

A417

Missing Link

Report on Public Consultation - Appendices

March 2019

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Appendix A - Elected representatives invited to participate in the consultation

Title	Name	Surname	Stakeholder Group / Name
Councillor	Doug	Nelson	Badgeworth Parish Council
Councillor	Jill	Jones	
Councillor	Max	Bruckshaw	
Councillor	Mike	Howe	
Councillor	Nigel	Cottell	
Councillor	David	Hitchcock	
Councillor	Chris	Haines MBE	
Chairman	Tom	Overbury	Brimpsfield Parish Council
Councillor	Andrew	Ward	
Councillor	Emma	Ryan	
Councillor	Heather	Eaton	
Councillor	Roger	Lock	
Councillor	Jane	Parsons	
Councillor	Brenda	Parish	Brockworth Parish Council
Councillor	Carol	Green	
Councillor	Carole	Neal	
Councillor	Cheryl	Joyce	
Councillor	Daisy	Neal	
Councillor	Fiona	Miles	
Councillor	Frank	Green	
Councillor	Harry	Turbyfield	
Councillor	Iris	German	
Councillor	Jeanette	Styles	
Councillor	Jim	Hunt	
Councillor	John	Clarke	
Councillor	Katie	Mumford	
Councillor	Mike	Hobden	
Councillor	Ron	Furolo	
Councillor	Ruth	Hatton	
Councillor	Sue	Neal	
Councillor	Steve	Jordan	Cheltenham Borough Council
Councillor	Dan	Powell	Coberley Parish Council

Title	Name	Surname	Stakeholder Group / Name
Councillor	Hugh	Piggott	Coberley Parish Council
Councillor	Joanna	Thurnham	
Councillor	Joanne	Marshall	
Councillor	Christopher	Hancock	Cotswold District Council
Councillor	Mark	Annett	
Councillor	Mark	MacKensie-Charrington	
Councillor	Nicholas	Parsons	
Councillor	Stephen	Hirst	
Councillor	Sue	Coakley	
Councillor	Julian	Lavington	
Councillor	David	Metcalf	
Councillor	Eileen	McKay	
Councillor	Liz	Workman	
Councillor	Stuart	Drysdale	
Councillor	Stuart	Bradley	
Councillor	Marcia	Lynall	Cranham Parish Council
Councillor	Andrew	Hopkins	
Councillor	Charlie	Overs	
Councillor	Nick	Holyoake	
Councillor	Nigel	Cooper	
Councillor	Teresa	Clarke	
Councillor	Mr	Hobbs	
Councillor	Frances	Toase	
Councillor	Linzi	Gass	
Councillor	Mr	Collins	
Councillor	Mr	Cooch	
Councillor	Iain	Dobie	Gloucestershire County Council
Councillor	Jack	Williams	
Councillor	Lesley	Williams MBE	
Councillor	Lynden	Stowe	
Councillor	Mark	Hawthorne	
Councillor	Nigel	Moor	
Councillor	Paul	Hodgkinson	
Councillor	Robert	Vines	
Councillor	Sarah	Johns	
Councillor	Vernon	Smith	

Title	Name	Surname	Stakeholder Group / Name
Councillor	Colin	Thompson	Great Witcombe Parish Council
Councillor	Adrian	Mears	Leckhampton Parish Council
Councillor	Angela	Swales	
Councillor	Anne	Regan	
Councillor	Chris	Nelson	
Councillor	Ian	Bickerton	
Councillor	John	Davies	
Councillor	Peter	Lynch	
Councillor	Vivienne	Matthews	
Councillor	Ywe	Jowett	
Councillor	Penny	Henty	
Councillor	Gideon	Duberley	
Councillor	Jo	Tait	
Councillor	Martin	Ractliffe	
Councillor	Russ	Coles-Jones	
Councillor	Stephen	Pritchard	
Chairman	I.C	Gobey	Shurdington Parish Council
Councillor	G	Porter	
Councillor	G.A	Allen	
Councillor	J	Greening	
Councillor	M.C	Stewart	
Councillor	M.S	Galton	
Councillor	P.D	Surman	
Councillor	R.D	Allen	
Councillor	S.D	Sowerbutts	
Councillor	Robert	Bird	Tewkesbury Borough Council
Councillor	Dave	Waters	
Councillor	Kay	Berry	
Councillor	Harry	Turbyfield	
Councillor	Ron	Furolo	
Councillor	Ruth	Hatton	
Councillor	Bridget	Wayman	
Councillor	Chuck	Berry	Wiltshire Council
Councillor	Horace	Prickett	

Appendix B - Hard-to-reach group details

Making contact

The project team initially contacted the identified hard-to-reach groups by phone. If that failed or where a number was not available, an email was sent. The hard-to-reach groups that were contacted via email are indicated in the 'Pre-launch contact' heading of the summary table (see below).

An example of this email can be found below:

Dear **XXX**

I'm emailing on behalf of Highways England regarding their consultation on improving the A417 Missing Link between the Brockworth bypass and Cowley roundabout in Gloucestershire, which will be starting public consultation next month. I'm sure you know it causes huge problems in terms of getting in, out and around the region.

We're planning to put information online and host a series of consultation exhibitions in the local area over the course of the consultation.

We're keen that everyone has an opportunity to get involved in the consultation including any adults with learning disabilities who use the route as drivers, passengers, pedestrians, or cyclists, and I was hoping we could discuss any ways you may be able to help us spread the word about the consultation.

Other organisations have volunteered to circulate information in digital newsletters or social media, and some have offered to accommodate the consultation booklet, feedback forms at events or in their reception area. If **XXX** would be interested in helping out, let me know. I can put you on the list and send out materials and information nearer the time. Otherwise, if you have any other questions, then my details are below.

Many thanks,

XXX

Launch correspondence

Upon the launch of the public consultation, correspondence was issued to all those hard-to-reach groups that had indicated that they wanted to receive further information.

An example of this email can be found below:

A417 Highways England Consultation Information

Dear **XXX**,

Thanks so much for agreeing to spread the word about the A417 Missing Link consultation. This consultation runs from Thursday 15 February to Thursday 9 March 2018. If you use this road, then make sure you take the opportunity to have your say.

We'd also appreciate it if you could use the information attached to share our message about the consultation so that as many people as possible have the chance to participate.

For more information on the consultation proposals and all the public exhibitions, please visit the consultation webpage: www.highways.gov.uk/a417-missing-link

Thank you again for agreeing to help spread the word.

XXX

Hard-to-reach group contact - summary table

The below table summarises the contact that was made with the hard-to-reach groups both before and during the course of the public consultation.

Hard-to-reach group		Pre-launch contact			Launch contact			
Category	Group	Phone contact	Email contact	Preference format of materials at launch	Contact format	Booklet included	Social media content included	Poster included
People with Disabilities	GDA (Gloucestershire Deaf Association)	X		A preference for email was expressed, to allow material to be circulated amongst members easily.	Email		X	X
People with Disabilities	Building Circles		X	Having had no success in establishing phone contact, an email was sent on 19 January 2018. No response was received.	N/A			
People with Disabilities	Gloucestershire Disability Forum		X	Having had no success in establishing phone contact, an email was sent on 19 January 2018. No response was received.	N/A			
People with Disabilities	Brandon Trust		X	Having had no success in establishing phone contact, an email was sent on 19 January 2018. No response was received.	N/A			

Hard-to-reach group		Pre-launch contact			Launch contact			
Category	Group	Phone contact	Email contact	Preference format of materials at launch	Contact format	Booklet included	Social media content included	Poster included
People with Disabilities	Insight Gloucestershire	X		The organisation decided that the scheme was not relevant or applicable to it, and therefore declined to participate further.	N/A			
Isolated, Elderly or Vulnerable People	Cirencester Community Development Trust		X	Having had no success in establishing phone contact, an email was sent on 19 January 2018. No response was received.	N/A			
Isolated, Elderly or Vulnerable People	Age UK Gloucestershire	X		It was requested that Highways England call back when the appropriate member of staff is available; although several attempts were made, no contact could be made.	N/A			
Isolated, Elderly or Vulnerable People	Carers Gloucestershire	X		A preference for email was expressed, to allow material to be circulated amongst members easily.	Email		X	X
Isolated, Elderly or Vulnerable People	2gether NHS Foundation Trust	X		A preference for email was expressed, to allow material to be circulated amongst members easily.	Email		X	X

Hard-to-reach group		Pre-launch contact			Launch contact			
Category	Group	Phone contact	Email contact	Preference format of materials at launch	Contact format	Booklet included	Social media content included	Poster included
Isolated, Elderly or Vulnerable People	Gloucestershire Council Mobile Library	X		A preference for email was expressed, to allow material to be distributed easily. This was progressed through relevant contacts at Gloucestershire County Council.	Email	X	X	X
Isolated, Elderly or Vulnerable People	Cotswold Friends	X		A preference for email was expressed; an email was then sent on 19 January 2018. No response was received.	N/A			
Young People	Young Gloucestershire	X		A preference for email was expressed; an email was then sent on 19 January 2018. No response was received.	N/A			
Young People	Gloucestershire College	X		A preference for email was expressed; an email was then sent on 18 January 2018. No response was received.	N/A			
Young People	Peter Lang's Children's Trust	X		The organisation decided that the scheme was not relevant or applicable to it, and therefore declined to participate further.	N/A			

Hard-to-reach group		Pre-launch contact			Launch contact			
Category	Group	Phone contact	Email contact	Preference format of materials at launch	Contact format	Booklet included	Social media content included	Poster included
Young People	Cirencester Housing for Young People	X		The organisation decided that the scheme was not relevant or applicable to it, and therefore declined to participate further.	N/A			
Young People	Youth Support Team	X		The organisation decided that the scheme was not relevant or applicable to it, and therefore declined to participate further.	N/A			
Time Poor/Busy Working People	Birdlip Primary School	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Time Poor/Busy Working People	Sapperton Primary School	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Time Poor/Busy Working People	Castle Hill School	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Time Poor/Busy Working People	Cranham Primary School	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Time Poor/Busy Working People	Ridgemount Cottage Nursery	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X

Hard-to-reach group		Pre-launch contact			Launch contact			
Category	Group	Phone contact	Email contact	Preference format of materials at launch	Contact format	Booklet included	Social media content included	Poster included
Time Poor/Busy Working People	The Little People Day Nursery	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Time Poor/Busy Working People	Stratton Primary School	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Time Poor/Busy Working People	Brockworth Primary School	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Time Poor/Busy Working People	Shurdington Primary School	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Holiday Home Owners, Tourists and Visitors	Cotswolds.com	X		A preference for email was expressed, to allow material to be circulated easily.	Email	X	X	X
Holiday Home Owners, Tourists and Visitors	Explore Gloucestershire	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Holiday Home Owners, Tourists and Visitors	The Cotswolds Tour Guide	X	X	Multiple attempts at phone and email contact were made; no response was received.	N/A			

Hard-to-reach group		Pre-launch contact			Launch contact			
Category	Group	Phone contact	Email contact	Preference format of materials at launch	Contact format	Booklet included	Social media content included	Poster included
Holiday Home Owners, Tourists and Visitors	Visit the Cotswolds	X		Having had no success in establishing phone contact, an email was sent on 17 January 2018. No response was received.	N/A			
Economically Challenged People	Gloucester City Homes	X		A preference for email was expressed; an email was then sent on 17 January 2018. No response was received.	N/A			
Economically Challenged People	Severn Vale Housing	X		A preference for email was expressed, to allow material to be circulated easily.	Email		X	X
Economically Challenged People	Cheltenham Borough Homes	X		The organisation decided that the scheme was not relevant or applicable to it, and therefore declined to participate further.	N/A			
Economically Challenged People	Cirencester Housing Society	X	X	Multiple attempts at phone and email contact were made; no response was received.	N/A			
Economically Challenged People	Gloucestershire Community Foundation	X		The organisation decided that the scheme was not relevant or applicable to it, and therefore declined to participate further.	N/A			

Hard-to-reach group		Pre-launch contact			Launch contact			
Category	Group	Phone contact	Email contact	Preference format of materials at launch	Contact format	Booklet included	Social media content included	Poster included
Ethnic Minorities	Gloucester Chinese Women's Guild	X	X	Multiple attempts at phone and email contact were made; no response was received.	N/A			
Ethnic Minorities	Gloucester Muslim Welfare Association	X		Multiple attempts at phone contact were made; no response was received. There was no email address for contact available.	N/A			
Ethnic Minorities	The Hindu Cultural Association Gloucester	X		The organisation decided that the scheme was not relevant or applicable to it, and therefore declined to participate further.	N/A			

Appendix C - Statutory consultees under Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The Welsh Ministers	All proposed applications likely to affect land in Wales	All applications likely to affect land in Wales	No	
The Scottish Executive	All proposed applications likely to affect land in Scotland	All applications likely to affect land in Scotland	No	
The relevant Northern Ireland Department	All proposed applications likely to affect land in Northern Ireland	All applications likely to affect land in Northern Ireland	No	
The relevant Regional Planning Body	All proposed applications likely to affect land in England and Wales	All applications likely to affect land in England and Wales	Yes	Cotswold District Council Tewkesbury Borough Council
The Health and Safety Executive	All cases	All cases	Yes	Health and Safety Executive

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The relevant Strategic Health Authority	All proposed applications likely to affect land in England and Wales	All applications likely to affect land in England	Yes	Clinical Commissioning Group, Gloucestershire Hospitals Foundation Trust, Gloucestershire NHS, Gloucestershire County Council
The relevant Health Board(1)	All proposed applications likely to affect land in Scotland	All applications likely to affect land in Scotland	No	
Natural England(2)	All proposed applications likely to affect land in England	All applications likely to affect land in England	Yes	Natural England
The Historic Buildings and Monuments Commission for England	All proposed applications likely to affect land in England	All applications likely to affect land in England	Yes	Historic England
The relevant fire and rescue authority	All cases	All cases	Yes	Gloucestershire Fire & Rescue
The relevant police authority	All cases	All cases	Yes	Gloucestershire Constabulary

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The relevant parish council, or, where the application relates to land Wales or Scotland the relevant community council	All cases	All cases	Yes	Badgeworth Parish Council Brimpsfield Parish Council Brockworth Parish Council Coberley Parish Council Cowley Parish Council Cranham Parish Council Elkstone Parish Council Leckhampton Parish Council Miserden Parish Council Shurdington Parish Council Syde Parish Council Winstone Parish Council
The Environment Agency	All proposed applications likely to affect land in England and/or Wales	All applications likely to affect land in England and/or Wales	Yes	Environment Agency
The Scottish Environment Protection Agency	All proposal applications likely to affect land in Scotland	All applications likely to affect land in Scotland	No	
The Commission for Architecture and the Built Environment	All proposed applications likely to affect land in England	All applications likely to affect land in England	No	
The relevant Regional Development Agency	All cases	All cases	No	

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The Equality and Human Rights Commission	All proposed applications likely to affect land in England and Wales	All applications likely to affect land in England and Wales	No	
The Scottish Human Rights Commission	All proposed applications likely to affect land in Scotland	All applications likely to affect land in Scotland	No	
The Commission for Sustainable Development	All cases	All cases	No	
AONB Conservation Boards	All proposed applications likely to affect an AONB that is managed by a Conservation Board	All applications likely to affect an AONB that is managed by a Conservation Board.	Yes	Cotswolds Conservation Board
Royal Commission on Ancient and Historical Monuments of Wales	All proposed applications likely to affect the historic environment in Wales	All proposed applications likely to affect the historic environment in Wales	No	
The Countryside Council for Wales	All proposed applications likely to affect land in Wales	All applications likely to affect land in Wales	No	
The Homes and Communities Agency(3)	All proposed applications likely to have an effect on its areas of responsibility	All applications likely to have an effect on its areas of responsibility	No	
The Joint Nature Conservation Committee	All proposed applications likely to affect the marine environment	All applications likely to affect the marine environment.	No	

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The Commission for Rural Communities	All proposed applications likely to affect rural communities in England	All applications likely to affect rural communities in England	No	
Scottish Natural Heritage	All proposed applications likely to affect land in Scotland	All applications likely to affect land in Scotland	No	
The Maritime and Coastguard Agency	All proposed applications likely to affect the maritime or coastal environment, or the shipping industry	All applications likely to affect the maritime or coastal environment, or the shipping industry.	No	
The Marine and Fisheries Agency	All proposed applications likely to affect the marine area in England and Wales	Where the proposal would involve carrying on any activity in the marine area in England and Wales	No	
The Scottish Fisheries Protection Agency	All proposed applications likely to affect the fisheries industry in Scotland	All applications likely to affect the fisheries industry of Scotland	No	
The Civil Aviation Authority	All proposed applications relating to airports or which are likely to affect an airport or its current or future operation	All applications relating to airports or which are likely to affect an airport or its current or future operation	No	

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The Highways Agency	All proposed applications likely to affect road or transport operation and/or planning on roads for which the Secretary of State for Transport is the highway authority.	All applications likely to affect road or transport operation and/or planning on roads for which the Secretary of State for Transport is the highway authority.	Yes	Highways England
Integrated Transport Authorities (ITAs) and Passenger Transport Executives (PTEs)	All proposed applications likely to affect transport within, to or from the relevant integrated transport area of the ITA or PTE	All applications likely to affect transport within, to or from the relevant integrated transport area of the ITA or PTE	No	
The relevant Highways Authority	All proposed applications likely to have an impact on the road network or the volume of traffic in the vicinity of the proposal	All applications likely to have an impact on the road network or the volume of traffic in the vicinity of the proposal	Yes	Gloucestershire County Council
Transport for London	All proposed applications likely to affect transport within, to or from Greater London	All applications likely to affect transport within, to or from Greater London	No	
The Rail Passengers Council	All proposed applications likely to affect rail passenger transport	All applications likely to affect rail passenger transport	No	

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The Disabled Persons Transport Advisory Committee	All proposed applications likely to affect access to transport for disabled people	All applications likely to affect access to transport for disabled people	No	
The Coal Authority	All proposed applications that lie within areas of past, present or future coal mining.	All applications that lie within areas of past, present or future coal mining.	Yes	The Coal Authority
The Office of Rail Regulation and approved operators(4)	All proposed applications likely to affect the rail transport industry	All applications likely to affect the rail transport industry	No	
The Gas and Electricity Markets Authority	All proposed applications likely to affect gas and electricity markets	All applications likely to affect gas and electricity markets	No	
The Water Services Regulation Authority	All proposed applications likely to affect the water industry in England and Wales	All applications likely to affect the water industry in England and Wales	No	
The Water Industry Commission of Scotland	All proposed applications likely to affect the water industry in Scotland	All proposed applications likely to affect the water industry in Scotland	No	
The relevant waste regulation authority	All proposed applications likely to affect waste infrastructure	All applications likely to affect waste infrastructure	Yes	Gloucestershire Joint Waste Authority (run by Gloucestershire County Council)

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The relevant internal drainage board	All proposed applications likely to increase the risk of flooding in that area or where the proposals relate to an area known to be an area of flood risk	All applications likely to increase the risk of flooding in that area or where the proposals relate to an area known to be an area of flood risk	No	
The British Waterways Board	All proposed applications likely to have an impact on inland waterways or land adjacent to inland waterways	All applications likely to have an impact on inland waterways or land adjacent to inland waterways	Yes	Canal and River Trust
Trinity House ⁽⁵⁾	All proposed applications likely to affect navigation in tidal waters	All applications likely to affect navigation in tidal waters	No	
The Health Protection Agency	All proposed applications likely to involve chemicals, poisons or radiation which could potentially cause harm to people	All applications likely to involve chemicals, poisons or radiation which could potentially cause harm to people	No	
The relevant local resilience forum	All cases	All cases	Yes	Gloucestershire Prepared
Relevant statutory undertakers	All proposed applications likely to affect their functions as statutory undertakers	All applications likely to affect their functions as statutory undertakers	Yes	

Column 1; Consultee	Column 2; Circumstances when that person must be consulted about a proposed application.	Column 3; Circumstances when that person must be notified about an application.	Relevant?*	Organisation
*relevant, in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.				
The Crown Estate Commissioners	All proposed applications likely to impact on the Crown Estate	All applications likely to impact on the Crown Estate	No	
The Forestry Commission	All proposed applications likely to affect the protection or expansion of forests and woodlands	All applications likely to affect the protection or expansion of forests and woodlands	No	

Appendix D - Non-statutory organisations and groups invited to participate in the consultation

Non-statutory groups/organisations contacted
AA
Active Gloucestershire
Ancient Monument Society
British Horse Society
British Motorcycle Federation
British Telecom
British Vehicle Leasing Association
British Vehicle Rental Leasing Association
Campaign for Better Transport
Campaign to Protect Rural England
Chamber of Commerce and Industry, Thames Valley
Cheltenham & Tewkesbury Cycle Campaign
Cheltenham Chamber of Commerce
Cheltenham Civic Society
Cheltenham Development Task Force
Children and Young People's Service
Cirencester Community Development Trust
Cirencester Opportunity Group
Community Connexions
Confederation of British Industry
Confederation of Passenger Transport
Confederation of Passenger Transport (CPT) UK
Cotswold House Care Home
Cotswolds RDA
Countryside Agency
Cyclists Touring Club
Defence Infrastructure Organisation
Defence Logistics Agency (DLA) South West
Disabled Motoring UK
Disabled Motoring UK (BMUK)
English Heritage
English Nature

Non-statutory groups/organisations contacted
Farming & Wildlife Advisory Group (FWAG)
Federation of Small Businesses (FSB)
Forest Links
Freight Transport Association
Friends of the Earth
Garden History Society
Gardners Lane
GDA
GFirst LEP
Gloucester Amphibian Group
Gloucester Badger Group
Gloucester Bat Group
Gloucester Civic Trust
Gloucester YFC
Gloucestershire Ambulance Service
Gloucestershire Care Services
Gloucestershire Centre for Environmental Records
Gloucestershire Chambers of Commerce
Gloucestershire Community Foundation
Gloucestershire Environmental Data Unit
Gloucestershire Local Access Forum
Gloucestershire Local Nature Partnership
Gloucestershire Ramblers
Gloucestershire Wildlife Trust
IAM Roadsmart
Inland Waterways Association
Insight Gloucestershire
Inspector of Ancient Monuments
Local Police Team (LPT) Inspector - District
Lower Severn Internal Drainage Board
Mencap
MID COTSWOLD TRACKS & TRAILS GROUP (MCTTG)
Mid Cotswolds Tracks & Trails Group
Monmouthshire County Council
National Autistic Society Gloucestershire
National Express

Non-statutory groups/organisations contacted
National Farmers Union
National Grid
National Grid Electricity Transmission Plc
National Grid Plant Protection
National Rail
National Trust
Network Rail
Npower
Pebbles Nursery
Pedestrians Association
People for You (befriending service)
Protection of Rural England
RAC Foundation for Motoring
Rail Freight Group
Ramblers Association
Right to Ride
Road Haulage Association
Road Management Services (Glos)Ltd
Royal Mail
Royal National Institute of Blind people (RNIB)
Royal Society for the Protection of Birds (RSPB)
SENDIASS Gloucestershire
Severn Trent Water
Severn Trent Water Limited
Severn Trent Water Ltd
Severn Vale Housing
Severn Vale Housing Society Limited
South West Regional Assembly
South West Regional Assembly (SWRA)
South Western Ambulance Service NHS Foundation Trust
Sustrans
Telewest Broadband
Tetbury Chamber of Commerce
The Camping and Caravanning Club
The Caravan Club
The Garden Trust

Non-statutory groups/organisations contacted
The Geological Society of London
The Gloucestershire Association for Disabilities
The Gloucestershire Heritage Urban Regeneration Company
The Pedestrians Association
The Scout Association Trust Corporation
The South West of England Regional Development Agency
The Woodland Trust
Transport Focus
Travelwatch Southwest
United Response
Virgin Media
Wessex Reserve Forces And Cadets Association
West Bromwich Homes Limited
West of England Partnership
Westbury Homes (Holdings) Limited
Whitbread Group Plc

Appendix E - A5 flyer



A417 Missing Link public consultation

Have your say

Highways England has been investigating possible route options to improve the A417 Missing Link, a three-mile stretch of single lane carriageway between the Brockworth bypass and Cowley roundabout in Gloucestershire that causes many problems for local people and road users.

We would like to hear your views on our proposals and are holding a public consultation between 15 February 2018 and 29 March 2018. As part of this, we will be holding a number of drop-in public exhibitions.

Saturday 17 February 2018 11am - 6pm National Star College, Ullenwood, GL53 9QU

Thursday 22 February 2018 12pm - 8pm Elkstone Village Hall, Hill View, Elkstone, GL53 9PB*

Friday 23 February 2018 11am - 6pm Witcombe and Bentham Village Hall, Pillcroft Road, Witcombe, GL3 4TB

Saturday 24 February 2018 11am - 6pm St Andrews Church Hall, Montpellier Street, Cheltenham, GL50 1SP

Sunday 4 March 2018 11am - 6pm GL1 Leisure Centre, Bruton Way, Gloucester, GL1 1DT

Thursday 8 March 2018 12pm - 8pm Henley Bank High School (formerly known as Millbrook Academy), Mill Lane, Brockworth, Gloucester, GL3 4QF

* denotes venue with limited or no parking facilities

From 15 February, consultation materials will be available online and at these public information points around Gloucestershire:

Public information points

- Crickley Hill Visitor Centre, Crickley Hill, Birdlip, Gloucester GL4 8JY
- Gloucester Library, Brunswick Road, Gloucester, GL1 1HT
- Cheltenham Library, Clarence Street, Cheltenham, GL50 3JT
- Cirencester Library, The Waterloo, Cirencester, GL7 2PZ
- Stroud Library, Landsdown, Stroud, GL5 1BB
- Hucclecote Library, Hucclecote Road, Gloucester, GL3 3RT
- Brockworth Community Library, Moorfield Road, Brockworth, GL3 4ET



Contact us

Website www.highways.gov.uk/A417-missing-link
 Email A417MissingLink@highwaysengland.co.uk
 Telephone 0300 123 5000

Appendix F - Flyer distribution locations

Name of outlet	Area	Number
Black Gold Cafe	Cheltenham	40
The Country Kitchen		40
Wild Beer Co.		50
Shakes 2 Go		30
The Laundry Room		30
Farmhouse Deli		50
The Swan		50
Delhi Heights		40
Premier Express		50
Cafe Moochoo		40
The Old Restoration		40
The County Kitchen		40
The Spectre		50
The Enchanted Tea Room		30
Costa Coffee (Cambray PI)		50
Soho Coffee Co. (Cambray PI)		40
Tailors		40
Sporting Barbers		20
Subway (High St)		30
The Moon Under Water		50
Peter and Sons		20
Wolfies		50
The Barber Shop		20
The Strand		30
The Vine		30
Salon Anna		20
Kaspa's Desserts		40
Deepam		30
Sunrise Cafe		30
Go Peri		40
Happy Garden		40
Bramwells Barber Shop		30
Falafel King		30

Name of outlet	Area	Number
Ginger and Garlic	Cheltenham	30
Sarah Louise Hairdressing		20
The Kings Arms (Gloucester Road)		40
Shell Garage (Gloucester Road)		60
Shell Garage (A40)	Gloucester	60
The Kingsholm Inn		40
Mermaid Fish and Chips		30
The Pelican		30
The Comfy Pew		30
Hubble Bubble Coffee House		40
Lily's Restaurant and Tea Room		30
Celly's Hairstyle International		30
Robert Raikes House		40
Cookes Coffee and Curios		30
The Mens Groom		20
Cafe René		50
Spa Vapes		30
Caffe Nero		50
Liquor and Chow		40
Cornish Bakehouse		20
Revival Cafe Bar and Grill		30
Hedley's Tea and Coffee House		30
Farmhouse Deli		40
Knobby Cob		30
Mark Blake Hair		20
USA Nail Salon		20
Costa Coffee (Southgate St)		50
Coffee #1 (Northgate St)		50
Old Tap and Barrel Bar		30
Poppins		40
Costa Coffee (King's Walk)		50
Woody's Fruit and Veg		50
Fountain Inn		30
The Old Crown		30
The Dick Whittington		40

Name of outlet	Area	Number
The Socialight Coffee Bar	Stroud	30
Greggs		30
Costa Coffee		20
Greyhound Bar		40
Johnson Cleaners		30
Cornhill Pets and Country Crafts		30
Harriet's Hairdressing		20
The Retreat at Stroud		40
Timpson Stroud		30
Curio Lounge		40
Subway Stroud		40
McColl's (High Street)		50
Mill's Cafe		30
Strandz Hair Salon		20
Falafel Mama		20
Fifteen Bistro		30
The Little George		30
Coffee #1		50
Woodruffs Organic Cafe		30
Cotswold Hills Golf Club		Ullenwood
The Air Balloon	Birdlip	100
The Royal George Hotel		100
Shell Petrol Station Crosshands	Brockworth	120
Subway		80
Motor World		80
The Green Dragon Inn	Cowley	120
Centurion Service Station	Duntisbourne Abbots	120
A417 Chef/Cafe (Service St)		80
Burger King (Burford Road)	Cirencester	100
Co-Op Petrol Station (Burford Road)		2 (Notice boards)
BP Petrol Station (Bulford Rd)		50
The Golden Cross		50
Corn Hall		100
Heather's Cafe		50
Clippers		40

Name of outlet	Area	Number
Licata's Hairdressing	Cirencester	30
Envisage Beauty		30
Oops A Daisy Flowers Limited		30
LBs Food		50
LORD Barber shop		30
West Cornwall Pasty Company		50
Halfords		50
The Tavern Inn		60
The Old Cafe		40
CSW Catering Limited		50
Smarty Dry Cleaners		30
Hall Bakery		30
Coffee #1		100
Costa Coffee		100
Caffe Nero		100
The Brewers Arms		50
Toro Lounge		60
Black Horse		60
Jesse Smiths Butchers		40
Keith's Coffee Shop		30
The Crown		60
Woodcock & Cavendish		30
Johnsons Dry Cleaners		30

Appendix G - Press releases

Press release 1

Share your views on plans for the A417 Missing Link

Drivers, residents and businesses are invited to have their say on proposals to improve journeys by filling a 'missing link' on a vital South West Route

Published 31 January 2018

From: [Highways England](#)

On 15 February 2018 Highways England will launch a consultation on options to upgrade a three-mile stretch of the A417 near Birdlip in Gloucestershire.

Known locally as the 'missing link', this stretch of single carriageway road between the Brockworth bypass and Cowley roundabout restricts the flow of traffic on a key route which is otherwise dual carriageway. Upgrading this section to dual carriageway will help unlock Gloucestershire's potential for growth and secure opportunities for housing and jobs, as well as improving life in local communities.

The A417 passes through the Cotswolds Area of Outstanding Natural Beauty and so any solution will be designed sensitively to meet the special character of the landscape, environment and history.

The improvement is being made possible by the Government's £15bn investment in motorways and major A roads and will be delivered by Highways England.

Project manager Mike Goddard said: "Our plans will deliver reliable journey times between the Thames Valley and West Midlands, offer a safer journey for drivers and protect the special character of the landscape.

"Upgrading this route has been a key focus for the community and we would encourage as many people as possible to share their views on the different options to help us shape the best possible outcome."

Highways England is holding a public consultation between 15 February 2018 and 29 March 2018. Once the consultation officially launches, full details of the options for consideration and feedback forms will be available online via the scheme website, along with dates and venues public information exhibitions.

Ends

Press release 2

Have your say on options for upgrading A417 ‘missing link’ in Gloucestershire

Highways England is inviting people to have their say on plans to upgrade the A417 near Birdlip on a vital South West route.

Published 15 February 2018

From: [Highways England](#)

Consultation starts today, Thursday 15 February and will continue until Thursday, 20 March. Known locally as the ‘missing link’ at Air Balloon roundabout this stretch of single carriageway road between the Brockworth bypass and Cowley roundabout restricts the flow of traffic on a key route which is otherwise a continuous dual carriageway between the M5 at Gloucester and the M4 at Swindon.

