

Hilton Parish Council

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

12th June 2015

Dear Ms Fernandes

Your reference: TR010018

Representation Number: 180

Written representation on the Application by Highways England for an Order Granting Development Consent for the A14 Cambridge to Huntingdon Improvement Scheme

Please find attached our written representation regarding the above scheme submitted in time for Deadline 2, 15th June 2015.

Yours sincerely

Peter Baliki
Chairman
For & on behalf of Hilton Parish Council

Hilton Parish Council

Written representation on the Application by Highways England for an Order Granting Development Consent for the A14 Cambridge to Huntingdon Improvement Scheme

Index

Executive Summary	Page 3
Representations on the Consultation Process	Page 3
Value for Money	Page 6
Choice of Route	Page 7
Visual, Noise, Air and Night-Time Light Pollution	Page 8
Traffic Impacts	Page 9
Lack of Detail in DCO Application	Page 10
Quality of Life & Heritage	Page 11
Conclusion	Page 12

Appendices

Appendix 1	Detailed representations on Pollution	Page 14
Appendix 2	Detailed representations on lack of detail in DCO Application	Page 18

1. Executive Summary

1.1 We believe that Hilton will be significantly, and adversely, affected by the construction and operation of this proposed new road. In our opinion;

1.1.1 The consultation process lacked transparency and did not comply with the Planning Act 2008.

1.1.2 The proposed development does not justify the planned expenditure and is not a good use of public funds.

1.1.3 The choice of route seems to have been pre-determined and HE has consistently failed to provide reasons and evidence as to why it must pass so close to Hilton.

1.1.4 There is a lack of effective measures to mitigate visual, noise, air and night-time light pollution.

1.1.5 There is a lack of effective measures to mitigate ongoing traffic intrusion, including rat-running.

1.1.6 There is a serious lack of detail in the available documentation particularly defining mitigation measures, traffic modelling and environmental impacts.

1.1.7 The construction phase will bring intolerable levels of heavy goods vehicles through the village together with an associated increase in noise, air & light pollution.

1.1.8 Insufficient consideration has been given to the adverse effect of the scheme on the historic assets of the village.

1.1.9 There will be an unacceptable loss of tranquillity and a reduction in the quality of life for Hilton residents.

2. Representations on the Consultation Process

2.1 The current A14 is 2.7km from Hilton, and at ground level. Most of our concerns in relation to the proposed A14 stem from the fact that the new road would be within 800m of the village and elevated by up to 3m, with the consequent effect that local roads crossing the A14 would be 11m high.

2.2 By any measure, it is obvious that this would cause significant, adverse impacts from noise, air and light pollution on Hilton. Yet this is dismissed by Highways England (“HE”), formerly Highways Agency, with *“Overall effects on villages and community facilities are not expected to be significant”* and *“No significant residual adverse effects from noise or air pollution are predicted for Hilton.”* (Source: DCO Application, Volume 5, 5.2 Appendix E)

2.3 In our view, this demonstrates that HE were never serious about listening to the concerns of consultees. This was reinforced by Jacobs in a public meeting on 8th May 2014 when they announced that *“Hilton are big losers in this scheme”* and *“there is no realistic chance of the route being changed at this late stage”*.

2.4 In our view, the consultations were intended to be a box-ticking exercise, as evidenced by;

2.4.1 Unavailability of important data and information

2.4.2 The presenters from HE and Jacobs being consistently unable (or unwilling) to provide answers to any questions which were asked

2.4.3 Hilton residents raising more concerns at the consultation stage than other affected communities yet no noticeable amendments relevant to Hilton were made to the scheme

2.5 We believe that some of the objectives set by HE, and their responses, are simply sugar-coating. Objectives such as *“...create a positive legacy: recognising the wider benefits of the road improvement scheme for local communities...”*, *“...a design that is, so far as possible, sympathetic to the needs and wishes of stakeholders...”* and *“...allow consultees the opportunity to influence the scheme so it better meets their needs and objectives...”* sound very community-spirited but are just words when set against the significant adverse effects of this scheme on Hilton and the lack of response by HE to any of our concerns.

