

I am the Vice Chairman of the Cowley & Birdlip Parish Council, and I am one of the Councillors who represents the residents who live in the village of Cowley. The Parish Council is made up of 3 members from each village, and in addition the current Chairman also coming from Birdlip. The vote will always therefore fall to Birdlip. I am writing in my personal capacity, not as a member of the Parish Council.

My primary concern is that, in my view, the residents of Cowley have not been fairly consulted by Highways England, and their comments to the Parish Council are being blocked.

Meaningful Consultation: Cowley residents have reached out to Highways England on several occasions over the past years. I am aware that residents within Cowley either wrote or spoke in person with representatives of Highways England, requesting dialogue over the proposed scheme, and the possibility of holding public exhibitions in the village – a valid request seeing the village of Cowley is the only village that will be negatively impacted by Option 30. You would think that Highways England would do their utmost to ensure the concerns of the residents of Cowley were addressed in person. I believe all these requests were not taken up by Highways England. As a Councillor in the village, and talking to the residents, a constant theme is that the village has not been adequately consulted by Highways England, to a point that many feel that Highways England have deliberately not wanted to consult directly with the village. Why would Highways England choose not to hold a public exhibition in Cowley and not engage with the residents, the one village that is adversely affected by the proposed Option?

Question: Can the ExA be appraised as to why it was deemed unnecessary to hold a public exhibition within the one community most affected by this proposal?

Question: Can the ExA be confident that the views of the residents of Cowley have been adequately consulted?

Censored Responses from the Cowley Parish Council: The other route that the residents of Cowley can voice their concern is via the Parish Council. Over the past year whilst everyone has battled with the pandemic, residents have consolidated their thoughts, and the majority in the village now believe that Option 12 is a more prudent, safer, more environmentally friendly, and future proof solution to the requirement for an improved A417. Understandably this view is at odds with the village of Birdlip. The issue we have is that because the Parish Council has 4 members from Birdlip, and only 3 from Cowley, the views from residents of Cowley to do with the Scheme will never be endorsed. The initial representation that was sent in on the 8th August on behalf of the Cowley and Birdlip Parish Council was never seen in draft by the Councillors, and interesting enough, the word ‘Cowley’ is not mentioned once! In addition, as eloquently demonstrated in the past week, a written representation submitted by the residents of Cowley via myself, has not been submitted. The Chairman decided it would be only fair to vote to either submit or make no written representation. Cowley was outvoted and no written submission has been made. I think this clearly shows that the Parish Council is not representing the views of the residents of Cowley, and we are being thwarted in our attempts to make our concerns known to the Inspectorate. This is not the first time and unfortunately it will not be the last.

Question: Can the ExA be appraised as to why it was correct to block the written representations submitted by the residents of Cowley, whilst it was proper to submit the initial representation without consulting any of the Counsellors from Cowley?

Question: Can the ExA be confident that the views of the residents of Cowley have been/are being passed on to the Inspectorate, via the Cowley & Birdlip Parish Council, and that our voices

are being heard?

Climate / Environment / Safety: The two Options would appear to be driven by different factors. Option 12 has clearly been landscape led, whilst Option 30 would appear to be driven more by the desire to maintain the speed limit at 70 mph, necessitating the larger road radius on the approach to/from the Hot Air Balloon roundabout. I attended a virtual A417 Missing Link - project update by Highways England on Thursday 9th November at which a member of Highways England made a point about the "volatile microclimate" that exists where the scheme will be built. My concern is that clearly Highways England are aware of the extreme climatical changes that occur quickly in this area, and at the same time they intend to increase the speed limit. Common sense would suggest that reducing the speed limit should mitigate the changes in weather conditions, and thus reduce accidents, whilst at the same time maintaining the flow. Option 12 has demonstrated that with a reduced speed limit, the journey time is reduced only slightly from that achieved with Option 30.

Question: Can the ExA be appraised as to why it was stated that the area has a "volatile microclimate", and assuming it referred to the severe weather conditions experienced there, the logic behind increasing the speed limit?

Question: Can the ExA be appraised as to whether, in general, a speed limit of 50mph would be more suitable to a "volatile microclimate" than a 70mph limit?

Question: Can the ExA be appraised as to whether a 50mph speed limit is more environmentally friendly than a 70mph limit?

Question: Can the ExA be appraised as to the difference in flow rate and journey time between doing 50mph on the complete 6.4km of Option 12, compared to doing 70mph of the complete 5.6km of Option 30.

Question: Can the ExA be appraised as to whether there is an impact on flow rate between the two Options, when considering the traffic going down the hill from the Hot Air Balloon area "specifically if the speed limits were 50mph for Option 12 and 70mph for Option 30.