Upgrading this section to dual carriageway will help unlock Gloucestershire’s potential for growth and secure opportunities for housing and jobs, as well as improving life in the adjoining local communities.

Two options are being presented following a detailed consideration of potential routes to upgrade this three-mile stretch of the A417. The improvement is being made possible by the Government’s £15bn investment in motorways and major A roads and will be delivered by Highways England.

The A417/A419 route passes through the Cotswolds Area of Outstanding Natural Beauty and so any solution will be designed sensitively to meet the special character of the landscape, environment and history.

Project manager Mike Goddard said: “This is your opportunity to get involved in developing the right solution for this well-known Gloucestershire traffic hotspot. We urge everyone to tell us what they think of the two proposals so we can deliver a scheme that will support growth and prosperity.

“Improving this missing link will be a benefit to local residents, users of this important route, and those accessing the walking routes of the Cotswold Way and the Gloucestershire Way. Reducing unpredictable delays will encourage motorists to stay on the A417 with reduced journey times, leaving local roads less congested.

“We have worked with local partners to offer a safer route while recognising this very special area. We are keen to hear from drivers, businesses, local residents and other road users, and we invite them all to visit us at one of our exhibitions, or respond to the information available online or at one of our local information points.”

The consultation starts on 15 February and closes on 29 March. For further information and to have your say on the consultation visit the consultation page, where you can also find details of the public exhibitions taking place and find out where to pick up consultation booklets and feedback forms.

Ends

Press release 3

Last chance to have your say on A417 proposals

With just a week to go until the consultation ends, local residents and businesses are urged to share their views on plans for the A417 at Birdlip.

Published 23 March 2018

From: [Highways England](#)

Brockworth bypass and Cowley roundabout restricts the flow of traffic on a key route which is otherwise a continuous dual carriageway between M5 at Gloucester and the M4 at Swindon.

Two options are being presented following a detailed consideration of potential routes to upgrade this three-mile stretch of the A417. The improvement is being made possible by the Government's £15bn investment in motorways and major A roads and will be delivered by Highways England.

The A417/A419 route passes through the Cotswolds Area of Outstanding Natural Beauty and so any solution will be designed sensitively to meet the special character of the landscape, environment and history.

Upgrading this section to dual carriageway will help unlock Gloucestershire's potential for growth and secure opportunities for housing and jobs, as well as improving life in the adjoining local communities.

Mike Goddard, Project Manager said: "Nearly 800 people have joined us at our events over the past few weeks, and more than 1400 have responded to the consultation. This is an excellent response and we appreciate the time and effort people have taken to find out more about our proposals, and to share their thoughts.

"With a week to go we are encouraging anyone else who might want to contribute to do so before 29 March. There is still the opportunity to feedback online at the consultation page. Alternatively, consultation booklets and feedback forms are available at the following public information points:

- Crickley Hill Visitor Centre, Crickley Hill, Birdlip GL4 8JY
- Gloucester Library, Brunswick Road, Gloucester GL1 1HT
- Cheltenham Library, Clarence Street, Cheltenham GL50 3JT
- Cirencester Library, The Waterloo, Cirencester GL7 2PZ
- Stroud Library, Landsdown, Stroud GL5 1BB
- Hucclecote Library, Hucclecote Road, Gloucester GL3 3RT
- Brockworth Community Library, Moorfield Road, Brockworth GL3 4ET
- Coleford Library, The Main Place, Old Station Way, Coleford GL16 8RH

-
- Gloucestershire County Council, Shire Hall, Westgate Street, Gloucester GL1 2TG
 - Cotswold District Council, Trinity Road, Cirencester GL7 1PX
 - Tewkesbury Town Hall, High Street, Tewkesbury GL20 5AL

Ends

Appendix H - Facebook adverts

Highways England
27 February · 🌐

We're holding a public consultation on proposals to improve the A417 Missing Link in Glos.

A417
Have your say on our proposed scheme

highways england

Have YOUR say
Find out how to get involved

Learn More

👍 10 5 Comments 10 Shares 3.2K Views

👍 Like 💬 Comment ➦ Share

Highways England
27 February · 🌐

We holding a series of public exhibitions about proposals to improve the A417 Missing Link

A417
Have your say on our proposed scheme

highways england

Have YOUR say
Information on our A417 events

Learn More

👍 😄 38 23 Comments 26 Shares 14K Views

👍 Like 💬 Comment ➦ Share

Highways England
27 February · 🌐

Two weeks left of our public consultation on proposals to improve the A417 Missing Link

A417
Have your say on our proposed scheme

highways england

Have YOUR say
Find out how to get involved

Learn More

👍 9 6 Comments 5 Shares 3.9K Views

👍 Like 💬 Comment ➦ Share

Highways England
27 February · 🌐

Not long left to have your say on proposals for the A417 Missing Link

A417
Last chance to have your say on our proposed scheme

highways england

Have YOUR say
Find out how to get involved

Learn More

👍 🗨️ and 95 others 81 Comments 85 Shares 85K Views

👍 Like 💬 Comment ➦ Share

Appendix I - Poster

A417 Missing Link public consultation

Have your say

Highways England has been investigating possible route options to improve the A417 Missing Link, a three-mile stretch of single lane carriageway between the Brockworth bypass and Cowley roundabout in Gloucestershire that causes many problems for local people and road users.

We would like to hear your views on our proposals and are holding a public consultation between 15 February 2018 and 29 March 2018. As part of this, we will be holding a number of drop-in public exhibitions.

Saturday 17 February 2018	11am - 6pm	National Star College, Ullenwood, GL53 9QU
Thursday 22 February 2018	12pm - 8pm	Elkstone Village Hall, Hill View, Elkstone, GL53 9PB*
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Sunday 4 March 2018	11am - 6pm	GL1 Leisure Centre, Bruton Way, Gloucester, GL1 1DT
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* denotes venue with limited or no parking facilities

From 15 February, consultation materials will be available online and at these public information points around Gloucestershire:

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- Hucclecote Library, Hucclecote Road, Gloucester, GL3 3RT
- Brockworth Community Library, Moorfield Road, Brockworth, GL3 4ET

Contact us

Website www.highways.gov.uk/A417-missing-link
Email A417MissingLink@highwaysengland.co.uk
Telephone 0300 123 5000



Appendix J - Stakeholder pack

A417 Missing Link stakeholder pack

Introduction

This stakeholder pack is designed to be a resource for you to help share information about the A417 Missing Link options consultation that is taking place from 15 February – 29 March 2018.

Below you will find blocks of text that can be cut and pasted into newsletters, onto Facebook pages or similar, along with suggested Twitter post, to help raise awareness of what is happening, why, and how you and others can get involved.


You will also find a link to a poster that can be downloaded and printed out, again to raise awareness of the consultation and how people can take part in them.

Sharing information about the consultation will help to ensure that those people affected by the proposed road improvement have the opportunity to have their say.

Resources:

Printable posters

It is quick and easy to put up a poster in your workplace, shop window or on a noticeboard. If you would like to help raise awareness of the consultation in this way, please print out a copy of the poster attached to this email.



A417 Missing Link public consultation

Have your say

Highways England has been investigating possible route options to improve the A417 Missing Link, a three-mile stretch of single lane carriageway between the Brockworth bypass and Cowley roundabout in Gloucestershire that causes many problems for local people and road users.

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- Hucclecote Library, Hucclecote Road, Gloucester, GL3 3RT
- Brockworth Community Library, Moorfield Road, Brockworth, GL3 4ET



Contact us

Website www.highways.gov.uk/A417-missing-link
 Email A417MissingLink@highwaysengland.co.uk
 Telephone 0300 123 5000

Text block

Please mention the A417 Missing Link consultation in your newsletter, e-bulletin, parish magazine, blog or website. This will help ensure as many people as possible are aware of it, and that everyone has the opportunity to have their say. Here's some suggested text:

A417 Missing Link	Highways England is holding a consultation on proposals to improve the A417 Missing Link between the Brockworth bypass and Cowley roundabout in Gloucestershire. This consultation runs from Thursday 15 February until Thursday 29 March 2018. If you use this road then make sure you take the opportunity to have your say. To find out more visit: www.highways.gov.uk/a417-missing-link
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Twitter posts

@HighwaysSWEST is Highways England's official south west Twitter feed. We will tweet out various messages during the consultations – usually on the launch date, and at intervals thereafter - if you are able to retweet any of our messages that would be great.

If you are tweeting your own messages, please use the following hashtag:

#A417MissingLink

Some suggested wording for tweets can be found below for your convenience too.

A417 Missing Link	Highways England is consulting on plans to improve the A417 Missing Link between the Brockworth bypass and Cowley roundabout. Find out more & have your say at: www.highways.gov.uk/a417-missing-link
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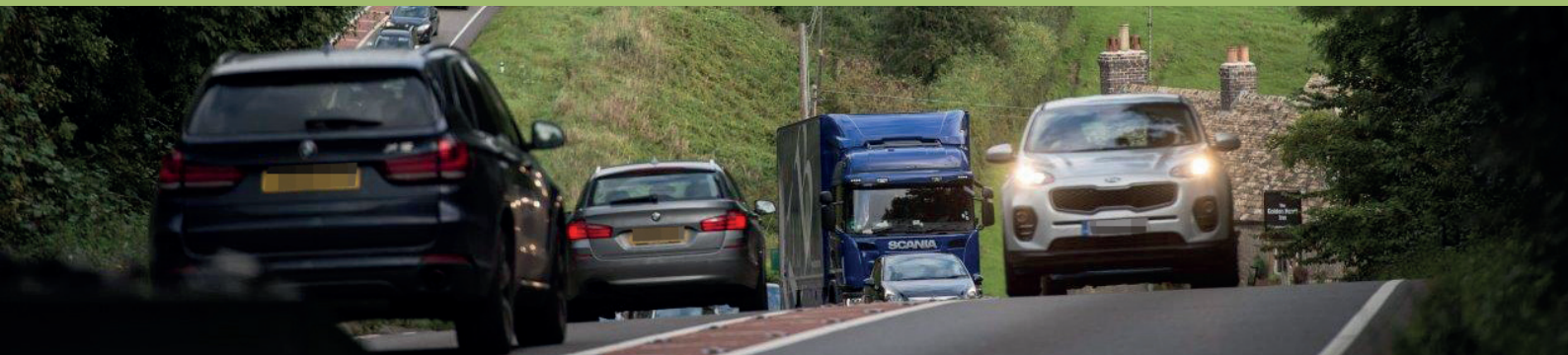
Facebook posts

A417 Missing Link	Highways England is holding a consultation on proposals to improve the A417 Missing Link between the Brockworth bypass and Cowley roundabout. If you use this road then make sure you take the opportunity to have your say. To find out more visit: www.highways.gov.uk/a417-missing-link
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Appendix K - Feedback form

A417 Missing Link

Feedback form
15 February - 29 March 2018



Highways England is seeking your views on options to upgrade the A417 Missing Link between the Brockworth bypass and Cowley roundabout. This form is to help you give us feedback on our proposals during our public consultation, which is running from 15 February to 29 March 2018.

We have prepared a public consultation brochure which sets our proposals for the A417 Missing Link. We recommend that you read the consultation brochure and supporting documents, or visit one of the consultation events, before completing this feedback form.

Consultation materials and details of events can be viewed online at www.highways.gov.uk/a417-missing-link or requested free of charge from Highways England by phoning **0300 123 5000**.

How to tell us your views

Feedback can be sent through any of the channels listed below. The deadline for responding is by the end of Thursday 29 March 2018.

- **FREEPOST A417 MISSING LINK** (please note that the address must be written in capital letters and you do not need a stamp)
- An online version of this feedback form is available at: www.highways.gov.uk/a417-missing-link

What we are consulting on

During this stage of consultation, we would particularly like to hear your views on the following topics to help us as the project goes forward:

- our proposed route options to upgrade the A417 Missing Link
- any information relating to the local area, specific issues you would like to see us address or any concerns you have about the potential impact of our proposals

About you

Name: _____

Address: _____

Postcode: _____

Telephone (optional): _____

Email (optional): _____

Organisation (optional): _____

What is your interest in the A417 Missing Link road improvement scheme? Please tick appropriate boxes ✓

I am a resident who lives along this section of the A417

I commute along this section of the A417

I own land along this section of the A417

I mostly use this section of the A417 for leisure purposes

I own or work for a business located along this section of the A417

I am a tourist who visits the area

Other (please specify) _____

The proposed option

We have assessed over 30 route options to find a solution for improving the A417 Missing Link. Based on the evidence of our assessments to date, we are proposing to take route Option 30 forward for further design and assessment work. It comprises of:

- a 3.4-mile surface route following the alignment of the existing A417 at Crickley Hill
- a new section of road through Shab Hill to the east of the existing A417 to Cowley roundabout
- a new junction at Shab Hill and a roundabout on the existing A417 close to Barrow Wake to ensure local connections are maintained

Question 1 To what extent do you agree with our proposed Option 30?

Please tick appropriate boxes ✓

Strongly agree

Agree

Neither agree nor disagree

Strongly disagree

Don't know

I prefer Option 12

Please provide any comments to support your answer to question 1 in the box below

Option 12

Our assessments also indicated that Option 12 falls within the scheme's cost range (£250 million - £500 million) and is being presented as an affordable alternative to Option 30. This is similar to the Brown Route previously proposed as a solution.

- a 4-mile surface route reusing sections of the existing A417 on Crickley Hill and Birdlip
- three new junctions – a replacement for Cowley roundabout and two new junctions at Birdlip and north of Barrow Wake
- new sections of road at Nettleton and Emma's Grove complete the route

Question 2 Do you have any comments to make in relation to Option 12? We will take these in to consideration as we develop the scheme.

Other options

Question 3 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Question 4 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

About the consultation

Question 5 How did you hear about this consultation? Please tick all that apply ✓

- | | | | | | |
|---|--------------------------|-------------------------|--------------------------|--------------|--------------------------|
| Received a letter from Highways England | <input type="checkbox"/> | Newspapers or magazines | <input type="checkbox"/> | Social media | <input type="checkbox"/> |
| Received an email from Highways England | <input type="checkbox"/> | Posters | <input type="checkbox"/> | TV or radio | <input type="checkbox"/> |
| Local authority | <input type="checkbox"/> | Other source | | | |

Question 6 Do you have any feedback on this consultation – events, information provided, advertising etc?

Thank you for completing the feedback form.

Personal information that is supplied to Highways England in response to this consultation will be treated confidentially and handled in accordance with the Data Protection Act 1998.

The information may be disclosed or shared with Highways England's contractors or advisors who are working on the project and the Planning Inspectorate.

If you need help accessing this or any other Highways England information, please call **0300 123 5000** and we will help you.

Appendix L - Exhibition banners

Welcome

We are seeking your views on our proposed route options for a solution to the A417 Missing Link. The information we receive during this consultation will help us develop a preferred route.

We would encourage you to read the information on display today, take a copy of our consultation booklet and provide your thoughts by completing a feedback form.

You can either complete a feedback form and leave it with us today, post it to us or it can be found online.

Address: FREEPOST A417 MISSING LINK

Website: www.highways.gov.uk/a417-missing-link

Email: A417MissingLink@highwaysengland.co.uk

Telephone: 0300 123 5000

Your feedback is important to us in shaping a solution for this section of the A417. We will consider all feedback we receive and use it to help us develop our proposals further.

Please send us your feedback form by the end of **29 March 2018**.



About the A417

Together, the A417 and A419 through the Cotswolds make up one of the south west's most important road corridors, helping people get to work and school and visit family and friends.

But there's a problem. While most of the route is dual carriageway, there's one section that isn't. Known as the 'Missing Link', this 3-mile stretch of single carriageway on the A417 between the Brockworth bypass and Cowley roundabout restricts the flow of traffic, causing congestion and pollution.

Congestion can be so unpredictable that some motorists rat run along local roads, affecting the communities along these routes. These local roads were not designed for this level of traffic and collisions often happen.

The existing A417 runs through the Cotswolds Area of Outstanding Natural Beauty, and crosses the highly sensitive Cotswolds escarpment at Crickley Hill. This steep change in the landscape means that finding a suitable solution for upgrading the A417 Missing Link is extremely challenging.

The A417 Missing Link needs an upgrade to be able to accommodate the future increases in traffic likely to be generated by the new housing and jobs being created in the area.



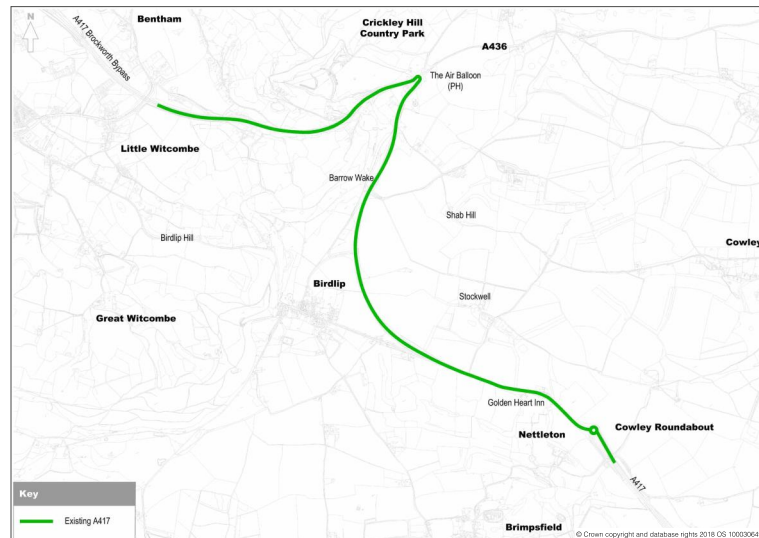
Steep slopes and poor visibility mean that lots of collisions are seen along this stretch of road

The story so far

Over the years, there have been numerous attempts to improve the A417 Missing Link. For various reasons, including affordability and changes in investment priorities, these have never come to fruition. However, in recent years, the case for improvement has become more compelling – to improve safety, support the economy, ease congestion and reduce pollution.

The Government's Road Investment Strategy acknowledges that any new solution for the A417 Missing Link would need to take into account *“both the environmental sensitivity of the site and the importance of the route to the local economy.”*

The challenging shape of the landscape, and the highly sensitive nature of the Cotswold escarpment, means that there is no easy solution for improving this section of road.



The current route of the A417 between the Brockworth bypass and Cowley roundabout

Scheme vision and objectives

We have looked at a number of route options, including proposals which have been put forward in the past, assessing them against our vision and objectives which were developed in partnership with stakeholders, such as the Cotswolds Conservation Board and Gloucestershire County Council.

The scheme's vision: a landscape-led highways improvement scheme

We want to create a landscape-led highways improvement scheme that will deliver a safe and resilient free-flowing road while conserving and enhancing the special character of the Cotswolds Area of Outstanding Natural Beauty; reconnecting landscape and ecology; bringing about landscape, wildlife and heritage benefits, including enhanced visitors' enjoyment of the area; improving local communities' quality of life; and contributing to the health of the economy and local businesses.

Objectives for the scheme

Transport and safety: to reduce delays, create a free-flowing road network and improve safety along this stretch of the A417

Environment and heritage: to reduce the impact on the landscape, natural and historic environment of the Cotswolds and, where possible, enhance the surrounding environment

Community and access: to reduce queuing traffic and pollution, improve access for local people to the strategic road network and support residents and visitors' enjoyment to the countryside

Economic growth: to help boost growth and prosperity by making journeys more reliable and improving connectivity

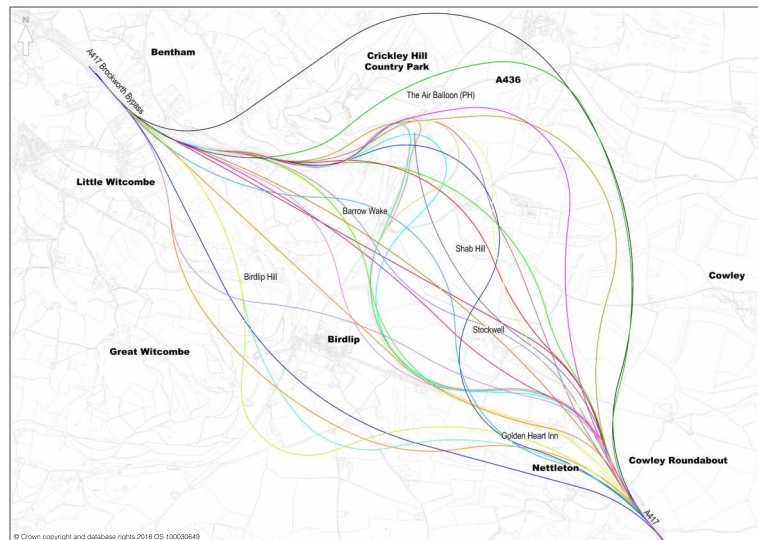
Identifying our proposed options

Over the last 18 months, we have considered a wide range of options and gradually narrowed them down using four broad steps:



Step 1: Identifying route options

Around 18 months ago, we started early assessment work to identify possible route options. This work identified 30 possible route options.



The initial 30 route options between the Brockworth bypass and Cowley roundabout



Step 2: Assessing route options: the engineering test

The next step was to review the 30 options in engineering terms to ensure we only took forward options which improved on the quality of the existing road and can be realistically delivered.

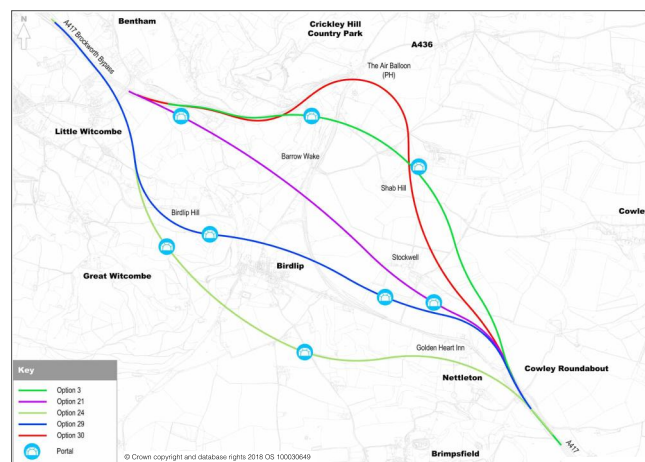
As a result of this test, 10 of the initial 30 route options were discounted and 20 moved on to Step 3.

Step 3: Assessing route options: the sift

We then assessed each route using a Department for Transport approved assessment method which measures five factors:

- **Strategic** – how it will address the problem
- **Economic** – the economic, environmental and social impact
- **Managerial** – the deliverability of a route in terms of construction and management throughout its lifespan
- **Financial** – the cost to build and affordability of each option
- **Commercial** – the value for money, or benefit to cost ratio, of each option

This method, however, did not allow for the scheme's landscape-led vision and objectives to be taken in to account. We therefore adapted this method so that we could rank each option and score it against how strongly it meets the vision, objectives and the factors above. As a result of this work, five options were taken forward for further assessment work. These were options 3, 21, 24, 29 and 30.



The five route options at the end of Step 3

Step 4: Assessing value for money and affordability

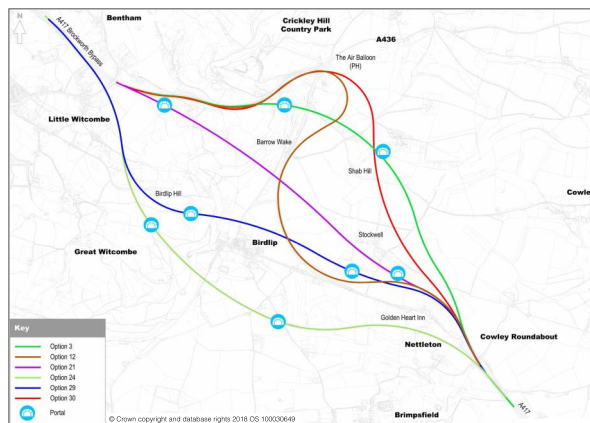
Results from Step 3 suggested that the tunnel options (Options 3, 21, 24 and 29) would bring greater landscape benefits, but would not offer value for money and be over the cost range allocated for the scheme (£250 million - £500 million). The surface option (Option 30) was the most affordable of the five options.

As a result of this, we then assessed the other surface options to see if there were any other more affordable options that may be deliverable within the scheme's cost allocation.

Two of the surface routes were discounted because of the visual impact they would have on the landscape. After this assessment work, it was clear that surface route Option 12 met the scheme's objectives and affordability criteria.

This process left us with six shortlisted options:

- **Option 3** – a 0.6-mile tunnel option (green route on map)
- **Option 12** – a 4-mile surface option which has also been called the Brown Route under previous attempts to find a solution for improving this stretch of road (brown route on map)
- **Option 21** – a 1.8-mile tunnel option (purple route on map)
- **Option 24** – a 0.9-mile tunnel option (light green route on map)
- **Option 29** – a 1-mile tunnel option (blue route on map)
- **Option 30** – a 3.4-mile surface option (red route on map)



The six route options

Our assessment of route options

To understand the opportunities and impacts of each of our six options, we assessed:

- **Traffic impact** - to varying degrees, all six options would reduce delays, and improve journey times and reliability along the A417.
- **Road safety** - to varying degrees, all six options would have a positive impact on road safety and help reduce the number of incidents on the strategic road network.
- **Environmental impact and opportunities** - surface options have more of a visual impact on the landscape when compared with tunnel options. However, the landscape benefits brought about by tunnel options were not as great as expected because of the need to keep the existing A417 open for the connection with the A436 and tunnel portals.
- **Social impact assessment** - by retaining existing routes, or providing new ones for pedestrians, horse riders and cyclists, we expect all six options would have a positive impact on physical activity and wellbeing compared with the existing A417.
- **Value for money and cost** - Option 30 is the only route to offer positive value for money, meaning that the return on investment is estimated to be higher than the initial cost. All other options would see us make a loss on taxpayers' investment. The table below contains further information:

	Option 3 (tunnel)	Option 12 (surface)	Option 21 (tunnel)	Option 24 (tunnel)	Option 29 (tunnel)	Option 30 (surface)
Most likely cost (in millions)	£875m	£465m	£1,625m	£1,210m	£1,240m	£485m
Return on investment*	79 pence	68 pence	47 pence	54 pence	56 pence	£1.04
Value for money rating	Poor	Poor	Poor	Poor	Poor	Low

* for every £1 spent improving this stretch of road, this is the amount the taxpayer would expect to get back.



Overall conclusions on sifting and assessment process

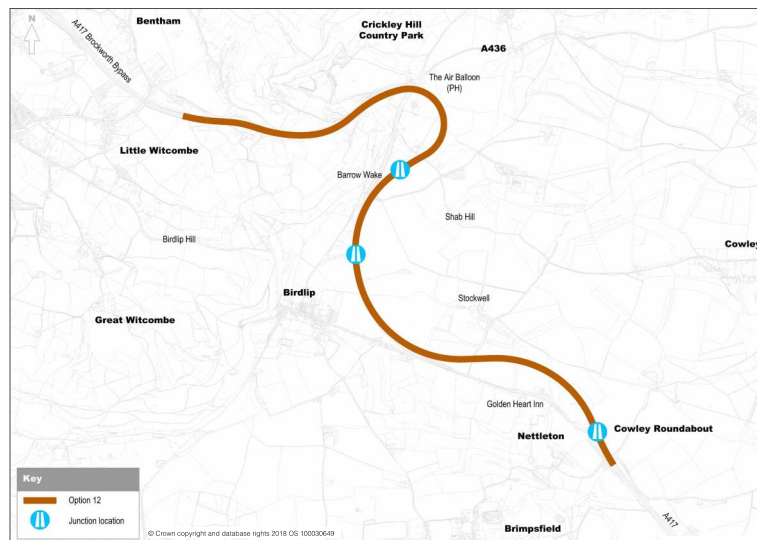
After the four step process of identifying and refining possible route options, we have concluded that the tunnel options provide better opportunities to reduce the impact on the landscape. Tunnel options would, however, still have an adverse environmental and visual impact due to the need for tunnel portals and link roads to the existing A417. The existing A417 and A346 would be retained.

Tunnel options demonstrate poor value for money. That means that when their benefits are weighed against their significant cost, they would not offer a return on their investment for taxpayers. All of the tunnel options that we identified are above the allocated cost range for the scheme of £250 million to £500 million. While Option 12 (a surface route) also offers poor value for money, it falls within the cost range for the scheme.

To ensure that affordable routes that fall within the allocated cost range for the scheme are taken forward, we are presenting Option 12 and Option 30 as our proposed route options.

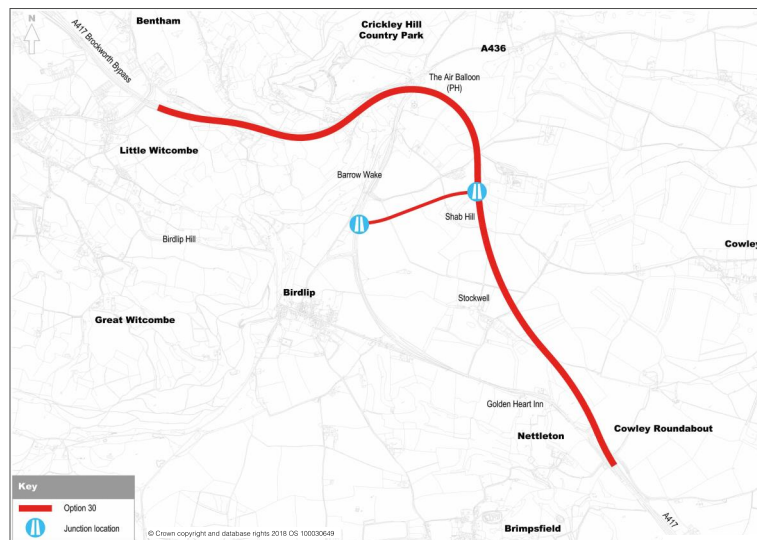
Option 12: an overview

- A 4-mile surface route reusing sections of the existing A417 on Crickley Hill and Birdlip
- New sections of road will be built at Nettleton and Emma's Grove
- Three new junctions – one at Cowley roundabout, one on the existing A417 close to the B4070 junction and one to the north of Barrow Wake
- Three lanes going up Crickley Hill and two lanes coming down.



Option 30: an overview

- A 3.4-mile surface route following the alignment of the existing A417 at Crickley Hill with less of a slope
- A new section of road will be built through Shab Hill to the east of the existing A417 and re-joining the existing road near Cowley roundabout
- Two new junctions – one at Shab Hill and one on the existing A417 close to Barrow Wake with a link road in-between
- Three lanes going up Crickley Hill and two lanes coming down.



