



25 September 2015

Ms Frances Fernandes
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol, BS1 6PN

Dear Ms Fernandes

Having participated fully in the consultation and Examination, including attending a number of the issue-specific hearings, I thought it would be helpful to summarise my thoughts and conclusions for consideration by the Panel.

Route Choice

As I have referred to in my various representations, I do not believe that Highways England ("HE") has made the case for driving a whole new road through the countryside. It certainly lacks strategic thought or direction, as evidenced by the A428 upgrade being progressed in complete isolation, and I find it hard to believe that it represents value for money, given the other alternatives that were inadequately assessed by HE. I accept that I am not an expert in these matters and I do not have the resources to retain equivalent experts but I have been in business for a very long time and my instincts are usually reliable. On this matter, I have to rely on your expertise and judgement.

DCO and the Examination process

Firstly, I would like to say that I have been impressed with the diligence and challenge demonstrated by the Panel and express my appreciation to the members.

In my view, the Application was rushed. Whether this is due in part to the immense political pressure being applied, I leave you to judge. HE's documentation was defective in a number of important respects and far too much detail has been left up in the air, even at this late stage in the process. Only you can decide whether the scheme is sufficiently well developed to be capable of being approved but the lack of detail is of great concern to me.

Throughout the process, HE has been arrogant, evasive and stonewalling. Their responses to challenges have invariably been either off-point or a regurgitation of what is set out in the minimum requirements. It has not approached the Examination process with an open mind. It has viewed the process as a quasi-judicial one, as evidenced by its reliance upon London solicitors and even a QC (I question the necessity and cost of those). It has also treated the Examination process with disdain, in my view, by retaining (at public expense) consulting engineers and construction companies to proceed with detailed design and commence construction, prior to ExA completing its work and reaching its independent recommendations.

Once ExA completes its work and makes its recommendations, HE will only be answerable to the SoS (its owner): there will be no independent checks, balances or examinations. Accordingly, it will have a free reign to proceed as it wishes, regardless of the consultations which it has proposed but not formalised in any way.

As a result, if this DCO is approved in its current form, I predict that HE will breathe a sigh of relief and proceed with the scheme on the basis of minimal consultation and lowest cost. I urge the ExA to reject the DCO application on the grounds that it is not sufficiently detailed and provides no protection to interested parties once the Examination is complete. If ExA is minded to approve the application, I hope it will be subject to onerous conditions.

Impact of the proposed scheme on Hilton

I do not propose to repeat my previous detailed representations regarding the negative impacts on Hilton. I would, however, like to provide some colour to the way in which my concerns have been addressed by HE.

At no point has HE denied that Hilton will be significantly and adversely affected in respect of the concerns raised. Indeed, on more than one occasion, it, or one of its representatives, has declared that Hilton is one of the big losers in this scheme. Yet, HE has not provided for any mitigation in its plans, save for some visual screening which might have some visual effect fifteen years after completion. Instead, it has chosen to rely upon the minimum requirements under the Design Manual for Roads and Bridges. I do not see how this is compatible with the speech entitled "Beautiful Roads" delivered on behalf of the Department for Transport by The Rt Hon John Hayes MP on 4 February 2015 which included the following quotes:

- "making sure every project is rooted in its locality and actually enhances the natural landscape"
- "Where roads sink softly into the landscape"
- "Where people reminisce about how bad it was before the work was done"
- "Our goal is not just to undo the most intrusive, insensitive road design of the past 50 years. It's to create a new aesthetic. Values that reflect and even enhance the beauty of the local landscape"
- "And I want that future to start now"

I urge the Panel to question HE as to how it has applied this policy in relation to Hilton.

Along the same lines, HE has repeatedly stated its desire to leave a positive legacy yet I see only negatives for Hilton in this scheme. The village will lose its local access to the new A14, suffer adverse pollutions of all kinds and a worsening traffic problem. None of these can be denied. HE has been unable to point to a single positive legacy for this village, preferring to rely on its assessment that we will not endure *sufficient* pollution etc to require it to take any mitigating action. It pointedly ignores the delta for us, which is negative in each case. I urge ExA to require HE to recognise the detrimental effects that this road will have on Hilton and consider what it (HE) can do to leave some form of positive legacy. For example, it could engineer, in conjunction with CCC, a 24 hour HGV ban on the B1040, which would reduce noise and air pollution in the village, thus offsetting, if only in part, the increases we will suffer from the design of the new road. This would be a welcome positive action by HE instead of simply arguing that it is not responsible for such matters.

Conclusion

I very much hope you agree that the proposed scheme has only detrimental effects on the village of Hilton. If you are minded to concur with the proposed routing, I hope you will consider requiring the amendments proposed by Hilton residents to be implemented by HE. In my view, any changes to alleviate the situation need to be incorporated into the DCO, otherwise HE will have no incentive to do anything but the minimum.

Yours sincerely

Richard Norton