

A417 Missing Link DCO

Response to First Written Questions

Gloucestershire County Council, Cotswold District Council,
Tewkesbury Borough Council

14 December 2021



Notice

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Document history

Document title: Response to First Written Questions

Document reference: A417ML.ExQ1

Revision	Purpose description	Date
1.0	Deadline 1 Submission	14/12/2021

Client signoff

Client	Gloucestershire County Council, Cotswold District Council, Tewkesbury Borough Council
Project	A417 Missing Link DCO
Job number	5206450
Client signature/date	

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1. Introduction

- 1.1.1. Gloucestershire County Council (GCC), Cotswold District Council (CDC), and Tewkesbury Borough Council (TBC) 'the Joint Councils' are the three host authorities for the National Highways' (NH) A417 Missing Link DCO Scheme 'the Scheme'.
- 1.1.2. This document is the Joint Councils Response to the Examining Authority's first written questions, submitted at Deadline 1 of the examination.

Table 1-1 - The Joint Councils response to Examining Authority's first written questions

ExA WQ1 ref	Question to:	Question	Joint Councils Response
1.1 - Miscellaneous and General			
1.1.2.	GCC, TBC, CDC	<p>NPSNN</p> <p>a) Do you agree with the Applicant's assessment of the Proposed Development's performance against the strategic objectives of the National Policy Statement for National Networks (NPSNN)?</p> <p>b) If not, where do you consider the Proposed Development would conflict with the NPSNN?</p> <p>c) Provide a high-level summary of the Council's position with regards to the three tests set out in paragraph 5.151 of the National Policy Statement for National Networks (if not forming a part of the Local Impact Report).</p>	<p>a) The Joint Councils consider Table 3-3 of the Case for the Scheme [APP-417] demonstrates conformity with that the strategic objectives of the National Policy Statement for National Networks (NPSNN).</p> <p>b) No response.</p> <p>c) The Examining Authority (ExA) is directed to the Joint Councils' response to Question 1.8.8.</p>
1.1.3	GCC, TBC, CDC	<p>Development Plan</p> <p>Could each of the local planning authorities please provide comments and any updates in relation to the Applicant's summary of the Development Plan position, including any emerging plans and plan documents set out in section 12 of the 'Case for the Scheme' [APP-417]?</p>	<p>Cotswold District Council (CDC)</p> <p>Cotswold District Development Plan is made up of the CDC Local Plan, GCC Waste Core Strategy and GCC Minerals Plan.</p> <p>The District Council has resolved to partially update the Local Plan to respond to the climate and ecological emergencies, as well as other matters including the requirement to respond to increased housing needs. A six-week regulation 18 consultation will start in January 2022. Adoption of the updated plan is expected in Autumn 2023.</p> <p>CDC is in the process of updating its Green Infrastructure Strategy which will inform the plan making and decision taking processes. Although not an SPD it will become an adopted District Council strategy and will be of relevance to the Scheme. Adoption of the Strategy is expected in April 2022.</p> <p>CDC is not aware of any works towards the preparation of Neighbourhood Plans in any of the parishes directly affected by the Scheme.</p> <p>Tewkesbury Borough Council (TBC)</p> <p>The development plan for Tewkesbury Borough comprises the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031 (JCS), adopted in 2017. The JCS is in the early stages of review and the timetable is in preparation.</p> <p>The Tewkesbury Borough Plan Main Modifications version was published for consultation in November 2021. It is anticipated that it will be adopted in Spring 2022.</p> <p>TBC is not aware of any works towards the preparation of Neighbourhood Plans in the parishes directly affected by the Scheme.</p> <p>Gloucestershire County Council (GCC)</p> <p>The local development plan for minerals and waste matters throughout Gloucestershire comprises of the Minerals Local Plan for Gloucestershire (2018 – 2032) (adopted March 2020), the Gloucestershire Waste Core Strategy (2012 – 2027) (adopted November 2012) and the saved policies of the Gloucestershire Waste Local Plan (2002 - 2012) (adopted October 2004).</p> <p>The Waste Local Plan for Gloucestershire is in the early stages of preparation, with Regulation 18 consultations planned for late 2022 / early 2023.</p> <p>The Local Transport Plan 2020 – 2041 was recently approved by GCC. Although not a Development Plan, the Local Transport Plan is a statutory document which is a material consideration for the Scheme. It contains relevant policies relating to highway safety and promotion of walking and cycling travel modes.</p>
1.1.4	GCC, TBC, CDC	<p>Infrastructure Delivery Plans</p> <p>In paragraph 13.1.33 of the Case for the Scheme [APP-417], there is reference to the Proposed Development being within three Infrastructure Delivery Plans. Have CIL receipts already been received and specifically set aside for the project?</p>	<p>Gloucestershire County Council</p> <p>GCC is not a CIL charging authority and does not have a CIL charging schedule. Paragraph 13.1.33 of the Case for the Scheme [APP-417] refers to the GCC Infrastructure Delivery Plan.</p>