A further assessment of our proposed options: transport and safety

Transport and safety	Option 12	Option 30
Journey time savings	Option 12 is 4-miles long, resulting in marginally longer journey times than option 30.	Option 30 is a 3.4-mile long surface route, bringing significant savings to journey times.
Capacity	Both routes will increase capacity on this section of the A417, helping to improve journey times and reliability.	
Safety	Both options will improve visibility compared with the existing A417, which should result in a decrease in the number of collisions along the route.	
Safety	Option 12 includes a very sharp bend to the east of Emma's Grove Scheduled Ancient Monument. Combined with a steep slope, this is likely to require a reduced speed limit (potentially 40 or 50mph) and other measures to manage safety such as average speed cameras.	Option 30 includes a sharp bend to the east of Emma's Grove Scheduled Ancient Monument but this would not impact the speed limit for the dual carriageway. Option 30 would have a 70mph speed limit.
Connectivity and junction arrangements	Option 12 has two new split level junctions and one standard junction. These will provide access to the A417 for neighbouring communities.	Option 30 has one new split level junction and a second junction to connect the new route to the existing one close to Barrow Wake. These will provide access to the A417 for neighbouring communities.
Disruption during construction	<p>During construction, both route options will require traffic management along the existing A417 and other local roads.</p> <p>At this early stage in the development of the scheme, it is anticipated that Option 12 would create more disruption compared with Option 30 because of the length of carriageway that uses the existing route, together with the construction of an additional split level junction close to the B4070 junction at Birdlip.</p>	



A further assessment of our proposed options: environment and heritage

Environment and heritage	Option 12	Option 30
Noise	It is anticipated that both options would have a positive impact on reducing noise compared with the existing A417 but there would likely be some negative effect on other areas along the route. Option 12 performs slightly better than Option 30 in terms of noise reduction.	
Air quality	Both options are predicted to improve air quality at properties within the Birdlip Air Quality Management Area. There would be a slight increase in greenhouse gas emissions within the overall area as a result of an increase in vehicle numbers, but Option 30 would have less of an impact than Option 12 because it is shorter.	
Visual impact	Options 12 and 30 are both surface routes which mean they will have an adverse effect on the landscape and impact the overall scenery in this area. Widening the existing route corridor through the sensitive escarpment at Air Balloon roundabout will minimise the impact on the escarpment elsewhere.	
Land take	Option 12 would require less land than Option 30 because it follows the existing A417 more closely.	There is an opportunity to remove parts of the existing A417 with Option 30 which would bring some environmental benefits. Further work will need to be undertaken to assess this opportunity at a later stage of the project.
Historic environment	The setting of important historic features would be largely unaffected by both options. Both options could impact Emma's Grove scheduled monument during construction, the setting of Crickley Hill Camp scheduled monument and the rural setting of some other listed buildings to the east of the existing A417. Further work will need to be undertaken to assess the extent of this impact and identify any possible mitigation.	
Biodiversity	Both options could negatively impact wildlife populations, including nesting birds and bats, in the area and reduce available habitat. They also have the potential to adversely affect the Crickley Hill and Barrow Wake Sites of Special Scientific Interest. Further work will need to be undertaken to assess the extent of this impact and identify any possible mitigation.	



A further assessment of our proposed options: community and access

Community and access	Option 12	Option 30
Impact on neighbouring communities	Both options are likely to have a positive impact on journey times and reliability overall because they convert an existing single-lane carriageway into a modern dual carriageway with free flowing junction improvements. This should have a positive impact for neighbouring communities by reducing rat-running and providing better access from local roads to the strategic road network.	
Impact on pedestrians, cyclists and horse riders	We would seek to maintain existing rights of way and, where possible, explore opportunities for providing new ones for pedestrians, horse riders, cyclists and other non-motorised road users.	

A further assessment of our proposed options: economic growth

Economic growth	Option 12	Option 30
Cost to build	£465 million	£485 million
Return on investment*	68 pence	£1.04
Value for money rating	Option 12 would not offer a positive return on investment, meaning it has a poor value for money rating.	Option 30 would deliver a positive return on investment but it is still considered to offer low value for money.
Support economic growth	Option 12 would provide a free-flowing, reliable route which would help support the economy in Gloucestershire and the wider region. However, Option 12 will have a reduced speed limit at the top of Crickley Hill which will result in slightly longer journey times.	Option 30 would provide a free-flowing, reliable route which would help support the economy in Gloucestershire and the wider region.

* for every £1 spent improving this stretch of road, this is the amount the taxpayer would expect to get back.

Conclusions

Having looked at Option 12 and Option 30 in detail, Option 30 presents greater opportunities to meet the objectives for the scheme by:

- improving safety
- supporting the economy
- easing congestion and pollution
- making the route more convenient for its regular users
- improving the wellbeing of those who live near it
- offering value for money for taxpayers' investment

The assessment shows that Option 30 performs better than Option 12 and is therefore our proposed solution for the A417 Missing Link.

What happens next

We are committed to making sure our proposals bring long-term benefits for local communities and all road users. This consultation is your first opportunity to give us your views on our proposals.

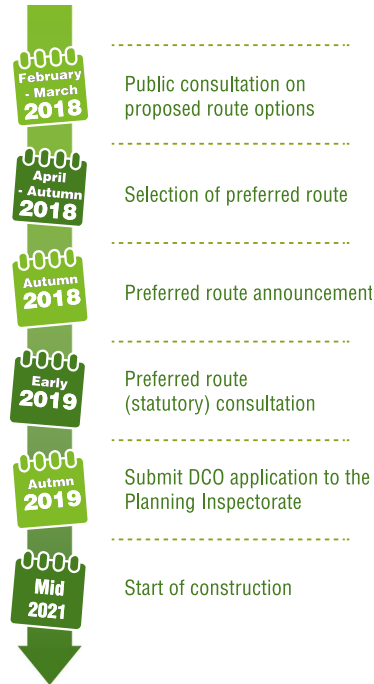
We will use feedback from this consultation to help us choose a preferred route. After we have selected our preferred route and before we submit an application to build the scheme, we will hold a second consultation to get your views on more refined proposals.

A nationally significant project

Because of its size, the A417 Missing Link scheme will be classified as a Nationally Significant Infrastructure Project (NSIP). NSIPs are major infrastructure developments, and include projects such as power plants, large renewable energy projects, new airports, airport extensions and major road projects.

Applications to build these types of projects are submitted to the Planning Inspectorate who examine the application on behalf of the Secretary of State for Transport, rather than the local planning authority. The Secretary of State for Transport makes the final decision on consent and consent is granted by a Development Consent Order (DCO).

We will ask for feedback at certain stages during the development of the project. We have already had discussions with some environmental bodies and elected members in the area. This public consultation on route options is the first opportunity to input into the project.



Appendix M - Statutory stakeholder responses

Responses from:

Ampney Crucis Parish Council
Badgeworth Parish Council
Baunton Parish Council
Brimpsfield Parish council
Cheltenham Borough Council
Cirencester Town Council
Coberley Parish Council
Cotswold District Council
Cotswolds Conservation Board
Councils of Gloucestershire (Joint response)
Cowley and Birdlip Parish Council
Daglingworth Parish Council
Environment Agency
Gloucestershire County Council
Hawling Parish Council
Herefordshire Council
Historic England
Latton Parish Council
Natural England
Swindon Borough Council
Syde Parish Council
Tewkesbury Town Council
The Coal Authority
Worcestershire County Council

Ampney Crucis Parish Council

Response ID ANON-8N38-8CJG-W

Submitted to **A417 Missing Link**
Submitted on **2018-03-29 18:03:30**

About you

1 Name

Qi:
Neil Holt

2 Address

Qii:
c/o Oakdale House, Ampney Crucis, CIRENCESTER

3 Postcode

Qiii:
GL7 5RZ

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
holt.neil@btinternet.com

6 Organisation (optional)

Qvi:
Ampney Crucis Parish Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

I commute along this section of the A417, I mostly use this section of the A417 for leisure purposes

Other (please specify):

I represent residents of a village that is close to A417 and will be affected by the proposed improvements

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::

This option apparently has the advantage of being more cost effective.

As a consequence, Highways England should be able to deliver a solution that also addresses the "bigger picture" implications for residents close to the A417/419 south of the development site.

A consequence of these works will be a significant increase in traffic seeking to cut off the M4/M5 "corner" between Swindon and Gloucester. This will inevitably include a larger increase in large commercial traffic.

The road surface of a relatively short stretch of the A417/419 dual carriageway between Latton and Daglingworth is currently concrete with a very significant increase in road noise. This has been a blight on the communities along and close to that stretch of road ever since the dual carriageway was opened.

Action has previously been promised to resurface that stretch of road to a comparable standard to the rest of the A417/419, but nothing has been delivered.

The proposed "missing link" works provide an opportunity also to address this matter.

Failure to resurface the "concrete" stretch as part of these works will mean that the increased traffic flows will further disadvantage communities along this short stretch of road.

It is our understanding that the available Environment Fund could be used to address this matter.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:

If Option 12 is adopted, my comments at Section 8 above also apply.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

If any other Option is adopted, my comments at Section 8 above also apply.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

My comments at Section 8 above also apply.

Recognising the acknowledged increase in traffic that will use the road after completion of the Missing Link works, failure now to address the road noise issues between Daglingworth and Latton will simply compound an already significant problem for communities along this relatively short stretch of the A417/419.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Local authority

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Badgeworth Parish Council

Response ID ANON-8N38-85Y7-E

Submitted to **A417 Missing Link**
Submitted on **2018-03-07 16:04:07**

About you

1 Name

Qi:
Badgeworth Parish Council

2 Address

Qii:
Badgeworth Village Hall, Badgeworth, Cheltenham

3 Postcode

Qiii:
GL51 4UJ

4 Telephone (optional)

Qiv:
07840073143

5 Email (optional)

Qv:
badgeworthpc@outlook.com

6 Organisation (optional)

Qvi:
Badgeworth Parish Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

Badgeworth Parish Council - the route from the bottom of Crickley Hill almost to Air Balloon PH is in Badgeworth Parish

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::

Safer option allowing free flowing traffic.

Better addresses the highway needs.

Better solution to increase traffic flow through the area.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
Long bends and steep gradients will give more potential for accidents.
50mph limit would be ignored

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

Once the road is completed, there will be sections of the former highway left.

Something needs to be done with them. If they remain part of the highway network, they get abused. For instance the former A417 from Bentham Church up to Dog Lane attracts anti social behaviour and activities - it is a very wide section of road, now totally secluded. Litter is strewn everywhere and unsavoury night time activities take place.

This should be avoided with this scheme - the remaining bits of old road need to be dealt with.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Received a letter from Highways England

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Events and information provided were good. Very knowledgeable staff

Baunton Parish Council

Response ID ANON-8N38-85D9-U

Submitted to **A417 Missing Link**
Submitted on **2018-03-20 12:36:47**

About you

1 Name

Qi:
Peter Todd

2 Address

Qii:
Thatchers, Baunton Lane, Cirencester

3 Postcode

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GL7 2LN

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
peter.todd6@outlook.com

6 Organisation (optional)

Qvi:
Baunton Parish Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

The Parish Council represents residents who live near to the A417/419 affected by road noise

The proposed option

8 To what extent do you agree with our proposed Option 30?

Neither agree nor disagree

Please provide any comments to support your answer::

While a tunnel would be the most widely preferred option, of the two surface-based proposals, the Parish Council has no stated preference

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
See answer to Q11

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
As previous comments regarding tunnel options

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:
We support the improvements being proposed but wish to highlight how this will exacerbate an existing problem of excessive noise pollution:

1. The overall increase in traffic numbers generated by the new routes will exacerbate the noise pollution which already exists along the concrete sections of the A419/417 between Latton and Daglingworth in particular.

2. You need to consider the 24 hour nature of current and expected traffic along the A419/417 (especially increases in heavy goods vehicles) and therefore how you will mitigate the noise pollution and the what the noise criteria will be.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Newspapers or magazines, Local authority

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

No

Brimpsfield Parish Council

From: Brimpsfield Parish [<mailto:brimpsfieldpc@gmail.com>]
Sent: 26 March 2018 09:41
To: A417 Missing Link at Air Balloon
Subject: Brimpsfield Parish Council - Submission of comments for the A417 Missing Link Consultation.

Please find below Brimpsfield Parish Council's comments on the above consultation.

Brimpsfield Parish Council ran two consultation nights with its parishioners to gather feedback on their views of the A417 'Missing Link'. Brimpsfield already suffers terribly as a rat-run off the A417 from the Cowley Roundabout through to Birdlip and there is real concern that this will be exacerbated until the new dual carriageway is complete.

Therefore the main issues highlighted by parishioners were to do with traffic calming measures to reduce the amount of traffic on the local roads, and to reduce the speed at which they travel. Solutions offered included:

1. To reduce the speed limit to 20mph within the village boundaries
2. Clearly signpost that existing roads are single track roads with passing places to deter rat-runners.
3. Reinstate formal passing places and put measures in place to narrow the existing lanes to prevent traffic from driving on verges, to prevent erosion and to slow traffic speed down
4. Speed cameras and other traffic calming practices put into place to ensure vehicles stay within speed limits.

Other concerns raised were that existing cycle paths, footpaths and bridleways that currently cross the A417 should be an important matter of consideration when looking at the new A417 missing link solutions.

At this stage, there seems to be little published detail on local road accesses. Local access will be very important to local residents.

Kind Regards

Kate

Kate Sales
Clerk and Responsible Finance Officer
Brimpsfield Parish Council

Cheltenham Borough Council

Response ID ANON-8N38-8CQF-3

Submitted to **A417 Missing Link**
Submitted on **2018-03-27 10:29:46**

About you

1 Name

Qi:
John Rowley

2 Address

Qii:
Cheltenham Borough Council, Municipal Offices, Promenade, Cheltenham

3 Postcode

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GL50 9SA

4 Telephone (optional)

Qiv:

5 Email (optional)

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john.rowley@cheltenham.gov.uk

6 Organisation (optional)

Qvi:
Cheltenham Borough Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

I am submitting on behalf of Cheltenham Borough Council

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::

Cheltenham Borough Council welcomes the proposals by Highways England to improve the Highway at the "missing link" on the A417 at the Air Balloon, and believes that this development is vital to improve road access to the south of Cheltenham. Improving the A417 is also important for the entire region in terms of economic growth, productivity, air quality and environmental impacts.

The Council recognises that Highways England is promoting two options, 12 and 30 in their consultation documentation.

Having considered the options this Council has formally resolved to support option 30 as the most effective way to tackle the current traffic problems on the A417.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
Given that Option 12 would require speed restrictions, have a steeper gradients than Option 30 and provide a very low the return on investment it does not appear to be a reasonable alternative to the preferred scheme.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

If the anticipated costs of route 30 and its associated mitigation escalate, tunnelled options should not be ruled out.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

Impacts on the highways network and the environment during the construction phase of the improvements must be properly considered as these will cause delays and expense to road users, and effect local communities.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Cirencester Town Council

Response ID ANON-8N38-8CF6-8

Submitted to **A417 Missing Link**
Submitted on **2018-03-28 13:49:23**

About you

1 Name

Qi:
Cirencester Town Council

2 Address

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GL7 2PP

4 Telephone (optional)

Qiv:

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info@cirencester.gov.uk

6 Organisation (optional)

Qvi:
Cirencester Town Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):
Local Council

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::

Recognising that alternative routes have been discussed and debated for many years, of the options identified towards improving safety and addressing congestion issues we believe that Option 30 is the most cost effective.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
No

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
No

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

When road schemes such as this are considered as a way of dealing with congestion and road safety issues they need to be connected to a much wider vision. Only through greater joined up working and thinking will we be able to deal effectively with air quality and climate change impacts and the damage being caused to our natural environment.

Whilst alternative routes have been discussed and debated for many years, what seems to be missing is a comprehensive assessment of alternative solutions; for example, traffic calming mitigation (including variable speed systems), improving public transport and the cycling network.

Being smart about how we plan for economic growth which protects habitats and biodiversity and minimises environmental damage should be included within any assessment on scheme viability.

Investing in creating jobs across the county, which minimise the need to travel, could be more cost effective than simply reacting to induced traffic demand because of focused economic growth on Cheltenham and Gloucester, which in turn will only lead to greater urban congestion and pollution.

Addressing issues of congestion, road safety and air pollution must be intrinsically linked to economic planning and explicitly contribute to improving the quality of life across the villages and towns of Gloucestershire as well as conserving and enhancing the Area of Outstanding Natural Beauty and sites of Special Scientific Interest.

About the consultation**12 How did you hear about this consultation? (Please choose all that apply)**

Received a letter from Highways England

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?**Q6:**

No

Coberley Parish Council

Coberley Parish Council

A417 Missing Link Consultation.

Proposals to improve the A417 between Brockworth bypass and Cowley roundabout in Gloucestershire.

During the meeting of Coberley PC on 22nd March 2018 the Highways England proposals for the Missing Link Scheme were discussed. **The Council unanimously supports the proposals in that one of Option 12 or Option 30 should be adopted**, however the Council was split as to which of these schemes it preferred - please see the comments below - and has some concerns/enquiries concerning the peripheral works and design of the schemes

Of the 2 options on offer, Option 12 involves a tighter bend and speed limits which spell risk of accidents and is longer. Option 30 appears the most logical and offers a better return on investment. Both appear to follow a similar principle to the original Brown Route, with the road being 'sunken' at the Air Balloon, with the A436 bridging it to merge with the old A417. Option 30 safeguards the two cottages.

However, the landscape, environmental and local social impact of Option 30 is considerably greater than that of Option 12 in that the former involves significant and permanent damage to undisturbed open countryside, whereas the latter utilises the existing route. It is noted that HE's financial modelling favours Option 30, however the underlying assumptions are not clear and the Council will wish to be reassured that sufficient weighting has been given to local environmental interests vis a vis the commercial interests of users of the route.

Coberley Parish Council requires detailed proposals for the **Leckhampton Hill Road/A436 junction**. It is vital that this is not just a standard junction as at present, as the traffic speeds are likely to be greater with freer flowing traffic in both directions. It will require traffic lights or a roundabout.

The junction at the Cowley/Ullenwood crossroads on A436 must be addressed by the relevant agency as traffic speeds and volume are likely to increase with the proposed new road system. (even though it is hoped that the new road system will reduce rat-running).

Footpaths. Coberley Parish Council asks that all footpaths are adequately catered for (Cotswold Way at Air Balloon; footpath at Nettleton Bottom) to ensure safe crossing of the new road.

The Parish Council requires clarification of access to **Shab Hill, Cuckoo Pen Farm (also Stockwell)**.

It is understood from technical staff during the consultation, that at this stage, the peripheral work has not been detailed until the final option is settled upon.

Coberley Parish Council, 23 March 2018

Cotswold District Council



COTSWOLD
DISTRICT COUNCIL

Nick Aldworth
Regional Director South West
Highways England
Via e-mail

29 March 2018

Our ref: A417 March 2018

When calling please ask for
Nigel Adams

Tel: 01285 620000

E-mail: nigel.adams@cotswold.gov.uk

Dear Mr Aldworth

The A417 Missing Link Route options consultation

I refer to the above consultation, and write to confirm that Cotswold District Council fully supports Option 30 as the better of the routes consulted upon, and therefore as its preferred option to securing a solution to this longstanding issue. This support reflects the views of both political groups within the Council.

In support of our response, I attach detailed replies to the six questions set out within the Feedback Form.

Whilst writing, I would wish to reiterate not only our desire to participate in any workshops and future consultations, but also, as the scheme moves forward towards the more detailed design stages, our request to have technical representation on the steering group.

Yours sincerely

Nigel Adams
Head of Paid Service



A417 Missing Link – Response from Cotswold District Council

Question 1. To what extent do you agree with our proposed Option 30?

Locally, this pinch point has been recognised as an issue from the mid-1990s, when the A417 was upgraded to dual carriageway. This Council, along with Gloucestershire County Council and the Cotswolds MP, Sir Geoffrey Clifton-Brown and other partners, has been seeking an improvement since. We are therefore pleased to see the progress made in bringing forward this consultation. Any solution inevitably impacts on this valued and sensitive landscape, but a solution must be found – the current route is already inadequate, with traffic load due to increase.

Cotswold District Council fully supports Option 30 as the better of the routes consulted upon, and therefore as its preferred option to securing a solution to this longstanding issue. This support reflects the views of both political groups within the Council. We also note that Option 30 provides a positive return on investment.

The current route up the escarpment, within the natural valley, is effectively the only surface option to gain the top of the escarpment. The massive excavation and radius towards the top are determined by acceptable gradients and line of sight, and subsequently the on-going route by the requirement to tackle or circumvent Nettleton Bottom. The land take is substantial, as is the impact on the landscape – however, the only surface alternative to this land take is to bring more of the route back on line. Option 12 attempts this, but by doing so reduces the safety, time and gradient benefits offered by Option 30. Option 30 also takes the bulk of the traffic further away from the escarpment edge, and the village of Birdlip and many of the more isolated dwellings, which is welcome. On that basis, we support Option 30 as the optimum surface route presented.

That being said, there are a number of issues around the project, which we hope can be addressed or explained as the detailed design work commences.

The maximum gradient on this proposed route is indicated as a rather steep 7.5%, which is nearly double the desirable maximum gradient for dual carriageways set out in Standards for Highways. It would be useful to know the average gradient, to better understand how the route as a whole tackles the challenge of the climbing the escarpment, and how this compares to UK standards. Ultimately, the requirement for a climbing lane suggests that the gradient remains a challenge for traffic using the route, particularly HGVs. While separate carriageways will improve safety over the current situation, there will be a significant speed disparity between cars travelling up the hill at 70 and slower moving traffic in the crawler lane. We would hope that changes in transport technology have been considered as we would imagine that a steep incline will have a significant effect on the range of electric/hybrid vehicles.

The traffic modelling data supplied in this consultation does not detail the A436 traffic flows, but the route for traffic to/from Gloucester/M5 will be slightly longer, interrupted by more roundabouts, until it then has to merge onto the A417. We assume that the route is capable of taking the current load and modelled growth as we would not wish for the project to offer a fix to the A417 at a cost to the A436. The A436 connects with the A40, creating a significant link through to the Oxford – Milton Keynes – Cambridge Arc, an area of the country anticipated to take major growth in the future, and an economic powerhouse.

While we appreciate this consultation is seeking views on options, not presenting final scheme detail, there is limited information presented on mitigating the impact of the scheme,

notwithstanding that this option has been assessed as having a 'Large Adverse' impact on the landscape. Government has recently launched a 25 year Environment Plan which aspires for the country to be recognised as a champion of a greener, healthier and more sustainable future. Likewise, Highways England's Environment Strategy seeks to not only avoid or minimise harm, but ultimately to improve the environment. Given the sensitivity of the landscape affected by this project, and the attention given to landscape and environmental concerns in the scheme objectives, we believe that a firmer commitment to mitigation and capitalising on opportunities would have been beneficial at this stage, to address any fears that they may fall by the wayside as 'nice to haves' rather than project fundamentals. The historical dualling of the A417 to the south in our district was undermined by the use of noisier concrete surfacing, creating avoidable noise pollution – we are keen not to see an equivalent consequence from this much-needed investment.

As presented in the consultation, this route requires a deep cutting, and areas of embankment, which will require investment and creative thinking to soften their impact on the landscape and environment.

In relation to Option 30, we would be keen to see that where the existing road is superseded by new development, it is appropriately downgraded – we would encourage the full investigation of removal of the stretch of road from the Stockwell to Birdlip junctions as referenced in the Technical report. This report suggests that the current Barrow Wake Underbridge may be affected by a new roundabout – this would not appear to be the case from the map provided, perhaps inferring some room for manoeuvre for the link road – could the connection on to Birdlip use the old road now serving Barrow Wake, and allow a longer stretch of the current route to be removed?

We would welcome detail on how this route could best tackle the current severance between Crickley Hill and Barrow Wake, for ecology, landscape and non-motorised users. This is an area where we see an opportunity to improve on the current situation, and also a location where we envisage significant mitigation may be required, given the scale of excavation envisaged to tackle the severe gradient. The consultation document suggests a green bridge could be possible here, but we would be interested to know more about the extent of such a structure – we understand at a minimum that it would provide Non-Motorised User connectivity, but we suggest that to provide landscape connectivity such a structure (or structures) will need to be planned in as an integral part of this scheme.

There will be a significant area of land locked in between the new route, the link road, and the retained existing route. This severance will affect the usability and value of the land for agriculture, an impact we do not believe has been captured, but could also perhaps be considered as an opportunity for mitigation, managing this land as a country park or similar to offset the impact of the scheme more generally. We would like to see the installation of the site compound(s) managed in such a way as to present an opportunity, rather than a short term necessity (e.g. site compound hard standing could provide parking for future visitors – any site servicing could provide visitor facilities).

The enlargement of the road through this landscape could have a severe urbanising effect. We encourage Highways England and its delivery partners to consider options to try to offset this, including, but not limited to: the minimum amount of lighting to ensure safe transit, and highly directional lighting where it cannot be avoided; the minimum amount of overhead signage; landscaping proposals to reflect the local landscape and biodiversity character.

We look forward to further details, especially on mitigation – and believe this is an area where the District Council should be fully engaged. As the Local Planning Authority for this part of the Cotswold Area of Outstanding Natural Beauty, we have a statutory duty to conserve and enhance this landscape. While the decision on this project sits elsewhere, any additional works, licensing requirements, environmental health issues will fall within our remit. With this in mind, we would appreciate technical representation by this authority on the project steering group.

Question 2. Do you have any comments to make in relation to Option 12? We will take these in to consideration as we develop the scheme.

We note that in the most recent evaluation, Option 12 did not score highly. While option 12 does have a slightly reduced land take, this is achieved by an engineering approach which appears to compromise the speed of the route, and thereby undermines the case for investment. Moreover, by swinging the road round back on line, it is brought closer to a greater density of housing, presumably on an embankment as currently, thereby causing more noise impact on residents.

Question 3. As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

The idea of a tunnel has a long history, and, arguably, not taking a tunnel forward as an option means its proponents may not feel it has had a fair and full hearing. Furthermore, other interested parties may have valued information as to how the various scheme costs would have compared if a natural capital methodology had been adopted. That said we acknowledge that as currently presented a tunnel is not a financially viable option.

We note that currently Option 30 is the only option amongst the six subjected to further appraisal that generated a positive return on investment. If scheme costs were to escalate, there could be a need for some of the other options to be re-assessed.

Question 4. Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

The Missing Link has been a problem ever since the A417 was dualled elsewhere on its route. The discussions over a solution started at this point, and since then, users have suffered delays, increased risk of serious accident, and residents have faced the blight of noise and pollution. Now that a solution is presented, it is of paramount importance that Government invests in the scheme and tackles these problems. The issues faced on the Missing Link are set to get worse, given predicted traffic growth, so the sooner a solution is delivered, the sooner the benefits are realised to start to repay the investment made. We firmly believe that this bottleneck is a brake on growth for Gloucestershire and the wider region using this strategic route – indeed we feel the economic consequences of the investment will be greater than calculated, albeit challenging to quantify.

The cost range for the scheme was set at £250 million to £500 million late in this process in autumn 2017. It is essential that this constraint does not prevent a solution being delivered.

There is limited detail available on how the costs have been calculated, or how the approach incorporates the costs of any disbenefits and the environmental costs. Moreover, section 85 of the Countryside and Rights of Way Act 2000 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within, an AONB. It could be argued that the evidence currently published does not provide full confidence to all that this duty has been fulfilled. Given the exceptional AONB landscape in this location, a more detailed 'open book' analysis of the scheme costs could be beneficial, and could provide reassurance that the mitigation required to justify the 'landscape led' ambition is fully costed in.

Some analysis has been made of the financial and other impacts on local businesses (3.7), but this does not include agriculture and farming. There is little mention in the reports of agriculture and farming except to state in the landscape section that much of the landscape is farmed and to include agriculture under discussion of the government's 25 year environment plan. It is important that route options and detailed scheme designs are

assessed for their potential impacts on local farming businesses, for example whether they might sever land from farm buildings leading to a decrease in viability of farm holdings. This should be included in the potential indirect costs of the proposals.

The construction of any solution will be time consuming, inevitably creating disruption, to road users and our local community. The two solutions under consultation have large elements 'on-line'. The traffic management necessary to achieve the build will cause delays on the already overloaded route during construction, creating inconvenience and cost for road users. While we understand that the delay is costed into the economic analysis, we would also anticipate that there will be an indirect impact: in the local tourism industry during construction – access to the district will be affected, and one of its assets, the Cotswold escarpment, will be less tranquil; in other sectors, the increased delay and reduced reliability during construction may well discourage many businesses from activities that would require transit through the scheme area; workers will avoid commutes that require travel through the scheme at peak times - these lost opportunity costs could well outstrip the cost of the actual delay currently factored in to scheme costs. There will be a long term loss of land to the scheme, and we imagine an additional loss during construction, as land is used to facilitate construction, or inaccessible during the build. While these appear unavoidable consequences, mitigation for these consequences needs to be considered, and actively managed during construction.

One of the consequences of the current bottleneck is rat-running. Given the construction is likely to create temporary additional delays, without proactive prevention, this problem will get worse during construction. We would expect that the construction phase will be managed in such a way as to discourage this. Furthermore, we wonder whether Option 30's routing of the A436 towards Birdlip, before turning onto the A417, may result in some of this growing traffic stream actually favouring the existing rat run from Birdlip to Witcombe/Brockworth rather than having to merge onto the A417.

We would also expect that arrangements will be put in place for hosting the workforce – there are limited facilities to service the workforce in the immediate vicinity, but we are keen to see it as an economic opportunity as well. Given this interaction between the project and the wider community, and indeed the potential for new demands on the authority from enabling planning applications, licensing requests, and so forth, we believe we should have technical representation at the steering group.

There are some key potential opportunities to benefit the District that could come indirectly from this scheme, examples include the possibility of creating a new country park on land required to deliver the landscape and biodiversity mitigation for the scheme; addressing lack of connectivity between habitats caused by the current road layout; resolving some of the poor linkages within the public right of way system; the involvement of young people in the design and construction process as part of the STEM curriculum etc.

When the southern part of the A417/A419 was dualled in 1997, it was one of the last routes nationally to be surfaced with concrete – a 9 mile stretch running from Daglingworth to Latton. While this surface has proved hard wearing, it also has the unfortunate effect of being a much noisier surface than tarmac, and has created a significant nuisance for our local communities since its opening. Removing the Missing Link bottleneck, and the anticipated growth of traffic using the route will create an additional load on the existing dual carriageway through Cotswold District, exacerbating this current problem unless measures are taken. A particular concern is that the improved route will be significantly more attractive to freight traffic, running at all hours. As this route runs through the AONB and the Cotswold Waterpark, tackling this noise pollution presents an opportunity for an environmental improvement, by tackling an existing problem and leaving the area more tranquil after this project implementation, in line with Highways England's Environment Strategy.

Question 6. Do you have any feedback on this consultation – events, information provided, advertising etc?

We believe it would have been beneficial for more background information to have been made available to assist and inform the overall consultation process. While the Technical report provides more information than the consultation documents themselves, there remains significant data behind this that was not published as part of this consultation. We also feel that detail on mitigation could have been made at this stage, both to better enable consultees to appreciate the relative merits of the schemes considered, and also to provide a firm commitment that the mitigation will be an integral part of the project.

Contact: Nigel Adams
Head of Paid Service

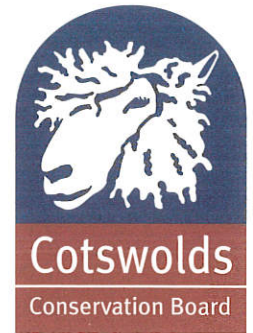
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Cotswolds Conservation Board

Nick Aldworth,
Regional Director (South West)
Highways England
Temple Quay House
2 The Square,
Temple Quay
Bristol BS1 6HA



24th March 2018

Dear Nick

A417 Missing Link Route Options Consultation

Thank-you for the opportunity to submit comments on the options consultation. As you know the Board has worked with Highways England (HE) and its predecessor since 2014 to identify and review suitable options for addressing the Missing Link.

The Board still believes that a solution to the Missing Link is necessary. We also firmly believe that all partners should strive to secure the right solution for this nationally and internationally important landscape. It has to be an exemplary solution that delivers the agreed Vision and Design Principles, a solution that everyone can be proud of since it would not be cost effective to revisit and rectify any shortcomings in the future.

We were pleased to jointly agree the Vision, Design Principles, Objectives and Sub Objectives for any scheme. We were also pleased with the progress through to autumn last year and the identification of 5 possible solutions.

We are concerned with the two options that have been taken forward to consultation and do not believe they meet the agreed Vision and its cascade to Sub Objectives or fully reflect the evidence gathered and then applied to the identification of options for taking forward to public consultation. Similarly we are concerned that tunnel options were not included within the consultation since HE clearly identified them as outperforming the surface route options on economy, environmental and social measures.

However, the consultation only offers one real option, since within the material HE clearly dismisses option 12 in preference for option 30. HE has not used its full set of evidence to genuinely consult the public on one or more of the far better environmental and landscape performing tunnel options. HEs assessment of options does not clearly relate them back to the agreed Vision, Design Principles, Objectives and Sub Objectives.

