

Submissions received after the close of the Examination

TR010056

A417 Missing Link

Last updated: 16 November 2022

Date Examination closed: 16 May 2022

Date of Recommendation Report: 16 August 2022

Date of Decision: 16 November 2022

Submissions made after the Examination closed (appended below)			
Number	Date submission received by the Planning Inspectorate (PINS)	Name of party and description of correspondence	Date submission forwarded to Secretary of State (SoS)
Submissions received during Recommendation			
1	17/05/2022	Carol Gilbert Late Deadline 9 submission	16/08/2022
2	17/05/2022	Gloucestershire Ramblers Late Deadline 9 submission	16/08/2022
3	18/05/2022	Gloucestershire Ramblers Post-Examination submission	16/08/2022
4	20/05/2022	Gloucestershire Ramblers Response to Deadline 9 submissions	16/08/2022
Submissions received during Decision			
5	10/10/2022	Gloucestershire Ramblers Unresolved matters between the Applicant and Gloucestershire Ramblers	10/10/2022
6	16/11/2022	Gloucestershire Ramblers Unresolved matters between the Applicant and Gloucestershire Ramblers	N/A - received directly by SoS
Submissions made in response to SoS consultation (not appended)			

Number	Date submission received by PINS	Name of party and description of correspondence	Date submission forwarded to SoS
SoS's consultation of 2 September 2022			
7	09/09/2022	Severn Trent Water Response to Secretary of State Consultation dated 2 September 2022	20/09/2022
8	16/09/2022	DWF Law LLP on behalf of Severn Trent Water Response to Secretary of State Consultation dated 2 September 2022	20/09/2022
9	16/09/2022	National Highways Response to Secretary of State Consultation dated 2 September 2022	20/09/2022
10	30/09/2022	National Highways Late response to Secretary of State Consultation dated 2 September 2022	04/10/2022
11	30/09/2022	DWF Law LLP on behalf of Severn Trent Water Late response to Secretary of State Consultation dated 2 September 2022	04/10/2022
12	07/10/2022	National Highways Late response to Secretary of State Consultation dated 2 September 2022	10/10/2022
13	07/10/2022	DWF Law LLP on behalf of Severn Trent Water Late response to Secretary of State Consultation dated 2 September 2022	10/10/2022

Submission number: 1

Date submission received by PINS: 17 May 2022

Name: Carol Gilbert

The Queen's Green Canopy (QGC) is a unique tree planting initiative created to mark Her Majesty's Platinum Jubilee in 2022 which invites people from across the United Kingdom to "Plant a Tree for the Jubilee".

This is a project that has spread across the Commonwealth with countries all over the world taking part and, during a televised discussion with Sir David Attenborough in Windsor Great Park, Her Majesty said that perhaps it would help with Climate Change

HRH Prince Charles has publicly endorsed the slogan "Plant a Tree for the Jubilee" and has told the British people that, as well as inviting the planting of new trees, QGC will

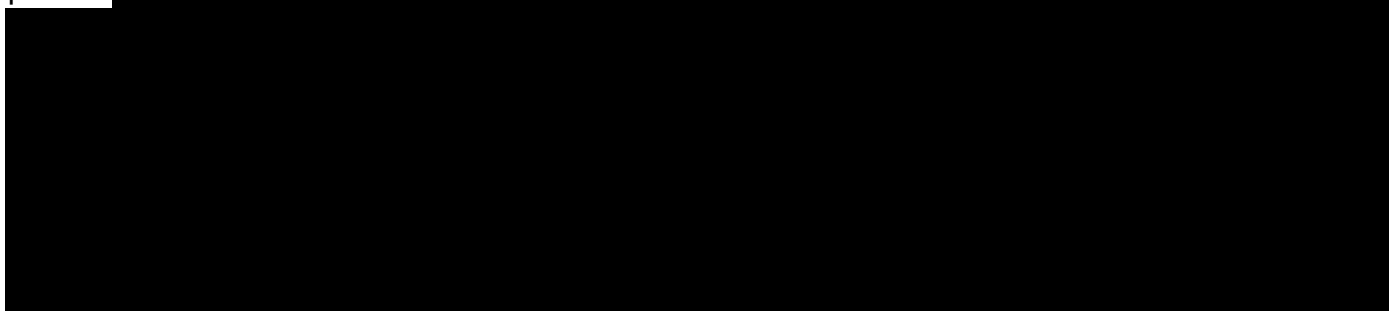
highlight 70 unique and irreplaceable Ancient Woodlands across the United Kingdom and identify 70 Ancient Trees to celebrate Her Majesty's 70 years of service.

The Government has also pledged the planting of 70 million trees to celebrate the Jubilee, their new Environment Act, which became law last November, includes a binding duty on the Government to halt species decline across England by 2030.