Options Assessment: The Reports as written I believe are crafted in favour of Option 30, and at times factually incorrect. To state that Crickley Hill Country Park is located adjacent to Option 12 and within 1km of Option 30, is fundamentally wrong and suggests word smithing to raise the environmental profile of Option 30. From my background as a civil engineer, the designs of Option 12 and 30 will have been based on a number of criteria, one of which will be assumed traffic flow along the route and feeder routes. Common sense would assume that these criteria would be the same for each Option. It therefore raises the question as to why the two designs that went to consultation had very different access designs, with Option 12 having three junctions, whilst Option 30 only one. To me this is illogical, other than to reduce the costs for Option 30 prior to going to consultation " a question I raised but was ignored by the Parish Council in a reply in March 2018.

Question: Can the ExA be appraised as to why Option 30 is not reported as being adjacent to the Crickley Hill Country Park?

Question: Can the ExA be appraised as to why the two designs prior to the consultation had marked differences in junction layout, given that the design flow rates would have been the same?

Question: Can the ExA be appraised as to whether at the time of the consultation, if the junction

layouts had been of similar number and design, would the monetised costs and benefits of both options have been more similar?

Written Representations: As mentioned earlier, the residents of Cowley spent time putting together questions with substantive evidence, to be put forward in good faith to the Inspectorate for their proper consideration. Attached to this summary is the representation put together by members of the local community who I believe are a definitive consultee, under the Planning Act 2008.

Cowley Village – Key Points for Representations to be submitted by the Cowley Parish Council

OPTIONS ANALYSIS		
REF	Question/ Point	
O1	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 129 Table 7.2	The forecast AADT Flows on the B4070 south of Birdlip rat run show significant flow increases (20% for Option 12 and 22% for Option 30) compared to the do minimum. Can the ExA be appraised as to whether this increase is acceptable, when considering one of the reasons for the new scheme was to reduce rat running?
O2	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 165 Para 9.3.2	The three design principles that govern all design development clearly articulate that the scheme should bring about substantial benefits to the Cotswolds landscape and environment as well as people's enjoyment of the area; and should have substantially more benefits than negative impacts for the Cotswolds Area of Outstanding Natural Beauty. Can the ExA be appraised as to how Options 12 and 30 measured up against these design principles, and demonstrate how Option 30 could provide more benefits than Option 12, when considering the routes location?
O3	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 180 Para 11.6.1	Can the ExA be appraised of the further engineering review of Option 12, what the review involved and what the outputs were?
O4	TR010056-000602-7.9 Technical Appraisal Report (February 2018) Page 129 Table 7.2	Page 129 gives indications of most likely OME. Option 30 'allows for a single junction at Shab Hill to serve the local road network, with the Air Balloon and Cowley roundabouts removed.' Option 12 allows for 3 junctions at Barrow Wake, Birdlip and Cowley roundabouts. Can the ExA be appraised as to why the two options, with the same traffic flow assumptions, had very different design solutions for junctions to serve the local road networks, and to confirm whether this was done to keep both options within the upper budget limit. The rationale between the two designs is very unclear. Can the ExA also be appraised as to the monetised costs and benefits if both options had similar junction layouts as presented at the time of the Report?
O5	Route development TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 6	The Scheme Assessment Report (SAR) states that Option 12 was a 'landscape led design, by minimising new road construction in the AONB'. Option 30 predominantly cuts straight through the AONB. Can the ExA be appraised as to whether the impact on the AONB has been considered at all within Option 30, and how this can be mitigated against compared against Option 12?
O6	The recommended preferred route TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 12	The Scheme Assessment Report (SAR) states that 'Option 30 would divert the strategic road network away from the Cotswolds escarpment' but fails to acknowledge that the proposed route cuts straight through the AONB. Can the ExA be appraised as to why keeping the road away from the escarpment is judged to be more important than cutting through the AONB, which goes against all the environmental pressures we are under today and is unnecessary?
O7	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 89 Para 5.3.2	The Scheme Assessment Report (SAR) states that 'Public exhibitions (or events) were held on six occasions at different venues'. The village of Cowley clearly would be heavily impacted by Option 30 if selected and can be described as a major interested party. Can the ExA be convinced that the Cowley community was adequately consulted. Also, can the ExA be appraised as to why, as Cowley is a location that would be severely impacted by Option 30, a Public exhibition was not held in the village to ensure maximum exposure of the options that were being consulted upon were exposed. Why was it not considered as fundamental?