2.6 HE claims that *“...its guiding philosophy has been to encourage and engage in a genuine two-way dialogue with consultees recognising the need for sustainable, long-term transparent and trusted relationships with local authorities, local communities, land owners and the public.”*

2.7 We do not accept that consultations have been transparent or trusted. HE have gone through the motions with us but failed to provide relevant information or answers to questions during the consultation process. There has never been a sign that they would make any allowances or changes for us, only that Hilton is to be a *“...big loser”*.

- 2.8 At a meeting called by the HE on 16 October 2014 at Hemingford Golf Club with representatives of the Hilton PC subcommittee, no questions were answered but various possible mitigating measures were hinted at.
- 2.9 However, none of the discussed mitigating measures were included in the DCO other than one small concession to add an earth mound next to the road but this is far from adequate.
- 2.10 We do not consider that the consultations carried out by HE complied with "Planning Act 2008 - Guidance on the pre-application process" issued by the Department for Communities and Local Government in at least the following respects;
- 2.10.1 People in Hilton will have had no influence over the decisions which will shape their lives and communities.
- 2.10.2 Although we are particularly well placed to comment on what the impact of proposals on our local community might be and what mitigating measures might be appropriate, none of the observations made have been incorporated into the application.
- 2.10.3 We have not been provided with sufficient information to be able to recognise and understand the impacts.
- 2.11 Hilton has a history of flooding and residents voiced concern that the proposed development could increase the risk of flooding in the future.
- 2.12 The fact that these concerns are still being voiced in the recently published relevant representations by the Planning Inspectorate demonstrate the lack of answers provided by the HE during Consultation (as well as the lack of detailed, understandable, information in the DCO submission).
- 2.13 Residents of Hilton say they did not get answers to many of their questions during the consultation period from the HE or their representatives (Jacobs et al). In addition, the information that was made available with respect to Hilton was either unclear or incorrect. Evidence of this can, again, be seen in the relevant representations published by the Planning Inspectorate, a good example being the misunderstood height of the Potton Road Bridge over the new A14.
- 2.14 MP Jonathan Djanogly's statement "...*The Decision has been taken. This road is now happening...*" as reported in the Hunts Post on 22nd April 2015 further confirms our belief that the consultation process was undertaken after a decision about the proposed route had been taken and is, therefore, invalid.

- 2.15 The recent announcement by HE that they have appointed a number of high value contracts for the implementation of the proposed Scheme before the end of the Examination Period is an indication that they expect the Application to be approved regardless of the representations of legitimate Interested Parties (“IP’s”).
- 2.16 The proposed scheme is basically very similar to one that was put forward 14 years ago and largely the same one which was cancelled by the Coalition Government in 2010. It fails to take account of changes in Government policies e.g. green/environmental strategy and EU legislation over the years.
- 2.17 HE claims that *“The consultation also helped identify issues of most concern to those living in the vicinity of the proposed scheme and, where appropriate, the Highways England has sought to provide mitigation of those impacts”*. We repeat that no noticeable amendments relevant to Hilton have been made to the scheme, despite specific suggestions made by us in a number of areas.
- 2.18 We believe the above demonstrates HE may have an underlying management culture that they can proceed irrespective of any real consultation with IP’s or proper regard of processes set in law. As such, we also are concerned that we may be denied the protection against improper or inappropriate planning decisions the law intends to provide.