ExA WQ1 ref	Question to:	Question	Joint Councils Response
			<p>Cotswold District Council</p> <p>No CIL receipts have been set aside for the Scheme. At CDC, CIL receipts are pooled into a strategic fund which is intended to fund critical and essential infrastructure identified in the Local Plan. As the A417 Missing Link is a national infrastructure item, the Local Plan's Development Strategy is not predicated on the Scheme.</p> <p>With a funding gap of over £10 million (after deducting CIL income) and a very high demand on the strategic fund, it is unlikely that CIL receipts collected in Cotswold District would be made available for the Scheme.</p> <p>Tewkesbury Borough Council</p> <p>No CIL receipts have been set aside for the Scheme, as it is not included on the 'Infrastructure List' published in the 2020 Infrastructure Funding Statement, prepared by TBC and the other the Joint Core Strategy (JCS) partners (Gloucester City Council and Cheltenham Borough Council) There is no intention that the Scheme would be funded by CIL by the JCS Authorities.</p>
1.1.5	GCC, TBC, CDC	<p>Planning Permissions</p> <p>With reference to paragraph 4.3.4 of the Statement of Reasons [APP-024] and Table 15-7 in ES Chapter 15 [APP-046], could each of the local planning authorities update as to whether any new planning permissions have been granted or existing permissions/ allocations progressed within the Order limits and within 500m of the Order limits since the DCO application was submitted?</p>	<p>The DCO application was submitted to Planning Inspectorate on 31 May 2021. Since then, a number minor householder planning permissions have been granted within 500m of the Order limits.</p> <p>Paragraph 4.3.4 of the Statement of Reasons [APP-024] relates to new residential developments. Table 15-7 of ES Chapter 15 [APP-046] lists the shortlist of projects with potential have potential for cumulative effects with the Scheme.</p> <p>On review of the recent planning permissions within 500m of the Scheme, all are minor householder permissions related to existing properties and none are of a nature to be relevant to paragraph 4.3.4 of the Statement of Reasons nor of a scale to be relevant to Table 15-7 of ES Chapter 15.</p>
1.1.11	GCC, TBC, CDC	<p>Environmental Statement Methodology</p> <p>Are there any concerns about the approach to EIA or the EIA methodology, with particular reference to paragraph 4.5.18 of ES Chapter 4 [APP-035]?</p>	<p>The Joint Councils are generally satisfied with the approach to EIA and the EIA methodology that is outlined within the Environmental Statement (ES).</p> <p>With regard to paragraph 4.5.18 of ES Chapter 4 [APP-035], the Joint Councils are satisfied with the assessment of impacts and significant effects in the air quality and noise and vibration chapters and that they have followed the relevant DMRB guidance.</p> <p>The Joint Councils do have some concerns about the approach to the EIA/ EIA methodology for the following environmental topics:</p> <p>Cultural Heritage – as outlined in the Joint Councils Statement of Common Ground (SoCG) with National Highways (NH) (ref 6.1 and 6.2 in Table 5.1, contained within Appendix A of the Statement of Commonality [APP-419]), the Joint Councils are concerned about the methodology as the assessment fails to be driven by a landscape-led approach, utilising broad brush Historic Landscape Character (HLC) when a much more holistic understanding of how landscape has developed over time is required and that trenching and associated geoarchaeological prospection and deposit modelling for Scheme remain inadequate in terms of both coverage and methodology.</p> <p>Climate - as outlined in the Joint Councils SoCG (ref 14.1 in Table 5.1 [APP-419]), the Joint Councils are concerned that the methodology does not include an assessment of energy consumption for maintenance of infrastructure during operation which is a requirement of DMRB LA 114.</p> <p>Materials and Waste – as outlined in the updated revised SoCG submitted at Deadline 1, the Joint Councils are concerned that the assessment gives a misleading impression of the quantities of waste arising from the Scheme that may require disposal to landfill (information which is required under section 3.12 of DMRB LA 110).</p>
1.1.19	GCC, TBC, CDC	<p>Community Engagement</p> <p>The ExA is concerned that the EMP, and REAC, [APP-317] do not provide adequate and clear instructions on how the Applicant intends to liaise with the local community during construction. This comment is based on the Applicant's approach to community engagement during construction of the Proposed Development, should the SoS decide to make the Order, and whether this is adequately secured in the draft DCO.</p>	<p>The Joint Councils note that the EMP [APP-317] refers to a Contractor Community Relations Manager (Table 2-1, EMP) who will be responsible for communications with the public, non-agricultural landowners, stakeholders and other interested parties, outreach and education during construction. There is no detail as to the methodology for carrying out the engagement with the public. For example, there is no reference to a Community Engagement Plan that would outline the communication methods and approach. The Joint Councils would expect, prior to commencement of any works, to be consulted on a Community Engagement Plan that would then be approved by the SoS and this would set out in more detail than what is provided in the EMP and REAC.</p>
1.1.21	GCC, TBC, CDC	<p>Management Plans</p> <p>a) Are the respective Councils content with their roles and responsibilities in reviewing management plans produced under the umbrella of the EMP? b) If not, why not?</p>	<p>The Joint Councils note a series of management plans are identified in Requirement 3 of the dDCO [APP-022] and the process on which the Joint Councils are consulted on this and other Requirements is set out in Requirement 4. This process is generally acceptable to the Joint Councils with the following clarifications.</p> <p>The Joint Councils would question why the process for consultation is set out in Requirement 4 rather than in Schedule 2; Part 2 of the dDCO – Procedures to Discharge Development.</p> <p>No statutory period for consultation with the Joint Councils is identified in Requirement 4 or Part 2 of the dDCO. The Joint Councils would expect to see a minimum of 21 days of consultation with a mechanism for extending this period if further issues are raised or the full information to be submitted to the Secretary of State is not made available to the Joint Councils.</p>