We believe that further consideration should be given to the tunnel options. Given HEs own evidence the tunnels should not be so readily dismissed at this stage and the general public should be consulted accordingly in future.

HE has a clear duty to have regard to conserving and enhancing the natural beauty of the Cotswolds AONB (Section 85 of the Countryside & rights of Way Act 2000).

Policy context is also provided by the National Planning Policy Framework (NPPF), paragraph 115 states "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."

Paragraph 116 states "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

Consideration of Option 12

HE identified this as joint 17 out of 20 options in February 2017 and discounted it as an option via engineering assessment. It was reintroduced following a meeting between HE & the Department for Transport (DfT) in November 2017 and given the evidence base its late reintroduction as an option in the consultation process was a surprise. It appears to be little more than an “aunt sally”.

If option 12 was dismissed in February 2017 it is difficult to see how it can meaningfully achieve the agreed scheme Vision and design principles.

Consideration of Option 30

Option 30 is the only surface route option from the October 2017 shortlist. It was the worst performing shortlisted option when compared against the assessment criteria. It had the best Benefits Cost Ratio (BCR) of the shortlisted options, but the BCR score was only 1 ie poor.

Option 30 was ranked 15 out of 20 in the assessment process. It has major junction implications, additionally damaging the landscape. It was the worst scoring shortlisted option in terms of the:

- Early Assessment & Sifting Tool (EAST and EAST Plus) processes
- Landscape Monetisation process
- Safety Assessment

In effect it was the cheapest but worst shortlisted option in autumn 2017.

Concern about the lack of tunnel options being advanced for consultation

A summary table depicting the relative merits of the 5 shortlisted corridor options compiled by HE and their consultants in October 2017, (as attached) clearly denotes that the tunnel options (3, 21, 24 & 29) more successfully deliver against the agreed Vision and design principles than any surface route. HEs consultation reports recognise that the tunnel options outperform the surface route options on economy, environmental and social measures, yet the tunnels have not been advanced to consultation.

HEs summary document doesn't compare the total lengths or gradients of options with each other to give like for like comparisons. However the tunnel options offer the lower gradients and in the majority of instances the shortest route length.

Similarly the summary booklet does not denote that due to their gentler gradient the tunnel options only require two lanes in each direction, whilst the surface routes need to retain three lanes, to include a crawler lane up Crickley Hill.

The tunnel options are clearly more successful at separating through traffic from local traffic, leading to less congestion and reduced surface traffic impacting on the AONB. The tunnel

options also offer less disruption to current road users during any scheme construction phase.

Consideration of A436 users

The identification of options has focussed on the A417 and HE and their consultants have admitted in meetings that the solutions put forward for consultation disadvantage the A436 user.

Option 30 requires an additional new link road to be constructed opposite the current Birdlip junction to provide access onto / off the new road. Traffic coming along the A436 from the A40 will need to travel across a bridge over the new A417 and then up towards Birdlip to a new link road onto the A417 to then travel back down the escarpment towards Gloucester. Traffic from Gloucester will have to travel up the new A417 to the new link road and Birdlip junction and then travel back down from Birdlip to access the A436 to Seven Springs and the A40. Option 30 is not a good solution for the A436 user.

Tunnel options would offer a much better solution for A436 users, with approximately a third of traffic travelling from Gloucester / M5 turning left at the Air Balloon.

The lack of consideration of Government's 25 Year Environment Plan

HE has not taken full account of the Government's 25 Year Environment Plan, launched in January by the Prime Minister, which aspires for the country to be recognised as a champion of a greener, healthier and more sustainable future for the next generation:

- Government wishes to embed a "net environmental gain" principle for development to deliver environmental improvements locally and nationally, but this cannot be meaningfully delivered for the A417 Missing Link with a surface route option;
- The Government wishes to apply a Natural Capital approach to decision making, but this has not been applied in the development of corridor options for the A417;
- The Government wishes to conserve and enhance AONBs, but the surface route options would damage the Cotswolds AONB;
- The Government is proposing to review National Parks and AONBs and consider the option for new National Parks, but the surface route options potentially compromise any consideration of the Cotswolds as a candidate National Park.

An incomplete Benefit Cost (BCR) assessment

The BCR scores are low for one option and poor for the other options. They are all below the normal 1.5 expected by DfT. At the same time they all fail to capture:

- Health and Wellbeing benefits for local populations, offering a reduction to the national prescription budget;
- The wider economic benefits and national and international economic tourism gains from a significantly improved landscape if the road is placed in a tunnel;
- Natural Capital benefits along the Cotswold escarpment;
- The public's willingness to pay for a tunnel option.

The Board understands that an extended BCR capturing this wider set of data and including the public's willingness to pay for a tunnel option was undertaken for the Stonehenge options assessment and cannot understand why this work was not undertaken for the A417.

The current proposal for Stonehenge is for a 2.9km tunnel, estimated to cost £1.6bn, which is the same estimated cost for option 21, of similar length. The tunnel options for the A417 appear to offer similar or better value for a more challenging gradient and landform.

The shortest tunnel, option 3, actually gives a better return on investment than option 12, reinforcing concerns that a tunnel option wasn't advanced to the consultation stage.

HE indicate that some of the wider economic analysis could not be undertaken due to the lack of computer memory and that improved computer memory will be available for the next stage of the process. Unfortunately good options will have been rejected by the time the larger computer memory is available.

The approach and methodology signalled in the Government's 25 Year Environment Plan has not been applied. The current BCR approach is in danger of being obsolete in the immediate future, yet the resulting road scheme will impact on the AONB for generations.

The scheme budget is the wrong budget

HE commenced the identification of corridor options with the wrong budget. The brown route (now Option 12) informed the original budget of £250m. It was obvious in February / March 2017 that this was an inadequate budget for any solutions that sought to meet the agreed Vision and design principles and the Board wrote expressing its concerns to HE on several occasions in Spring 2017.

The budget was only revised to a £250 – 500m envelope in Autumn 2017. At the same time the costings for Option 12 have risen to £465m, an 86% increase. Both options 12 and 30 are within the top 10% of the new budget envelope, reinforcing the point that the original budget was the wrong budget.

If the budget shortcomings had been addressed at an earlier stage the relative merits of tunnel costs compared to £500m guide figure would be quite different from being compared to a £250m figure.

Value for Money

Whilst value for money is not mentioned in the agreed Vision, design principles, objectives etc the Board fully recognises the need for value for money considerations.

It is clear from DfT advice from July 2017 that VFM is more than just BCR. The DfT advice identifies value for money as using public resources in a way that creates and maximises public value. Public value is defined as the total well-being of the UK public as a whole. This wider context reinforces the Board's concerns that the current BCR assessment was too limiting and did not capture the range of extended environmental, tourism and health and well-being benefits of the options. Similarly it did not reflect the Government's policies and thinking within the 25 Year Environment Plan and in particular the Natural Capital approach.

In that context the scheme's financial considerations, assessment and associated budgets need to consider value for money as a whole, taking account of the wider impact and benefits of any scheme and the national and international importance of the Cotswolds AONB.

Yours sincerely

E Eyre
Chairman

Councils of Gloucestershire (Joint response)

Mark Hawthorne MBE

Leader of the Council

Leader of the Conservative Group

**County Councillor for
Quedgeley**

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Jesse Norman MP
Parliamentary Under Secretary of
State for Roads
Department for Transport
Great Minster House
33 Horseferry Road
London, SW1P 4DR

MH/mc

28 March 2018

Dear Minister,

A417 - Highways England Public Consultation

The A417, known for two decades as the “Missing Link”, is the most important current gap in Gloucestershire transport infrastructure, resulting in daily harm to our economy, and the all too frequent tragic accidents, with personal injury and loss of life.

The councils of Gloucestershire wish to demonstrate to you through this letter our collective and unanimous support for this project for which Highways England are currently conducting a public consultation

Furthermore, we recognise the exhaustive process of search for routes that has been undertaken and concur with the Highways England finding that route 30 offers the best balance in terms of safety, economics, and the opportunity to find an environmentally positive solution in this very sensitive landscape.

To varying degrees, often with huge support from the business community, Town and Parish Councils, and numerous residents of Gloucestershire, we have sought a solution since the dual carriageways connecting to the “Missing Link” were opened in 1998. This has included many meetings with Ministers and led to the “spades in the ground by 2020” ambition by The Right Honourable Sir Patrick McLoughlin MP, which was hugely welcomed and led to the County Council making a £4m financial commitment to the project’s development.

With the Highways England consultation we have never been so close to delivering the project and trust you will appreciate how our united and unanimous support will play out in taking forward the statutory processes before construction can commence. I would add that your predecessor The Right Honourable John Hayes promised a “timeline” for delivery under RIS2, which we would still very much welcome to both assure partners and enable our economic growth planning.

Yours sincerely

Cllr Mark Hawthorne
Leader, Gloucestershire County Council

Cllr Steve Jordan
Leader, Cheltenham Borough Council

Cllr Mark Annett
Leader, Cotswold District Council

Cllr Tim Gwillam
Leader, Forest of Dean District Council

Cllr Paul James
Leader, Gloucester City Council

Cllr Doina Cornell
Leader, Stroud District Council

Cllr Dave Waters
Leader, Tewkesbury Borough Council

cc Jim O'Sullivan, CEO, Highways England.

Cowley and Birdlip Parish Council

Cowley and Birdlip Parish Council

A417 Missing Link

Route Options Consultation for Highways England ('HE')

Response Attachment for Cowley and Birdlip Parish Council ('PC')

Background and Summary

Councilors' from The PC attended the HE Engagement Event in July 2017 and were briefed on the consultation process. As a result the Parish Council held its own event in November 2018, attended by over 100 local residents. The feedback from this event was shared with HE and has been used to inform Councilors in preparing this response.

The key messages that we collated from residents in the Parish, in particular moving the route away from the village to the North to reduce noise and pollution, have a close correlation with the preferred Option 30. It is for this reason that Cowley and Birdlip PC has indicated in Question 1 that it "Strongly Agrees" with Option 30.

Question 1 – To what Extent do you agree with our proposed Option 30?

The PC strongly agrees with the proposed Option 30. There were a number of key concerns that were raised by residents and Option 30 substantially addresses these as detailed below:

Noise and Pollution – There was a general consensus that the new route needs to be placed further away from the village of Birdlip to provide a long term solution to the noise and pollution as a result of traffic and congestion that has increased substantially over the last 20 years. This is particularly relevant at the Hawcote Hill/Parsons Pitch end of Birdlip. However there is concern over increased noise where the route runs closer to the Stockwell and Cowley villages. It is suggested that noise mitigation measures should be provided in these areas specifically cut and cover tunnels, bund walls where the route is not in a cutting and the use of a low noise carriageway surface throughout.

Safety – This is a fundamental concern of residents and it should be noted that there have been 3 further fatalities since November 2017. Option 30 should alleviate many hazards that have caused most of the serious accidents, principally due to the dualling of the carriageway, the removal of the island junction at Birdlip and the addition of a third crawler lane for lorries up Crickley Hill. However it is noted that the outline design for Option 30 makes provision for access to the Golden Heart Inn and Stockwell Farm by way of the old A417 route. This could result in the creation of a local 'race track' creating a new hazard and further safety concerns. A better solution to the old A417 route past Birdlip is outlined in the PC's response to Question 4 below

Rat Runs – Most residents agreed that if a successful project design is implemented then the need for through traffic to use the village routes will be eliminated. Option 30 provides a fast through route that should eliminate the significant daily congestion that occurs at Nettleton Bottom and approaching the Air Balloon roundabout.

However the route should include a junction for traffic at the top of Crickley Hill to exit towards Cheltenham and the A436. The current scheme

includes for a lengthy diversion via the exit at Birdlip and the need to double back towards Cheltenham on the old route. This would increase congestion on the local roads around Birdlip and provide a local congestion 'hot spot' which can simply be avoided by way of an exit slip road at the top of Crickley Hill on the 'up' carriageway.

AONB – The PC does suggest that the design of Option 30 route should consider every means of minimising the environmental impact on the AONB, including landscaping remediation to mitigate the visual impact of the route and the planting of new woodlands and habitat designed to promote the establishment and conservation of local fauna and wildlife.

Question 2 – Do you have any comments to make in relation to Option 12? We will take these in to consideration as we develop the scheme

Option 12 fails to address the key residents concern with regard to noise and pollution. On the contrary the increased speed of traffic along the current line of the route is likely to increase noise. Furthermore the reduced speed (circa 50 MPH) around the bend at the top of Crickley Hill is likely to result in congestion at peak times backing back along the old route with the result that levels of pollution will remain high.

Question 3 - As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Residents have mixed views about the tunnel route options. A number of residents would not want to see the shorter tunnel options which have portals that are close to properties in the Brimpsfield and approached through the valley between Nettleton and Birdlip. Conversely a number of local residents have expressed disappointment that a more detailed study of the tunnel options was not carried out including a full Environment Agency groundwater study and as a result they consider that the potential tunnel costs are based on a worst case scenario. However, notwithstanding the cost and business case, many residents have commented at the public meeting that the tunnel routes in themselves would create significant new safety concerns should there be a major incident in the tunnel. Furthermore a single tunnel to the M5 would not address the issue of traffic that needs to access Cheltenham and the A436 which presumably would continue to use the old A417 route, thus not removing all the concerns of safety, noise/pollution and local rat runs.

Question 4 – Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

The PC has been discussing ideas as to how Option 30 could leave a legacy for the community by the development of a significant 'Brown Sign' leisure amenity. This would involve developing the existing A417 route from the Birdlip junction to the Stockwell Farm/Cowley junction into a cycle/running track/bridle path. This would require a new junction at the site of the old Cowley roundabout to allow access to the Golden Heart Inn and Stockwell, closing the existing A417 route at the Stockwell junction and at the existing Birdlip junction and utilising the existing tarmacked route with suitable modifications.

The PC has been in discussion with Crickley Flyers, a not for profit cycling organization who train and coach children and adults in cycling proficiency. The PC would like to open discussions with HE about the redundant stretch of the A417 with the aim of creating what could be an exciting local amenity with potential National importance.

Finally the PC believes that the creation of such a local amenity will finally

bring an end to the profusion of anti-social sexual behavior at Barrow
Wake viewpoint due to the use of viewpoint by families for parking to use
the new cycling amenity.

Daglingworth Parish Council

Response ID ANON-8N38-85PF-M

Submitted to **A417 Missing Link**
Submitted on **2018-03-14 10:48:48**

About you

1 Name

Qi:
Professor Christopher Price

2 Address

Qii:
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3 Postcode

Qiii:
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4 Telephone (optional)

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01285 656941

5 Email (optional)

Qv:
cpprice1@gmail.com

6 Organisation (optional)

Qvi:
On behalf of Daglingworth Parish Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):
Chairman of Daglingworth Parish Council

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::
We agree with the need to resolve the issue of the Missing Link. See response to Q11

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
We understand the reasoning for the choice of Option 30, over that of option 12.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:
We note you are seeking information relating to the local area and would like to hear specific issues or concerns about the potential impact of your proposals.

Whilst Daglingworth Parish Council can see the need for your road improvements, we are concerned that the resulting increase in traffic using the A417 will have a detrimental effect on our Parish. We have noted over recent years increasing complaints about road surface noise and concerns expressed about (i) air pollution caused by increased volumes of traffic on the A417, (ii) an increase in the number of cars and vans using the village as a rat run, (iii) an increasing volume of large lorries using the village as a rat run with concomitant damage to road surfaces, verges, boundary walls and street furniture and, and (iv) increasing problems with rainwater running down the road into the village, with build up of silt on the roads as well as entering property. We would like to see an Environmental Impact Assessment into the effect of the road improvements on the village, a more effective means of water flow management from the road down into the village, and more effective means of deterring the use of any vehicles (large and small) using the village roads as a rat run.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Received an email from Highways England, Local authority

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Agreement on the part of parish councillors that proposals were well presented

Environment Agency

Dr Harriet Carlyle
Sweco
Grove House
Mansion Gate Drive
Leeds
West Yorkshire
LS7 4DN

Our ref: SV/2018/109816/01-L01
Your ref: - Public Consultation -
Date: 03 May 2018

Dear Dr Carlyle,

PROPOSED A417 MISSING LINK CONSULTATION. A417 BIRDLIP HILL, NR BROCKWORTH, GLOS.

We wish to provide the following comments with regards the above and further to our meeting on Tuesday 27 February at our offices in Tewkesbury. We apologise for the delay providing you with our comments. The below discussion relates to the protection of controlled waters and highlights the key risks to the water environment from preferred routes: 30 and 12.

A scheme of this size will clearly require an Environmental Impact Assessment (EIA) and notably from a water perspective, a Hydrogeological Impact Assessment (HIA), as linear features such as roads can have a detrimental impacts upon the water environment if appropriate mitigation is not in place to protect such features.

We are not in receipt of any detailed design information including technical reports nor detailed road plans regarding the two preferred road routes and so our comments are more general on the information we can access at this time and from meeting discussions.

General comments on routes 30 and 12

Background to water protection in this locality

Both routes cross over the regionally important principal aquifers of the Cotswold Jurassic limestone's including the Great and Inferior Oolite's. These aquifers are significant aquifers which are used not only for both public drinking water and private water supplies, but also support and provide important local baseflows to watercourses and wetlands such as Bushley Buzzard SSSI near Nettleton Bottom to the south of these two routes. Locally, numerous springs issue on the Cotswold escarpment and on the plateau top providing the headwater springs to a number of local watercourses such as the important Rivers Frome and Churn and the Horsebere Brook.

Environment Agency
Newtown Industrial Estate (Riversmeet House) Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

The local Jurassic strata generally dip regionally to the east/ south-east and much faulting exists which break up the strata into blocks and more discrete aquifer units. We are unsure what role faults play in whether they prohibit or allow groundwater to move across them, but we do know that the blocks of strata tend to compartmentalise these units into separate aquifer units and groundwater behaviour can change.

There is a degree of flexure in the strata with more gentle folding in the rocks and the limestone units in particular are heavily fissured and fractured allowing infiltrating waters to move rapidly through the rock to discharge at spring locations on the escarpment forming spring lines and locally within shallow valleys.

However, landslipped materials and weathered head deposits on the western escarpment side tend to cover these bedrock spring lines covering the actual spring discharge location. Springs can then appear down gradient of the more clayey landslipped materials as a surface discharge forming a watercourse channel. From the limited information we have, spring flows tend to be flashy and respond quickly to rainfall events.

The Fullers Earth Formation which is a more impermeable clayey horizon and is found between the Great and Inferior Oolite principal aquifers tends to act as an impermeable layer and can perch groundwater in the Great Oolite aquifers which sit on top of this formation. Springs can issue at geologic contacts laterally into shallow valleys such as near Stocks Farm, Coldwell Bottom and Bushley Muzzard SSSI for example.

Hydrogeologically this area is complex and poorly understood. On the ground data will need to be collected from boreholes, wells, springs and river flows in order to improve understanding and model the groundwater environment. We acknowledge that a full numerical model will not be possible, but a more detailed conceptual model approach could be used to define and understand further the groundwater regime within this area combined with road sections before and after models.

General concerns over Route 30 and route 12

We do have some concerns over the two proposed routes where we will provide more details below.

In summary these concerns relate to:

1. General impacts upon the water environment (quantity and quality) from the road scheme
2. Groundwater impacts from road cuttings and effects of drawdown upon water features i.e. spring flows into watercourses
3. Impacts from barriers such as embankments, piling and foundations upon the water environment
4. Impacts upon groundwater quality from drainage
5. Implication of the road scheme upon any wetlands and other designated sites where impacts are related to the water environment

Physical effects of the road scheme on groundwater/ surface water environment

The road could effectively slice through the aquifer removing aquifer bearing rocks. We have concerns that road cuttings will truncate the aquifer and lead to loss of water out of

the aquifer and therefore naturally discharging springs could dry up which would have otherwise supported flows to headwater catchments of watercourses.

There is a distinct possibility that the construction of this road could lead to dewatering of the more saturated aquifer rocks where shallow road cuttings cut through these formations and then drainage is required.

This could have an immediate local effect on the water table and impact upon springs and watercourse who rely on the same source of water. We would expect to see a site investigation which would be targeted to areas of the road scheme at most risk to the water environment and which would help to quantify any risks to water and understand where aquifer rocks are saturated or dry and the road could have most impact. Truncating of the aquifer by road cuttings could be most apparent where rivers are crossed in valleys or where trying to construct the road carriageway to a more level gradient.

Dry valleys can reactivate during the winter months when recharge waters are replenished and the groundwater system responds with more ephemeral springs starting to reactivate within valley features up gradient. A number of the valleys on the plateau are now dry valleys which would have once had a flowing watercourse in channel. It is an important mechanism to realise as these springs do reactivate when the groundwater table rises up after prolonged rainfall and discharges flow once more out at ephemeral springs into what was thought to be a dry valley.

We would expect to see as detailed a conceptual model of the water environment as possible so risks can be defined, understood and mitigated against. A conceptual model of the underlying water environment should be defined so all the mechanisms which provide water to the various surrounding water features can be understood and what mitigation is required to protect these features from a road scheme of this nature.

We have concerns that road schemes have the potential to physically disturb aquifers and intercept groundwater flow pathways to water features such as springs outflows and possibly alter recharge mechanisms to the aquifers. These impacts can affect springs, stream flows, ponds and wetlands should they be in hydraulic connectivity to the same groundwater which has been intercepted by a road cutting and the groundwater table locally lowered.

Care should also be taken to not impede groundwater flow by impermeable barriers including piles, bridge foundations, borrow pits, filling of ground, in-ground barriers and drains. Such physical structures can divert local flows and impact water features. Embankments and road cuttings should be carefully configured to allow runoff to flow under them and still allow groundwater to flow. Embankments must not cut off valleys with a barrier to flow.

We have some concerns that embankments where constructed over valleys could impede runoff flows and physically block valley features. This could prevent hydrological processes from effectively operating. Any mitigating effects should be considered from such risks.

Pile foundations for bridge abutments may act as barriers to groundwater flow which maybe significant in a shallow water table situation where springs are flowing so the impact could be great.

Water Features Survey with a water balance approach

A water features survey surrounding the scheme area will be a requirement to understand any risks and impacts to other water users and the environment. An on the ground water features survey should be carried out to identify all of those water features whether surface water, groundwater, wetlands, springs and ponds/ lakes to name a few which could be affected by this road development scheme. We would expect to see this survey done within a designated radius of the route proposals identifying all those water features which appear on ordnance survey maps and actually on the ground.

The collection of spring flow data and baseflows from watercourses will assist in defining catchment zone areas along with water chemistry data which can be used as stated within the report for impact assessment decision making. Event rainfall data collection will be key to understanding recharge mechanisms and the timings of outflows from springs.

A water balance for the hydrogeological regime should be defined looking at quantifying recharge inputs from rainfall, the groundwater regime within the pathway and outflows from spring flows and into watercourses.

As part of the water features survey, all licensed surface and groundwater licences should be defined within the area. Deregulated sources should also be searched on and included within the survey.

Ground Investigation

Currently there is a distinct lack of available data on the underlying ground conditions which includes information on geology and hydrogeological conditions in the various aquifers.

Groundwater level data is sparse for this area the installation of a groundwater level borehole monitoring network combined with spring discharges is the only way to investigate the groundwater regime including groundwater levels, flow directions and water quality in this location to improve our understanding.

We note that no onsite ground investigations have been undertaken to date to understand the underlying nature of the ground/ hydrogeological conditions. It is important for a road scheme such as this that the linear routes are investigated so the nature of the rock and aquifer properties are fully understood. Mapping and desk-studies are no substitute for on the ground investigation and we would recommend that site investigation is undertaken sooner rather than later especially where monitoring of water features is concerned so that seasonal changes in the hydrological regime are measured effectively.

Data collection would ideally be undertaken over 2 years to collect enough good quality data to define the baseline dataset and to inform the risks to the construction phase of the road scheme. Any mitigation can be defined around these risks once this hydrogeological data is available. We would recommend that groundwater level is collected seasonally using loggers to improve data quality along with spring flows and also water quality data for the purposes of defining the baseline.

Groundwater levels will need to be monitored in representative boreholes to inform the aquifer properties, groundwater levels (depth) over seasonal changes in the groundwater regime relative to spring flow data building up a conceptual understanding of the hydrological regime in the scheme area. Groundwater within monitoring boreholes depending on location either side of faults and within various strata at depth

may exhibit different groundwater levels dependent on the local hydrogeological conditions.

Currently there is a degree of uncertainty between any hydraulic links with surface and groundwater features especially on the escarpment and the collection of field data will assist in understanding these aspects in further detail. Assessing the degrees of interconnectivity and leakage between aquifers is important, particularly where the Fullers Earth is present between the Great and Inferior Oolitic limestone principle aquifers. There may also be a number of perched aquifer environments within shallow aquifers of this nature with valleys cutting through.

In addition to the general comments above, we provide more route specific comments as below.

Route 30 specific issues to the water environment

Route 30 runs very close to (but not actually within) a groundwater source protection zone (SPZ) for Baunton Public drinking water supply boreholes, which is located within the Thames catchment and just to the east of the proposal road layout. Approximately 80m at its closet to the east of the road layout. The source at Baunton has a large source protection zone related to the underlying aquifer formations and is an important strategic source for Thames Water supplying drinking water on a daily basis.

Route 30 is also located within a Water Framework Directive drinking water protected area within the principal aquifer of the Cotswold Jurassic Limestone. The overall groundwater body classifications are at Good Status for quality and quantity aspects within the Severn Basin catchment side of the Severn Vale - Jurassic Limestone Cotswold Edge South (GB40901G305700). On the Thames catchment side the Burford Jurassic (GB40601G600400) is at overall Poor Status for this groundwater body.

The comments below start from the south of the road scheme and head northwards.

Crossing valleys

Starting from the Cowley roundabout to the south of the scheme, route 30 is set to run over a shallow valley which may provide some runoff to the south towards the River Frome which has its headwaters in Bushy Muzzard SSSI marshy wetland. This same valley heads up past Stockwell Farm to the north-west. A number of valleys exist which are dry within the area, however, after prolonged rainfall these valleys can have spring reactivation up gradient and new streams can flow within these same valley bottom and lead to considerable wetting of the valleys.

We have concerns that this mechanism will need to be further understood as the construction of embankments or foundations for bridge piers to cross valley features such as this may interfere with shallow groundwater flows to those springs cutting them off at source unless mitigation is put in place to reduce this potential impact. Natural runoff pathways should still be allowed to flow to the south via this valley feature. Bushley Muzzard SSSI spring fed marsh wetland a groundwater dependent terrestrial ecosystem obtains water from several springs which appear to issue out of an outcrop near Nettleton Bottom. The sources of this water to the springs must be defined and investigated as road cuttings and embankments could alter the local natural hydrogeological regime. These springs are also in the upper reaches of the River Frome catchment and constitute the headwaters where the source of the river is derived from.

Proposed road cuttings through aquifers & potential for dewatering of formations

Any road cuttings along the way also have the potential to influence the local water

table and drawdown the level where aquifers are cut through which can dewater formations and alter natural flows from artificial drainage. There are a number of shallow cuttings proposed through the Great and Inferior Oolitic limestone principal aquifers and these same aquifers are also supporting spring flows to watercourses. We would request that this aspect is specifically focused on and looked at in more detail from an impact point of view as the risks could be more significant on local spring flows and therefore associated river baseflows. The likely effects on the groundwater system should be assessed.

Should dewatering be required for construction to take place, the drawdown of the local water table will influence the hydrogeological regime and could severely impact upon spring flows. The collection of hydrogeological data after undertaking a water features survey and ground investigation will help assist in understanding the water environment so risks can be identified and mitigated against. This collection of data could include pumping drawdown tests to indicate how the aquifer responds and the local surrounding water features.

Dewatering for construction purposes now requires a groundwater abstraction licence if greater than 20m³/day and any mitigation to protect water features will need to be in place before pumping takes place onsite.

Shab Hill main road junction

Further north on the route, the proposed Shab Hill junction although located within a natural valley depression at the head of a valley we assume to get the underpass road to the existing road near Birdlip, it is in this location where numerous springs issue within the depression of the valley and risks to water could be more apparent by cutting into the shallow outcrop of the aquifer to located bridge piers and cuttings for the road.

We can understand why a low point for the junction has been selected, however, we would request that all the risks to the water environment are considered to protect spring flows to watercourses and any shallow groundwater within the Great Oolite Group principal aquifer (locally called the Hampden Formation) which is located between two main faults, Shab Hill fault and Shab Hill Barn fault. We would request that local impact assessments to the water environment focus on this area so a better understanding of any impacts can be defined and mitigated against.

Deeper road cuttings into Shab Hill via Air Balloon roundabout down Crickley Hill

Any deeper road cuttings proposed through this area of the current Air Balloon roundabout and round into Shab Hill has the potential to alter the groundwater divide regime i.e. that groundwater which flows to the Thames catchment and that groundwater which flows to the Severn catchment.

We have concerns that the deeper sections of road cutting proposed through this area of aquifer could dewater the limestone aquifer formations locally and the new drainage will in effect divert groundwater towards the opposite direction to that of natural flows before the road was in existence. It is also here that two major fault lines run through the proposed route and we are unsure how these faults operate in terms of acting as barriers to groundwater or allowing groundwater to pass through them.

The carriageway down Crickley Hill is also the headwaters for the Horsebere Brook (Severn catchment) with springs emerging down slope and we have concerns that the new road realignment and new wider road cutting may affect this sensitive hydrogeological regime. Due to the steeper gradients coming up hill we would assume that the inferior Oolite (Birdlip Limestone) aquifer will need to have a fairly sizeable

cutting to the top of the Air Balloon roundabout through land-slipped materials.

For the reasons stated above, we have concerns about truncation of the aquifer and interception of the shallow groundwater table. The springs emerging here feed directly into the Horsebere Brook providing all the flows to this watercourse in the headwaters and these preferential water pathways from groundwater and into the watercourse will need protecting and mitigating against to allow for the construction of the road.

To the north of the Air Balloon and into the proposed Shab Hill deep cutting, the River Churn (Thames catchment) derives flows from various shallow springs which discharge into the valleys i.e. near to the proposed Shab Hill junction discussed above in more detail. We would expect a local and focussed hydrogeological impact assessment to focus on this area so all risks and impacts can be mitigated against.

The width of the carriageway down Crickley Hill may also be a concern as the Horsebere brook watercourse may well find itself located directly between up and down carriageways within an island or within culvert underneath. We have yet to have discussions around this and not seen the detailed proposals.

Many springs tend to issue at the geologic contacts between clays and more permeable sandy/ limestone layers which tend to occur downslope on Crickley Hill. A water features survey will identify on the ground and off mapping where critical water features exist so risk assessments to sensitive water features can be undertaken and appropriate mitigation applied to protect these features from the road development.

Route 12 specific issues to the water environment

Crossing valleys

Starting from the Cowley roundabout, route 12 is also set to run over a part of the shallow valley which may provide runoff to the south towards the River Frome. Again so similar comments to those made above for route 30 are similar with Bushley Muzzard SSSI wetland close to this location. From a protection of water environment point of view, we would expect the hydrogeological regime here in particular to have more detailed investigation to identify risks and what mitigation needs to be applied to protect this important designated SSSI feature. Further advice should be sought from Natural England as it is the remit of NE to protect such features and our involvement is through protection of controlled waters i.e. surface and groundwater.

Proposed road cuttings through aquifers

Where the route swings back around onto the current carriageway alignment, we would assume that a cutting is to be made onto the existing road level. Any road cuttings also have the potential to influence the local water table where aquifers are cut through and in this case the Great Oolite is to be cut through which may require the dewatering of the aquifer formations via drainage. The springs related to the shallow Great Oolite aquifer which this cutting is constructed through may therefore be locally impacted by any road cuttings or indeed embankments. We would request that this aspect is looked at in more detail and any risks defined so mitigation can be applied for protection.