3. **Value for Money**

- 3.1 The current cost estimate for the scheme is £1.487 Billion, or nearly £60 Million per mile. By any measure, this is an extraordinary sum of money when considered in the light of continuing pressures on government spending and the other options available which we believe would be cheaper and less destructive.
- 3.2 We urge you to enquire into the amounts already expended in maintaining and improving this stretch of the A14 over the last few years and establish whether the unamortised cost is included in the current estimated cost.
- 3.3 In 2010 the Scheme was cancelled because it was unaffordable and clearing the country’s financial deficit was the Government’s aim. Yet seemingly miraculously in 2014, despite the deficit still being a long way from being cleared, the most expensive Scheme was authorised.
- 3.4 There are a number of much less costly options available, yet despite HE being directed by the Planning Inspector to cost and report on them at the Public Enquiry in May 2010, they have not done so.

- 3.5 The most obvious proposal is to widen the existing A14, thus eliminating the Southern By-Pass and to use the money saved to complete the duelling of the A428 from Caxton Gibbet to St Neots. In fact the A428 connects naturally to the A14 from both the east and the west.
- 3.6 We note that the cost of the scheme was estimated in 2006/7 to be in the region of £700m. For this estimate to have doubled, during a period of very low inflation, confirms HE's inability to forecast accurately to within any sensible tolerance. On this basis, we believe the taxpayer can confidently expect the eventual cost to be very substantially in excess of current estimates and the net present value to plummet accordingly.
- 3.7 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 A428/ M1 and A1/existing A14. Indeed spreading the traffic load across an improved existing road network, including the current A14 has not been considered as an option. In view of the amount of public money to be spent surely a study of the bigger region wide picture should have been considered?
- 3.8 If required, the existing A14 could easily be upgraded relatively cheaply, by comparison. HE has made the removal of the Huntingdon viaduct a centrepiece of this project, yet we understand that considerable sums have recently been invested in extending its life substantially.

4. **Choice of Route**

- 4.1 Notwithstanding our concerns that the Huntingdon Southern Bypass ("HSB") is unnecessary, we wish to express our objections to the proposed route.
- 4.2 Despite questioning HE repeatedly, they have not provided evidence to support the proposed route, which would bring the A14 to within 800 metres of Hilton village centre.
- 4.3 In our view, HE's repetitive reliance on the 2001 Cambridge to Huntingdon Multi Modal Study ("CHUMMS") does not answer our questions regarding the proximity of the proposed route to Hilton.
- 4.4 In addition, it is unnecessary to route it so close to Hilton, except on cost grounds (although the estimated cost is already so eye-watering that hardly seems to be a valid reason). We have consistently maintained that it could be routed further to the north without adversely affecting other communities.
- 4.5 HE have indicated that having decided the route should pass south of Huntingdon the precise positioning was chosen in consideration to the existing conurbations to the north, Fenstanton, the Hemingfords and Godmanchester.

4.6 Whilst we support the improvements arising from the reduction in all forms of pollution for these communities, we ask you to consider the injustice of the 400 households of Hilton paying such a heavy price, when there may be an alternative that has not been properly considered.

4.7 Residents of Hilton have also asked why the A14 needs to be so close to the village given there is land further north of the village. HE have yet to provide a reply to this question so important to the village. All that was given was vague excuses or promises to “get back to you...” that were never followed up.

4.8 We think it is significant that, of the six route “options” set out by HE, four included the Huntingdon Southern Bypass (“HSB”) as currently proposed – HE never presented the full range of options for consultation and never intended any other route option to be considered. Volume 7.1, Case for the Scheme, adds nothing to our understanding of this matter.

5. **Visual, Noise, Air and Night-Time Light Pollution**

5.1 HE claims that “*no significant residual adverse effects from noise or air pollution are predicted for Hilton.*” (Source: DCO Application, Volume 5, 5.2 Appendix E)

5.2 Indeed, in response to the Hilton Parish Council statement “*There is a lack of consideration of impact on quality of life of residents of Hilton*”, HE answered; “*Overall effects on villages and community facilities, including Hilton, are not expected to be significant*”. (Source: page72, DCO application response to relevant representations 1st June 2015).

5.3 Irrespective of how HE wishes to present the scheme, the proposal to build a 6 lane highway elevated 3m above the existing ground level just 0.8km from Hilton (2km closer than the existing A14) will result in substantially greater visual, noise, air and light pollution than currently experienced.