How then can National Highways be permitted to construct Option 30, a road that would devastate three farms, two small and one large, 5kms of old established hedgerow, countless mature trees and a small ancient woodland. The area abounds with flora and fauna, much of it identified as vulnerable, and the destruction of the beautiful Cotswold landscape would be irreversible and unforgivable

This project flies in the face of Government strategy, world opinion and the edicts of National Highways' own Environmental pledges. The latest UN Climate Change report and recommendations, to which ALL world nations have signed up, states that we have 3 years to change the way we work otherwise, in the words of Antonio Guterres, "we are on the fast track to disaster".

I heard somebody say recently "Birdlip needs this road" WRONG, Like dozens of communities nationwide Birdlip needs some alleviation to its traffic problems and Option 12 would serve the purpose equally well, as indeed would some lesser scheme. It would appear however that this issue has become more about Birdlip than the needs of the travelling public and the planet.



At the very outset, in a video clip from Cowley and Birdlip PC in response to ExQ1, they cited an event on Crickley Hill which is some distance from the village so totally irrelevant and would be solved equally as well with Option 12. The reasons for abandoning Option 12 were pathetic and would not stand up to scrutiny.

From the documents submitted during the process it would seem that National Highways have had scant regard for the CEPP Rules governing such an Application e.g. CEPP Submission in response to Deadline 7 which states that NH's responses in respect of emissions was "riddled with flaws" with a recommendation that the Examination be suspended until they did the work yet it seems there was no suspension.



How do we explain to today's children that we deliberately chose this option when there was a viable alternative readily available which would not destroy this beautiful landscape with its abundant wildlife and environment enhancing properties ?

Can the additional costs required to create this monstrosity be justified [REDACTED]

How would the general public react if they knew how tax payers money and our ever dwindling resources were to be squandered when there is a far better alternative ?

On behalf of future generations I implore the ExA put the environmental needs of our fragile planet to slow climate change before the [REDACTED] wishes of Birdlip and [REDACTED] of National Highways and refuse this scheme in favour of Option 12. This would save a huge amount of public funds as the two hideous over bridges at Stockwell Farm, and necessary excavation to sink the road, would not be needed, neither would the very extensive mitigation measures so that, even with the ever escalating costs, the Â£500million top budget might still be achievable

I thank you for your time throughout the process and can only hope that justice and commonsense will prevail to avert the catastrophe that would be Option 30

Submission number: 2

Date submission received by PINS: 17 May 2022

Name: Gloucestershire Ramblers



RAMBLERS

Gloucestershire Ramblers Area

A417 NH DCO Detail Design and

Re: A417 Missing Link at the Air Balloon

National Highways Application for a Development Consent Order

Background

The A417 Missing Link at the Air Balloon is a Nationally Significant Infrastructure Project located within the Cotswolds AONB, currently styled as the Cotswolds National Landscape with potential to become the Cotswolds National Park.

Ramblers have been campaigning here for over 20 years to remove through traffic from local roads to make them walkable and crossable again including placard protests outside the Air Balloon. It's not clear that sufficient weight has been given to design of the proposed road to maintain this special setting, compared to that of a non protected landscape.

The Applicant seems determined to move any matters outstanding into the detailed design phase of the project. However many of these matters may be significant. If the Applicant is given permission to proceed further, it is requested that proper resolution of such matters is made a condition of any consent.

1.	It's apparent that the SoCG process has not properly considered walking and the countryside. Issues are parked in Table 5 1 Matters Outstanding rather than Table 4 1 Matters Agreed
2.	Options for tunnelling or green bridges haven't been properly considered as per other AONBs
3.	The Air Balloon isn't being recognised as a Heritage Asset or its relevance to the Cotswold Way
4.	The Summary of Losses Map highlights severance for walking, wildlife and local communities

TR010056 000599 7.6 Combined Modelling and Appraisal Report 1.pdf

Table Q6 highlights safety and environmental impacts how does this compare with alternatives?

Safety (total number saved)		Environmental Impacts	
Accidents	-51.8	Number of noise important areas affected	5
Fatalities	66.1	Names of AQMAs	Birdlip AQMA
Seriously injured	201.2	Change in NOx emissions	661 (tonnes)
Slightly injured	-29.4	Change in PM2.5 emissions	85 (tonnes)
		Change in greenhouse gas emissions	903,811 (tonnes CO2e)

The Applicant added a note to consider cut and cover tunnels

TR010056-001005-National Highways - 8.6 Cut and Cover Tunnel Feasibility Study-1.pdf

Other low cost methods would better maintain the surface landscape.

A few key points

Gloucestershire Ramblers requests to be included as a consultee on detailed footpath changes

For example: if AWB 89 is extinguished where is the connectivity to Access land?

ABA86 could use a bat crossing similar to M5 J13 where an underpass is below 10 traffic lanes.