Top of Air Balloon roundabout into Shab Hill area

The route negates the need to have the same size of junction as at Shab Hill in the valley dip for route 30, however the tight turn of the proposed carriageway will cut into the aquifer with a deep cutting to get around the tight turn of the bend. So our concerns are similar to that of route 30 near to the Air Balloon roundabout and into Shab Hill. The

two large faults of Shab Hill fault and Shab Hill Barn fault reside in this area and we are unsure how they respond hydrogeologically.

Any deep road cuttings proposed through this area has the potential to alter the groundwater divide regime i.e. that groundwater which flows to the Thames catchment and that groundwater to the Severn catchment as referred to before. We have concerns that the deeper sections of road cutting proposed through this area of aquifer could dewater the limestone aquifer formations locally and the new drainage will in effect divert groundwater the opposite way to that which naturally occurs before the road. It is also here that two major fault lines run through the proposed route and we are unsure how these faults operate in terms of acting as barriers to groundwater or allowing groundwater to pass through them.

We also have the same concerns for the carriageway down Crickley Hill as this area is also the headwaters for the Horsebere Brook with springs emerging down slope and we have concerns that the new road realignment and new wider road cutting may affect this hydrogeological and hydrological regime within the watercourse. This is discussed above under route 30 in more detail.

Many springs tend to issue at the geologic contacts between clays and more permeable sandy/ limestone layers which tend to occur downslope. A water features survey will identify on the ground and off mapping where critical water features exist so risk assessments can be undertaken and mitigation applied to protect sensitive water features.

Geomorphology on the escarpment

The Cotswold escarpment is a large landslip which has many springs issuing at various levels within this material. All springs and seepage off the western escarpment on the Witcombe/Barrow Wake slopes and seepages are widespread across the escarpment which have aided landslipping.

The consultants WSP undertook a geomorphological study in 2004, which investigated cambering, landslips, springs and seepages. This information is available within a report. Understanding the geomorphology will be key to the road scheme and also the protection of the water environment. With springs coming out at various horizons it is often difficult to know exactly where they originate from and defining this will be important from the water features survey.

Generally, springs represent discharge points from an aquifer and therefore are representative of the lowest point when looking at hydraulic gradients. However, this area is characterised by a varied geology and it is acknowledged that springs can issue at contacts between the Oolite and fullers earth in particular. Where the springs issue in the landslipped material in the escarpment is less clear. The lack of a clear 'spring line' along the escarpment further complicates our understanding.

Many wet flushes appear on the escarpment slope and all of these water features support a wide ranging ecology which relies on this same water source for their existence.

Water quality concerns on the water environment

We have water quality concerns through the life cycle of this scheme during the construction phase and operationally when the road is in use. As discussed above, the proposed road scheme routes are located on sensitive principal aquifer environments with groundwater supporting many water features.

During construction the accidental spillage of fuels from heavy plant could put the water

environment at severe risk if measures are not put in place to provide protection. The fracture flow nature of the underlying aquifer make spills a notable issue as travel times for pollutants are fast putting receptors at risk.

We would like further details to be provided on road drainage and what methods will be employed to discharge storm water off the carriageway. The A417 and notably the steeper section of Crickley Hill has a history of accidents and we would want enhancements provided in the new road proposals to contain accidental spillages from polluting the water environment with the use of interceptors to contain.

We will expect Highways England and their contractors to produce a Construction Environmental management plan which details all mitigation and environmental protection measures, identifying all sensitive receptors, general site management, monitoring, emergency procedures to protect the environment and any consent and permits required to operate.

The CIRIA guidance on linear construction projects is very useful and worth consulting for further guidance and advice (C648 Control of water pollution from linear construction projects: technical guidance, 2006; C649 Control of water pollution from linear construction projects: site guide, 2006).

Flood Risk/Watercourses

Given the watercourses involved with this scheme are all 'Ordinary Watercourses' the Lead Local Flood Authority (LLFA) should be contacted at an early stage as any consents will be issued by the County Council. Equally, as the proposals are all in Flood Zone 1 we are not likely to make bespoke comment on the flood risks to and from the proposed development so the scope and review of any resultant Flood Risk Assessment should be discussed with the LLFA and Land Drainage Officers at the pertinent local authorities.

Given the downstream sensitivities with regards to flood risk, this scheme provides an opportunity to provide for flood risk betterment and we would advocate early consideration of this possibility.

I trust that the above is clear and of use but should you wish to discuss in further detail please do not hesitate to get in touch.

Yours sincerely

Mr Carl Cording
Planning Specialist

Direct dial 07775 020 020
Direct e-mail carl.cording@environment-agency.gov.uk

Gloucestershire County Council

Response ID BHLF-8N38-8CRM-B

Submitted to **A417 Missing Link**
Submitted on **2018-03-26 15:33:36**

About you

1 Name

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2 Address

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3 Postcode

Qiii:
GL54 5TA

4 Telephone (optional)

Qiv:
01451850339

5 Email (optional)

Qv:
vickysivell@btinternet.com

6 Organisation (optional)

Qvi:
Chairman, Hawling Parish Meeting

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

I commute along this section of the A417, I mostly use this section of the A417 for leisure purposes

Other (please specify):

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Received an email from Highways England

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

The maps are poor. All surrounding routes, including the existing A417 are too faint to see clearly.

No information on how traffic from A436 Seven Springs will access the new routes - or from any other local routes for that matter!

Hawling Parish Council

Response ID ANON-8N38-8CX6-T

Submitted to **A417 Missing Link**
Submitted on **2018-03-28 09:38:21**

About you

1 Name

Qi:
Steve Burgess

2 Address

Qii:
Herefordshire Council, Plough Lane Hereford

3 Postcode

Qiii:

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
sburgess@herefordshire.gov.uk

6 Organisation (optional)

Qvi:
Herefordshire Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):
Neighbouring authority

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::
From the information provided this option appears to present the best value for money.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
No

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
No

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:
Herefordshire Council has supported a scheme to resolve problems at this location in previous communications with local promoters. The council recognises the importance of improvements to strategic transport routes and notes that the A417 extends north west from Gloucestershire into Herefordshire where it eventually

connects up with the A49 (T). As such a scheme which supports free flowing traffic at this location and addresses current safety concerns is supported.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Local authority

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

No

Herefordshire Council

Response ID ANON-8N38-8CX6-T

Submitted to **A417 Missing Link**
Submitted on **2018-03-28 09:38:21**

About you

1 Name

Qi:
Steve Burgess

2 Address

Qii:
Herefordshire Council, Plough Lane Hereford

3 Postcode

Qiii:

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
sburgess@herefordshire.gov.uk

6 Organisation (optional)

Qvi:
Herefordshire Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):
Neighbouring authority

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::
From the information provided this option appears to present the best value for money.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
No

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
No

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:
Herefordshire Council has supported a scheme to resolve problems at this location in previous communications with local promoters. The council recognises the importance of improvements to strategic transport routes and notes that the A417 extends north west from Gloucestershire into Herefordshire where it eventually

connects up with the A49 (T). As such a scheme which supports free flowing traffic at this location and addresses current safety concerns is supported.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Local authority

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

No

Historic England



Historic England

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Mr Michael Goddard
Highways England
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6HA

Direct Dial: 0117 975 1300

Our ref: PL00312762

29 March 2018

Dear Mr Goddard

Re: A417 Missing Link invitation to public consultation

We are responding to the consultation on two route options put forward by Highways England for improvements to the A417 Birdlip Hill road. The two routes both involve an over ground road, which will require a large and deep cutting through the scarp edge to achieve a suitable gradient for better traffic movement. Additional link roads, overbridges, junctions and roundabouts will also be needed to link the new road to the existing network. The details of these additional items have not yet been fully designed.

Both routes have the potential to impact on a number of designated heritage assets. They will also cause harm to the significance of two scheduled ancient monuments close to the road. This will be through a change in their setting which harms the significance of the designated heritage assets. Both routes will also directly impact undesignated heritage assets, in the form of buried archaeology along the routes.

We recognise the need for this route to be improved and do not have an in principle objection to the scheme. We do however have concerns about the impact of the scheme on the designated and undesignated heritage assets along its route. Any scheme should look to improve setting where it can or to mitigate the harm through careful design and enhancements.

The consultation document and the Technical Appraisal Report both include one of the core objectives of the scheme:

Improving the natural environment and heritage: *to maximise opportunities for landscape, historic and natural environment enhancement within the Cotswolds Area of Outstanding Natural Beauty and to minimise negative impacts of the scheme on the surrounding environment.*

This is underpinned by sub-objectives with particular reference to the Historic Environment:

1. The scheme will have an identity which reflects, conserves and enhances the



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character of the local landscape.

8. The scheme will enable enhanced preservation of heritage assets and their settings and adopt designs that reflect and enhance the historic character of the area.

Some of the designated Heritage Assets in the vicinity of the route that may be impacted on are:

- Crickley Hill, Scheduled Monument (NHLE 1003586)
- Emma's Grove Barrows, Scheduled Monument (NHLE 1017097)
- Cowley Manor, Grade II* Registered Park and Garden (NHLE 1000759)
- A number of Grade II Listed Buildings including:
 - Golden Heart Inn (NHLE 1341766)
 - Crickley Hill Farmhouse Grade (NHLE 1091787)
 - Milestone (NHLE 1152736)
 - Shab Hill Barn (NHLE 1091775)

There is also a site of potentially National Significance which is currently undesignated

- Birdlip/ Peak Camp

Both routes will also potentially remove undesignated Heritage Assets which have not yet been assessed for their significance. In particular:

- Stockwell Deserted Medieval Village
- Crop marks of Iron Age and Roman settlements
- World War II Signal Station at Shab Hill

There are other designated assets, especially Scheduled Ancient Monuments (SAMs) in the vicinity but we most concerned about the two listed above as these will have the most direct impacts on them.

Crickley Hill is one of the best understood hillforts within Gloucestershire. Extensive excavations between the 1969 and 1993 recorded a sequence of occupation from the Neolithic to the post Roman period. The Neolithic period being the most significant, with the excavation of a defensive bank and ditch (rampart) and evidence for settlement. Unfortunately since the excavations ended there have been very few published articles about the site and the information and knowledge gained from the excavation has not been widely shared.

What we do know is that the site was a focus for activity for over 6,000 years. It overlooks the routeway up on to the Cotswolds from the Vale (now the A417). From the Vale it would have been an imposing structure on the Cotswold Edge commanding views over the land below. The large and complex Iron Age Ramparts would have been not only defensive but a status symbol of power and control for anyone



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approaching from the plateau.

The site in the Neolithic period is contemporary with another Neolithic site to the south, Birdlip/Peak Camp. Excavations here in 1980 and 1981 identified Neolithic activity within an area enclosed by a bank and ditch. It encloses a similar area to Crickley Hill. However little is known about the site beyond this or its relationship to Crickley Hill.

Between the two enclosed sites are three barrows, known as Emma's Grove. These barrows were largely overlooked by antiquarians and are hidden from the road by trees and vegetation. Because of this there is very little known about them. Access is also restricted as the public footpath through the site exits onto the very busy A417. The barrows are typologically dated to the Bronze Age except one which is very large. The date of this mound is not known it could be Neolithic or it could be later, i.e. an early Medieval Motte (earth Castle).

The site has an association with the landscape around it and possible with the other monuments locally (Crickley and Birdlip/Peak Camp). They also would have been visible to anyone approaching up the routeway (now the A417). They overlook the now dry valley where the A417 meets the Air Balloon Roundabout so would have been visible to travellers as they reached the plateau. They would also have acted as marker of the route down for anyone approaching across the plateau.

All of the monuments (including Birdlip/Peak Camp) are landscape features present for at least 6,000 years and have helped shape the modern landscape. They appear to be contemporary but their relationship is not understood. Further archaeological work for this road scheme will help us to better understand this.

Option 12 is essentially the former modified Brown Route from the previous consultation exercise to improve this route. The route cuts a new road in a deep cutting around the north side of the Emma's Grove Barrows. It then curves sharply around the south side of the Barrows and the new road runs nearly parallel with the Birdlip Bypass (current A417). It was assessed up to Stage 2 in 2006 and the report from that assessment showed that there is extensive undesignated archaeology along the route. It identified the need for further archaeological investigations to identify and assess the significance of those remains. It also concluded that the route will cause an Adverse Impact on the significance of the monuments through a change in their setting.

Option 30 follows the same route as Option 12 around Emma's Grove Barrows, in a deeper cutting, but then goes more directly to the Cowley roundabout.

The deep cutting needed for both options will separate the Emma's Grove Barrows from their landscape setting. From the initial designs of the linking roads the Barrow group will also become an island within the new road network. There will be an





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increase in vehicle movement on all sides of the monument, currently it is restricted to the western side.

The large cutting through the scarp slope and increase in vehicle movements will also impact on the setting of Crickley Hill. The road noise is currently restricted mainly to the southern side of the monument, but this is a significant aspect of the monument as it overlooks the routeway up and looks across to Birdlip/ Peak Camp.

The Technical Appraisal Report and) states that Options 12 and 30 will increase the level of noise (Section 11.3 Noise). However this is calculated for the populated areas and not for the rural areas and Historic Assets. The level of pollution is predicted to rise but again this is calculated with reference to the populated areas and not the rural or Heritage Assets (Sections 11.4 Air Quality and 11.5 Greenhouse Gases).

An increase in noise and pollution may cause additional harm to the setting of the Monuments, and therefore to their significance. To reduce the road noise there is the option for using a quieter road surfacing material. It is however currently unclear what impact an increase in noise and pollution will have on the significance of the Heritage Assets.

As both routes will cause harm we have no preference for one route over the other. Once a preferred route has been chosen then we will work closely with Highways England and their appointed consultants to ensure there is suitable mitigation and compensation for that harm.

We would seek to ensure the design of the road and associated infrastructure is of a high quality design to reflect the character and special landscape of the Cotswolds; that has been shaped by thousands of years of Human activity. As a comparable example the A30 across Bodmin Moor is an example of a well-designed road. It uses elements of local landscape features within the modern structures. This means as you drive through you experience the special character of the Moor, and not just another road.

The A391 near St Austell is another example of good road design being influenced by the landscape. Here land bridges have been used to good effect to maintain the links across the unique industrial landscape, which is now an iconic symbol of that areas heritage.

We would expect the design of this new road to reflect the different landscape characteristics of the areas it travels through. It should also look to ensure landscape links are not lost through the new cutting and link roads. Land bridges at suitable locations could help achieve this.

The Emma's Grove Barrows are currently on the Heritage at Risk Register due to tree



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cover and burrowing animals. There is an opportunity to remove the monument from the register with better management of the site which could be secured through the scheme. Removing the asset from the Heritage at Risk register would be a public benefit. It would also partially fulfil sub-objective 8 in enhancing the preservation of the Heritage Asset.

Once a preferred Route is chosen further work will need to be undertaken to better understand the impacts of the scheme on the Historic Environment.

To inform the Environmental Statement the further work needed along the preferred route will need to include:

- Desk-Based Assessment of all Heritage Assets along the route and within the corridor.
- A setting assessment of all designated assets that may be impacted on.
- Geophysical survey along the route of all the new roads. Previous surveys were concentrated around Emma's Grove and are now 12 years out of date. More sensitive equipment and better software means that more detailed and better results will be produced. Therefore this area will also need to be surveyed.
- Targeted evaluation based on the geophysics results and blank areas within the survey area. This will provide information on the survival and nature of the archaeological remains
- An assessment of the significance of the archaeological remains.

This base line information will then allow us and the County Heritage Service to fully assess the impacts of the whole scheme and identify areas needing further archaeological mitigation prior to construction.

Opportunities to improve the significance and setting of the scheduled monuments will need to be looked at. Opportunities we have identified are:

- Landbridge/s close to Emma's Grove to provide a landscape link for the monument.
- Funding of the publication of the excavations from Crickley Hill. Especially those elements which link to the wider landscape and archaeology along the road.
- Further investigation of Emma's Grove Barrows to better understand them
- Improved management of the barrows to remove them from risk
- the full analysis and publication of the archaeological material excavated from the archaeological sites along all the new road routes, putting the monuments in their landscape context.
- A commuted sum should go towards suitable conservation bodies, like Gloucestershire Wildlife Trust and The National Trust, for the management and maintenance of Heritage Assets in their care affected by the works.





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Historic England will work closely with Highways England, and their appointed consultants, with regards to the Historic Environment. We will seek to reduce or mitigate the impacts and make the most of the opportunities created by the new road.

We look forward to working with you on this project.

Yours sincerely,

Melanie Barge
Inspector of Ancient Monuments
melanie.barge@HistoricEngland.org.uk

cc: Toby Catchpole, Heritage Team Leader, Gloucestershire County Council



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Latton Parish Council

Response ID ANON-8N38-85DR-M

Submitted to **A417 Missing Link**
Submitted on **2018-03-20 15:48:21**

About you

1 Name

Qi:
Latton Parish Council

2 Address

Qii:
c/o 27 Croft Close

3 Postcode

Qiii:
SN6 6DL

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:

6 Organisation (optional)

Qvi:

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):
Latton Parish Council

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::
Latton Parish Council fully support option 30.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
POINTS TO BE RAISED UNDER CONSULTATION ON THE MISSING LINK

Latton Parish Council support the improvements being proposed and endorse Option 30 but wish to highlight how this will exacerbate an existing problem of excessive noise pollution:

1. The overall increase in traffic numbers generated by the new routes will exacerbate the noise pollution which already exists along the concrete sections of the A419/417 between Latton and Daglingworth in particular.

2. You need to consider the 24 hour nature of current and expected traffic along the A419/417 (especially increases in heavy goods vehicles) and therefore how

you will mitigate the noise pollution and the what the noise criteria will be.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Local authority

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Natural England

Date: 05 April 2018
Our ref: 238307



Highways England

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr. Goddard,

Planning consultation: A417 Missing Link - 3 mile stretch between Brockworth bypass and Cowley roundabout.

Thank you for your consultation on the above dated 15 February 2018 which was received by Natural England on 15 February 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the opportunity to comment at this stage of the proposal. We have reviewed the consultation documents and provide comments that are most relevant to our statutory role and interest in the Natural Environment. It should be noted that at this stage, our comments are relatively broad thinking, which reflects the level of detail provided in this consultation. We would be happy to comment further, once further detail has been provided.

**The Wildlife and Countryside Act 1981 (As Amended)
The Conservation of Habitats and Species Regulations 2017**

Proposed Options

It is noted that two options have been taken forward; option 12 and option 30. Natural England are disappointed that the tunnel options have not been taken forward, as they would have provided an opportunity for a clear landscape focussed and environmentally led scheme. We understand that all of the tunnel options have had to be dropped, due to high costs. Having reviewed the Technical Report, the two open cut options to be taken forward both have high environmental impacts in terms of landscape, ecology and access, which need to be addressed and mitigated against.

Option 30 is proposing a new road to be built through relatively open countryside, thus widening the impacts of the A417 and its ancillary roads. It is expected that any proposed mitigation will need to offset the environmental impacts to justify this.

However, we recognise the need for a solution to the current traffic situation, and look forward to future working with Highways England on a scheme that is best suited to the sensitivities of the area.

Designated sites

Natural England welcomes the recognition given to designated sites and the need for an environmentally led scheme, which takes account of the sensitivities of the area.

Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs) and European sites (Special Areas of Conservation) should be clearly identified in the context of any proposed impact, both direct and indirect by the scheme. Designated sites should be protected and, where possible, enhanced, so that their integrity is maintained through, for example, the provision of appropriate buffering. This should also relate to the existing road scheme, which did impact upon Crickley Hill and Barrow Wake SSSI when last modified.

The designated sites in question, which may be impacted upon are;

- Crickley Hill and Barrow Wake SSSI (of which HE owns a part)
- Bushley Muzzard, Brimpsfield SSSI
- Cotswolds Beechwoods SAC
- Cotswolds Commons and Beechwoods SSSI

It is difficult to assess the likely impact on designated sites as a result of the two road schemes, as there is not enough detail provided at this stage. However, as part of any mitigation package, Natural England would expect any scheme to retain and re-inforce connectivity of habitats and green space and assess any impacts on protected sites, in relation to both the existing and proposed road network. Any opportunities to enhance the condition of the SSSIs that might be directly or indirectly affected by the scheme should be explored.

For example, recreation has become a problem in a number of designated sites in the vicinity and mitigation measures are being considered by Natural England and a number of other partner organisations. Opportunities for the creation of new non-sensitive open space is one measure being considered. This could, for example, take pressure off of Crickley Hill and Barrow Wake SSSI whilst also giving the opportunity for enhancing recreation/access in the area.

We look forward to working with you closely with regards the impact on designated sites as the details of the schemes evolve.

Habitats Regulations Assessment – Cotswold Beechwoods SAC

The proposed scheme should be screened for any likely significant effects at an early stage so that outcomes of the assessment can inform any key decision making. It may be necessary to outline mitigation measures to ensure no adverse effect on the integrity of internationally designated sites.

There must be assurances that there are practicable and viable solutions to avoid such effects or, where such effects exist and cannot be avoided or adequately mitigated, that the subsequent tests under the Regulations are met.

Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.

Green Infrastructure

Green Infrastructure (GI) should form the basis of any future development. Natural England advises that any approved scheme should incorporate well designed GI to ensure that the development is better able to be accommodated within the landscape of the Cotswolds AONB. Multi-functional green infrastructure is also important to underpin the overall sustainability of the development by performing a range of functions including flood risk management, the provision of accessible green space, climate change adaptation and supporting biodiversity. Natural England would very much welcome a conversation about how GI will be incorporated into the proposal.

Air Quality

The proposal should address the potential issue of air quality. All relevant transport assessments should be undertaken, to assess the impacts of air quality on the natural environment and any designated sites in question. In particular, consideration should be given to any designated sites within 200m of the proposal.

We would expect the proposal to address the impacts of air quality on the natural environment. In particular, the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. Any detrimental impacts on the natural environment should be considered, and appropriate avoidance or mitigation measures where applicable highlighted. However, we would expect the new scheme to reduce the risk of congestion and queueing traffic and consequently improve air quality in the area.

Natural England advises that one of the main issues which should be considered in the plan is the additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic¹, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides a searchable database and **information on pollutants and their impacts on habitats and species**.

Hydrology

The proposed scheme has the potential to result in hydrological impacts. It should be noted that the hydrology in this area is complex. We would expect the scheme to take account of these impacts and address this accordingly through both avoidance or suitable mitigation. We understand that you are in discussions with the Environment Agency around these matters, and we would be happy to contribute, in particular with regards to Bushley Muzzard, Brimsfield SSSI.

Cotswolds AONB

The proposed scheme is located wholly within the Cotswolds Area of Outstanding Natural Beauty. NE advises that both Option 12 and Option 30 will have an adverse effect on the statutory purpose of this designation. For our detailed comments please refer to the landscape section below.

Landscape

Landscape and Visual Receptors

From the information we have seen so far we advise that both Option 12 and Option 30 would have a significant adverse effect on the natural beauty of this portion of the Cotswold Hills AONB. The conservation and enhancement of natural beauty is the statutory purpose of the AONB. The scheme would impact on both landscape and visual receptors i.e. the landscape fabric of the AONB and those seeking to enjoy that landscape and the visual amenity it offers. HE acknowledge this point in summary table on page 20 of the Consultation Document. The Cotswold escarpment is especially important to the AONB being a major and iconic feature of the designated landscape. It provides long and panoramic views from and to the Cotswold Hills, and this is a recognised 'Special Quality' of the AONB. The landscape affected by the new carriageway is therefore particularly sensitive to

¹ The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

major development of this sort.

As HE have previously stated, the new carriageway should be a;

'A landscape-led highways improvement scheme that will deliver a safe and resilient free-flowing road whilst conserving and enhancing the special character of the Cotswolds AONB; reconnecting landscape and ecology; bringing about landscape, wildlife and heritage benefits, including enhanced visitors' enjoyment of the area; improving local communities' quality of life; and contributing to the health of the economy and local businesses'.

For the scheme to realise HE's vision of being a 'landscape-led' design a final design of the very highest quality will be required which minimises the effect of the carriageway road on the landscape of the Cotswold escarpment.

NE supports this objective and our future advice will focus on securing the best possible scheme design which minimises the effect of the new carriageway and secures improvements to the quality of the existing landscape. We will seek to maximise opportunities for wider landscape enhancement measures in order that the scheme once completed will make a positive contribution to the natural environment of this part of the Cotswolds AONB.

Our objectives

In order to guide our advice NE has identified the following landscape objectives for the final scheme design. These are;

1. The removal of all redundant infrastructure associated with the current route of the A417 and the construction phase of the new route, and full reinstatement of the land along and surrounding the route, with a particular focus on valued landscape features which contribute to the natural beauty of the escarpment landscape and which support the purposes of the Cotswolds AONB.
2. The strengthening of existing landscape features which contribute to the natural beauty of the escarpment landscape and which support the purposes of the Cotswolds AONB.
3. Improve the visual amenity afforded from key viewpoints from the Cotswold escarpment for visitors and recreational users of the local PROW network so that people's enjoyment of the area is improved.
4. Locate the new carriageway to take full advantage of the natural screening provided by the topography of the area, in so far as this is possible. Any solution must ensure that the scheme is designed to meet the character of the landscape, not the other way round. Any deviation from this will need a full justification.
5. The choice of lighting technology used and its positioning needs to be carefully considered in order to minimise the extent of light spreading away from the carriageway, thereby limiting light pollution. The positioning of new roadside signage to be undertaken with sensitivity in order not to introduce additional clutter into the landscape thereby reducing the possibility of drawing attention to the route of the carriage in more distant views.
6. Any scheme must have substantially more benefits than negative impacts for the Cotswolds AONB.

Options

Whilst we accept that the tunnel options would not have been without detrimental consequences for landscape and visual receptors we are nevertheless disappointed that none of the 4 tunnel options came forward for public consultation. Of the two options which have come forward, NE offers the following comments:

- Option 12: For landscape and visual receptors NE considers this to be most damaging option. This is because, based on the information we have seen, this option provides fewer opportunities for landscape mitigation and enhancement measures. It therefore has limited the potential to deliver a 'landscape led' scheme as envisaged by HE or to uphold the statutory purpose of the AONB.
- Option 30: For landscape and visual receptors NE considers this to option to have more potential because of the greater opportunities to enhance the landscape and improve the visual amenity. These opportunities, to create an ambitious scheme design for the wider escarpment landscape, need to be realised if the effect of the new road is to be lessened. For instance, and in addition to other measures, the opportunity to remove a section of the existing A417 carriage (Technical Appraisal p.127 at 7.8.6) and undertake associated landscape reinstate measures could provide wider gains for the natural environment by restoring valued landscape features.

Our preference, on landscape grounds, for Option 30 is therefore based on the greater opportunities we believe this option could afford for a better overall scheme design and a greater gain for landscape and visual receptors and the wider natural environment.

NE requests that our advice is sought during the detailed design stage for the scheme in order that opportunities can be identified early and where possible incorporated at this time. We would stress that we should be involved fully at an early stage and throughout the design process to ensure that the scheme can proceed quickly and smoothly, avoiding complications at a later stage and during the Examination process.

Access provision via PROW network (Including the Cotswold Way National Trail)

As noted in the Technical Appraisal (p. 57 at 3.15.1) the PROW network in the vicinity of the Air Balloon junction has been greatly compromised as a result severance effects for all user groups caused by the existing A417 and A436. Our access objectives for the scheme therefore are straightforward;

1. To greatly improve the PROW network in the area for all users; walkers, cyclist, equestrians and those with mobility disabilities.
2. The creation of formal crossing points which are grade separated for users of the Cotswolds Way NT and Gloucestershire Way long distance path.
3. For bridleways, dedicated equestrian crossings should be considered.
4. The opportunity should be taken to increase the area of publicly accessible land, particularly in the vicinity of Crickley Hill Country Park and Barrow Wake. A means of linking these two areas and providing a crossing point for the Cotswolds Way via a green bridge should be considered.

From the information we have seen NE considers of the two options presented Option 30 would offer the greater access opportunity to realise our objectives.

The means by which these objectives are realised should form part of the final scheme design. NE requests that our advice is sought during the detailed design stage for the scheme in order that opportunities can be identified early and where possible incorporated at this time. We would stress that we should be involved fully at an early stage and throughout the design process to ensure that the scheme can proceed quickly and smoothly, avoiding complications at a later stage and during the Examination process.

We would be happy to comment further when the need arises but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Rebecca Underdown on 0208 225 6403. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Rebecca Underdown
Planning for a Better Environment
West Midlands Area Team

Swindon Borough Council

Response ID ANON-8N38-8515-4

Submitted to **A417 Missing Link**
Submitted on **2018-03-12 11:26:18**

About you

1 Name

Qi:
John Seddon

2 Address

Qii:
Swindon Borough Council, Civic Centre, Euclid Street, Swindon

3 Postcode

Qiii:
SN1 2JH

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
jseddon@swindon.gov.uk

6 Organisation (optional)

Qvi:
Swindon Borough Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

Local Authority with residents and businesses that rely upon good connectivity with the Midlands via the A419 and A417.

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::

SBC supports Highways England's view that Option 30 is the preferred option for the scheme, as this option:

- o Can be delivered with less disruption to existing traffic during the construction phase;
- o Will provide the maximum benefit in terms of reduced journey times, and;
- o Provides better Value for Money.

Option 30 provides a better alignment for through traffic, enabling the 70 m.p.h. speed limit for a dual carriageway to be maintained throughout the scheme. This route is also shorter, and this combination of shorter distance and higher speed limit means that this option would provide the greatest journey time benefits.

The other advantage of Option 30 is that a greater proportion of the scheme can be constructed off-line, meaning that construction activity would have less impact upon traffic during the construction period.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
Option 12 would involve construction activity along the full length of the existing route, meaning that traffic would be subject to greater disruption. It would also involve the imposition of a lower speed limit along a greater length of the route, increasing journey times for travellers and reducing the benefits from the scheme.

Therefore, whilst Option 12 would provide benefits compared to the existing alignment, these benefits would not be as great as they will be for Option 30.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

From a Swindon perspective, the main outcome that needs to be achieved is ensuring that an improvement scheme is delivered at this congestion hotspot as soon as possible. Either of the two preferred options identified by Highways England would achieve this.

The other options considered through this process would not provide the same level of benefits, or are too expensive and complex to easily deliver within a reasonable timeframe.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

The A419 and A417 together form the Strategic Road Network linking the M4 at Swindon with the M5 at Gloucester. The route is significant for Swindon as it provides the main route to the Midlands and the North for private and commercial traffic from the Borough. The congestion, and consequent impacts upon journey time reliability, is a significant issue for Swindon, and especially the business community, with companies such as Honda having a significant supply chain base in the Midlands which involves lorries travelling through the Missing Link to deliver vehicles parts to the Honda factory at Swindon. The lack of journey time reliability can have a significant impact upon local businesses, and therefore the Council strongly supports the proposals to improve the A417.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Other (please specify):

Highways England press release on the Government website.

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Syde Parish Council

Response ID ANON-8N38-85TX-A

Submitted to **A417 Missing Link**
Submitted on **2018-03-09 10:06:34**

About you

1 Name

Qi:
Penny Wright

2 Address

Qii:
Syde Manor, Syde

3 Postcode

Qiii:
GL53 9PN

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
sydeparish@gmail.com

6 Organisation (optional)

Qvi:
Syde Parish Meeting

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

I am replying as Clerk of the Syde Parish Meeting. Members live and own land along the A417 and use it every day

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::

The Syde Parish Meeting is broadly in favour of option 30 as it is the most cost effective and has a safer bend at the Air Balloon.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
The Syde Parish meeting is anxious about safety along Option 12 at the Air Balloon bend

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:
The priorities for Syde Parish Meeting are as follows:
1. A reduction in rat-running through the village with damage to verges and noise.