5.4 There can be no question about the resultant increase in pollution yet there is no recognition by HE of the adverse effects this road will have on the quality of life in Hilton nor the attendant health risks. Surely common sense must discredit HE’s opinion and also the various computer modelling they often refer to support their views?

5.5 We are far from convinced that the road needs to be elevated so much. We are told that the height is required to accommodate appropriately sized culverts to deal with anticipated water flows. If the anticipated water flows are so great, perhaps that is a very good reason not to build the road at the proposed site?

- 5.6 The proposed bridge to enable the B1040 to cross the new road will result in the top of HCV's being at least 15m above the existing ground level but HE has ignored the substantial light pollution which will arise from this.
- 5.7 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.
- 5.8 Subsequent relevant representations to the Planning Inspectorate from Hilton residents on the same subject are further evidence of HE's lack of consultation in this important area.
- 5.9 In our opinion, HE has been dismissive of the effects on Hilton and this has led to minimal mitigation measures being included in the DCO. It is inexplicable that HE can claim there will be no significant adverse effects for Hilton.
- 5.10 We have retained the services of our own Noise Pollution Expert in an attempt to understand the true likely impact of Noise Pollution from the proposed development. At the time of writing this report, our Expert has been denied access to the digitised data that was requested from Jacobs. We understand they are acting on instruction from HE in this regard.
- 5.11 Our Expert advises it is still possible to test HE's disclosed modelling but at an unnecessary increased workload and with less accuracy. We wish to reserve the right to comment further on this area once we have access to the Experts report.
- 5.12 The UK has failed to comply with EU directives and the Supreme Court has ruled that the UK must prepare plans to meet EU nitrous oxide limits by 2015.
- 5.13 The effect of the HSB means that traffic will have to travel a further 5 miles between Bar Hill and Alconbury, which equates to a 33% increase in fuel burnt and pollutant emissions. HE quote the Government's aim to "where possible contribute to the health and quality of life" (Chapter 6.1, para 14.1.14) yet the impact on health appears to have been ignored by HE. They should be required to respond to the latest research in the BMJ journal "Occupational and Environmental Medicine".

6. **Traffic Impacts**

- 6.1 HE states that "*a number of villages, including Hilton, would benefit from a reduction in through traffic*". HE is relying upon a traffic model to which we do not have access and are, therefore, unable to challenge. We do know that the modelling is based on a series of assumptions, again to which we have no access and therefore cannot challenge.

- 6.2 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 undertaking a verification study on the HE/Jacobs modelling data included in their DCO – so that “*we all know what the actual impacts are.*” We do not see how HE can make the claims that they do whilst the verification process is still underway (with no anticipated completion date).
- 6.3 In any event, a simple sense check tells us that the traffic modelling quite clearly produces the wrong answer for Hilton.
- 6.4 As an example, if we consider traffic from the north of Hilton intending to travel west then it is likely to take the shorter route via Hilton and Graveley Way which is 1 mile shorter than the HE preferred route utilising the de-trunked old A14.
- 6.5 This is an intolerable and unnecessary additional burden on Hilton and is a direct result of HE’s plans. We have pointed this problem out to HE, however they declined to recommend any form of traffic calming or other mitigation or correct their traffic model which we believe to be flawed. They consider traffic calming to be an issue for CCC but, in our view, they are abdicating responsibility for a problem created by this scheme.
- 6.6 Additionally, HE has not really addressed the issue of HCV traffic during the construction phase. The noise and pollution generated by the construction process will be further exacerbated by the activity at the gravel pits next to the B1040 just north of Hilton and the substantial lorry and plant movements associated with them.
- 6.7 HE claims that deliveries will be directed along the new A14 as it is constructed but there is no commitment that we can see to keep construction traffic out of the villages, including Hilton. Hilton is already exposed to high levels of HCV traffic, recording 575 HCVs over 7.5 tonnes in one day in a recent study, and construction traffic in addition to this would be intolerable. In our view, the B1040 is an inappropriate road for HCV traffic and strongly believe that there should be a 24 hour ban through the village. Again, HE declines to engage in this discussion on the ground that this is not their problem.