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O8	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 168 Table 9.6	Both Options 12 and 30 have been described as having 'Large Adverse to Moderate Adverse' impacts on the landscape. Can the ExA be appraised as to what the perceived impacts are for each option, and to understand out of the two options, which has the most impact and what the impacts are?
O9	TR010056-000602-7.9 Technical Appraisal Report (February 2018) Page 44 Para 3.8	The Technical Appraisal Report, page 44 gives details about the temperature and rainfall. Can the ExA be appraised of the analysis that has been undertaken with regards to the poor visibility that frequently affects the proposed route, and what the implications are of increasing the speed limit in this area on road safety?
O10	The recommended preferred route TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 12	The Scheme Assessment Report (SAR) states that although both routes are similar in most respects from an objective environmental assessment and appraisal, Option 12 is more likely to comply with the relevant policy requirements within the NPSNN than Option 30 relating to cultural heritage, geology and soils, population, health and climate. Considering COP26 and other climate pressures, can the ExA be appraised as to why these benefits seem to be ignored in the choice of route?
O11	TR010056-000602-7.9 Technical Appraisal Report (February 2018) Page 54 Para 3.14.20	The Technical Appraisal Report states on page 54 that the Crickley Hill Country Park is located adjacent to Option 12 and within 1km of Option 30. Can the ExA be appraised as to where Option 30 is assessed to be not adjacent to the Crickley Hill Country Park, as we believe both Options are adjacent. Considering this, can the ExA be assured that the environmental impacts for Option 30 have not been overstated when compared with Option 12.
O12	TR010056-000605-7.1 Case for the Scheme.pdf Page 12 Para 2.2.14	As set out in the recommendation of section 17.9 of the Technical Appraisal Report (Document Reference 7.9), it was identified that Option 30 was the preferred choice of Highways England when compared to Option 12 because it would provide greater benefits in relation to air quality, road safety, journey times and value for money. Can the ExA be appraised as to why the impact on the landscape and environment are not seen as key benefits when selecting the best Option?
O13	Economic analysis TR010056-000602-7.9 Technical Appraisal Report (February 2018) Page 15	Can the ExA be appraised as to why adjusted BCR for Option 12 is 0.68 and Option 30 is 1.04, when Option 30 most likely cost was greater, and logically the efficiency of the journey for the road user would be roughly similar for both Options, costs or benefits to the environment would be much greater with Option 30, and the impact of accidents and road works for both Options would be largely the same?
O14	TR010056-000602-7.9 Technical Appraisal Report (February 2018) Page 146 Table 9.2	The difference in adjusted BCR between the 2 options comes down to the perceived Economic Efficiency, Reliability Benefits and Wider Economic Benefits. Can the ExA be appraised as to how the economic efficiency for Option 30 can be on average 65% greater than Option 12, reliability benefits are 30% better and wider economic benefits 57% better, considering both options are about the same length, carrying the same volume and type of traffic?
O15	TR010056-000602-7.9 Technical Appraisal Report (February 2018) Page 154 Para 10.1.46	The overall horizontal alignment of Option 12 includes several curves that are notably below the desirable minimum (1020m radius) for a 120kph design speed. Can the ExA be appraised as to where they all are, or are they part of the one curve by the Hot Air Balloon? Mitigation measures may include a mandatory speed limit of 50mph with appropriate enforcement measures. In view of the amount of fog that sits on the proposed route, this could be seen as a positive feature.

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O16	TR010056-000602-7.9 Technical Appraisal Report (February 2018) Page 162 Para 10.1.89-92	There are several safety concerns raised in respect of the overall alignment of Option 30. If a mitigation measure was a reduced speed limit, can the ExA be appraised of what impacts this would have on the overall journey times, and would they then be of the same order as Option 12?
O17	Economic Assessment TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 10	The report states for Option 30, a significant reduction in excess material has been achieved, above that which was identified for Option 12. Option 30 had 80% surplus material volume compared to 90% for Option 12 before revised engineering assumptions. Can the ExA be appraised as to whether revised engineering assumptions on structural features achieve significant net reduction in cost for Option 12?
O18	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 126 Para 7.3.3	Both options are forecast to reduce journey times along the A417 in both directions compared to the 'Do Minimum' scenarios. Option 12 has a mitigation measure of a reduced speed limit. Can the ExA be appraised as to whether modelling has been undertaken to assess the traffic flow, journey times and environmental impact if Option 12 was designed for a lower design speed, whilst at the same time delivering a safe and resilient free-flowing road?
O19	TR010056-000605-7.1 Case for the Scheme Page 21 Table 3-1	Any solution involving a new road must ensure that the scheme is designed to meet the character of the landscape, not the other way around. The key design feature of Option 30 is two sequential 510m radius curves to meet the design speed; key design feature of Option 12 is the 270m radius curve to minimise impact on the AONB. Can the ExA be appraised as to whether the design speed (and defacto the minimum curves) is dictating the design and alignment of the new road, or the landscape? Can the ExA be appraised as to whether a lower design speed (that still maintains traffic flow) would allow the route to follow Option 12, thus meeting the character of the landscape?
O20	The recommended preferred route TR010056-000608-7.4 Scheme Assessment Report (March 2019) Page 12	The Scheme Assessment Report (SAR) states that 'Option 30 would divert the strategic road network away from the Cotswolds escarpment'. Can the ExA be appraised as to what the impact, if any, Option 12 would cause on the escarpment over and above what is there now with the current A417. In addition, can the ExA be appraised as to what design measures could be undertaken to mitigate any perceived impacts on the escarpment, caused by Option 12.