2. The safety of the junction onto the A417 at the Syde/Highwayman Inn turning. This is a 90 degree junction without a slip road and it is already very hard to get onto the A417 due to traffic speeds and volumes, which can only get worse. We would like EITHER the junction to be remodelled to include slip roads in both directions, OR a 50 - 60 mph speed limit to be introduced at this point. A speed limit would have the added benefit of reducing noise and pollution.
3. Noise abatement features, whichever scheme is chosen, as we are a community that is within 1 mile of the road.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Local authority

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

This has been a well organised consultation, and we hope you will take notice of the points made by local communities.

Tewkesbury Town Council

Response ID ANON-8N38-8C8X-V

Submitted to **A417 Missing Link**
Submitted on **2018-03-28 19:45:31**

About you

1 Name

Qi:
Tewkesbury Town Council

2 Address

Qii:
Town Hall, 18 High Street, Tewkesbury

3 Postcode

Qiii:
GL20 5AL

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
townclerk@teewkesburytowncouncil.gov.uk

6 Organisation (optional)

Qvi:
Tewkesbury Town Council

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

This route serves the residents and businesses of the Tewkesbury Town Parish.

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
We prefer option 30 as it provides greater benefits for the local area. We also note that the BCR for option 12 was lower than for option 3 despite that option exceeding the initial cost constraints. We would have preferred further consideration of a tunnelled option such as option 3.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
We like option 3 as we think there would be benefits to considering tunnelled alternatives.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:
Not at this time.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Local authority

Other (please specify):

Town Hall was a deposit location for the consultation information.

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

The Coal Authority



The Coal
Authority

Resolving the **impacts** of mining

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG
T: 01623 637 119

E: planningconsultation@coal.gov.uk
www.gov.uk/coalauthority

Mr Michael Goddard – Highways England Project Manager for A417 Missing Link
Highways England

[By email: A417MissingLink@highwaysengland.co.uk]

28 February 2018

Dear Mr Goddard

A417 Missing Link - Public Consultation

Thank you for your consultation letter dated 31 January 2018 requesting the Coal Authority's observations on the above.

I have checked the site location plan against the information held by the Coal Authority and confirm that the proposed development site is located outside the defined coalfield. On this basis we have no specific comments to make.

Yours sincerely

D Roberts

Deb Roberts *M.Sc.*
Planning Liaison Officer

Worcestershire County Council

28 MAR 2018

NTCC

Highways England
National Traffic Operations Centre
3 Ridgeway
Quinton Business Park
Birmingham
B32 1AF

12th March, 2018

Dear Sir/Madam

SUPPORT FOR A417 MISSING LINK

Worcestershire is an ambitious county, with a strong track record of delivering and supporting economic and development growth. Continued improvement to strategic accessibility to and from Worcestershire to key national economic hubs by both road and rail are critical to ensure that our long-term growth aims are achieved.

The A417 through Gloucestershire provides a strategic transport link from Worcestershire, via the M5, to London and the south east, including the nationally significant M4 Thames Valley Growth Corridor, Heathrow and Gatwick airports and the ports of Southampton, Portsmouth and Dover. Congestion experienced at the Air Balloon roundabout and its approaches is regularly cited as an issue by Worcestershire businesses that need reliable access to local, national and international markets to enable them to prosper.

Worcestershire County Council is strongly supportive of plans to invest in the A417 Missing Link, recognising that journey time unreliability on this critical corridor acts as a constraint to our ambitions for growth.

I concur, with the conclusions drawn by Highways England specifically, that Option 30 presents the preferred solution to tackle identified objectives for this scheme. This option offers the best value for money of all the options proposed, delivering a continuous, dual carriageway route between the M5 and the M4 with no speed restrictions. It is clear that this option will deliver strategic improvements to journey time reliability and safety, support economic activity and growth and reduce the impact of this route on the precious local natural and built environment.

Kind regards



Simon Geraghty
Leader of the Council

Simon Geraghty
Leader of the Council

County Hall
Spetchley Road
Worcester
WR5 2NP

Office: 01905 766678

Home
35 Fern Road
Worcester
WR2 6HJ

Home: 01905 420740

Email: sgeraghty@
worcestershire.gov.uk

Electoral Division
Riverside

Appendix N - Non-statutory stakeholder responses

Responses from:

BPE Solicitors
British Horse Society
Campaign for Better Transport
Campaign to Protect Rural England
Cheltenham and Tewkesbury Cycling Campaign
Cheltenham Chamber of Commerce
Cotswold Trails and Access Partnership
Cotswold Way Association
Endsleigh Insurance
GFirst LEP
Gloucestershire Local Access Forum
Gloucestershire Ramblers
Gloucestershire Wildlife Trust
National Trust
Road Haulage Association Ltd
Trail Riders Fellowship
Woodland Trust

BPE Solicitors

Response ID ANON-8N38-8CQG-4

Submitted to **A417 Missing Link**
Submitted on **2018-03-27 11:40:37**

About you

1 Name

Qi:
Liz Bastock

2 Address

Qii:
BPE Solicitors

3 Postcode

Qiii:
GL50 3PR

4 Telephone (optional)

Qiv:
01242224433

5 Email (optional)

Qv:
bpe@bpe.co.uk

6 Organisation (optional)

Qvi:
BPE Solicitors

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

Representing a business with offices in Cheltenham, Cirencester and Stonehouse

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:
In looking for business, Cheltenham and Gloucester are competing with other major towns and cities despite its obvious attractions.

A major issue affecting business investment into Cheltenham and businesses staying in the town are the transport links. Cheltenham has also seen a number of

high profile corporate departures over the last decade.

Given the slow links to London, car transport is often the preferred entrance point, with three routes M40/M5/A40 and M4/ A419/ A417. Key are the frequent delays on the A417 at Birdlip.

The delays on the A417 at busy periods radically affect the driving time so making Cheltenham and Gloucester less attractive to businesses on several levels.

On Festival income (vital to the local economy) it affects and potentially deters Festival goers - who now have an increasing choice of festivals both in the Oxfordshire and Gloucestershire.

It also affects intra-Gloucestershire investment given the time that can be taken between Cheltenham/Gloucester and Cirencester due to the A417 delays. We have encountered difficulties recruiting Cirencester based staff to work in Cheltenham for example.

Action to ameliorate this is now urgently required and we are pleased to see positive steps being made towards resolving the issue of the 'Missing Link'.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Other (please specify):

Via GFirst LEP Retail Sector Group

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

British Horse Society

Response ID ANON-8N38-856W-B

Submitted to **A417 Missing Link**
Submitted on **2018-03-12 18:12:51**

About you

1 Name

Qi:
Ms Ros Davies

2 Address

Qii:
1 Mill Lane, Winchcombe, Cheltenham

3 Postcode

Qiii:
GL54 5LT

4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
rosdavies_home@yahoo.co.uk

6 Organisation (optional)

Qvi:
British Horse Society and Misslink4horses focus group

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

As the BHS Gloucestershire County Access and Bridleways Officer I support local riders

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::

Although route 30 cuts across 7 existing bridleway and ORPAs (Other Route with Public Access) it gives a great opportunity to build effective new horse friendly crossings. This may enable routes that do not get used at the moment because there is very little safe crossing of the existing A417 to be used in the future. There is also an opportunity maybe to use some of the A417 road that is being replaced as a route for riding. It also hopefully will reduce some of the rat run driving that currently makes many of the roads off the existing A417 especially around Cowley but also around Birdlip and Brimpsfield, so dangerous.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
no comment

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
No

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

Where Rights of Way for horses cross the new road or go by the side of it, ensure adequate fencing or treeline to ensure that traffic and horses are completely separate. For example currently there is a lay-by near the Cowley roundabout that riders navigate to get between 2 bridleways. If a horse bolted or lost its rider it would go directly onto the dual carriageway.

Horse riders prefer underpasses to overpasses if possible where there are crossings.

The Misslink4horses horse rider forum is aiming to come up with some views on crossings and we look forward to working with Highways in the design phase

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Received a letter from Highways England

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Very informative consultation session. Thank you for sending through the large paper copies of the routes 12 and 30. I spoke to a couple of experts on the day and felt very positive about the possibilities for horse riders with this development.

Campaign for Better Transport

A417 'Missing Link' consultation - Response from Campaign for Better Transport

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment. We welcome the opportunity to respond to proposals for the A417 'Missing Link' consultation.

Summary

We formally object to both the proposed new road options, on the grounds that neither of them will deliver sufficient benefits to justify the significant environmental costs they will impose in a protected landscape setting and both fail the major development test. Increasing road capacity undermines key policy goals on environmental protection, modal shift, carbon reduction, air pollution and public health.

We are concerned that damaging new road building is being considered in this sensitive and important location before all other options have been considered, contrary to the principles of sustainable development. The primary purpose of this scheme is not to improve the local environment, but as the consultation documents indicate, to address what is seen by some as a 'missing link', at great financial and environmental cost.

What is disappointing is that the previous landscape led approach to finding a solution to this section of the Strategic Roads Network appears to have been jettisoned without any explanation. This is unacceptable. It has also led to the rather odd re-introduction of a previously discarded scheme (option 12) to give the semblance of choice within the consultation process. However, this is yet another example of Highways England proceeding to public consultation without any real choice at all.

Comments on the consultation process

We are particularly concerned at what appears to be a recurring theme with Highways England consultations. Two options are put in front of the public but one of those is written off by Highways England so that effectively only one option is being consulted upon. Even if both were valid options, with the narrow range of options presented, the public is given very little chance to influence the outcome of the route selection process. Consequently, it appears to be little more than a tick-box exercise to allow Highways England to say that it consulted with the public before it selected its preferred route.

It is not until the formal consultation on the preferred route that the public would expect to only be consulted on one route. Before that time, good practice would encourage the public to be engaged in a wide number of options to allow Highways England to properly consider all the possibilities for delivering a particular scheme.

Instead, what we have here is a predetermined preferred option, based on an arbitrary cost constraint, with a previously rejected aunt sally (option 12) thrown in to try and give the pretence of choice. In the consultation documents Highways England explains the landscape led process and how the options fared, including the various tunnel options. However, there is no justification provided for arbitrarily choosing a funding budget which, quite by chance, manages to exclude any tunnel options.

Justification for the scheme

The scheme appears to be justified on the grounds that it will fill a missing link between the M4 and M5, yet the information provided as part of the consultation shows that all options increase air pollution and carbon emissions because of the extra traffic that will result and the longer distance the traffic would then travel. As this would cause more traffic to pass more houses, than were the traffic to go on the A34 and M40, its impact will be greater. Therefore, rather than being a missing link, it appears to be more of a lengthy and polluting diversion.

This is reinforced by the poor cost-benefit ratio for the preferred option (30) which only just manages to get above one, hardly a convincing case for new road construction, especially given the environmental impacts. At least one of the tunnel options has a better cost benefit ratio than option 12, while the benefits of placing the road in a tunnel are not truly recognised by the current assessment process.

If these wider benefits had been given sufficient weight then different tunnel options would have featured in the consultation.

Impact on an Area of Outstanding Natural Beauty

We are particularly concerned that new road construction and increased road capacity is proposed in an Area of Outstanding Natural Beauty (AONB). AONBs enjoy special protection under the National Planning Policy Framework (NPPF) and the National Policy Statement for National Networks (NNPS).

The NPPF states: *“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas... Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.”*¹

The NNPS (section 5.152) states: *“There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty.”*²

This protection is very significant in planning terms. The case for building this road is far from compelling given its very low or poor cost benefit ratio and certainly does not meet the test for building in an Area of Outstanding Natural Beauty. It should therefore be withdrawn as a proposal as it currently stands. If Highways England continues with promoting option 30 it is either going to waste a lot of time and money, or, if approved, would set a dangerous precedent, opening up nationally designated landscapes to all sorts of damaging developments.

An approach based on demand management and sustainable modes would sit far more comfortably with the NPPF which advocates that *“economic, social and environmental gains should be sought jointly and simultaneously through the planning system”*.

Road building only a temporary solution

Providing new road capacity can only be a temporary solution to congestion. The phenomenon of induced traffic is well-established. This has been seen for example at the Dartford Crossing in Kent, where repeated increases in capacity have been overwhelmed by growing demand.

¹ Paragraphs 115 and 116, National Planning Policy Framework – DCLG, March 2012

² DfT “National Policy Statement for National Networks” 2014

Highways England report *“Analysis of traffic data shows that traffic demand at Dartford has responded in step with capacity; such that whenever new capacity has been provided, it has filled up and created the need for more capacity. This has been a recurring pattern since the second tunnel was opened at Dartford in 1980 and then the QEII Bridge in 1991. Today there is insufficient capacity to cater for current and future traffic demand.”*³

The higher traffic volumes and encouragement of car use arising from new road capacity would be at odds with other key public policy priorities. The UK has a binding target of an 80% CO₂ emissions reduction by 2050 and reducing transport emissions is key to achieving this and it is questionable whether these emissions can be reduced quickly enough through a move to low and zero emission vehicles alone.

The 2017 Report to Parliament from the UK Committee on Climate Change noted that carbon dioxide emissions from transport have increased 0.9 per cent from 2015 to 2016, the third successive year that emissions have risen. The Committee advises that this trend needs to be reversed, as a matter of urgency, to deliver a reduction in emissions of 44 per cent from 2016 to 2030⁴. The consultation documents make clear this proposal will increase carbon emissions, yet this fails to be properly addressed both here and at the more strategic Government level.

The UK Government has been found to be in unlawful breach of air quality standards with local authorities required to implement action plans to reduce air pollution. The major source of NO_x and particulates is emissions from diesel engines. The level of breaches of vehicle emissions regulations means that air pollution baseline assumptions are meaningless. New research has found that not one single brand complies with the latest air pollution limits (‘Euro 6’) for diesel cars and vans in real-world driving conditions⁵. The increase in traffic levels as a result of the new road will adversely impact roadside air quality along the route and in surrounding towns and villages some of which are likely to have air pollution issues.

In the longer term, we advocate a more strategic multi modal approach to long distance travel including a shift to rail freight as envisaged in the Government’s recent Rail Freight Strategy.

Investing to improve the capacity for rail freight has multiple economic benefits as well as being significantly less environmentally damaging. There are cross-cutting benefits from the inward investment for passenger rail, creating a virtuous circle of improved alternatives and reduced demand for road space.

The case for a tunnel

We do not support the proposals for new road construction in the AONB and do not believe that any proposed mitigation could adequately address the permanent damage to protected landscapes and habitats unless the road was put in a tunnel, which would produce some landscape and environmental improvements for the AONB and go some way to addressing the road’s serious overall negative impacts.

We believe that a sufficiently long tunnel is essential to safeguard the landscape and to provide a sufficient level of mitigation for a road that would otherwise cause major landscape harm.

Other aspects

Highways England claims that the schemes will have minor positive impacts on health and non-motorised users yet provides no evidence that this will happen. Given that the scheme will increase traffic it is going to lead to less attractive conditions for non-motorised users when this traffic leaves the strategic road network and uses local roads.

³ Highways England “Lower Thames Crossing Pre-Consultation Scheme Assessment Report” 2015

⁴ UK Committee for Climate Change – [2017 Report to Government](#)

⁵ Transport & Environment: “Dieselgate: Who? What? How?” 2016

While there could be benefits if improved crossings and facilities are provided for non-motorised users that are safe, direct and convenient, all too often this is not the case. This means designs should conform to the latest standards⁶. However, it should be pointed out that improvements could happen anyway and are not reliant on a new road to achieve them.

It is also worth noting that the tunnel options would provide the greatest benefits for non-motorised users as any interaction with fast moving traffic on the strategic road network would be completely removed.

Conclusion

We object to both route options as they clearly fail to meet the major development test for construction within the AONB. Little weight has been given to the landscape impact of the proposals contrary to national planning policy and this is clearly unacceptable. It cannot be right that Highways England constantly tries to avoid its duty to plan infrastructure in a sympathetic way in such important places. The use of arbitrary project costs as a reason to plough ahead with a cheaper option regardless of its impact should not be allowed.

We believe that the impact on the protected landscape, combined with permanent loss of habitats, increased air and noise pollution and increased carbon emissions, provide clear grounds to reject these road plans.

March 2018

Chris Todd
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX
Registered Charity 1101929. Company limited by guarantee, registered in England and Wales:
4943428

⁶ For cyclists this is [Design Manual for Roads and Bridges IAN 195/16](#)

Campaign to Protect Rural England



Community House
College Green
Gloucester
GL1 2LZ
Telephone: 01452 309783
email: info@cpreglos.org.uk
website: www.cpreglos.org.uk

28th March 2018

Nick Aldworth
Regional Director (South West)
Highways England
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6HA

Dear

A417 MISSING LINK CONSULTATION

CPRE Gloucestershire Branch has submitted a response to this consultation using the electronic pre-formatted questionnaire. However we are concerned that in complying with that format the true spirit of our comments may have been obscured so we are writing to you direct.

We are very concerned that the consultation is fundamentally flawed and this may lead to unnecessary delay in finding the right scheme for this very sensitive location. There are two reasons why it is inadequate:

1) The consultation is basically for only one option

In terms of the publication of material, arrangement of events where the public can understand the options presented and the publicity for those events the consultation has been good. However CPRE believes the consultation to be flawed. As the brochure and Technical Appraisal Report make clear, Option 12 is deficient; it makes only a marginal improvement to traffic flows, for safety reasons it requires speed restrictions, it has minimal environmental benefits and it offers a poor value for money versus the current situation. In effect the consultation is therefore for only one option – Option 30. This falls short of the expectations for major road scheme consultations and is contrary to the ruling on the

Taunton consultation and Sefton Council challenge on the Liverpool docks access road scheme. The second most viable option (Option 3) should have been included particularly as taking environmental benefits into account it probably represents better value for money than Option 30. The only reason that it is not included in the consultation is that the capital cost exceeds the arbitrary budget of £500 million. The public should have been allowed to express a view as to whether they were prepared to accept this higher cost. Our analysis of the value of Option 3 is set out in attachment 1.

Ideally Highways England should reissue the consultation document immediately including Option 3 but with an additional question to the effect that “were you to prefer Option 3, would you support the additional expenditure of £390 million to achieve those benefits? “

2) Highways England’s preferred Option 30 does not meet the environmental and community objectives for the project

It fails to meet two of the key objectives for the scheme set out in the consultation brochure. Namely:

- to reduce the impact on the landscape, natural and historic environment of the Cotswolds and where possible enhance the surrounding environment; and
- to reduce queuing, improve access for local people to the strategic network and support residents’ and visitors’ enjoyment of the countryside.

The scheme does not sufficiently recognise the sensitivity of the Cotswold AONB and Highways England’s statutory duty to have due regard to the protection and enhancement of its natural beauty. The scheme as presented would significantly damage the public’s enjoyment of the AONB.

The scheme really does not offer a sensible solution for A436 users; it concentrates on the A417 user to the detriment of A436 and local roads users.

However we believe that Option 30 can be improved such that its major disadvantages are substantially mitigated. The improvements we think are essential are given in attachment 2.

Finally, we at CPRE are committed to finding a solution to the congestion problems caused by the current configuration of the A417 but it has to be a sensible balance between the Natural Capital of environmental protection and the purely economic benefits of improved traffic flows. We would be happy to work with Highways England to achieve this balance and would be glad to meet with you to explore options and possibilities.

Yours sincerely

Patricia Broadfoot

Professor Patricia Broadfoot CBE
Chair, CPRE Gloucestershire Branch

Why CPRE considers Option 3 to be a viable alternative to Option 30 on which the public should be consulted

Tunnel Option 3 gives much higher (£105 million PVB) benefits compared with Option 30 and the second highest benefits cost ratio of all the schemes. It also has considerable environmental benefits:

- it minimises the number of new junctions,
- it does not require a new link road through a sensitive part of the AONB to accommodate the traffic from the A436 towards Gloucester,
- it offers a less steep gradient and therefore the need for a crawler lane up Crickley Hill.
- it would reduce traffic noise from vehicles climbing the escarpment, and
- it offers an easy wide green bridge at the Air Balloon.
- While it has a slightly later completion date, it has a much lower take away of spoil (about 800,000m³) and there would be less disruption to traffic during the construction period.

The method (BCR) used to evaluate the options will be obsolete when the approach and methodology signalled in the Government's 25 year Environment Plan are brought into force, in particular the need to deliver wider public benefits and the use of Natural Capital accounting in evaluating schemes. In effect this wider approach was used in assessing the Stonehenge tunnel and we cannot understand why it has not been used for the "missing link" given that the landscape here is of equal if not greater sensitivity.

It is probable that, were these environmental benefits to be fully translated into Natural Capital, then the net benefit would eliminate the £105 million difference in PVB minus PVC versus Option 30. On the face of it, when all the factors are taken into account there looks to be a high probability that Option 3 gives the better value.

Improvements to Option 30 which CPRE believes would help mitigate its shortcomings

- a) There is no access to the lanes to Cowley and Brimpsfield or Nettleton Bottom which exist today from the Cowley roundabout. These need re-instatement with a new junction at or near the existing Cowley roundabout.
- b) The landscape from roughly the Cowley roundabout to Shab Hill is exceptionally beautiful and remote in feel. Much of it can be seen from some distance from other parts of the AONB. A particularly charming area is at Stockwell Farm and the section of Cowley Lane which runs through it. Yet at this point it appears that the new A417 would be elevated and cross **over** Cowley Lane. The road should on no account be routed along the crest of the ridge above Stockwell Farm: it should be sunk so that it passes **under** Cowley Lane and so that as many of the ancient trees which line the lane are preserved.
- c) Similarly, just before Shab Hill the route would be very prominent from a distance. To reduce visibility, the cutting towards the Air Balloon should commence some 100 metres further south than proposed.
- d) The proposed link road from the old A 417 to the new A417 is routed along the plateau section of the landscape and would therefore be highly visible, as would be the junctions at each end. This unacceptably damages to the AONB. It would be much preferable to route A436 traffic going in the Gloucester direction via a slip road going north west and linking with the new A417 lower down on Crickley Hill similar to that proposed for Option 3; south bound A436 traffic could use the old A417 to the needed junction at or near to the Cowley roundabout (see (a) above).
- e) Among the stated environmental benefits of Option 30 is the removal of a section of the old A417. On closer inspection this will be a very short section as access to Birdlip, Stockwell Farm and Nettleton Bottom will still be needed. We do not see the removal of very short stretches of the old 417 as being of much environmental benefit.
- f) The proposals for a green bridge to the west of the Air Balloon near the summit of Crickley Hill are inadequate. What is needed is a sufficiently long section of cut and cover tunnel combining the “green bridge concept” (providing a landscape and wildlife link and a route for the Cotswold Way National Trail and the Gloucestershire Way) with the A436 crossing of the A417. This would give a much more satisfactory landscape solution than the piecemeal approach suggested and have the additional benefit of muffling the traffic noise heard at Barrow Wake and from Crickley Hill: at present, the bowl shape of the landscape at the Air Balloon tends to focus and echo the noise.
- g) Great care needs to be taken with lighting at the junctions. Ideally it should be avoided. If deemed essential, it should be limited to down lighting only.

Cheltenham and Tewkesbury Cycling Campaign

From: George Allcock [mailto:george.allcock@gmail.com]
Sent: 12 April 2018 18:26
To: A417 Missing Link at Air Balloon <A417MissingLink@highwaysengland.co.uk>
Cc: cyclecheltcom@yahoogroups.com
Subject: FW: A417 Link - Cheltenham & Tewkesbury Cycling Campaign

Consultation feedback for A417 Link proposals (preferred route, 30) - Cheltenham & Tewkesbury Cycling Campaign response

Dear Sirs,

We are in agreement with Highways England that Route 30 is easily the best route of the two considered to be viable options, however,

This should include provision of a new shared use cycle/pedestrian track paralleling the route up the Escarpment, to provide a safer and easier pedestrian/cycle access up into the Cotswolds from Gloucester and Cheltenham. There are no suitable cycle routes up the escarpment from either Cheltenham or Gloucester at present - all are too steep or too busy except for experienced cyclists, so such a route is really very badly needed.

This should start with a new grade separated crossing at Crickleigh Farm to link Dog Lane and the public track on the opposite side of the existing A417 (which would also link a number of other public footpaths currently with no safe crossing). Together with the existing underpass between Little Witcombe and Bentham this would give good cycle links into other minor roads towards Gloucester, the Witcombes, Bentham etc.

From there, it should parallel the new dual carriageway with some separation and ribbon landscaping and raised earth barrier between until it reached and connected with the minor road to Barrow Wake, but should use the same overall route and earthworks, so that expense is minimised and a safe route with reasonable gradient similar to the new A417 link being provided.

There are also many footpaths and tracks crossing the proposed route, so we have superimposed this on an Ordnance Survey map (enclosed) to illustrate our proposal for a shared use path up the escarpment, and the public footpaths and tracks which cross it.

Notes.

- 1) Start of road link
- 2) Resurface existing public track (PT)
- 3) Grade separated crossing for track and public footpaths (PFs)
- 4) Start of shared use cycle link (also preserving pedestrian connections with Dog Lane, the road to Cold Slad and the PFs currently using the A417 verge locally.
I've shown it on the uphill side – reducing danger from traffic.
Ideally separated from and uphill from A417, with landscaped buffer strip between.
- 5) Crossing for PF
- 6) Crossing for PFs
- 7) Grade separated crossing for PFs, PTs and road (slightly rerouted to all use same crossing)
- 8) Interchange with new A436 link road; cycle track joins with new A436 road link.
- 9) Grade separated crossing for PT
- 10) Re-routed PF (economy – removes the need for crossings)
- 11) Grade separated crossing for PT
- 12) Grade separated crossing for PF & road (slight realignment of PF to suit)

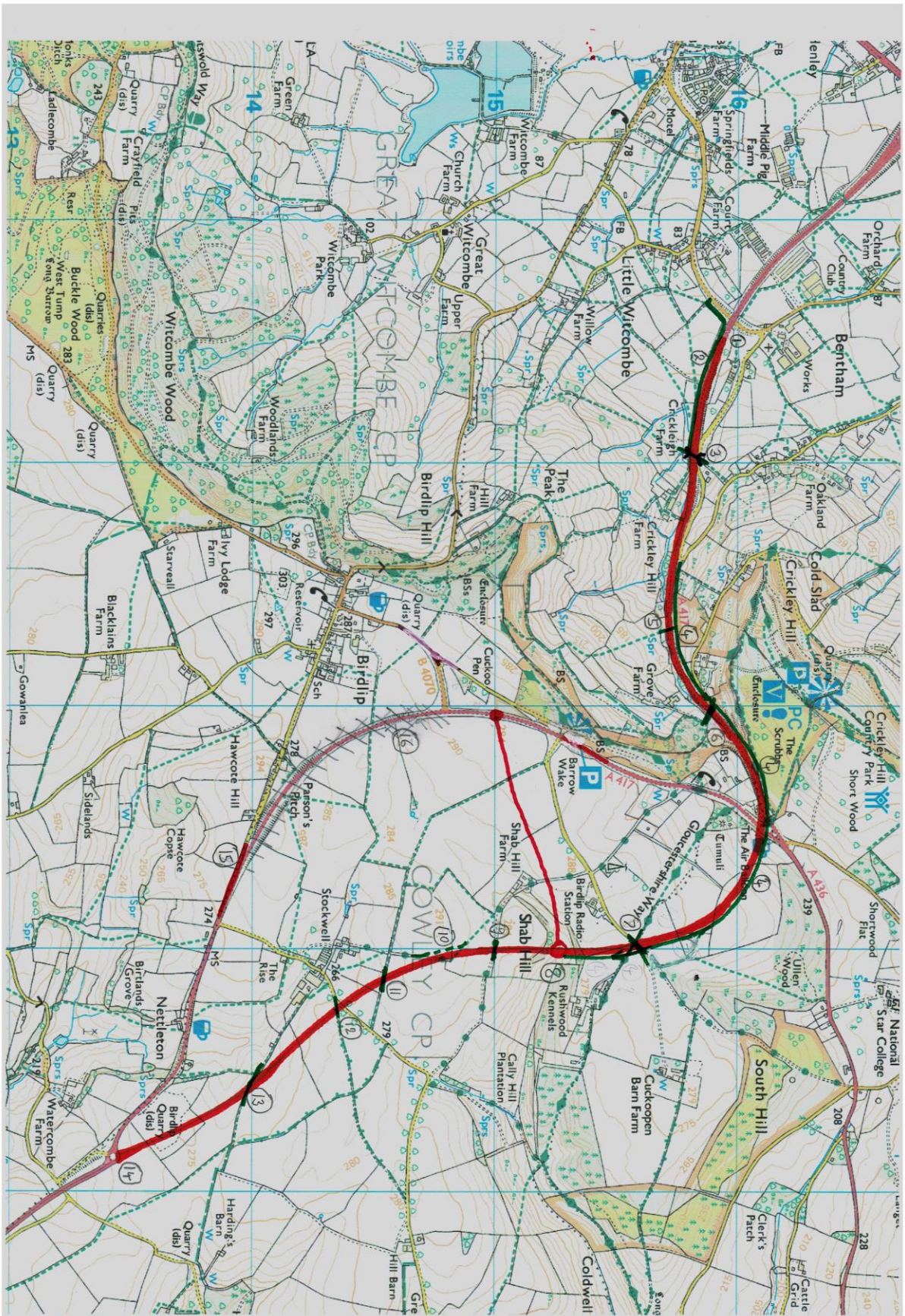
- 13) Crossing for PF
- 14) End of road link, new interchange
- 15) Rerouting of old section of A417 onto Birdlip Road
- 16) Redundant section of A417 removed
- 17) Rationalise/straighten road access from new road link to Birdlip

Regards, George

27 Ravensgate Road, Charlton Kings Cheltenham GL53 8NR

Phone: 01242 262557

Mobile: 07788646328



Cheltenham Chamber of Commerce

Response ID ANON-8N38-8CCQ-Z

Submitted to **A417 Missing Link**
Submitted on **2018-03-26 12:32:46**

About you

1 Name

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01242252626

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Qv:
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6 Organisation (optional)

Qvi:
Cheltenham Chamber of Commerce

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):
Spokesperson for the Cheltenham Chamber of Commerce

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::

With the proposed expansion of the region now that the JCS has been adopted, pressures on the route will increase and it is vital for the local economy that these improvements take place.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
A reasonable "reserve option" but not as good as option 30.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
Option 30 stands out as being the best option.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

We cannot stress enough the importance of these improvements for the economy of the region

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Received an email from Highways England

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Cotswold Trails and Access Partnership

Nick Holliday
Chair
Cotswold Trails and Access Partnership
C/O The Old Prison
Fosse Way
Northleach
Glos GL54 3JH

March 13, 2018

Dear Sir/Madam

A417 Missing Link proposals

The Cotswold Trails and Access Partnership (Partnership) is a body tasked with pursuing initiatives to enhance and promote the enjoyment of the Cotswolds by the public, whether they be local, national or international visitors, whether walking, cycling, riding or simply sightseeing and shopping.

We have the following comments on the published proposals for improvements to the "Missing Link" stretch of the A417 from Cowley roundabout to the bottom of Crickley Hill.


Irrespective of which scheme may go forward our principal concerns are for the integrity of the footpath & bridleway network and the physical safety of all those using them, during any works and subsequently following completion and in protecting the integrity of the environment and in particular the escarpment. There is already a high level of concern for safety of users of the Gloucestershire Way and the Cotswold Way at the Air Balloon crossing. It must be recognised that the Cotswold Way in particular attracts a high number of International visitors, and Tourism in the Cotswolds - currently worth £1bn a year - is just as much a commercial consideration as all the other activities driving the prosperity of the area. We do not want any "No-Go" areas introduced that would threaten its reputation and reduce interest.

While we want to emphasise these two long distance routes, there are many other paths in the area of interest for the new scheme which are potentially threatened. We urge you to avoid any repetition of the situation between Birdlip and Nettleton where footpaths at A, B, C, & D to all practical purposes stop at the highway edge in the absence of any assistance to protect people crossing – see below. This amounts to reduction in quality of life for users of these paths.