7. **Lack of Detail in DCO Application**

- 7.1 HE claims in the DCO Application that it has complied with Regulation 5(2) (o) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.
- 7.2 In our opinion, the documentation is deficient in that it does not allow for a proper appreciation of, inter alia, external appearance and landscaping. We set out some specific examples in the following paragraphs.

7.3 These regulations specifically require sectional drawings for every bridge, embankment etc. No such cross sections were provided, only longitudinal sections. This means it is impossible to determine the shape and arrangement of the bunding in relation to the road. As this is one of the important features of mitigation, it is a significant oversight.

7.4 It has been confirmed by HE that the new road will be a 'Smart road' and as such the expectation is to have illuminated sign gantries placed at regular intervals along the course of the road. As these gantries will be high, probably 8m to 10m above existing levels the visual impact will be significant. We are aware there are no gantries to be positioned close to Hilton, however we seek assurance that this situation will prevail.

7.5 Whilst HE claims that mitigating barriers will be designed in accordance with the Design Manual for Roads and Bridges (Source: Volume 6 DCO Application), the evidence we have suggests otherwise. We understand that HE is proposing "earth mound" barriers rather than a more effective hard edge arrangement, for instance an earth mound with high acoustic fence and planting or even better a Gabion Wall (road side) with mound and fence on the other facing Hilton.

7.6 The height of the proposed earth mound is stated as 2m above road height, but is subject to a dimensional tolerance of +/- 1m which could mean the earth mound will be no more than 1m above the road height which will be inadequate.

7.7 Notwithstanding the enormous volume of paper put out by HE, approaching nearly 800 documents, the information is deficient on vital issues such as traffic flow predictions, noise measurement, bridge design, demonstration of compliance with pollution legislation, etc. The public, and indeed yourselves as Examining Authority, are being asked to examine flawed and partial data. In other words HE's submission is incomplete and should be rejected.

7.8 We have provided a more detailed representation on this subject as Appendix 1.

8 Quality of Life & Heritage

8.1 The historic village of Hilton is a quintessential English village set within a verdant landscape. The village can be dated back to Saxon times.

8.2 Many villagers moved there to quietly enjoy the unique features of the village and bring up their families in a healthy environment.

8.3 This will be largely destroyed by a road which, because of its height, will be a huge eyesore and, because of its proximity to the village, will bring with it increased pollution of all kinds.

- 8.4 The A14 Study Output 1 identified the impact on health resulting from noise and vehicle emissions in the existing A14 corridor as a key quality of life challenge.
- 8.5 It is our opinion that the DCO Application will create similar issues within the new A14 corridor for Hilton with the planned proximity to the village.
- 8.6 Many residents of Hilton have expressed concern that the Heritage of the village is preserved given the historical relationship with 'Capability' Brown and the presence of a rare Turf Maze dating from the restoration of the monarchy in 1660. However, there is no acknowledgement of these concerns nor of the perceived loss of such amenity in the consultation, let alone any amendments to the DCO Application.
- 8.7 We have not received any assurances that nearby borrow pits will be return to a natural landscape and that extraction will not continue on a commercial basis.
- 8.8 There has been little consideration of the intrusion by the scheme into the existing tranquil nature of Hilton Village and of the historic and architectural assets of the village with the resultant reduction in quality of life for the residents and in contradiction to a stated objective of creating a positive legacy for the residents of Hilton (Source: DCO Application, Volume 7.1 Case for the Scheme, Paragraph 3.6).
- 8.9 In February 2014, The Right Honourable John Hayes MP made a speech entitled 'Beautiful Roads' (<https://www.gov.uk/government/speeches/beautiful-roads>) and set out his vision "*...to protect and even enhance the beauty of our countryside...*" when designing major roads such as the proposed DCO Application. We cannot find any evidence that this type of thinking has been considered by HE when they submitted the DCO.