QUALITY OF CONSULTATION		
REF	Question/ Point	
C1	A417 Public Consultation Brochure A further assessment of our proposed options Page 18-19	The Consultation Brochure under 'Journey time savings' states that Option 12 results in marginally longer journey times and increased travel costs, whilst Option 30 would bring about significant savings to journey times. Can the ExA be appraised as to whether the choice of wording exaggerates the benefits brought by Option 30, considering the text talks about 'marginally longer journey times' and could be construed as intentionally enhancing the benefit of Option 30 compared to Option 12?
C2	A417 Public Consultation Brochure A further assessment of our proposed options Page 18-19	The Consultation Brochure under 'Connectivity and junction arrangements' states that Option 12 will have two new split-level junctions and one standard junction along the route, compared with Option 30 only having one new split level junction along the route. Can the ExA be appraised as to why the perceived requirements for junctions was significantly different considering the flow modelling data would have been the same. Would this design decision have caused the costs for Option 30 to be significantly lower at this stage in the consultation process?
C3	A417 Missing Link: Report on Public Consultation	Table 3.1 lists the venues that were used for the public consultations. Two villages are most impacted by the development – Birdlip in a positive way, and Cowley in a negative way. Can the ExA be appraised as to why Cowley was not considered to

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	Table 3.1 Public Events Page 21	be a fundamental location where a public consultation should take place, as it is the one village that is negatively impacted upon by Option 30. Can the ExA be appraised as to whether the views of this community have been adequately engaged and listened to before the choice of option was made. If not, why not as they would be viewed as local residents who should be consulted as a matter of priority?
C4	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Figure 6.2 Page 96	Para 6.2.4 states that the mainline geometry [of Option 30] was amended to fit more closely with the existing landscape. The alternative alignment has shifted the carriageway approximately 230m east of Stockwell Farm compared to the previous version of Option 30. Can the ExA be appraised as to whether the residents of Cowley were further consulted following this amendment, considering the increased impact on the village? If not, why not as they would be viewed as local residents who should be consulted as a matter of priority?
C5	BRS20_0104_A417_brochure_onlinePDF3 The Design of Cowley Junction Page 12	As a result, we've redesigned the junction to prevent vehicles from accessing Cowley Lane. Access would, however, be retained along Cowley Lane for local properties, as well as for walkers, cyclists and horse riders, including disabled users. Can the ExA be appraised as to how vehicles will be prevented from accessing Cowley Lane, whilst retaining access for local properties?
C6	A417 Missing Link: Report on Public Consultation Table 3.1 Public Events, Page 21	<p>The Planning Act 2008 defines the local community as a definitive consultee, with the onus on the applicant to follow the prescribed process and to instigate meaningful consultation to benefit the project. Furthermore, it is accepted as good practice that the applicant should engage with the community early in the process and be available to engage with them in the most convenient ways to the community in question.</p> <p>The village of Cowley, being the community most affected by the proposed development should clearly have been consulted with in a meaningful way from the outset and the applicant has failed in this duty.</p> <p>A request was made in writing to the applicant on 12th June, 2019 stating that “there is a strong feeling amongst the residents of Cowley that there has been insufficient consultation with the community and respectfully requesting that at least one of the next round of consultation meetings be held in Cowley. This was declined.</p> <p>Can the ExA be appraised as to why this request was declined?</p>
C7		<p>The whole title ‘The Missing Link’ is factually incorrect and totally misleading. Originally, in about 2014, the proposal was referred to as ‘The Missing Loop’ at some point the applicant began to erroneously refer to the proposed scheme as the missing link. This inaccuracy has clearly influenced the fairness of the consultation as “there is no broken chain” in the existing road network, the present A417 runs continuously.</p> <p>Can the ExA be appraised as to why the title was changed, and when?</p>
C8	A417 Missing Link: Report on Public Consultation Table 3.1 Public Events Page 21	<p>At the consultation meeting held at Birdlip church on the 9th of October 2019, it was clear that the applicant’s representatives were unable to answer any questions as to the impact of the proposals on the village of Cowley.</p> <p>At this point the village of Cowley was not even shown on the maps and no one had visited the village to check out the condition of the local roads.</p>