People imagine what the new road is going to be like and may not realise possible impacts

The gradient from Brockworth is to increase rather than reduce (from 7% to 8%)

Footpaths are being extinguished rather than crossings improved

The well known land mark Air Balloon Inn or Public House is proposed demolished

The quiet access road to Barrow Wake view point car park is to become the main traffic link to Birdlip

Local traffic connections are lost between villages Birdlip, Stockwell, Nettleton, Cowley, Brimpsfield

National Policy Statement for National Networks - Environmental Impact Assessment

4.15 When examining a proposal, the Examining Authority should ensure that likely significant effects at all stages of the project have been adequately assessed

4.20 Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate development consent requirements in the development consent order



RAMBLERS

2. Statement of Commonality

The Applicant has submitted a Statement of Commonality
(which is likely to be updated at Deadline 9 Monday 16th May 2022)

TR010056 001552 National Highways 7.3 Statement of Commonality Rev 3 2.pdf

Within the Statement of Commonality is Appendix H the Statement of Common Ground for the Walking Cycling and Horseriding Technical Working Group WCH TWG

It is apparent from Appendix H Table 4 1 Matters Agreed and Table 5 1 Matters Outstanding that a common ground has not been achieved on Walking matters.

Gloucestershire Ramblers has confirmed to the Applicant that Matters Outstanding in Table 5 1, which are in line with Ramblers charitable aims of defending footpaths and protecting the countryside, should be incorporated into the scheme so that Table 4 1 Matters Agreed can be updated.

For example Table 4 1 Section 4.1 Population and Human Health indicates that DMRB LA 112 (The Design Manual for Roads and Bridges on Population and Human Health) has been 'used' for assessment. However Table 5 1 Matters Outstanding shows that LA 112 generally has not been 'met'.

A417 Missing Link | HE551505

Highways England

5 Commonality

- 5.1.1 This section of the document provides a summary of principal topics covered in the SoCGs and highlights where topics have been agreed, are subject to further discussion, or where a topic is not agreed.
- 5.1.2 The summary in Table 5-1 is presented in such a way to show topics covered within the various SoCGs and any position for each topic. The topics are defined at a high-level to enable overview and comparison and may not reflect the structure of each individual SoCG. The topics have been defined where possible to broadly align with those of the Environmental Statement (ES), which comprises Volume 6 of the DCO application. Table 5.1 shows topics covered within the various SoCG and how these are relevant to each other party. It provides a position for each topic as follows:

	Matter agreed
	Matter subject to further discussion (including matters in which it is agreed to engage further at detailed design stage)
	Matter not agreed
	Matter not relevant to party / not included in SoCG

Table 5-1 Table of Commonality at Deadline 35 of Examination

SoCG Ref	Party	Broad topics considered in SoCG and current position																								
		Principles of Development	Project Description	Consultation	Assessment of Alternatives	EIA Methodology	Air Quality	Cultural Heritage	Landscape & Visual	Biodiversity	Geology, and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Public Rights of Way	Drainage/Water Environment	Climate	Cumulative effects	De-Trunking	Traffic and Transport	Crossings of the A417	Engineering Design	Draft DCO	Land acquisition and/or impacts on property	Environmental Management Plan	Construction Traffic Management Plan
7.3.1	Joint Councils																									
7.3.2	Environment Agency																									
7.3.3	Natural England																									
7.3.4	Historic England																									
7.3.5	Cotswolds Conservation Board																									
7.3.6	Gloucestershire Wildlife Trust																									
7.3.7	National Trust																									
7.3.8	WCH TWG																									
7.3.9	Celnex UK																									
7.3.10	Coberley Parish Council																									

Unfortunately the above related Statement of Commonality, Table 5 1 Table of Commonality, line 7.3.8 Population and Human Health, shows as green (Matter Agreed) rather than red (Matters not Agreed). The Applicant has said that the box will be updated to orange 'Matters not agreed but to be discussed.' However it is concerning that other boxes may be green to confirm a standard has been selected rather than to confirm that the standard has been met.

Gloucestershire Ramblers does not confirm that all matters within Table 4 1 Matters agreed are strictly 'agreed' or 'generally agreed' because the meetings were generally presentational and not everyone was present or indicated agreement.



RAMBLERS

3. Recognition of the Air Balloon as a Heritage Asset alongside the Cotswold Way

Statement of Commonality Appendix H, Walking Cycling Horseriding TWG
TR010056 001552 National Highways 7.3 Statement of Commonality Rev 3 2.pdf

5 Matters outstanding

5.1.2 *It should be acknowledged that some members of the WCH TWG object to or do not agree with wider elements of scheme design beyond the topic of WCH, for example impacts of severance on the landscape, and the demolition of the Air Balloon Public House. Those wider matters are not relevant to and are thus not captured within this SoCG, which considers WCH and PRoW related matters only.*

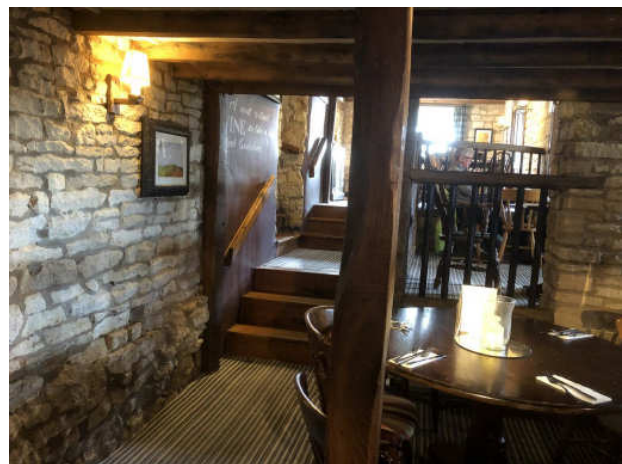
The presence of a popular and historic landmark alongside a long distance trail is naturally of importance to walkers. Its proposed demolition is raised in Table 5 1 Matter Outstanding. and covered by DMRB LA112. The Environment, Heritage and Landscape TWG became inoperative and members seemed to migrate to the .WCH TWG hence why these matters have become relevant.



