

To follow are my questions relating to the proposed route of Option 30, particularly when compared to widening the existing A417 (Option 12).

***A417 Missing Link: Report on Public Consultation Table 3.1 Public Events
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At the consultation meeting at Birdlip Church (9/10/2019), the applicant's representatives were unable to answer questions regarding the impact of the proposals on the village of Cowley. At this point Cowley was not even shown on the maps and no one had visited the village to ascertain the condition of the local lanes.

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.

The village of Cowley, being the community most affected by the proposed development should have been consulted with in a meaningful way from the outset. 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 requested that at least one of the next round of consultation meetings be held in Cowley. This was declined. The applicant has failed in its duty towards Cowley.

QUESTIONS: Can the ExA be appraised as to why

- Cowley was not on the maps and no one had assessed the lanes, bearing in mind the significant negative outcome on Cowley?
- Requests for consultations in Cowley were declined?

***A417 Missing Link: Report on Public Consultation Table 3.1 Public Events
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Table 3.1 lists the venues used for the public consultations. Two villages are most impacted by the development – Birdlip in a positive way, and Cowley in a negative way.

QUESTIONS: Can the ExA be appraised as to

- why Cowley was not considered to 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?
- 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?

**TR010056-000608-7.4 Scheme Assessment Report (March 2019) Figure 6.2
Page 9**

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.

QUESTION: 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?

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.

QUESTION : 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?

Furthermore, 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.

QUESTION : 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?

**BRS20_0104_A417_brochure_onlinePDF 3 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"

QUESTION : Can the ExA be appraised as to how vehicles will be prevented from accessing Cowley Lane, whilst retaining access for local properties?

Page 101 Table 6.1 Scheme Assessment Report (March 2019)

The Heads of the Valleys Road speed limit has been reduced to 50mph from the proposed 70mph. The Welsh government said this 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

QUESTION : 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, as well as the unpredictable adverse weather conditions on the proposed route?
- 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?

Page 27 Fig 2.3 Scheme Assessment Report (March 2019)

It is considered by some that safe vehicle spacing is the solution to the Missing Link not speed. For example, 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.

'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.

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 during non-peak hours.

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.

QUESTIONS: 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?
- peak flow cannot be managed in Option 12 by the proposed 50mph speed limit?