		Can the ExA be appraised as to why this was the case, seeing Cowley is impacted most in a negative manner.
SAFETY ANALYSIS		
REF	Question/ Point	
S1	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Para 2.2.29 Page 32	<p>Missing Link section of road is 31% of total accidents along the length of the A417. (Glos Highways 2016-2020 Collision & Camera Map). National Highways quote that ‘the number of collisions on the Missing Link represent half of the collisions on the whole length of the A417/A419 trunk within Gloucestershire, yet represent less than 20% of its length’. National Highways originally conceived this scheme using data from 1998–2013 which is at best 9 years out of date and at worst 23 years out of date. More relevant and accurate data is available as used in recent material (SAR 2.2.30) but how would a design based on recent infrastructure data and modelling be conceived in the current climate with technological innovations, safety learnings and the climate at the core?</p> <p>Can the ExA be appraised as to why new and relevant traffic data cannot be used to assess the up-to-date impact of the accident rate (not just 2013 – 2018) whilst also including location, climatic conditions and time of day to show a specific pattern of collisions and their severity? This would then also consider advances in automotive safety systems such as autonomous braking, adaptive cruise control which have become common place in the past 23 years.</p> <p>Can the ExA be appraised to ensure that Option 30 is not a scheme outdated by old data, tired thinking nor born out of aged process which bears no relevance in a fragile, environmentally conscious modern era?</p>
S2	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Para 2.2.28 Page 33	<p>In the latest figures published by Gloucestershire Highways (Glos Highways 2016-2020 Collision & Camera Map), the most fatal section of the Missing Link is between Brockworth and Air Balloon Roundabout where 17% of all accidents on the entire length of the A417 occurred. This is also the section of road least touched by Option 12 or Option 30. This is also the only section of the Missing Link with a 70mph limit.</p> <p>Can the ExA be appraised as to whether such a high rate of fatalities on this section of the Missing Link will be mitigated in either Option 12 or Option 30?</p>
S3	TR010056-000608-7.4 Scheme Assessment Report (March 2019) Para 2.2.12 Page 27 Para 2.2.33 Page 34 Fig 2.3 Page 27 EXQ1 1.8.11 Page 49	<p>The flow rate of the A417 is highest between 06.30 and 18.00 (Feb 2016). The number of fatalities that occurred during this peak flow time amount to 2 of the 8 total between 2016 - 2020.</p> <p>75% of total deaths occurred late at night, with 6 of the total deaths on the Missing Link stretch. 25% of the incidents involved a single vehicle.</p> <p>The least fatal section of road where zero fatalities have occurred is from Cowley Roundabout to Stockwell turn including Nettleton Bottom. There’s no coincidence that the speed limit is also 40mph. The single serious accident that occurred on this stretch of road occurred at night and involved a single vehicle. Scheme Assessment Report 2.22.33.</p>

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		<p>Can the ExA be given evidence as to how Option 30 will reduce non-peak flow deaths and single vehicle accidents which have the highest prevalence on the entire Missing Link?</p> <p>Can the ExA be appraised as to how National Highways can substantiate a safer road with a 70mph Option 30 vs 50mph Option 12?</p>
S4	EXQ1 1.10.4 Page 55	The rest of the A417 isn't dual carriageway, Maisemore to Ledbury is a single carriageway.
S5	EXQ1 1.11.15 Page 60	<p>Can the ExA be appraised of where the construction workers car parks will be and where machinery will be stored?</p> <p>Can the ExA also confirm the landowners who will benefit from the construction process/build plan, along with the CPO's for Option 30?</p>
S6	Page 34 2.2.34 & Scheme Assessment Report (March 2019)	<p>The casualty rates on the Missing Link are higher than the national average. National Highways and the media refer to the Missing Link as an accident blackspot. Staunton Cross to Ledbury, a stretch of 8.4 miles on A417 has speed mitigation measures in place including a 50 mph zone and warning signage yet it still accounts for 7% of total accidents on the total 35.8 miles of the A417 in Gloucestershire.</p> <p>Can the ExA be appraised as to why over the past 23 years (1998-2013 figures) National Highways haven't installed any safety signage, accident blackspot signage or made road users aware of the fatalities on the Missing Link?</p> <p>Can the ExA also be appraised as to how, aside from the proposed average speed cameras, the road safety will be signed and deaths mitigated on Option 30?</p>
S7	Page 101 Table 6.1 Scheme Assessment Report (March 2019)	<p>The Heads of the Valleys Road has had its speed limit reduced to 50mph from the proposed 70mph. The Welsh government said the proposed speed limit (of 50mph) was 'in the interest of safety' and to 'reduce the scheme's environmental impact'. It further states that 'traffic flow would be improved, journeys would be faster and safer, and there would be less environmental impact'. BBC News 28/06/2021</p> <p>Can the ExA be appraised as to how a 70mph speed limit will be in the interest of safety when stopping sight distance (SSD) is below the minimum desired, two sequential 510m radius curves are two steps below the desirable minimum and there's reduced visibility on approach to Cowley junction?</p> <p>Can the ExA be appraised as to whether a speed limit of 50mph would improve traffic flow, make journeys faster and safer, and whether there would be less environmental impact in respect of this scheme.</p>
S8	Page 27 Fig 2.3 Scheme Assessment Report (March 2019)	<p>Safe spacing of vehicles is the solution to the Missing Link not speed.</p> <p>A car at 50mph needs less braking distance - 38m than a car at 70mph - 75m, therefore at a lower speed limit more vehicles can be accommodated on the same stretch of road.</p>