9 **Conclusion**

- 9.1 It is our contention that the consultation process carried out by HE did not comply with the Planning Act 2008 (as amended).
- 9.2 It is also our opinion that HE had decided on the route and associated infrastructure before the end of the consultation period and then went through a box ticking exercise in their consultation with Hilton residents.
- 9.3 Whilst we agree with the need for change, we do not believe the optimal solution for the UK taxpayer, particularly residents of Hilton, has been proposed by HE in the delivery of the DCO Application.
- 9.4 It is clear that HE decided some time ago that Hilton was to be the loser in this scheme and its legitimate views and concerns could be ignored.

9.5 We believe the slightest possibility that the health of communities close to the preferred route may be put at risk should become an important reason to reconsider the route.

9.6 On these grounds, we ask that you reject the DCO application.

Appendix 1

Detailed representations on Pollution

HE claims that *“no significant residual adverse effects from noise or air pollution are predicted for Hilton.”*

We repeat that it is inexplicable that HE can make this claim when the proposal is to build a 6 lane highway elevated up to 3m above the existing ground level just 0.8km from Hilton (2km closer than the existing A14).

Noise

We do not believe that HE’s proposal to provide a 2m high bund along part of the southern boundary to the new road is sufficient to address the additional noise pollution.

HE states that the provision of the localised length of bunding will neutralise their decision to route the road much closer to Hilton. We do not believe this is credible. A high proportion of the traffic likely to use the new A14 will be HCVs including large container vehicles approaching 5 m in height.

We believe sound barriers need to be provided in addition to the bund which would also help to combat the visual intrusion of the road especially at night.

Light

HE has not addressed the adverse noise, light and air pollution conditions generated by traffic using the B1040 bridge. HE has ignored the particular issue that HCVs using the bridge will often have their lighting set above the top of the drivers cab and that could be 15m above ground level.

Air

HE say that the standards adopted by The World Health Organisation (WHO) are not higher than those set out in the relevant EU Directive and UK legislation and standards. (Source: HE Response to representations, dated 1st June 2015)

Understandably, residents of Hilton (and other affected communities) would probably not agree with them on this matter.

In our opinion however, the standards adopted by HE 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 PM₁₀ HE use a higher standard annual mean, 40µg/m³, rather than WHO 20 µg/m³
- Particulate matter levels - HE do not measure PM₂₅ as suggested by WHO.
- HE do not measure sulphur dioxide, or ozone. Yet these feature in reported incidents of UK high air pollution (see box below):

From European Respiratory Society, the following extract as an 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 (NO₂) 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 NO₂, sulphur dioxide (SO₂) 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 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.*"

Please also consider the following views of **Charles Andrew FRCPATH**:

"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."

Reliance on UK standards may be called further into question as a result of the recent judgement in the UK Supreme Court (*ClientEarth v Secretary of State*) in that the UK was found to be in breach of Directive 2008/50/EC (The Air Quality Directive).

HPC, on behalf of its parishioners, ask you to consider the effects of increased air pollution on the long term health of the parishioners as well as the associated increase in cost to the NHS as a result of the effects of pollution on health.

It is our opinion that, regardless of what standards HE need to comply with, the highest possible diligence should be applied and considered when committing communities south of the preferred route to increased levels of pollution and risk, however low they are. This is especially true when there are alternative options available.

Cost should not be an issue in this matter!

Appendix 2

Detailed representations on lack of detail in DCO Application

Source: Volume 2 – Drawings

In the DCO document under ‘General arrangement plans’ the introduction states:

“1.3. This document comprises part of the suite of Application documentation and is included in the Application in compliance with Regulation 5(2)(o) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, which requires:

any other plans, drawings and sections necessary to describe the proposals for which development consent is sought, showing details of design, external appearance, and the preferred layout of buildings or structures, drainage, surface water management, means of vehicular and pedestrian access, any car parking to be provided, and means of landscaping;”

The information available does not allow for a clear idea on the appearance in detail of the new road and therefore does not comply with this regulation.

