

TR010056 Written Representation Summary

Deadline 1 (14th December 2021)

The National Trust's written representation provides further detail on those matters raised in our relevant representation. It responds to the Development Consent Order (DCO) application submitted by National Highways for the A417 Missing Link which will directly and indirectly affect Crickley Hill Country Park, Crickley Hill and Barrow Wake SSSI, and the Cotswolds National Landscape.

Within the representation Part B, Section 4 discusses in more detail our position regarding the three main outstanding principal matters - 1) National Highway's assessment of the predicted impact on Crickley Hill and Barrow Wake SSSI during construction and operation, 2) That a holistic approach should be taken for scheme mitigation that overlays cultural heritage, historic environment, and natural environment to understand the significance of the landscape, and therefore, mitigation proportionate to the significance, and 3) the approach to biodiversity net gain and delivering best possible outcomes for nature.

In Part B, Section 5 has been aligned to follow the initial assessment of principal issues prepared by the Examining Authority (ExA) and set out in Annex C to the Rules 4, 6 and 9 letter from the Planning Inspectorate dated 30 September 2021. Our sub-headings reflect the issues set out in the Principal Issues table in the Planning Inspectorate's letter, though we have not commented in respect of each issue. We have highlighted our areas of concern, our reasoning, and - where appropriate - a proposed method for resolution.

In summary:

National Trust summary on Air Quality and Emissions:

The Trust would want there to be a mechanism to report and resolve any issues with construction dust. We would like to see best practice for local carbon design and construction secured. We would expect the Applicant to demonstrate the scheme is compatible with all relevant legislation, policy, and guidance on climate change.

National Trust summary on Biodiversity, Ecology and Natural Environment:

The National Trust has a number of concerns regarding the scheme's impacts on Crickley Hill and Barrow Wake SSSI, and requests changes to the LEMP and/or requirements. The Trust has made comments and recommendations regarding dust, pollution, and sediment run-off from construction work. We would like to see additional compensation measures for the loss of veteran trees. We have commented on the appraisal of wildlife crossing mitigation methods, on mitigation monitoring and remedial actions and on successful habitat creation and have proposed solutions. The Trust also has two principal matters relating to biodiversity that have been set out in more detail in our principal outstanding matters.

National Trust summary on Compulsory Acquisition / Temporary Possession:

It is not yet clear which mechanism would be used for the acquisition of the National Trust's inalienable land, or the means through which compensation would be secured. The National Trust is not objecting to two parcels of inalienable land dedicated for highway use being compulsorily acquired. We believe certain entries in the Book of Reference need changing. The impact on our grazing operation and loss of land from tenancies, and the associated compensation, are outstanding matters.

National Trust summary on Cultural Heritage:

The Trust has flagged certain concerns about an over-reliance on the DMRB methodology and advocated the benefits of taking a more holistic approach to assessing scheme impacts (and proposing mitigation). The University of Gloucestershire (UoG) report commissioned by the Trust in Annex B has raised questions about the assessment and understanding of historic landscape character. The report indicates that there has been insufficient interpretation and understanding of designated and non-designated heritage assets, and their inter-relationships and group value. The report concludes and recommends that key areas affected by the scheme need to be better understood and more robust mitigation proposed, rather than that suggested by current assessment. The report's recommendations also include that there are significant opportunities for the scheme to celebrate and interpret the historic landscape.

National Trust summary on draft DCO:

The Trust has a strong interest in the Environmental Management Plan (EMP) and its constituent documents and future and ongoing engagement by the Applicant and contractor. For detailed design and consultation, we have suggested that a working group or consultation panel on key design elements could be formed. The Trust has also made comments on the limits of deviation and the effect on its inalienable land, stopping up of streets and rights of way, private rights over land, special category land and fencing.

National Trust summary on Landscape and Visual:

In respect of landscape character, the Trust has highlighted the conclusions and recommendations of the UoG report. In respect of the AONB, the Trust supports the scheme's landscape led vision and welcomes the Design Summary Report – although the scheme would still produce permanent adverse effects on the special qualities of the AONB. Regarding visual effects, we consider that to fully assess the scheme, a better understanding of the visual appearance of the cutting would be helpful. We have also raised the proposed changes to Leckhampton Hill at the entrance to Crickley Hill country park, and commented on scheme lighting, drainage basins and fencing.

National Trust summary on noise and vibration:

We would want construction noise impacts to be minimised where possible. In respect of operational noise, we support the use of low noise road surfacing. We would want to ensure that appropriate noise mitigation measures are secured through the draft DCO and its Requirements.

National Trust summary on socio-economic affects:

The Trust continues to have an interest in the Construction Traffic Management Plan (CTMP) as it evolves and in detailed scheme design. We welcome the undertakings given by the Applicant to continue to engage with local landowners and address any adverse effects, that our cattle would be able to use the Cotswold Way crossing, and that access to Crickley Hill country park would be maintained at all times. However, we have significant concerns as to how such access for staff and visitors could be achieved in practice and about the effects of the construction works on the Trust's grazing and management of land, including our ability to claim BPS/HLS payments.

National Trust summary on traffic and transport:

The Trust agrees that the dualling of the A417 missing link would address the congestion and safety issues currently being experienced. We support the scheme's landscape-led vision and understand how the current scheme has been developed. We would support any further measures to minimise harm and maximise benefits and ensure that the best possible outcomes are secured. As mentioned earlier, we have an ongoing interest in the detailed design of the scheme, and in the CTMP as it develops.

To conclude, the National Trust supports the landscape-led vision for the road scheme and would want to see the best possible scheme within this sensitive landscape context; with the effects fully assessed and understood, the adverse impacts robustly mitigated, and the benefits and opportunities secured through the draft DCO and its requirements, and through the EMP and its constituent parts.

We hope that our written representation will provide sufficient evidence and context for matters of concern, but also highlights areas that would be beneficial to the scheme design if incorporated at this stage and request that a working group is established for the detailed design stage, which would be mutually beneficial for all parties.