		<p>'If people maintain a safe headway, a motorway can carry 15% more vehicles per hour at 40mph than at 70mph. The journeys take longer but the benefit is that more people can travel and still be safe. This is the reason we have variable speed limits on motorways'. Smarter Cambridge Transport, January 2021.</p> <p>Given the peak volume of traffic occurs for up to 4 hours per day on the Missing Link, it would be more realistic to consider a lower speed limit to carry more people at these peak flow times vs developing a new road with a 70mph speed limit that will be underused for 20 hours of the day.</p> <p>The introduction of smart motorways was to manage traffic flow at peak times and to keep motorways moving, safely. Grant Shapps acknowledges that 'to achieve safe roads, technology has to be installed to smooth traffic flow with variable speed limits and messages warning motorists ahead of incidents displayed on electronic signs'. (Smart Motorway Safety, Evidence Stocktake and Action Plan, 2020). Option 30 doesn't include any of this technology.</p> <p>Can the ExA be appraised as to why Option 30 is being pursued, which has a proposed fixed 70mph speed limit, when other infrastructure projects around the country, the M6, M4 and M1 for example are being redesigned to reduce speed or manage speed via Smart technology to improve flow?</p> <p>Can the ExA be appraised as to why peak flow cannot be managed in Option 12 by the proposed 50mph speed limit?</p>
S9	<p>Page 51 Fig 2.6 Scheme Assessment Report (March 2019)</p>	<p>The A417 Missing Link is situated in a dynamic and changeable meteorological location at the top of the Cotswold escarpment with a prevailing South Westerly wind. Weather is a major safety factor on the Missing Link stretch of road and local villagers are more aware than any independent authorities as to the micro-climactic conditions that occur on and around the A417. Fog descends rapidly, as does rain turning to snow as it hits the top of the Cotswold escarpment and drivers are unaware of how severe both these conditions can be.</p> <p>Can the ExA be appraised as to why local meteorological surveys that are not just precipitation as rainfall haven't taken place to assess the impacts of fog, snow, wind and ice? Regional Climate Data from 1981 – 2010 does not consider the extreme weather events that have increased in frequency in the UK in the past 11 years.</p> <p>Can the ExA be appraised as to what safety consideration and mitigation will be put in place to manage the high-speed traffic that meets predictably changeable weather all year round at the proposed 70mph speed limit of Option 30?</p>
S10	<p>Page 103 6.7.1 & Table 6.1 Scheme Assessment Report (March 2019)</p>	<p>It is clear that a driver at 70mph using Option 30 in highly changeable weather conditions will not be as safe as a driver at 50mph using Option 12. Either one of those drivers will have to adjust their driving to suit the conditions when they meet a fog bank at night, when most of the recent (2016-2020) accidents occurred and one will have more time to brake.</p>

