cut a swathe through what is currently open and peaceful countryside. We are not experts in this area and will rely on other interested parties to comment on the data which HA has made available. However, the mere fact that the new road would be within 800 metres of the village (2Km closer than the existing A14), elevated by 3 metres and with local roads crossing the A14 at a height of 9 metres means it is obvious that there will be significant, adverse impacts from noise, air and light pollution on Hilton.

In addition, under the current proposals, we will lose our westbound access to the A14 at the B1040. There seems no persuasive reason why this should be the case.

Finally, we are concerned about the longer-term effects of de-trunking the existing A14. As we understand it, one of the results is that its maintenance will be transferred from Highways Agency to the Local Authority. If so, we presume that means we will have to fund the future maintenance of this road - ironic, given the vastly negative impact of this scheme on us.

The construction phase

Unless action is taken, we will suffer huge disruption from noise and pollution during the construction phase, together with an increase in traffic. Hilton is a small village which already suffers intolerable levels of heavy goods traffic. Our house is a Listed Building on the Potton Road and shakes markedly every time one of the estimated 500 HGVs drives through each day - Potton Road is a B road which simply should not be subjected to these traffic flows.

In our view, it is imperative that a 24 hour HGV ban be introduced in Hilton prior to the construction phase. There is no need whatsoever for HGVs to drive through Hilton as there are more appropriate A roads.

Flood risk

Flood risk is, rightly, high on every home-owner's agenda and that is particularly so in Hilton, where dozens of houses (including ours) were flooded about 10 years ago. We are surprised there is no acknowledgement of this and no real detail on how the additional flood risk created by this new road is to be mitigated.

Traffic flows following completion

As stated above, there is no proposed access to the A14 from the B1040, as is currently the case. Consequently, we will suffer from additional traffic as Hilton will be used as a rat run for those travelling from the North (and, to a degree, from the East), intending to join the A14 westbound. Contrary to the planners' expectations, traffic will enter Hilton and then travel down Graveley Way towards the A1198. That route is at least a mile shorter than the official route via the existing A14/A1198 and we are certain that satellite navigation systems will direct drivers that way. We believe there will be a need for some serious traffic calming to make this route unattractive. HA claims that this is "not their problem" but we would argue that the issue arises directly from their design of the new A14. We would also look for a commitment to proper signage to direct cars from the North along the existing A14 westwards.

Our overall conclusion

It is clear that Hilton is being sacrificed by HA for the benefit of other parts of the constituency. There is no "positive legacy" for us and we have been hung out to dry. There are several practical measures, which we have outlined, that could be taken, at relatively modest cost, to ameliorate the damage which will otherwise be done to our beautiful village and we urge you to implement them, in the event that the design of the scheme is not reconsidered.

Summary of actions we believe should be taken

- Highways England ("HE") to reconsider Option 6
- HE to explain properly, its decision to route the road so close to Hilton when it is open to them to move it further north
- HE to be challenged on value for money as common sense tells us that this is an unnecessarily expensive proposal
- HE to be required to factor in the best mitigation in respect of noise, air and light pollution
- HE to recognise the need for traffic calming in Hilton as a result of their scheme design and include it as part of their proposals.

- HE to be challenged on the rigour of their flood risk mitigation proposals
- Implement a permanent 24 hour HGV ban throughout Hilton prior to the commencement of construction

Thank you in advance for your consideration of our representations. We look forward to discussing them with you as the examination progresses.

Richard and Lynn Norton