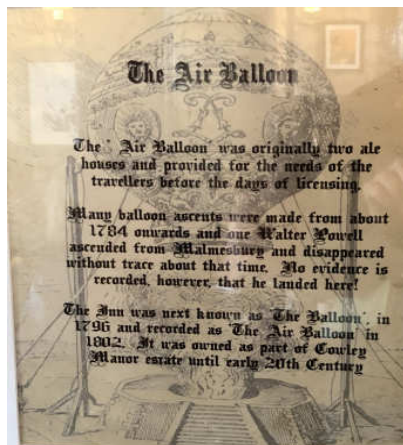
East view of the porch with the Victorian brass Bench Mark over the engraved stone Bench mark behind



Stone Fireplace



Stone walls and wooden beams



Heritage pre dates 1784.....Evening walk and food



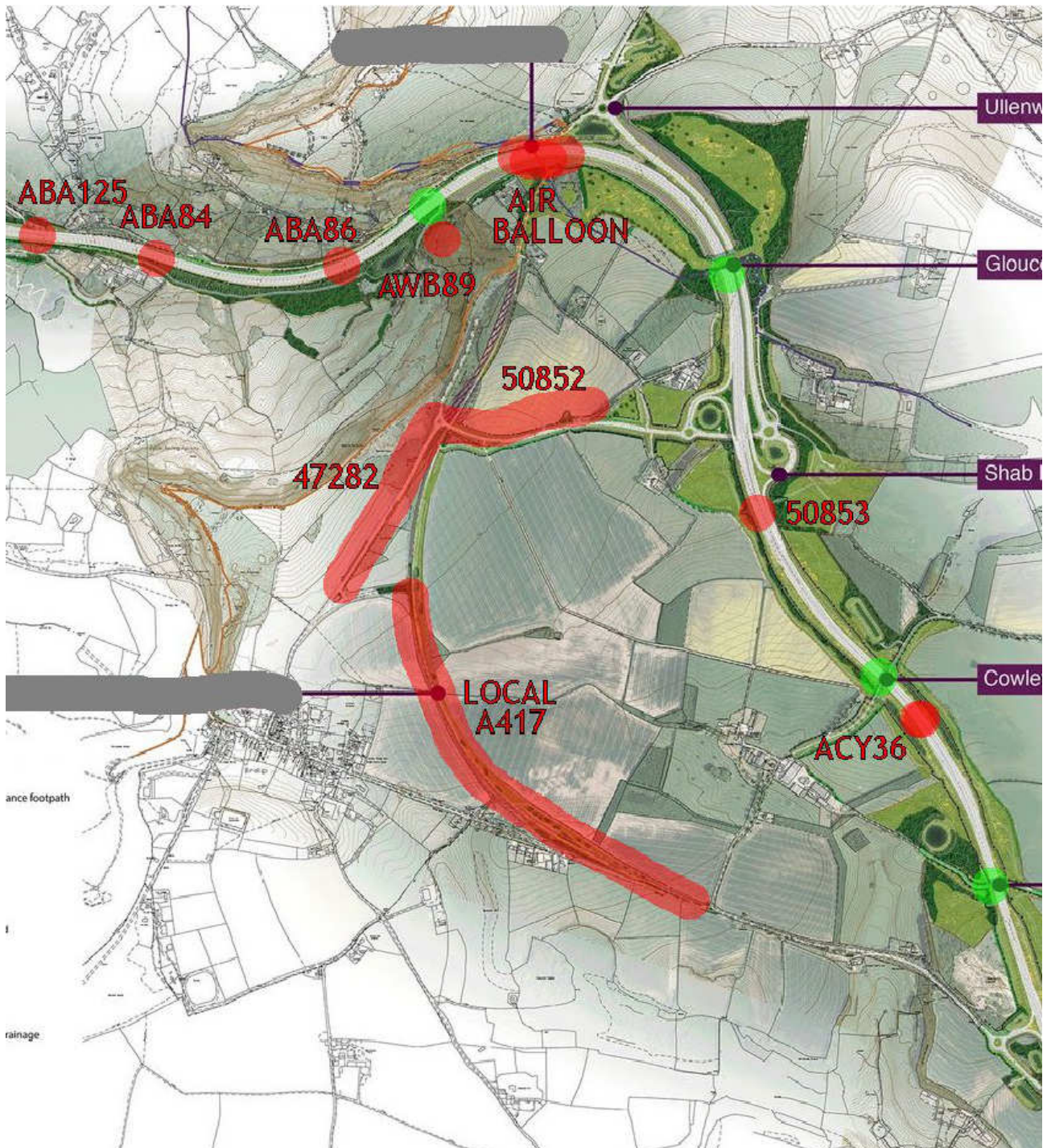
4. Summary of Losses Map

Highlight red Severance & demolition for walkers, loss of connectivity for wildlife & local communities
 Highlight Green = connectivity retained