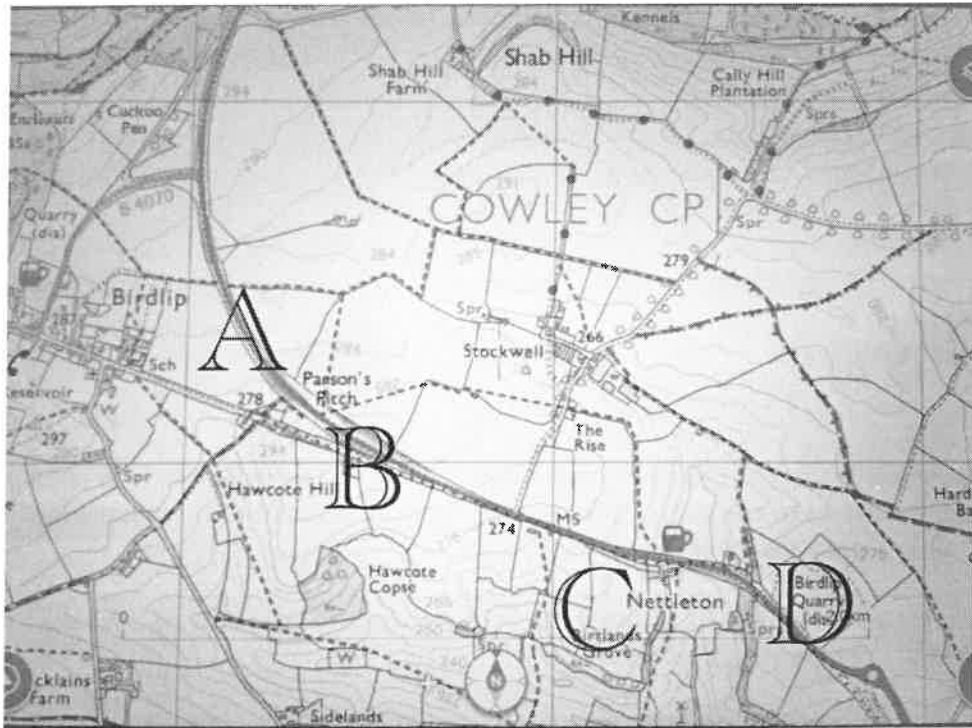
We are concerned that current proposals which appear to rule out the most environmentally sensitive options on the grounds of immediate cost, do not take into account the far greater costs which would be incurred by a very lengthy period of unacceptable traffic hold ups during the construction period which would generate huge hidden costs to business which could well result in the total cost of the project making a surface option less attractive and in fact more equal to the cost of the tunnel options. If evidence of this is needed, then the half empty supermarket shelves in the first week of March after a few days' unseasonal snow, is proof positive of the costs of disrupting normal traffic flows.

Certainly in terms of the integrity of this precious and beautiful protected AONB landscape, the tunnel option wins hands down. Added to this a tunnel would eliminate ice and snow hold ups on the approach road, offer a gentler gradient to give fuel & emission savings, and would be a final solution to this long standing problem, where surface solutions have failed.

Yours faithfully



p.p. Nick Holliday, Chair, Cotswold Trails and Access Partnership



Cotswold Way Association

Response ID ANON-8N38-8CH4-8

Submitted to **A417 Missing Link**
Submitted on **2018-03-24 18:13:08**

About you

1 Name

Qi:
John Bartram

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4 Telephone (optional)

Qiv:

5 Email (optional)

Qv:
info@cotswoldwayassociation.org.uk

6 Organisation (optional)

Qvi:
Cotswold Way Association (Reg Charity 1167094)

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):
Chairman - Cotswold Way Association

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly disagree

Please provide any comments to support your answer::
See submission under Question 11

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
See submission under Question 11

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
One of the tunnel options should be re-considered as outlined in our submission under Question 11

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:
Comments on the A417 proposals by the Cotswold Way Association

Headlines

The hugely popular Cotswold Way National Trail will be severely impacted by both of the proposed A417 route options as they pass through one of the most important parts of the Cotswold escarpment. We are looking for clear statements about what protection the area will have, the restitution of the surroundings and the maintenance of one of the most used and internationally valued walking routes in the UK

In our view these proposals are ill-considered and simply an attempt to drive through the cheapest possible solution, whereas the best solution would be to take the road away from this sensitive area. Hence one of the discarded tunnel options should be re-considered.

Further Details

The Cotswold Way Association is a registered charity dedicated to the improvement of the Cotswold Way National Trail and related long distance paths. A visit to our website will demonstrate the practical support we provide – www.cotswoldwayassociation.org.uk

Our concerns about the A417 re-development proposals relate to the impact the development will have on the Cotswold Way which currently crosses the A417 at the A436 roundabout. However the proposals submitted in the consultation totally lack any detail as to how they will impact on the trail and more particularly on the landscape surrounding it, they are just lines on a map without any of the information needed for us and those concerned with the environment to reach any conclusions.

Our specific concerns are as follows :-

1. Routing of the Cotswold Way National Trail and other walking routes Our National Trails, with their high standards of maintenance, clear signage and ease of access are cornerstones for introducing walking to as many people as possible, with all the benefits well documented by the NHS and supported by governments of all parties. The Cotswold Way is walked by thousands of people every year and is the base for a support industry from Bath to Chipping Campden, an industry that brings in significant foreign currency and has the highest environmental standards. We look for a clear statement that the Cotswold Way National Trail will remain open to walkers throughout the works and when finally realigned will be on a safe and aesthetically pleasing route and no less commodious that the present routing .

Other long distance routes, and well-used paths intersect with the Cotswold Way at this location. Again, we wish to see, at this stage, assurances that these routes or acceptable diversions remain in place, and that any closures are strictly temporary, with closure and re-opening dates clearly defined as early as possible.

2. Impact on the Landscape around the Cotswold Way The popularity of the Cotswold Way is in no small way due to the quality of the scenery along the Cotswold escarpment through which it passes. One of the most spectacular sections is crossing the valley between Crickley Hill and Birdlip Hill.

The consultation documents admit that "both surface routes will have an adverse effect on the landscape and impact the overall scenery in this area." The comments that "widening the existing route corridor through the sensitive escarpment at Air Balloon roundabout will minimise the impact on the escarpment elsewhere" is of little help to the Cotswold Way as this is where the trail crosses the valley. Therefore it is impossible to avoid the conclusion that both of the proposed options will have a devastating impact on the landscape along this section of the Cotswold Way and will therefore seriously reduce the enjoyment of the walk.

3. Effect on historic and protected landscapes The Cotswold Way corridor between Crickley and Birdlip Hills is unique in that it is host to the Crickley Hill and Barrow Wake Sites of Special Scientific Interest and also the scheduled historic monuments of Emma's Grove and Crickley Hill Camp. The consultation document admits that there is the potential to adversely impact all these sites as well as to negatively impact the wildlife populations of the area.

Recent studies and reviews have emphasized the need to join environmentally protected areas to allow passage of wildlife of all descriptions. Both route options would sever forever any link between the two SSSI areas of nationally scarce habitat and would be a massive negative development.

There is no allowance in the consultation proposals for the restitution of the land along the present line of the road. To leave an unnecessary tarmac and concrete scar in place in an area such as this is clearly unacceptable and would make the zone of impact even wider just where the Cotswold Way crosses the valley

What should happen ...

We are presented with a choice between two proposals which both follow the valley between Crickley and Birdlip Hills where it is crossed by the Cotswold Way. What is needed is for the road to take a totally different route and hence one of the tunnel options previous discarded should be re-considered. The consultation documentation shows that Options 12 and 30 are the worst possible choices on every basis other than cost.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Local authority

Other (please specify):

Cotswold Conservation Board

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Endsleigh

Response ID ANON-8N38-8CAR-Y

Submitted to **A417 Missing Link**
Submitted on **2018-03-28 14:30:50**

About you

1 Name

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Qv:

6 Organisation (optional)

Qvi:
Endsleigh

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

I commute along this section of the A417, I own or work for a business located along this section of the A417

Other (please specify):

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::

As a Cheltenham employer, Endsleigh supports development of the A417 and option 30.

An improved infrastructure would benefit us from an accessibility point of view, for colleagues and Business Partners alike.

Cheltenham is not large or diverse enough to recruit for many of our specialist roles (e.g compliance, marketing or legal roles), therefore this would increase our catchment area and ease candidate concerns over lengthy commute times. There are also numerous accidents and delays on this stretch of road so improvements would also be welcome from a colleague wellbeing perspective.

Many of our Business Partners visit us from the major UK cities, particularly from Bristol, London, the South coast and from various locations in the North. Partners use the M4 and M5 links to do this, especially when they are factoring in multiple appointments so travelling by train is not a viable alternative. Improving the access routes from these major roads to our site would facilitate and encourage visits from our Partners, boosting our chances of commercial success and in turn ensuring our sustainability as a large and respected local employer in the region.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Local authority

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

GFirst LEP

Response ID ANON-8N38-8CKY-G

Submitted to **A417 Missing Link**
Submitted on **2018-03-27 15:04:16**

About you

1 Name

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Neil Hopwood

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GFirst LEP , The Growth Hub, Oxstalls Lane, Gloucester

3 Postcode

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4 Telephone (optional)

Qiv:
01242 715484

5 Email (optional)

Qv:
neil.hopwood@gfirstlep.com

6 Organisation (optional)

Qvi:
GFirst LEP CIC

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

I am responding on behalf of GFirst LEP the Gloucestershire Local Enterprise Partnership

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::

Our view is that option 30 provides the safest option and also that it presents the best opportunities for environmental enhancement (in the Nettleton Bottom to Birdlip section) despite the fact that it requires new highway across the Cotswold high plateau to the east of Stockwell. Whilst we recognise the new road may have some impact (specifically from a slight increase in background noise levels potentially) on the communities of Stockwell and Cowley, this is outweighed by the benefits to the much larger community of Birdlip and also the reduction in 'rat-running' this will achieve through Brimpsfield. Option 30 will also be significantly less disruptive during the construction phase, which is a major consideration to the LEP from an economic impact point of view.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:

Our primary concern in relation to Option 12 is the level of disruption it is likely to create during the extended construction phase. Given that the current road is already a major source of lost productivity for businesses within Gloucestershire any additional disruption is likely to have significant economic impact.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:

No comment to add.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

The proposed 'Green Bridge' that will link the Cotswold Escarpment across the new road should be considered as an integral part of the scheme and not a 'nice to have'. It should also as far as possible be designed as an aesthetic feature in its own right. High quality design should be an intrinsic part of the scheme. The scheme should make provision for using Designated Funds to deliver enhancements to the local communities/areas of interest that have been or will be impacted by the A417 , for example Crickley Hill Country Park parking facilities, Witcombe Cricket/Sports club (dangerous access onto the B4070 Birdlip Hill). We would encourage engagement with the local communities in order to identify enhancement schemes that could be delivered alongside the scheme. We would also like to see some provision made (e.g. signage, access etc) to ensure the on-going viability of the Golden Heart Public House as an important community asset, given that it may be at risk of losing significant 'passing trade'. As an example , when the current dual carriageway to Cirencester was constructed the Five Mile House public house became isolated and within a short space of time ceased trading in 2015 and is now a private residence.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Other (please specify):

We are a statutory consultee.

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

No.

Gloucestershire Local Access Forum

Response ID ANON-8N38-8C4V-P

Submitted to **A417 Missing Link**
Submitted on **2018-03-25 17:36:26**

About you

1 Name

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2 Address

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horbox@hotmail.com

6 Organisation (optional)

Qvi:
Gloucestershire Local Access Forum (GLAF)

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):

This is the response from members of the GLAF

The proposed option

8 To what extent do you agree with our proposed Option 30?

Neither agree nor disagree

Please provide any comments to support your answer::

Views varied significantly but on aggregate the responses were neutral.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
It was noted that Option 12 disrupted fewer non-motorised routes than Option 30.
Similarly Option 12 has a lower impact on undisturbed countryside as the route closely follows the line of the current route.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
There was a consensus that the project should be landscape led which would suggest that a tunnel should have been the proposed option. Landscape is a valuable asset which creates tourism and recreation, and the surface routes degrade that landscape value and potentially sever recreational connections. The EAST plus assessment indicated that tunnel options delivered higher ranking scores. However after the cost range for the scheme was confirmed the surface routes became the preferred options. Subsequently the landscape led options were rejected through 'value for money' analysis.

A contrary view from one member was that the time scale for tunnels is longer than the surface route and tunnels end in unsightly portals.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

Connectivity, both recreational and for wildlife, should be paramount to whichever option is taken forward, and the GLAF would wish to be consulted on the detailed proposals as soon as the finalised route is chosen.

The new road must not be permitted to allow dead-end PROW to be created through ill-thought through design. The GLAF could be involved in reviewing the PROWs which will be affected by the proposed new road.

This project has the potential to create and enhance NMU routes to deliver a positive impact on physical activity and wellbeing. The GLAF would like to see an ambitious approach to this element of the design for the new road.

In addition the GLAF could advise on improvements to be made to the crossings of the 'old' road which will still be operational.

We noted that no consideration has been made for NMU who currently use the A417. A physically separated cycle lane should be provided which would also be available to walkers and horse riders

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Received an email from Highways England

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Gloucestershire Ramblers

Through March 2018 Gloucestershire ramblers reviewed Highways England options for the A417 in Gloucestershire. Gloucestershire ramblers had previously taken part in the 2014 consultation process opened by Gloucestershire County Council which appeared to lead to a reasonable consensus that included a number of elements which could have been taken forward.

Highways England made a shortlist of 6 options. However, only the two non-tunnel options 12 and 30 were put forward for consultation. Ramblers examined these and also the cheapest tunnel option 3 (and described on Gloucestershire Ramblers website).

Due to traffic congestion at the Air Balloon, there is a lot of pressure from the general public to do something and do it now. Due to difficulties in crossing the traffic, there is also pressure from walkers on the Cotswold Way, and the Gloucestershire Way. This could be an opportunity to remove much of the through-traffic from the immediate site so the area becomes more amenable for both.

Route Options 12 and 30 are effectively the same from Brockworth to the Air Balloon and both include demolishing the pub. The pub is part of the character of the area and a popular place for families and walkers. Surely one of the options could have included a green bridge or short tunnel to keep the pub in place above the new road as discussed 2014. In contrast Option 3 takes the A417 through-traffic off local roads leaving the Cotswold Way and Gloucestershire Way in much quieter surroundings at the Air Balloon.

These are the responses to the consultation.

Question 1. To what extent do you agree with our proposed Option 30

Strongly Disagree

As it stands Option 30 contains little to show any benefit to footpaths or to the countryside. It seems merely an example of a dual carriageway to take traffic across the AONB from one side to the other. The arrangement for access to the A436 further compounds the impact on the countryside by including a link road with roundabouts and slip roads at each end. The fly through presentation seemed confusing in the way it depicted arrangements particularly at the Air Balloon compared to the description in the HE report. However see Q4 below for retaining the line of the route and deleting the link road while retaining well known paths and the pub.

Question 2. Do you have any comments to make in relation to Option 12?

We will take these into consideration as we develop the scheme.

One advantage of Option 12 over Option 30 is that it doesn't affect open countryside east of Shab Hill. However the HE report makes Option 12 untenable with its description of speed limits, average speed cameras and number of junctions. It also contains little about footpaths and the countryside so cannot be supported as it stands. The fly through video has similar issues to those for option 30.

Question 3. As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Highways England initially indicated this project would be 'landscape led' which would suggest that a tunnel should have been the proposed option. The EAST Plus assessment (Technical Appraisal Report 6.3.7) indicated that tunnel options delivered higher ranking scores. However the cost range for the scheme following 'value for money' analysis precluded the tunnel options.

This is a one off opportunity to pursue the best option in this sensitive AONB. Surely, if a tunnel option works best in the landscape, attempts should be made to secure adequate funding.

Question 4. Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Ramblers would not wish to see, anywhere on the route, a repeat of the Birdlip bypass where footpaths were severed by a very busy road. The difficulty in crossing can lead to the footpaths being considered impassable. Adequate crossings must be provided.

Ramblers decided to take Option 30, treat it in much the same way as a tunnel, and arrived at the simplified option 30 overleaf. It

1. cuts the new A417 slightly below surface to reduce traffic noise, with level bridges over for footpath etc
2. deletes the cross link to save the countryside and money & includes slips onto the new A417 at the Air Balloon
3. has a green bridge (short tunnel) below the pub and retains the Cotswold and Gloucestershire Ways on their present lines

It should meet many of the requirements for the road and surely ought to be worth subjecting to a costing analysis. However it's realised there may be further benefit in adjusting the length of the tunnel and/or its location.

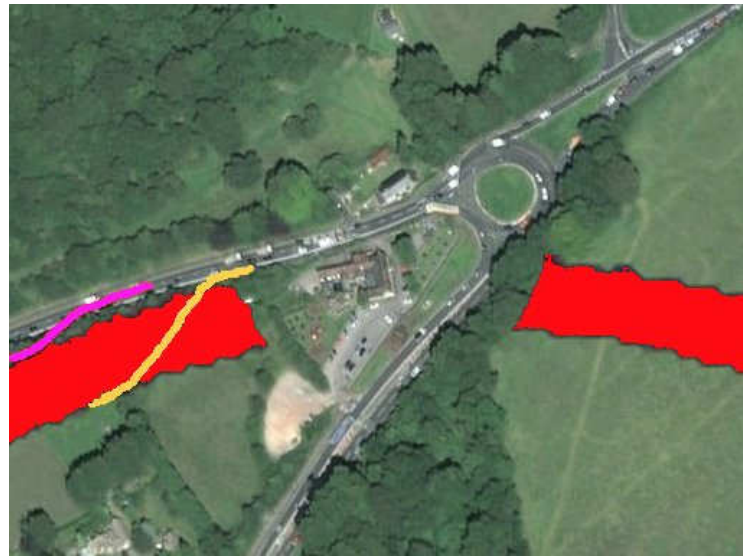
If it's accepted that the opening Option 30 is only an initial line of a route, ramblers should be able to work with Highways England and other bodies in evolving it and other proposals. However it's necessary to reject the two Options put forward at this stage of the consultation, in the way they're presented.

Richard Holmes
Gloucestershire Ramblers Area Footpath Secretary

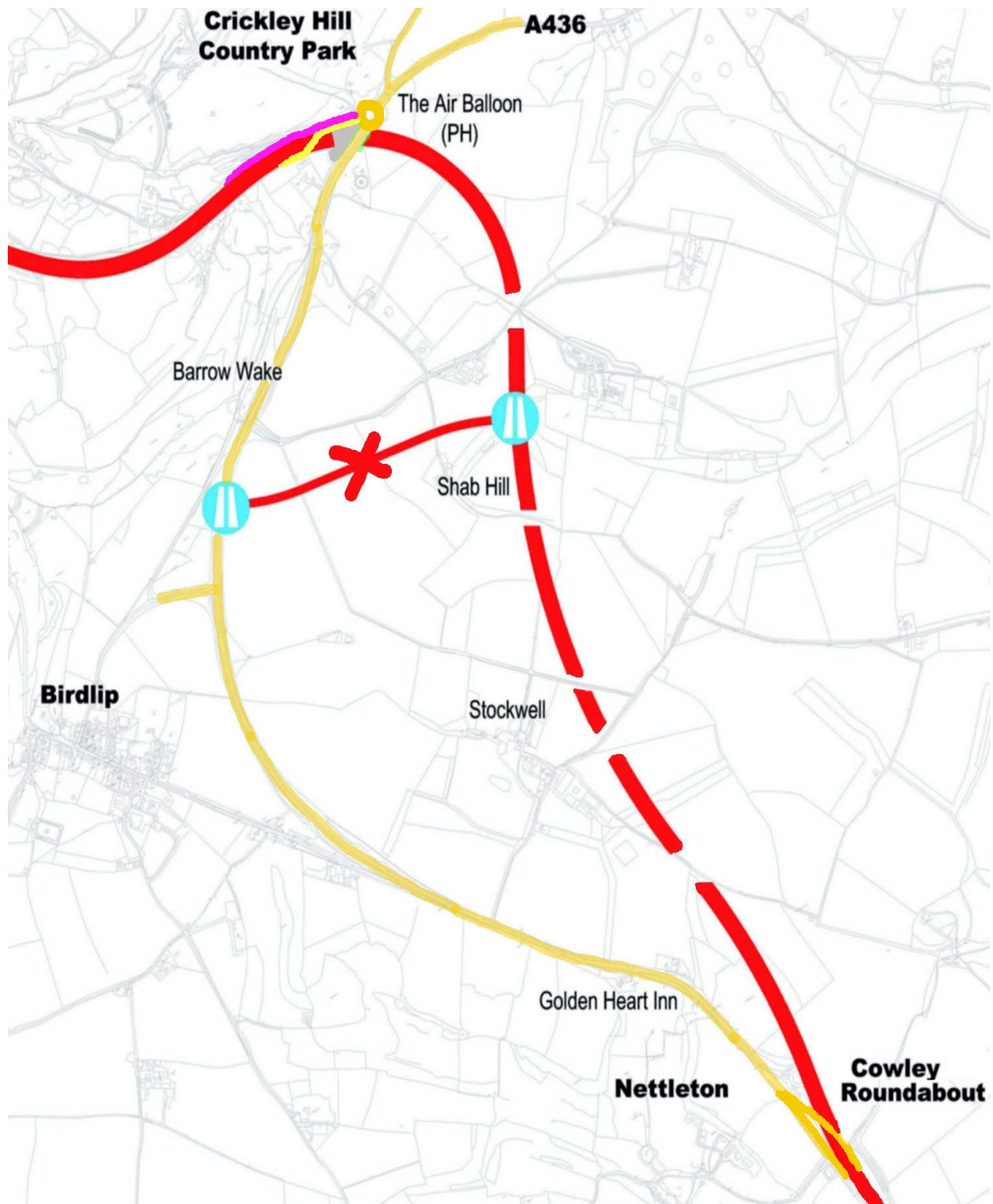
Bernard Gill
Gloucestershire Ramblers Area Chair

Proposed Green Bridge at the Air Balloon

Note A436 access to new A417
(same as Option 3 tunnel arrangement)



Simplified Option 30



Gloucestershire Wildlife Trust

A417 Missing Link Project Team
Highways England
Temple Quay House
2 The Square, Temple Quay
Bristol
BS1 6HA

Gloucestershire Wildlife Trust
Robinswood Hill Country Park
Reservoir Road, Gloucester GL4 6SX
Telephone: 01452 383333

info@gloucestershirowildlifetrust.co.uk
gloucestershirowildlifetrust.co.uk

Registered charity number: 232580
Registered in England number: 708575
VAT number: 535 6446 33

27th March 2018

Dear Sir/Madam

A417 Missing Link Proposed Road Improvement

Gloucestershire Wildlife Trust (GWT) is the largest environmental organisation in the county, with a membership of over 28,000 people representing around five per cent of all households in Gloucestershire.

Our mission is to connect and improve Gloucestershire's wildlife and wild places. We have a vision where each year there is more wildlife, where there are more wild places and where more people with a connection to the natural world. We want to create bigger, better and more connected places where people and wildlife can thrive; inspire more people and communities to take action for nature; lead on 'natural solutions', championing the value of what nature can do for us; and grow our resources, influence and reach, shaping a stronger and more resilient organisation.

GWT own and manages 60 wild places in Gloucestershire, including Crickley Hill (owned jointly with the National Trust) and Barrow Wake nature reserves. These two sites, although separated by the A417, form a single Site of Special Scientific Interest (SSSI) for the high quality unimproved limestone grassland (a UK priority habitat) that they support. This, in conjunction with the extensive archaeological interest, protected as a Scheduled Ancient Monument (SAM), together with their significant amenity value make the two sites collectively one of our 'gateway' nature reserves. The sites were long managed by Gloucestershire County Council as a Country Park and View Point but were transferred to GWT on 1st April 2016.

GWT welcomes the opportunity to comment on the options for the A417 Missing Link. We were pleased to have been involved in the Steering Group during which time the options were developed, as well as the Value Management Workshops where the principle for the scheme to be landscape-led was established. We have an expectation to see this vision will be delivered by the scheme.



Our current position

We are disappointed that, following the work of the Steering Group, one of the tunnel options did not make it to the public consultation.

Throughout the nine months in which we participated in the Steering Group, tunnel options scored highly with respect to reduced environmental and landscape impact and were most closely aligned to the scheme's environmental objectives. We feel that insignificant weight was given to the sensitive nature of the landscape and the environment when the Early Assessment and Sifting Tool (EAST) was applied and that the constraint placed on the feasible options by the scheme budget could have been identified earlier.

We accept the existing road needs improving but while we were encouraged to see a robust vision for a landscape-led road scheme, we do not believe the route options presented in the consultation reflect the vision for a scheme that is appropriate within the Cotswolds Area of Outstanding Natural Beauty.

We understand that value for money is important, but this is a nationally significant landscape highly dependent on visitors who value the countryside of the Cotswolds. The economic assessment of the route has not fully considered the wider and longer term social and economic benefits of delivering a landscape led scheme.

The recently launched Government 25 Year Plan to Improve the Environment has a specific commitment to make sure that AONBs 'are not only conserved but enhanced' claiming that its policies 'will contribute to making all areas more beautiful'. The actions it promotes includes working with AONBs to deliver environmental enhancement, including through demonstrator projects.'

Responding to the consultation

Despite our concerns about the lack of a tunnel option in the consultation, we also want to respond formally to the route options presented in the consultation. Given that the focus of our organisation is to protect and restore the wildlife and wild places of Gloucestershire, we will restrict our comments to biodiversity and will leave others to comment on the potential landscape impact of the two options.

In considering the two options the Trust has applied six principles to our review:

- The favoured option should not harm existing high biodiversity value sites or species assemblages in the route corridor and beyond;
- The scheme must deliver a net gain for biodiversity, and such gain should be relevant and complementary to the conservation priorities both in the immediate vicinity and beyond the area affected by the scheme;
- Enhanced habitat connectivity relevant to the conservation priorities of the designated sites should be a pre-requisite of the preferred option;
- The scheme should address and seek to reverse the damage done to protected sites when the current road was constructed;
- The scheme should ensure that the important amenity value of Crickley Hill is not degraded and where possible enhanced; and
- Habitat creation should rely where possible on natural colonisation or the use of locally-sourced plant material rather than active seeding and planting.

The 25 Year Plan for the Environment increases Government's ambition for delivering environmental improvements through infrastructure projects. It makes a particular commitment to embedding 'environmental net gain for development, including infrastructure

projects'. As one of the first wave of road investment projects to be consulted on since the publication of the plan, we see no reason why this commitment to net gain cannot be embraced here, especially in an environment of such high quality where enhancement and restoration is achievable.

The current road passes between and very close to Crickley Hill and Barrow Wake SSSI which supports nationally important examples of the priority habitat unimproved limestone grassland. The current road is also within 500 metres of the Cotswold Commons and Beechwoods SSSI, the beechwood element of which is also protected under European legislation as a Special Area of Conservation (SAC). There are also ancient woodlands and unimproved limestone grasslands of county significance in the vicinity which are identified as Key Wildlife Sites. Detailed surveys of the area will be required as part of the ecological assessment and it is likely that a range of species groups will be identified from reptiles and bats to birds and wildflowers.

Question 1: To what extent do you agree with our proposed Option 30?

We understand that Option 30 will widen the approach up Crickley Hill through the escarpment significantly, removing a large swathe of linear secondary woodland along its southern edge. Although this habitat is only of local significance, the extent of this habitat loss is likely to be significant and will need to be addressed and mitigated. In particular any connectivity that it currently provides parallel to the road will need to be investigated and reinstated. It appears likely from the consultation that this road widening might also clip the edge of the Barrow Wake SSSI but the extent of this will not be known until the detailed plans are drawn up.

Option 30 does not appear to impact directly on any high value biodiversity site, although it does come close to a woodland and an unimproved limestone grassland Key Wildlife Site, Option 30, however, would leave land for habitat creation between the new and old roads and as such we believe that it has the greater potential to deliver net gain for biodiversity in this area.

We understand that it is possible that part of the A417 between the Birdlip turn-off and the Stockwell turn-off could be downgraded, possibly to a footpath/bridleway. As such Option 30 also presents a far greater opportunity for habitat restoration along and adjacent to the downgraded route. Of the two routes, GWT believes that Option 30 minimises the impact of high biodiversity value sites and, as importantly, provides greater opportunity for delivering net gain for biodiversity.

Question 2: Do you have any comments to make in relation to Option 12?

Option 12 would follow the same route up Crickley Hill and thus have the same impact on the linear stretch of secondary woodland along its southern edge. Option 12 then loops relatively sharply back to join the A417 to the east of Barrow Wake at a new junction. It then continues to follow the route of the existing road. In fact it follows the route of the current road which itself sliced through the edge of the Barrow Wake SSSI when it was constructed. Thus while neither option appear to have a direct impact on any high value sites, Option 12 not only brings traffic very close to Barrow Wake SSSI with a new junction, it also restricts the opportunity for extending, through habitat creation, the unimproved limestone grassland habitat at that site.

We have also looked at the opportunities for restoring habitat connectivity as part of the scheme. Given its national significance, we believe that restoring connectivity for limestone

grassland along the Cotswold scarp should be the priority for mitigation and habitat enhancements planned as part of the scheme.

Both options propose a green bridge across the A417 which is greatly welcomed. This will help meet two of the Trust's principles in relation to the scheme, namely net biodiversity gain and restored habitat connectivity (as well as enhancing amenity value for people). The width of the green bridge should be determined by the size appropriate to deliver effective connectivity. Size and location will further be determined by the nature of the habitats being connected and the species likely to be using it. Our initial assessment is that 50 metres is not wide enough to deliver benefits for people and wildlife.

Question 3: Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Restoring connectivity

To fully maximise the restored connectivity provided by a green bridge the scheme should also look beyond the immediately reconnected sites both north and south. We believe that the focus for habitat connectivity should be along the Cotswold escarpment, effectively from Leckhampton Hill SSSI to the Cotswold Commons and Beechwoods SSSI and SAC and we would welcome the opportunity to discuss the potential for this in more detail.

Net biodiversity gain could be delivered by reversing damage to the Barrow Wake SSSI from the original A417 which, now long abandoned, forms the site's viewpoint and car park. There is considerable opportunity to restore and reconnect habitat within the SSSI, increasing its viability, by removing part or all of the original road, reconnecting the limestone grassland either side of it, and redesigning the visitor infrastructure. This would also help to address the current anti-social behaviour at the site.

We want to see the scheme promote natural colonisation on any areas subject to habitat creation as the default option. All too frequently schemes are landscaped or subject to planting which is inappropriate to the local area and we would wish to see this given a high priority. The current A417 was victim to inappropriate planting when it was constructed in the mid-1990s (see <https://www.floralocale.org/dl62>). The current scheme should prioritise natural colonisation.

Visitors to Crickley Hill

Crickley Hill, now jointly owned by GWT and the National Trust is one of Gloucestershire's most popular outdoor attractions, with up to 200,000 visitors per year. As well as exceptional biodiversity, the site is also a focus for the built heritage in the area, as well as one of the few places on the Cotswold scarp easily accessible by the public.

Relieving visitor pressure on the SSSI and Scheduled Ancient Monument (SAM) is a significant priority for the site. Currently visitor infrastructure is sited close to both the SAM and SSSI. The acquisition of new, adjacent land would provide a potential alternative site for visitor infrastructure and could move people and damaging activities away from these sensitive areas. There is also an opportunity to increase the level of engagement and understanding among visitors. The heritage and environmental assets are currently poorly understood by visitors.

In developing a preferred option, GWT would like to explore with Highways England (and with our partners on the site, the National Trust) how visitor pressure on the SSSI and monument might be reduced and better managed in the future.