The regulation 5(2)(o) is quoted on every drawing in the title box.

The introduction guidelines for the ‘Engineering section drawings’ goes on to state:

6(2) If the application is for highway related development or for the construction or alteration of a railway, it must be accompanied by section drawings to suitable horizontal and vertical scales which show, by reference to Ordnance Survey or Chart datum-

(a) The levels of the proposed works, including in particular and where relevant

(i) ground levels; through which it would pass.”

(ii) the height of every proposed bridge, viaduct, aqueduct, embankment, and elevated guideway;

(iii) the depth of every proposed cutting and tunnel;

(iv) the levels of the bed of any tidal waters or inland waterway in which it is proposed that any works should be situated;

(v) the height of every structure or device (including a cable, but not catenary and related equipment) intended to be erected above, on or below the surface of, or on or beneath the bed of tidal waters or an inland waterway; and

(vi) drainage outfall details for highways;

(b) a cross section of every intended tunnel and any altered gradient of a carriageway or a way forming part of a guided transport system on either side of every level crossing, bridge, tunnel or underpass which would carry the carriageway or way or through which it would pass.”

Again, the level of information called for here is not available.

Under ‘Engineering Section drawings’, there are no cross sections of the road, only longitudinal sections. This means it is impossible to determine the shape and arrangement of the bunding in relation to the road. As this is one of the important features of mitigation this is a significant oversight.

In the ‘Approach to the EIA’ (VOL 6, 6.1 Statement Chapter 6) the design of mitigating barriers will be done in accordance with the Design Manual for Roads and Bridges (DMRB) (Highways Agency et al., 1993). From the limited design information provided it is hard to see if the design is in compliance with this manual however from these following few extracts we must assume not:

“Department for Transport, The Design Manual for Roads and Bridges (DMRB), Vol10, Section 5, Chapter 2,4

2.17 It has been shown that a sharp edge at the top of a barrier increases its efficiency, so that a vertical fence is more effective than an earth mound of the same height. By using a low barrier on top of an earth mound, a given level of noise reduction can be provided with less visual impact. Similarly, short barriers at the top of cuttings can improve their acoustic efficiency.”

A combination of a fence and mound would give better noise mitigation. As this is the preferred method of the Department for Transport why has this not been proposed in the DCO?

It goes on to say:

“2.18 Raising the height of a barrier increases the size of the shadow zone. The minimum effective height for a barrier is normally 2 metres although the use of lower barriers may be appropriate in conjunction with cuttings or earth mounding. Although barriers up to 10 metres in height have been used in other countries, structural constraints normally limit the maximum height of simple fence type barriers to about 5 metres.”

The current DCO application calls for a 2 meter earth bund with a vertical tolerance of +/- 1m. This could in practice leave sections of the mitigation bund at just 1m above road level and thus not comply with this directive.

A combination of bund, absorbent timber panels and planting to soften, is the conclusion this manual reaches in the section: 'Rural Case Studies' for land described as 'Arable Plain'.

Alternatively:

We know from above, a sharp edge to the barrier increases the efficiency. We also know that the closer this edge is to the source of the noise the more beneficial the angle of diffraction. The Design Manual goes on to say:

"2.13 The area behind the barrier which benefits from the noise reduction is known as the "shadow zone" The angle of screening varies according to the angle through which the path of transmission is diffracted."

Therefore the steeper the angle of the road facing slope the more efficient the barrier. An alternative solution would be a Gabion Wall; the Design Manual says:

"4.8 Gabions (wire cages filled with stone and some soil) can also be appropriate to retain the steep slopes in a rural context."

Why has this design not been considered?