Lost Crossings ABA125, ABA84, ABA86, Lost Air Balloon, diverted Cotswold Way

Lost connectivity AWB89 to woody access land

Lost quiet road walking parking 47282 towards view point, Lost quiet road 50852, Lost crossing 50853



Lost local A417 traffic connection between Birdlip, Stockwell, Nettleton, Cowley, Lost Crossing ACY36
 Just off Map bottom right lost local connection Brimpsfield to Cowley.

A change of use of a footpath to include other types of access would not usually be considered an enhancement such as for ABA86 an open downhill path from the Cotswold Way.

Overbridges to Cowley and Stockwell Farm shown as green should seek to maintain the current width between hedgerows as well as retaining the hedgerows and avenue of trees. Temporary access could be constructed off line, so that the completed structure keeps the current alignment.

Submission number: 3

Date submission received by PINS: 18 May 2022

Name: Gloucestershire Ramblers

From: [REDACTED]
To: [A417 Missing Link at Air Balloon](#)
Subject: GR-A417 Missing Link [TR010056] re Deadline 9
Date: 18 May 2022 11:46:00

Dear Mr Harrold

Thanks again for the response below and keeping us informed throughout the examination process.

We're content that we've done everything we could have done within the very tight timescales at times and we're grateful to know that our late final submission will be forwarded anyway.

If there's a one thing new to us that came out during the process it was the Climate change representations. We'd realised when it was first mooted that the proposed closure of the current Birdlip bypass to all traffic was going to be problematic. Going through it for our Deadline 8 submission showed that some journey distances between local villages can almost double.

It ties in with a meeting back in January 2019 of Gloucestershire Ramblers Area Council (where many local walking organisations get together). GRAC agreed that priority should be given to greening up the new road in the scheme - retaining the Air Balloon on a green bridge, retaining footpaths and tracks on green flanked bridges -before any measures for the A417 Birdlip bypass.

We also saw the DCO correspondence about similar issues of two villages in one Parish (Cowley and Birdlip) and the way the scheme introduces severance in local access.

It's all been very interesting and eagerly await the outcome of the ExA report in August.

Kind regards

[REDACTED]

[REDACTED]

Gloucestershire Ramblers

----- Original Message -----

Subject:RE: A417 Missing Link [TR010056] re Detail and Construction

Date:2022-05-17 10:58

From:A417 Missing Link at Air Balloon
<A417MissingLink@planninginspectorate.gov.uk>

To:A417 Gloucs Ramblers [REDACTED]

[REDACTED]

Many thanks for your email and your submission.

As the Examining Authority cannot exercise discretion to accept any late submissions into the Examination once the Examination has closed, please note that your submission will be submitted to the Secretary of State for consideration alongside the Recommendation Report in due course.

Please do not hesitate to let me know if I can be of any further assistance.

Kind regards,

George Harrold
Case Manager
National Infrastructure Planning
The Planning Inspectorate

<https://infrastructure.planninginspectorate.gov.uk>

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General enquiries: 0303 444 5000

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From: A417 Gloucs Ramblers [REDACTED]
Sent: 17 May 2022 10:07
To: Harrold, George <George.Harrold@planninginspectorate.gov.uk>
Cc: A417 Missing Link at Air Balloon <A417MissingLink@planninginspectorate.gov.uk>
Subject: Re: A417 Missing Link [TR010056] re Detail and Construction

Dear Mr Harrold

Please find attached our submission for Deadline 9. It's taken some effort to try to respond in a timely manner to the various deadlines.

Please also accept our apologies that this is now late.
It's appreciated the ExA will use its discretion whether or not accept it or perhaps to forward to the Secretary of State.

Kind regards and many thanks.

[REDACTED]

[REDACTED]

Gloucestershire Ramblers

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DPC:76616c646f72



Submission number: 4

Date submission received by PINS: 20 May 2022

Name: Gloucestershire Ramblers

From: [REDACTED]
To: [Harrold, George](#)
Cc: [A417 Missing Link at Air Balloon](#)
Subject: Re: A417 Missing Link [TR010056] re SoCG
Date: 20 May 2022 11:56:42
Attachments: [REDACTED]

Dear Mr Harrold

We've now had time to quickly review some of the Deadline 9 submissions.

We're unsure of the process if we find we may have been misrepresented in a submission.

For example and briefly TR010056-001778-National Highways - 8.35 Comments on responses received by D8-1.pdf

Section 2.5 response to Gloucestershire Ramblers submissions at Deadline 8.