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		<p>Option 30's proposed A436 junction with the A417 runs into the main carriageway on the shortest of slip roads at an altitude where fog is prevalent, and conditions are most changeable and where the stopping sight distance is already acknowledged to be below the desired minimum. An HGV building up speed will not have built up enough safe speed prior to joining traffic travelling at 70mph and will inevitably become an obstruction to faster moving traffic.</p> <p>Can the ExA be appraised as to how the A436 slip road solution, a gradient of 8% and multiple roundabouts can be safer for a vehicle joining the A417 than the current Air Balloon roundabout where there have been no fatalities (2016-2020) or Option 12 which is too vague in detail but will have a 50mph speed limit?</p>
S11	<p>Page 103 6.7.1 & Table 6.1 Scheme Assessment Report (March 2019)</p>	<p>Can the ExA be appraised to provide evidence of the traffic flow, volume and category of vehicle travelling from Leckhampton Hill and Seven Springs on the A436 joining the A417 at the Air Balloon roundabout?</p>
S12	<p>TR010056 Doc Ref 7.10 Transport Report (May 2021) Page 5 Para 2.2.2</p>	<p>The last key element of The NPSNN's vision and strategic objectives for the National Networks' is '<i>Networks which join up our communities and link effectively to each other.</i>'</p> <p>Option 30 fails to achieve this for some locals living in the area:</p> <p>The access for Cowley residents to easily travel west or south to Birdlip (its co-parish), Stroud, Painswick, Gloucester (the area's principal hospital and paediatric emergency treatment centre), and the Forest of Dean will be much longer if Option 30 is put in place.</p> <p>The current easiest access is to travel from Cowley village, up the lane to Stockwell, and then turn onto the A417. Or to drive via the lane to Ullenwood or on the A435, and then onto the A436. Option 30 will mean our only access will be to go on the A436, go uphill to the Shab Hill junction and underpass, before we can travel down to Gloucester, or across to Birdlip, Brimscombe etc, and the Stroud Valley villages and towns. Or an alternative route is to travel through Elkstone to get onto the A417 to go west. Both of which will add time and cost to our every-day journeys.</p>
S13	<p>TR010056 Doc Ref 7.10 Transport Report (May 2021) Page 12 Para 3.1.16</p>	<p>It is incorrectly stated that "<i>At the eastern extent of the scheme is Cowley roundabout and this connects the existing A417 and provides access to Cowley, Brimpsfield, Birdlip and other local communities.</i>" This route is NOT a viable or safe route for Cowley villagers, and most locals avoid it: the route from the roundabout to Cowley village is a narrow single-track lane, with very few passing places, with lots of potholes, that is used as a cut through for delivery vans who travel along it at high speed with no regard for walkers, horse riders, wildlife or other drivers. It also has water running down and across it, which freezes over as sheet ice in the winter.</p>
S14	<p>TR010056 Doc Ref 7.10 Transport Report (May 2021) Page 12 Para 3.1.17</p>	<p>This paragraph lists 3 key junctions between Cowley roundabout and Brockworth bypass but fails to include the Stockwell junction which provides essential access to the A417 and other local villagers and towns for Stockwell, Cowley, Colesbourne and Cockleford residents.</p>

Cowley Village – Key Points for Representations to be submitted by the Cowley Parish Council

S15	TR010056 Doc Ref 7.10 Transport Report (May 2021) Page 12 Paras 3.1.16 and 3.1.17	<p>It is clear that there has been inadequate monitoring of, or investigation into, the lanes used around the A417 by local residents and the importance of these routes for those who live along them and use them on a daily basis as their main routes to access major trunk roads and local villages and towns.</p> <p>Option 30 will reduce journeys for others by 3-4 minutes, but for many locals it will increase journey times by longer than this.</p> <p>Can the ExA be provided with confirmation and evidence that Option 30 and Option 12 have been thoroughly, fairly and accurately discussed with all members of Cowley and Coberley villages and that the onus has not been left solely with the local Parish Council to provide the interpretation of the facts?</p>
S16	<p>TR010056 Doc Ref 7.10 Transport Report (May 2021) Page 52 Para 7.3.27</p> <p>TR010056 Doc Ref 7.10 Transport Report (May 2021) Pages 47-48 Tables 7-1, 7-2, 7-3, 7-4</p>	<p>It is questionable whether Option 30 will reduce traffic times significantly enough to stop rat-running through surrounding villages. National Highways have stated that Option 30 will increase traffic on Leckhampton Hill which leads to and from a residential area, 30mph zone, with a local primary school just below the foot of the hill.</p> <p><i>‘The impact of the scheme on local roads is to generally reduce the amount of traffic using these roads. The additional capacity provided on the A417 as a result of the scheme leads to less vehicles using local roads as an alternative route to avoid congestion on the existing A417 and at the Air Balloon roundabout. The exception to this is Leckhampton Hill where traffic increases as a result of the scheme.’</i></p> <p>TR010056 Tables 7-1, 7-2, 7-3, 7-4 demonstrates journey times savings of 3-4 minutes. In some instance there seem to be no time savings at all. Highways England report current delays of 20-mins, but if using the new A417 doesn’t save any time, or saves a maximum of 4-minutes. It seems that Option 30 will do little to decrease rat-running in most local villages, on lanes that are not built to safely accommodate high volumes or fast traffic.</p> <p>Can the ExA be appraised as to what will be done to prevent existing rat-runners from continuing to use the lanes around Cowley and Elkstone to access the A417 to travel south/east, or to come off the A417 to travel north and west?</p>
S17	Rat-Running Impact of Potential Accidents at Shab Hill junction	<p>If the south bound Shab Hill junction does become an accident hot-spot it is likely that the accidents will block this junction for southbound traffic. There is concern that drivers will use unsuitable local roads to circumvent the traffic jams and that they will, once again, use the narrow lanes around Coberley and Cowley, and onto the wider lanes at Elkstone, to cut through and access the A417 at the Elkstone junction.</p> <p>Can the ExA be provided with modelling that reflects blockages at each junction and how the flow of traffic will disperse into local villages or how the new design will accommodate traffic relief in the case of accidents and what mitigation will be put in place?</p>
S18	Safety During the Construction Phase and Prevention of Rat Running	Can the ExA be appraised as to what safety measures will be put in place during the construction phase to avoid rat-running through village lanes during the inevitable delays to traffic using the A417.