Development of alternative natural green space for people

The Trust would also like to consider current impacts on high biodiversity value sites in the area through increased recreational pressure and how the scheme might be able to mitigate such impacts. The upgrading of the A417 at Birdlip is considered imperative to improving the economic prospects for Gloucestershire. Considerable economic growth is anticipated in the county in the next decade and with it an increase in workforce.

The population of Gloucestershire has increased by 58,000 since 2000 and many new homes have been built in Gloucester and Cheltenham to meet the demands of that growing workforce. The indirect consequences of this economic growth, however, have been an increased recreational pressure on several visitor hotspots in the area, notably Leckhampton Hill, Crickley Hill and the Cotswold Commons and Beechwoods. The provision of recreational areas has not increased in line with the increasing population and as such the existing sensitive sites are being negatively impacted. It is inevitable that the upgrading of the A417 at Birdlip will indirectly increase the pressure on these sites.

The Trust would therefore wish to see the scheme consider the provision of new areas for recreation, in addition to that provided for habitat creation and connectivity, to divert visitor pressure away from these sensitive sites.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Roger Mortlock', written in a cursive style.

Roger Mortlock

Chief Executive

National Trust



**National
Trust**

ian.wilson@nationaltrust.org.uk
Direct line: 07795 301138

Your ref: A417 Missing Link
Our ref: A417 Missing Link Consultation Feb.-Mar. '18

28th March 2018

A417 Missing Link Project Team
Highways England
Temple Quay House
2 The Square, Temple Quay
Bristol
BS1 6HA

Dear Sir/Madam

A417 Missing Link Proposed road improvement

Thank you for the opportunity to respond to the Highways England consultation on the proposed A417 Missing Link road improvement.

The National Trust is Europe's largest conservation charity with over five million members. Established over 120 years ago, our primary purpose is to promote the preservation of special places for the benefit of the nation. To achieve this aim we own and manage places of historic interest and natural beauty and have become the UK's largest private landowner. In South West England, this includes over 57,000 hectares of countryside, over 1300 listed buildings and nearly 300 miles (19%) of the coastline. Given the range of our activities, we are in a position to comment both from the perspective of a landowner and as a major conservation organisation responsible for safeguarding the nation's natural and historic assets.

Our ownership includes part of Crickley Hill which lies adjacent to the current A417 and on the Cotswold scarp within the Cotswolds Area of Outstanding Natural Beauty (AONB). Crickley Hill is jointly managed and owned by the National Trust and Gloucestershire Wildlife Trust (GWT) (see enclosed map) and is a nationally important site for archaeology (including an Iron Age hill fort, which is a Scheduled Ancient Monument, the first battle site in the country with evidence of human activity going back to 4000 BC) as well as for its limestone grassland and woodland, supporting a range of nationally important habitats (including four designated Sites of Special Scientific Interest (SSSI)). It is also actively used and enjoyed by the surrounding population with over 150,000 visitors per year.

The calcareous grassland on both sides of the Cotswold scarp is extremely rich in wild plants, which in turn support a large variety of invertebrates, butterflies, moths, bees, snails and other protected species including adders, bats and many species of birds. The amount of fungi found in the wooded areas of Crickley Hill (including the woodland that runs down to

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the edge of the current A417) – over 600 varieties – puts the site in the top six in the county and is of huge biological importance alongside a large number of veteran trees on the Ancient Tree Inventory. There are also three ancient woodlands, a traditional orchard and extensive wood pasture within the area of the proposed road development.

Crickley Hill is currently accessed from the A436/A417 Air Balloon roundabout which for many years has suffered with severe congestion and is a bottleneck not only for the local road network, but also as part of the A417/A419 strategic road network between the West Midlands and Thames Valley and as an alternative to the M5/M4 route via Bristol. The National Trust are aware of the longstanding challenges of highway access from the West Midlands to the South West and the important benefits for local communities, visitors and the wider economy that could arise from road improvements.

In response to the current consultation, we agree that measures are needed to address the issues associated with the 5km stretch of single carriageway between Brockworth bypass and Cowley roundabout. We do however note that – in the National Policy Statement (NPS) for National Networks – there is a “strong presumption against any significant building of new roads” in protected landscapes such as AONBs, unless it can be shown that there are compelling reasons for the enhanced capacity and with benefits outweighing the costs “very significantly” (para 5.152). There are also requirements for “high environmental standards”, to have regard to the purposes of the AONB designation, and to avoid compromising the purposes of the designation and for projects to be “designed sensitively” (para’s 5.153 and 5.154).

In light of the above, we consider that it is essential that the proposed highway scheme is a genuinely “landscape-led” solution, and we support the emphasis on this in the vision statement. We also agree with the aims of conserving and enhancing the special character of the Cotswolds AONB, reconnecting landscape and ecology, bringing about landscape, wildlife and heritage benefits, and enhancing visitor enjoyment. From our perspective, we would also stress the importance of protecting the views and setting of heritage assets, and bringing about substantial benefits for the Cotswolds landscape and environment, including a clear net gain to wildlife and habitats, as well as delivering high quality mitigation.

Turning to the consultation options (two surface dual carriageway routes); we are very disappointed that none of the tunnel options considered at earlier stages are part of the current consultation. As the consultation acknowledges, the tunnel options “would bring greater environmental benefits” – and they are also likely to involve a lower level of environmental impact, for the lifetime of the upgraded road. Although the tunnel options would exceed the “cost range” allocated for the scheme, the AONB status of the landscape, the necessity for a landscape-led scheme and the challenging topography all require a highway solution of highest standards. It is also noted that tunnel option 3 would produce a better ‘return on investment’ than the surface option 12 that is being consulted on.

Given the above, we do not feel it is appropriate at this stage to express a preference for either of the surface route options when we have not seen evidence of how either can deliver Highways England’s own vision for the scheme within the current cost envelope; instead we have made a range of comments to respond to the consultation questions and inform the process of achieving a solution that does meet the scheme vision and objectives.

Question 1: To what extent do you agree with our proposed Option 30?

Option 30 involves a new surface dual carriageway through the AONB, with associated junctions and links to the local highway network, and with an indication that a small land bridge would be part of the proposals. We are extremely concerned about the scale of new highway infrastructure being proposed within the AONB landscape and affecting the setting of Crickley Hill as an important landscape, heritage and ecological asset. Allied to this, we are concerned that there are insufficient measures to reduce or mitigate the likely impacts, and offer environmental improvements. Overall, we would not be able to support this option as presented. Beyond this fundamental concern, some of our additional issues and concerns are set out below:

- We would want to understand the calculation of land take required for this option and the resulting habitat loss. We would then want to understand the potential for the creation of an equivalent amount of new habitat (as a minimum). We would expect the scheme to aim for an increase in biodiversity and specifically a significant net gain in calcareous grassland. The assessment of what mitigation is required should take into account habitat loss across the whole length of new road tarmac, fringe infrastructure and build disturbance.
- The likely removal of trees along new sections of the road or through upgrading of existing surface route will be very damaging for visual setting of Crickley Hill, Barrow Wake and the wider Cotswold landscape. It is likely to increase the audible noise from the road at key areas used by the public and result in loss of associated habitats. We would expect to see significant replanting, with particular attention to native species for the local area.
- Where the road is in a cutting, we would want to see the cutting successfully planted with calcareous grassland species and concrete infrastructure should be avoided wherever possible. Earth bunds would look artificial in the landscape and placement of lighting will be crucial on junctions to ensure it is sympathetic to the landscape but sufficient to meet the Highways design standard for safety requirements.
- The junctions and associated link roads are neither well represented in the visualisations, nor explained in the consultation documentation sufficiently well enough for us to determine their impact. We ask Highways to provide this detailed information in the next phase of development to be able to inform our thinking.
- We are extremely concerned about the impact of five lanes of traffic beneath Crickley Hill as well as the infrastructure associated with the new junction and the access to Cold Slad Lane. Beyond the very obvious visual intrusion into the landscape we do not yet have sufficient information to assess the visual, noise and settings impact for Crickley Hill and the impacts on access for motorised users and non-motorised users between Crickley Hill and Barrow Wake.
- With this road network being the main access point for the Cotswolds, we are still concerned about the volume of traffic and future capacity of the A417 junctions and A436 link road to the local network. The junctions will need to cope with the volume of traffic from Gloucester via M5 to the north Cotswolds as well as traffic from Swindon to north Cotswolds without running the risk of increasing the use of existing local

network. We would want to see further evidence that traffic during the commuting period will be sufficiently managed to avoid localised rat running from the junctions through villages. Due consideration must be taken for future proofing the capability of this road scheme and its integration with the local network.

- From a historic environment perspective option 30 appears to have less of an impact on Emma's Grove Scheduled Ancient Monument and given its shorter length is less likely to have a direct impact on unknown archaeology. Further landscape impact assessment work is needed and this should include an assessment of the impact on the accessibility of historic sites and the connectivity between the sites e.g. the impact of option 30 on severing current walking routes and the potential to provide meaningful alternatives. It will be important not to neglect the heritage significance of the landscape and show evidence of how sites can be re-connected, not least options to maintain and improve the connections to and from the Crickley Hill SAM. This could and should be done in mutual consideration of landscape and ecological gain.
- We are pleased to see the provision of a green bridge, however, as with all details in this scheme the specific approach to design will be critical to its success and we have provided further details on this in Question 4.

Question 2: Do you have any comments to make in relation to Option 12?

As with option 30, option 12 involves a new surface dual carriageway through the AONB, with associated junctions and links to the local highway network, and with an indication that a small land bridge would be part of the proposals. Again, we are extremely concerned about the scale of new highway infrastructure being proposed within the AONB landscape and affecting the setting of Crickley Hill as an important landscape, heritage and ecological asset. With option 12 this issue is amplified by its increased length. Allied to this, we are concerned that there are insufficient measures to reduce or mitigate the likely impacts, and offer environmental improvements. In addition, we are very aware that this route has been previously discounted and see no reason as to why this route should now be consulted on. Overall, much like option 30, we would not be able to support option 12 as proposed. However, in this case it feels implausible that this route could be mitigated sufficiently to provide an acceptable solution, even with bigger cost envelope. Beyond this fundamental concern, some of our additional issues and concerns are set out below.

We understand that this option was published in 2014 as Gloucestershire County Council's solution to the longstanding issue for the Air Balloon roundabout. We are also aware from engaging with Highways England during the last eighteen months that this option was discarded during the sifting process and not considered as a potential solution in the final five (four tunnels and one surface) options. We are very concerned that a tunnel option (likely to be the best option in landscape terms) has been discounted on cost grounds at this stage in the process, and that option 12 has been re-introduced shortly before the current consultation particularly as it is poorer value for the tax payer than the shortest tunnel, only achieving a return on investment of £0.68p for every £1 spent (as oppose to £0.79 for the shortest tunnel). We believe that to properly consider the range of options and their merits (including on landscape and cost grounds), a tunnel option should have formed part of the current consultation.

Question 3: As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

As a key stakeholder in this scheme, we have been engaged in the assessment work to date. We have already made comments in this response about the lack of a tunnel option as part of the current consultation. In respect of option 12, our main comments are outlined in question 2. However, if option 30 continues to be the preferred option, there would need to be significant improvement to the proposed scheme to reduce its impacts on the landscape and provide sufficient mitigation measures and environmental enhancements to make the solution appropriate for a road scheme within an AONB.

We also want to understand the breakdown of costs to deliver this scheme, as initially it was due to exceed the budget envelope of £500 million, but is now indicated as being just below this figure at £485 million. Whilst both option 30 and option 12 are considered as being "affordable" (page 18 of Technical Appraisal document), we are concerned that the detailed design, mitigation and environmental enhancements that are necessary as part of the scheme may not be incorporated within the current budget.

Should a surface option be progressed, we believe (based on the limited information Highways England have made available about potential mitigation) that a solution that contains appropriate mitigation will cost more than £500 million. While we believe Highways England have the ability to deliver the right scheme, we remain extremely concerned that Highways England will not be able to deliver the right solution with the current budgetary limitations. Again we would stress the significance of the landscape and historic environment in the vicinity of Crickley Hill.

Question 4: Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Should Highways England design a suitable solution for the AONB, we would expect the mitigation they propose to include a commitment to enrich and enhance the existing calcareous grassland and to work with key stakeholders to identify and nurture new areas of calcareous grassland (in the 1930s, around 40% of Cotswolds was covered in calcareous grassland, yet today it is less than 1.5%). There should be a net gain as a result of the road improvement scheme for well managed land under wildlife or habitat conservation criteria to help protect the future of this part of the Cotswolds AONB. In particular we would stress the importance of ensuring that plans are in place to continue the management of the downland characteristics and to improve habitat connectivity.

Any surface scheme must improve public access between the Cotswold Way and Gloucestershire Way across the A417 between Crickley Hill and Barrow Wake to maintain and improve people's enjoyment and understanding of the wider landscape. Currently, the routes presented will have a significant negative impact on the visitor experience at Crickley Hill, in particular those areas of the site close to the proposed dual carriageway, new infrastructure and junctions. We urge Highways England to ensure that the extent of these areas currently enjoyed, are not compromised and be discussed with the Trust and GWT in the next stage of design.

Provision for landscape links - Green Bridges

As indicated above, we have serious misgivings about the two surface routes that are part of the current consultation. However, we note that provision would be made for a green bridge of up to 50 metres in width that could link the Crickley Hill landscape to that of Barrow Wake. On one hand we are encouraged by this provision, but on the other we consider that such a structure would be significantly below the level of mitigation and enhancement that we would expect should a surface route be taken forward.

The fly-throughs of the surface route options indicate three lanes up and two lanes downhill from Crickley Hill, plus the retention of access to the cottages at the foot of Crickley Hill, the A436 link road and as in option 12, a broad central reservation. This would pose an impossible barrier to wildlife and people and would be significantly worse than the current situation. We believe that a substantial landscape link is a fundamental requirement to ensure this major infrastructure project includes elements that reconnect the landscape.

Such a landscape link would need to be of significant width and we would strongly advocate more than one green bridge, individually substantially wider than the current proposed green bridge to provide an ecosystem level of connection as recommended by the Landscape Institute. This would provide a green bridge as the main connectivity for landscape, people and wildlife, with a further green bridge for any local road crossing of the dual carriageway in the Air Balloon vicinity. Please note we initially recommended a 400 metre cut and cover tunnel for the 'loop' (option 12) route promoted by Gloucestershire County Council in 2014, so this represents a considerable reduction in scale, albeit one we may be able to accept subject to detailed design and other considerations.

The benefits of a substantial landscape link as described above would be many-fold. It would reduce the visual impact of the road as well as reducing traffic noise and would create a route for the public to walk both on the Cotswolds Way and connect to the wider Cotswolds landscape. It would provide an ecosystem level of connection that will provide benefits for wildlife that would otherwise be unable or unwilling to pass the multiple lanes and infrastructure. The green bridge(s) would need to be seeded with native provenance wildflower seed, vegetated with native trees, shrubs, grasses, along with the creation of amphibian habitat (i.e. ponds) and erection of wildlife fencing as part of the design to guide wildlife to utilise the structure and allow a range of species including mammals, reptiles and insects to move over the reconnected habitat. The exact position of the green bridges would need to be carefully considered and we recommend Highways England carries out an accessibility study in consultation with the Trust, GWT and key stakeholders.

Conclusion

In conclusion, this letter represents the National Trust's initial response to the proposed road improvement. Our view on proposals for new or enhanced transport infrastructure is guided by our statutory purpose which, in broad terms, seeks to protect special places for ever for everyone and the design of both new and existing infrastructure needs to be of high design quality, respecting its setting and the spirit of the place where it is located.

We agree that the A417 between Brockworth bypass and Cowley roundabout is unable to successfully accommodate the volume of traffic, causing congestion and associated problems such as air pollution. We accept the need for a solution to address these issues,

and as we have set out, are very disappointed that a tunnel option is not part of the current consultation proposals, in order to engender a wider debate. Our position is that we would oppose a surface scheme that would have significant and detrimental impacts on the landscape and heritage assets in this location. We have not yet seen evidence that an acceptable surface solution could be delivered within the current budgetary constraints.

We strongly advocate the need for a sensitively designed scheme that is respectful to the landscape it sits within, with substantial mitigation to reduce its impacts on the natural and historic environments within the Cotswolds AONB to an acceptable level, and with significant environmental enhancements. At present we consider that the two surface options that form part of this consultation fall considerably short of meeting the scheme's vision.

We look forward to engaging further with Highways England, its consultants and other stakeholders in an attempt to find an appropriate solution for this special place.

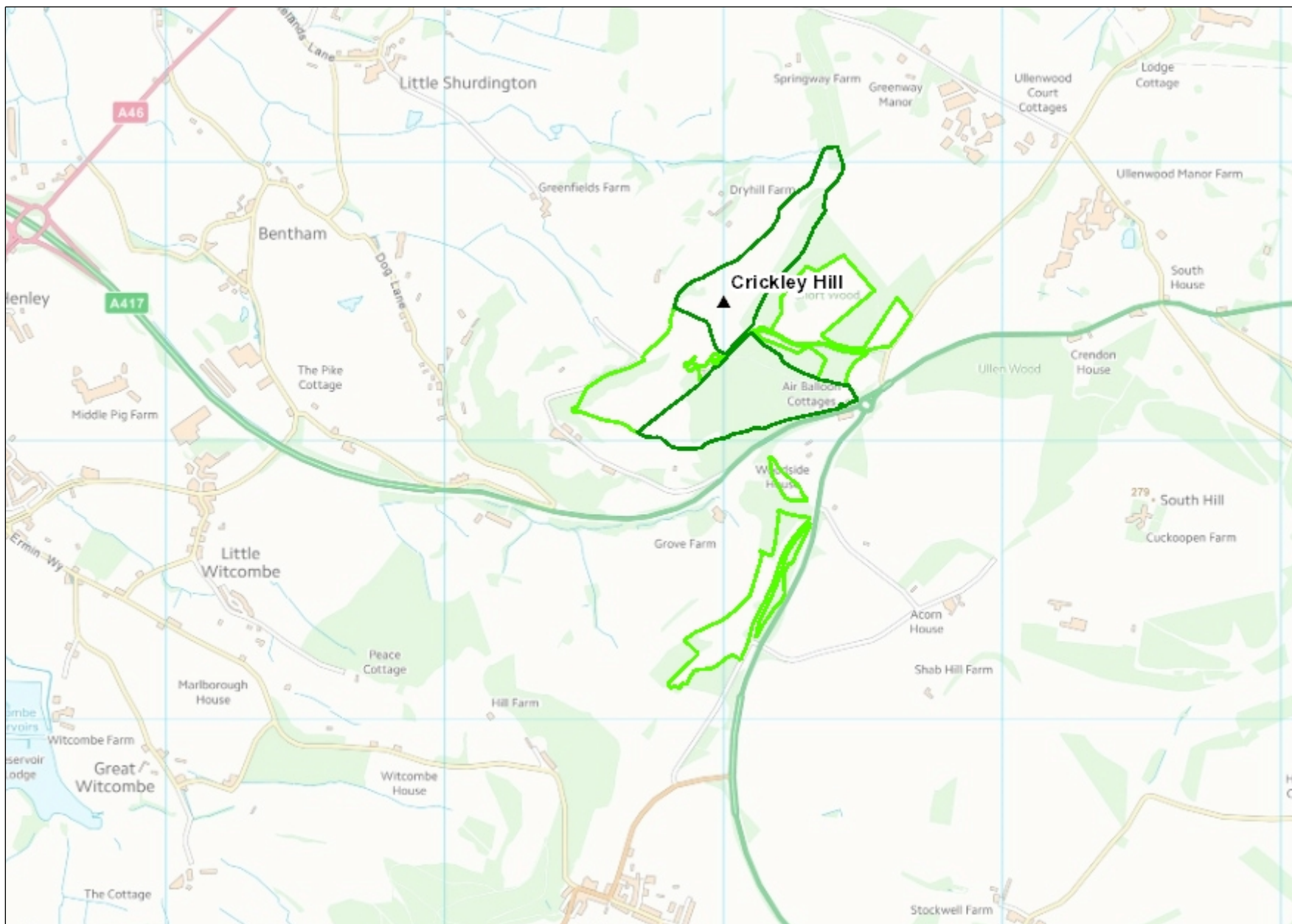
Yours faithfully,



Ian Wilson
Assistant Director Operations



Crickley Hill & Barrow Wake



Legend

- ▲ Definitive Properties (GB)
- NT Ownership (GB)
- NT Leasehold (GB)

1: 20,000



0.8 0 0.40 0.8 Kilometers

British_National_Grid

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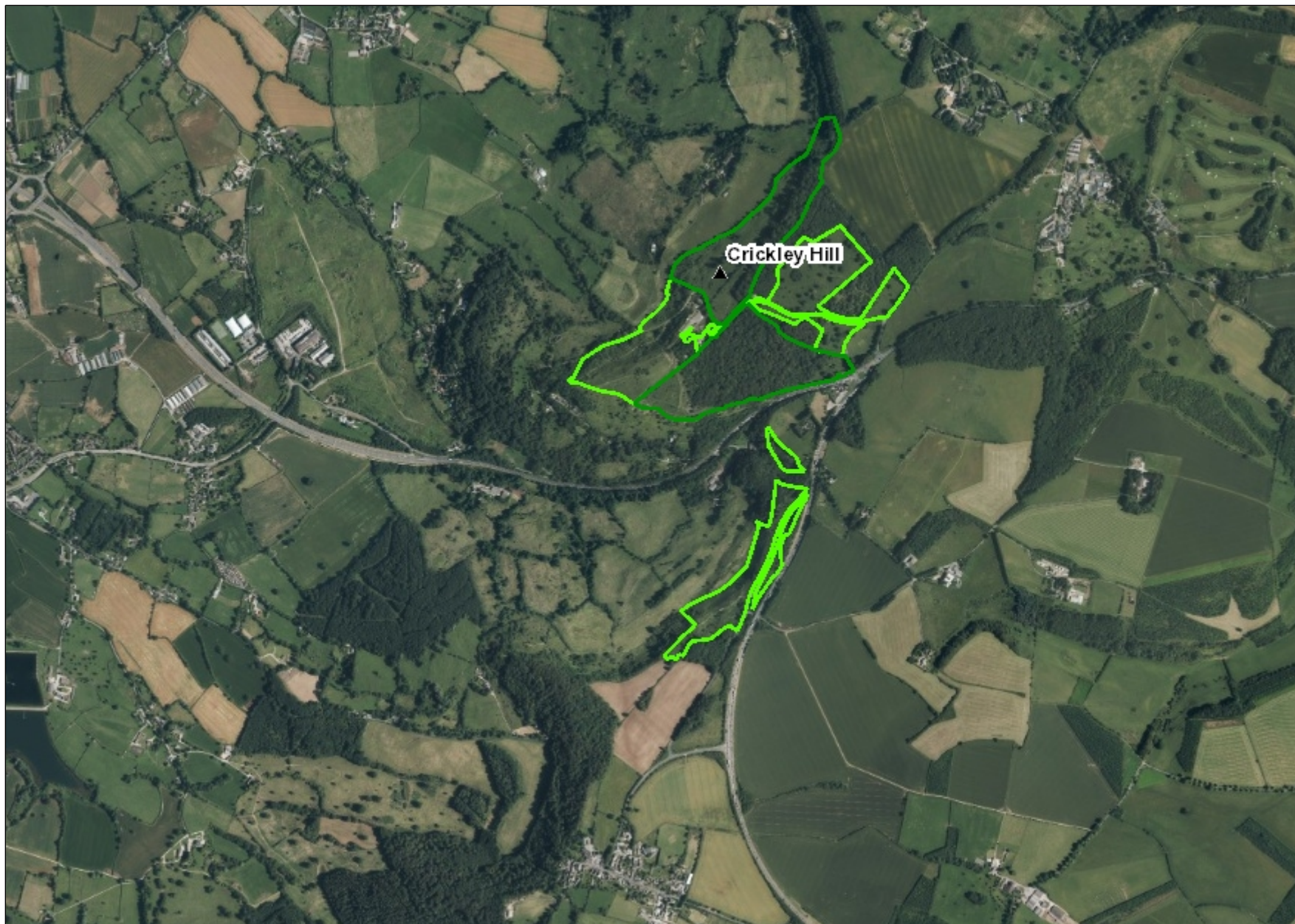
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Crickley Hill & Barrow Wake



Legend

- ▲ Definitive Properties (GB)
- NT Ownership (GB)
- NT Leasehold (GB)

1: 20,000



0.8 0 0.40 0.8 Kilometers

British_National_Grid

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Road Haulage Association Ltd

Response ID ANON-8N38-8CKZ-H

Submitted to **A417 Missing Link**
Submitted on **2018-03-22 15:57:50**

About you

1 Name

Qi:
Tom Cotton

2 Address

Qii:
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3 Postcode

Qiii:
KT13 9DZ

4 Telephone (optional)

Qiv:
07864 609064

5 Email (optional)

Qv:
t.cotton@rha.uk.net

6 Organisation (optional)

Qvi:
Road Haulage Association Ltd

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

Other (please specify):
Trade Association

The proposed option

8 To what extent do you agree with our proposed Option 30?

Agree

Please provide any comments to support your answer::

This option is preferred because of improved journey times and despite the sharp bend higher speed can be maintained. Option 12 is longer, so increased journey times at a lower speed. Additionally Option 30 construction would be less disruptive whilst improvements are made.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
Option 12 is longer and with potentially a lower speed limit. This will result in increased journey time and fuel cost, compared with Option 30.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
The RHA supports the route which provides the shortest, quickest route between two points. Whilst construction costs need to deliver value for money, it is equally important to consider user driving times and fuel cost for commercial vehicles. Fuel costs are considerably more for commercial vehicles, so shorter, free flowing routes improve air quality.

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

RHA members have been calling for this section of road to be improved and this needs to be done as quickly as possible.

About the consultation

12 How did you hear about this consultation? (Please choose all that apply)

Received an email from Highways England

Other (please specify):

13 Do you have any feedback on this consultation - events, information provided, advertising etc?

Q6:

Trail Riders Fellowship

Response ID ANON-8N38-8CW2-N

Submitted to **A417 Missing Link**
Submitted on **2018-03-27 14:29:12**

About you

1 Name

Qi:
Mark Holland

2 Address

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Springfield, Walford, Ross-on-Wye, Herefordshire.

3 Postcode

Qiii:
HR9 5RB

4 Telephone (optional)

Qiv:
01989566034

5 Email (optional)

Qv:
trf@mark-holland.info

6 Organisation (optional)

Qvi:
Trail Riders Fellowship (Gloucestershire group)

7 What is your interest in the A417 Missing Link road improvement scheme? (Please choose all that apply)

I commute along this section of the A417, I mostly use this section of the A417 for leisure purposes, I am a tourist who visits the area

Other (please specify):
affected Green Roads - unsealed public roads

The proposed option

8 To what extent do you agree with our proposed Option 30?

Strongly agree

Please provide any comments to support your answer::

Some of our local group of about 60 people prefer option 12 because it impinges less on Green Roads and countryside.

Option 12

9 Do you have any comments to make in relation to Option 12? (We will take these in to consideration as we develop the scheme)

Q2:
would possibly be far more disruption during build. Prefer good finished scheme rather than compromise.

Other options

10 As part of identifying route options, we've assessed over 30 options, including 6 as part of our further appraisal work. Do you have any comments on any of the other options included in the assessment?

Q3:
no

11 Is there anything further you would like us to consider in relation to improving the A417 Missing Link?

Q4:

Effect on recreational highways (footpath, bridleway, restricted byway and County Road on the County Council's List of Streets in this area).

We enjoy using the sealed and unsealed County Roads in this area - marked as Other Routes with Public Access (ORPA) on OS maps.

We ask for:

1 Clear signage during construction.

2 Design to ensure character is kept as far as possible, some combining of routes through bridges or under-passes is possible.

3 There are a shortage of higher-rights routes (bridleway and above) so we suggest a deal with the Highway Authority (Glos CC presently run by Amey) to upgrade / improve access on routes elsewhere to keep the same distance.

Option maps did not print properly - came out with black background.

Option maps should have been shown against OS maps to properly show RoW, contours, woods, villages, etc.

We heard through the Local Access Forum - luckily two of our members have been accepted to attend these meetings.

At least the ACU - AutoCycle Union should have been consulted, and they have an agreement to pass consultations to the TRF. This is laid down in government circulars on Rights of Way.

About the consultation**12 How did you hear about this consultation? (Please choose all that apply)****Other (please specify):**

Local Access Forum

13 Do you have any feedback on this consultation - events, information provided, advertising etc?**Q6:**

Members attended various events and discussed at our monthly meetings in Gloucester.

I attended Guildhall event.

Again, surprised no clear overview eg laid over colour OS maps or even a 3D model (3d printed). Exhibition pull-ups just bits from the leaflet.

Fly-through could have been better.

Leaflet quite good.

Should have mentioned the pdf copy at the start!!!!

With these online forms there is often the risk that they will drop out or time out, and also the customer has no copy, especially if press the wrong button and loses a lot of input.

Woodland Trust



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FREEPOST A417 MISSING LINK

8th March 2018

Dear Sir/Madam,

Thank you for the opportunity to provide comment on the A417 'Missing Link' Consultation.

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. We aim to prevent damage, fragmentation and loss of these finite irreplaceable sites.

The Woodland Trust **objects** to both route options on the grounds of loss of a veteran apple tree at grid reference (SO9346116080) verified on the Ancient Tree Inventory.

Policy

National Planning Policy Framework (NPPF), paragraph 118, states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

The National Policy Statement for National Networks (NNNPS) largely follows NPPF wording in its protection for ancient woodland. Paragraph 5.32 states: "Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for

and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.”

Cotswold District Council’s Local Plan (2011): Policy 10: Trees, Woodlands and Hedgerows states that: Permission will not be granted for development that would adversely affect Ancient semi-Natural or Ancient Replanted Woodland or Veteran Trees.

In light of the Governments’ recent publication of the **25 Year Environment Plan**, it should be highlighted that under Chapter 1: Using and managing land sustainably, 4: Focusing on woodland to maximise its many benefits: “Beyond the economic benefits, the Government recognises the significant heritage value and irreplaceable character of ancient woodland and veteran trees. We are committed to ensuring stronger protection of our ancient woodlands, making sure they are sustainably managed to provide a wide range of social, environmental, societal and economic benefits.”

Highways England’s Biodiversity Action Plan (2015) outlines key environmental goals for minimising environmental impact: “Biodiversity is entrenched within the Government’s Road Investment Strategy and Highways England’s Strategic Business Plan. In particular, the Road Investment Strategy states that by 2020, the company must deliver no net loss of biodiversity and that by 2040 it must deliver a net gain in biodiversity.” As such, by putting forward a proposal of this nature, Highways England is in **direct contravention** of its own biodiversity policies.

Impacts of the scheme

Both route options will result in the loss of a veteran apple tree at grid reference (SO9346116080). Ancient and veteran trees are a vital and treasured part of our natural and cultural landscape. Ancient and centuries old veteran trees in the UK represent a resource of great international significance. Veteran trees are the ancient trees of the future. It has been estimated that the UK may be home to around 80% of Europe's ancient trees. They harbour a unique array of wildlife and echo the lives of past generations of people in ways that no other part of our natural world is able.

For this reason it is essential that no trees displaying ancient/veteran characteristics are lost as part of this scheme. Any loss of veteran trees would be highly deleterious to the wider environment of veteran trees within close proximity, which may harbour rare and important species.

Conclusion

In summary, Woodland Trust **objects** to the both route options put forward as part of the A417 ‘Missing Link’ consultation on the grounds of direct loss of a veteran apple tree. The Trust finds these proposals in direct contravention of Local and National planning and biodiversity policy (including Highways England’s own Biodiversity Action Plan) and an alternative proposal options should be sought.

We hope our comments are of use to you; if you wish to discuss any of the points raised by the Woodland Trust, please do not hesitate to get in touch.

Yours sincerely,

Nicole Hillier
Assistant Campaigner – Ancient Woodland

If you need help accessing this or any other Highways England information, please call **0300 123 5000** and we will help you.