We have not pressed for cut and cover tunnels and as the Applicants referred note concludes - they're unsuitable for this location.

Cut and cover involves creating a steep sided or walled cutting, destroying the surface landscape before constructing a roof on the top.

We've been pressing for use of a tunnelling method used to good effect in the North and North Downs to retain the surface landscape. It uses pretty much a standard excavator at each end to dig underneath a surface feature. It can be used for quite short tunnels, so short that if less than 150 metres they can be deemed bridges and remove some of the requirements for lighting ventilation escape routes etc.

We can't claim credit for a bridge less than 150 metres that looks like a tunnel as it came out of a 2014 GCC consultation where the county was trying to understand whether a common proposal could find all round support. A green bridge suitable for wildlife retaining the Air Balloon achieved that aim.

A longer option creating a 1km tunnel using the same process should also be viable but the applicant only considered rotary tunnel boring machines.

There has been a gap in the options process for both the above, but may be still be suitable for consideration at this stage.

As we seem to have been unfairly represented - do we have an opportunity to respond?

Similarly the note on the make up of the Cotswold Trails Partnership is interesting. It appears from previous that the rep from Natural England didn't realise they were involved. However there seems to be no representation from user groups like us.

Although the Cotswold Way crossing at the Air Balloon could be improved, and it's said that some 80,000 people use it per year for many people it wouldn't be worth the loss of the Air Balloon itself. In a similar way and at another level, improvement to roads at Stonehenge would unlike result in the heritage site. HS2 and Cross Rail have similarly used tunnelling to retain surface landscape.

The offer of facilities at Nettleton Bottom is too far away and besides, it seems the current proposal only earmark parking outside the Golden Heart that is already in use.

While it is fair to say that representatives have appeared receptive, understanding and supportive at public consultation events, the formal process feels to have been a one way street.

Is there an opportunity to respond in some way to the above Applicant submission?

If so, I can formalise this note.

Regards

[REDACTED]

[REDACTED]

Gloucestershire Ramblers



Submission number: 5

Date submission received by PINS: 10 October 2022

Name: Gloucestershire Ramblers

**Re: A417 Missing Link at the Air Balloon - Unresolved Matters
National Highways Application for a Development Consent Order**

On 2nd September 2022 in TR010056-001876-Consultation Letter 1 final-1.pdf

the Secretary of State, via the Transport Infrastructure Unit and Planning Inspectorate, asked the Applicant and Severn Trent Water to give an update on outstanding Protective Provisions.

This could be about changes to A417 infrastructure, perhaps outside the Air Balloon, which could be resolved by improving the plans to keep the road, heritage site and Cotswold Way.

There are still unresolved matters between the Applicant and Gloucestershire Ramblers. The process for the examination procedure meant that any statements made by the applicant about Gloucestershire Ramblers for Deadline 9 could not be challenged through the process. Gloucestershire Ramblers raised some issues with the Examining authority at the time.

It's not clear the scheme meets its aims of landscape led and recreational enhancement or whether it will benefit the protected landscape, the people within it and those passing through.

Gloucestershire Ramblers has been campaigning for over 20 years for through traffic to be removed from local roads to make them walkable and crossable again - the landscape remaining much the same. Ramblers has not campaigned for the demolition of the very places where traffic was to be reduced nor the closure of footpaths, tracks and roads for local access.

Some Examples of Unresolved Matters are:-

Low cost Tunnelling

TR010056-001778-National Highways - 8.35 Comments on responses received by D8-2.pdf

Paragraph 2.5.4 at top of page 9 of 14 says

The Gloucestershire Ramblers set out their alternative design proposals, including the use of tunnelling, which they consider would resolve this issue and provide additional benefits such as avoiding diversion of the Cotswold Way National Trail and the demolition of the Air Balloon Public House.

Paragraph 2.5.8 contains the response

National Highways has engaged with the Gloucestershire Ramblers to explain why a tunnelled scheme was not progressed, and has shared a technical note to address their suggested cut and cover tunnel alternative.

Gloucestershire Ramblers has not been suggesting 'cut and cover tunnel' as this would destroy the surface landscape of the AONB including the historic Air Balloon.

Alternative design proposals are based on

- (a) GCC 2014 'A417 loop' consultation to use a bridge, that looks like a tunnel, underneath the Air Balloon car park and current A417, keeping it for local traffic. (DMRB says a bridge is a tunnel of length less than 300 metres -apparently only bridges would be funded in the scheme)
- (b) Option 3 of National Highways proposals using a 1km tunnel.

Gloucestershire Ramblers has merely been trying to highlight benefits or otherwise in the proposals - including, to keep Option 3 within the scheme £500m budget, the use of a low cost spray lined concrete tunnelling method found in the north and south Downs AONB, rather than the expensive twin tunnel boring machines suggested by National Highways.

Also at paragraph 2.5.8

National Highways notes the Gloucestershire Ramblers' submission at Deadline 8 relating to the climate emergency and its view that a tunnelled option may bring about carbon emission benefits. As set out above, National Highways has engaged with the Gloucestershire Ramblers to explain why a tunnelled scheme was not progressed.