Cowley Village – Key Points for Representations to be submitted by the Cowley Parish Council

S19	Making the Access to Cowley from Cowley Roundabout for walkers, etc and local residents only.	It is unclear how this will be made into access for residents only. As detailed above, it is used as a rat run particularly for delivery drivers. Can the ExA be appraised as to how this will be stopped, and how access will be granted to locals only?
S20	TR010056-000602-7.9 Technical Appraisal Report (February 2018) Page 44 Para 3.8	At a presentation by The Highways Agency on 9th December 2021, Highways England commented upon how it was well known that the area of the proposed new road experienced a “volatile micro climate”. Can the ExA be appraised as to how this “volatile micro climate” is being addressed in the overall design, especially as a “volatile micro climate” is unlikely to be represented in regional weather data. In addition can the ExA be appraised as to the suitability of increasing the speed limit on this stretch of road, when Highways England refer to the “volatile micro climate” in this area.

ENVIRONMENT		
REF	Question/ Point	
E1	ExQ1 there are 42 points under 1.3	<p>Promised “new” Hectares of grassland</p> <p>It is very unclear where these hectares are coming from and who is to look after them and own them. It would appear that highways are referring to the edges of the carriageway of option 30 as these “new” hectares. If this is the case then they are far from new grassland as most of the Option 30 route cuts through permanent virgin grasslands and not farmland and so the route would lead to a massive net loss of grassland in the area. The ‘new’ grassland would not be commensurate with the old as it would suffer from the initial disturbance of all plants and fauna as work was carried out and the carriageways themselves would eat up many acres of the permanent grassland. Into the future, light, noise and fumes pollution would all affect the quality of the road edge pasture which is not conducive to wildlife and because of fencing for safety would be inaccessible by many species. This is a far cry from the undisturbed pastures that already exist.</p> <p>COP26 Has given us a deadline of 2030 to significantly reduce our carbon emissions. All proposed “greening” of option 30 will take 10 to 20 years to establish the sequestration of carbon from established trees, hedges and permanent grassland. This takes us well beyond 2030.</p> <p>Option 12 leaves Stockwell Farm largely intact and leaves approximately 3,300 tons of carbon currently sequestered in the permanent pasture.</p> <p>Option 12 however does pass through a small amount of grasslands but then skirts the edge of farm land and the new carriageway would encroach onto the farmland and render the road edges as new grassland. Thus adding to the gain of grassland in the area and more importantly leaving the original virgin permanent grassland unaffected by the development. This would in turn be better for wildlife and the carbon sequestration of the grasslands would be kept intact and not lost.</p> <p>Island</p> <p>Option 30 effectively creates a farming island between the escarpment edge with the proposed footpath/bridleway/cycleway on the existing road route and the option 30 carriageway itself. The safety fencing of the carriageway construction will stop</p>

	<p>wildlife from entering and exiting freely from/to an area they are already occupying. All the proposed amenity development for walkers horses are good in theory but endangered birds reptiles and plants require peace and quite and isolation to thrive. The spread of the proposal over a larger land area will have a huge adverse effect.</p> <p>Option 12 because the route follows existing roadways and its close proximity to the escarpment and the close proximity of the upgraded footpaths etc means the footprint of the landscape and therefor its impact on the natural world will be drastically smaller. It will indeed preserve the grasslands to the east of its path and not create an island inaccessible to a diverse se- lection of species.</p> <p>Translocation of species</p> <p>The arguments for and against dislocating and then relocating wild animals have not reached a provable conclusion scientifically and research is still ongoing. It cannot be shown clearly that the objectives of translocating species and then returning them are achievable. Wildlife left alone undisturbed fares far better than wildlife impacted by development. In fact certain species such as dormice are extremely difficult to move successfully. In this area from the national Biodiversity Network we see there are 15 species of bats including the rare Brandt Bat (3) and Great Horse Shoe Bat (96) which is endangered. The NBN atlas shows there are 3270 different species, flora and fauna in the area.</p> <p>Where are all the biodiversity surveys and their findings for Bats, Owls, Dormice, European water voles, bank voles, pole cats, greater crested newts, hedgehogs, Hares etc etc. ? All of which are on the Biodiversity survey.</p>
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