National Highways has not explained why low cost tunnelling methods were not considered- keeping the Air Balloon & current A417 for local people with either 300m bridge or 1km tunnel.

Diversion of the Cotswold Way

At paragraph 2.5.10 'National Highways also notes the Gloucestershire Ramblers' objection to the proposed diversion of the Cotswold Way National Trail.'

Although other parties seem to have been invited to discussions, it should be noted that Gloucestershire Ramblers is the only body with a Membership base to represent walkers including users of the Trail - many would not regard demolition, diversion and loss as an improvement, especially when alternative suitable proposals appear to be available.

Loss of Parking vs. Recreational Enhancement

Gloucestershire Ramblers has raised the issue of severe loss of parking within the scheme and the relationship with the scheme supposed aims of recreational enhancement.

Currently Crickley Hill is said to be at capacity. Barrow Wake viewpoint has 70 parking spaces and is full from time to time. Its access road with up to 80 spaces is used for longer term parking for the Cotswold Way and other routes. The Air Balloon has 30 spaces plus 30 in overflow and with its facilities is a useful base for walking. National Highways also refers to some layby parking further away, next to the Golden Heart and opposite the turn to Stockwell.

During the consultation process an accounting process seems to have used where say taking a number of things away and offering one thing instead, is to be treated as a benefit.

In paragraphs 2.5.12 to 2.5.15 National Highways has raised a new concept of 'informal' vs. 'formal' parking places. National Highways says it's renamed some informal spaces to formal.

Somehow the huge loss of 'informal' spaces in the access road and business spaces at the Air Balloon becomes a benefit by renaming as 'formal' a few spaces near the Golden Heart and Stockwell. Elsewhere loss of suitable parking has resulted in parking on verges. Loss of spaces in the Barrow Wake access road and at the Air Balloon, could lead to parking on the protected grassland of the SSSI, within Birdlip Village or increase pressure on Crickley Hill.

Earlier Consultation

The GCC 2014 A417 loop consultation showed that most people and organisations could support a scheme that provided a road while retaining the landscape.

Unfortunately the current proposal does not appear to be such a scheme.

DMRB LA-112 (Design Manual for Roads and Bridges on Population and Human Health)

Although it's been agreed DMRB LA-112 should be 'used' it is not apparent it has been 'met'. For example sections on National Trails, employment and alternatives to compulsory purchase.

CCB Response highlights that there are not enough benefits to outweigh the negatives TR010056-001770-National Highways - 7.3.5 Statements of Common Ground with Cotswolds Conservation Board.pdf page 26 of 31

'the scheme will not result in substantially more benefits than negative impacts for the Cotswold AONB'.

It also mentions *'significant adverse effects on a nationally important SSSI and the irreplaceable habitat of Ullen Wood ancient woodland'.*

Road Safety - the proposals say that accident rates for the current A417 are below average for the type of road. The modelling suggests that the new road with almost double the traffic numbers, would increase some types of accidents and reduce others. Overall the numbers stay around the same. In addition Local Parishes have raised that the layout of the scheme directs traffic onto unsuitable roads in southern Cheltenham and could impact collision rates there.

Pollution - estimated traffic almost doubles, much of the A417 gradient increases from 7% to 8%, extra journey length -A436 users climbing to Shab Hill junction and back - it all adds up.

Overall Summary

The unresolved matters raised by Gloucestershire Ramblers have not been settled, recreational enhancement needs to be quantified, disconnect means journey distances for local people increase. The scheme appears less than beneficial for this special landscape including walking.

However, a modified proposal could be an exemplar of a suitable road scheme within an AONB.

Submission number: 6

Date submission received by PINS: 16 November 2022

Name: Gloucestershire Ramblers



Re: A417 Missing Link at the Air Balloon - Unresolved Matters National Highways Application for a Development Consent Order

On 2nd September 2022 in TR010056-001876-Consultation Letter 1 final-1.pdf the Secretary of State, via the Transport Infrastructure Unit and Planning Inspectorate, asked the Applicant and Severn Trent Water to give an update on outstanding Protective Provisions.

There are still unresolved matters between the Applicant and Gloucestershire Ramblers.

The process for the examination procedure meant that any statements made by the applicant about Gloucestershire Ramblers for Deadline 9 could not be challenged through the process. Gloucestershire Ramblers raised some issues with the Examining authority at the time.

The test for this scheme isn't necessarily how many people think it's a good idea vs. how many don't, but whether the scheme is a benefit to the protected landscape, the people within it and those passing through.

Gloucestershire Ramblers has been campaigning for over 20 years for through traffic to be removed from local roads to make them walkable and crossable again - the landscape remaining much the same. Ramblers has not campaigned for the demolition of the very places where traffic was to be reduced nor the closure of footpaths, tracks and roads for local access.

Some Examples of issues unresolved are:-

Low cost Tunnelling

TR010056-001778-National Highways - 8.35 Comments on responses received by D8-2.pdf

Paragraph 2.5.4 at top of page 9 of 14 says

The Gloucestershire Ramblers set out their alternative design proposals, including the use of tunnelling, which they consider would resolve this issue and provide additional benefits such as avoiding diversion of the Cotswold Way National Trail and the demolition of the Air Balloon Public House.

Paragraph 2.5.8 contains the response

National Highways has engaged with the Gloucestershire Ramblers to explain why a tunnelled scheme was not progressed, and has shared a technical note to address their suggested cut and cover tunnel alternative.

Gloucestershire Ramblers has not been suggesting 'cut and cover tunnel' as this would destroy the surface landscape of the AONB including the historic Air Balloon.

Alternative design proposals are based on

- (a) a GCC 2014 'A417 loop' consultation to use a bridge that looks like a tunnel underneath the Air Balloon site / car park (DMRB says a bridge is a tunnel of length less than 300 metres)
- (b) Option 3 of National Highways proposals using a 1km tunnel.

Gloucestershire Ramblers has merely been trying to highlight benefits or otherwise in the proposals - including, to keep Option 3 within £500m budget, the use of the low cost spray lined concrete tunnelling method found in the north and south Downs AONB, rather than the expensive twin tunnel boring machines suggested by National Highways.

Similarly at paragraph 2.5.8

National Highways notes the Gloucestershire Ramblers' submission at Deadline 8 relating to the climate emergency and its view that a tunnelled option may bring about carbon emission benefits. As set out above, National Highways has engaged with the Gloucestershire Ramblers to explain why a tunnelled scheme was not progressed.

National Highways has not explained why low cost tunnelling methods were not considered -either up to 300 metres underneath the Air Balloon car park or 1km as say in Option 3.

Diversion of the Cotswold Way

At paragraph 2.5.10

'National Highways also notes the Gloucestershire Ramblers' objection to the proposed diversion of the Cotswold Way National Trail.'

Although other parties seem to have been invited to discussions, it should be noted that Gloucestershire Ramblers is the only body with a Membership base to represent walkers including users of the Trail, many of whom would not regard demolition and diversion as an improvement, especially when alternative suitable proposals appear to be available.

Loss of Parking vs Recreational Enhancement

Gloucestershire Ramblers has raised the issue of severe loss of parking within the scheme and the relationship with the scheme supposed aims of recreational enhancement.

Currently Crickley Hill is said to be at capacity. Barrow Wake viewpoint has 70 parking spaces and is full from time to time. Its access road with up to 80 spaces is used for longer term parking for the Cotswold Way and other routes. The Air Balloon has 30 spaces plus 30 in overflow and with its facilities is a useful base for walking. National Highways also refers to some layby parking further away, next to the Golden Heart and opposite the turn to Stockwell.

During the consultation process National Highways seems to have used an accounting process where say taking 6 things away and offering one thing instead, is to be treated as a benefit.

In paragraphs 2.5.12 to 2.5.15 National Highways has raised a new concept of 'informal' vs. 'formal' parking places. National Highways says it's renamed some informal spaces to formal.

Somehow the huge loss of 'informal' spaces in the access road and business spaces at the Air Balloon becomes a benefit by renaming as 'formal' a few spaces near the Golden Heart and Stockwell. Elsewhere loss of suitable parking has resulted in parking on verges. Loss of spaces in the Barrow Wake access road and at the Air Balloon, could lead to parking on the protected grassland of the SSSI, within Birdlip Village or increase pressure on Crickley Hill.

Earlier Consultation

The GCC 2014 A417 loop consultation showed that most people and organisations could support a scheme that provided a road while retaining the landscape. Unfortunately the current proposal does not appear to be such a scheme.

DMRB LA-112 (Design Manual for Roads and Bridges on Population and Human Health)

Although it's been agreed DMRB LA-112 should be 'used' it is not apparent it has been 'met'. For example sections on National Trails, employment and alternatives to compulsory purchase.

CCB Response highlights that there are not enough benefits to outweigh the negatives TR010056-001770-National Highways - 7.3.5 Statements of Common Ground with Cotswolds Conservation Board.pdf page 26 of 31

'the scheme will not result in substantially more benefits than negative impacts for the Cotswold AONB'.

It also mentions *'significant adverse effects on a nationally important SSSI and the irreplaceable habitat of Ullen Wood ancient woodland'.*

Road Safety - the proposals say that the accident rates for the current A417 are below the average for the type of road. The modelling suggests that new road with almost double the traffic numbers, increases some types of accidents, reduces others so that numbers stay about the same. Local Parishes have raised concerns that the layout of the scheme directs traffic onto unsuitable roads in southern Cheltenham and could raise collision rates there.

Overall Summary

The unresolved matters raised by Gloucestershire Ramblers have not been settled, recreational enhancements have not been realised and the proposed scheme is less than beneficial to the landscape and walking. Disconnect means journey distances for local people increase.

However, a modified proposal could be an exemplar of a suitable road scheme within an AONB.