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			<p>The Joint Councils would also expect to see a Community Engagement Plan on the list of Management Plans to be consulted on and discharged by the Secretary of State (see Question 1.1.19).</p> <p>There is no mechanism for recouping costs related to reviewing and advising on the discharge of Requirements; or any monitoring required to be undertaken by the Joint Councils set out in the dDCO. The Joint Councils would expect a service level agreement to be set out in the dDCO or a mechanism for agreeing such agreement.</p>
1.1.25	Applicant, GCC	<p>Legal Agreement</p> <p>With regards to measure PH3 in the EMP [APP-317], what progress has been made on any legal agreement between the parties and will a completed obligation be presented to the ExA before the close of the Examination?</p>	<p>PH3 in the EMP [APP-317] is concerned with the provision of additional signage for businesses in operation i.e. signage off the trunk road once the Scheme is complete (also known as Brown Signs). This is a signage strategy and detailed design function for NH who should engage with any affected businesses (for example, the Golden Heart Pub) to agree what signage is needed and who will pay for it. These discussions do not need to involve GCC and therefore, GCC believe that there is no requirement for National Highways to enter into a legal agreement with GCC.</p>
1.1.29	Applicant, CDC, CCB	<p>Cotswold National Park</p> <p>A few relevant representations have raised the prospect of the creation of the Cotswold National Park. Provide any information on any intentions or workings undertaken on any such creation to date and what, if any, the implications of the Proposed Development would have on achieving any National Park status.</p>	<p>CDC has not undertaken any workings towards changing the designation of the Area of Outstanding Natural Beauty (AONB) to a National Park and is not aware of any plans in place to do so by others.</p> <p>The possibility of creating a Cotswolds National Park has been under discussion for many years. It was identified in the Glover report published in September 2019 and can be found online: https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review.</p> <p>Although this question is not directed at GCC, GCC notes that none of the democratic bodies in Gloucestershire have come out in support of a National Park and the Government has not issued any decision to progress a change to the AONB.</p> <p>GCC has written to Natural England and Ministers in response to the Glover Report, to oppose the notion of a National Park designation for the Cotswolds on the basis that:</p> <p>A National Park designation would greatly restrict the ability of CDC and GCC to pursue its economic and wider social priorities, and the Council would lose a raft of planning powers to a largely appointed body.</p> <p>There is already a housing affordability crisis in the Cotswolds and a National Park designation could further exacerbate this as there is often a 'price premium' applied to National Park area designation. A National Park designation would reduce democratic accountability across significant parts of Cotswold and Stroud districts, as well as parts of Tewkesbury and Cheltenham.</p>
1.2 - Air Quality and Emissions			
1.2.4	GCC, TBC, CDC	<p>Air Quality Management Areas (AQMAs)</p> <p>a) Are the Applicant's identification and description of AQMAs within the Order limits correct and representative of the challenges faced in the respective AQMA?</p> <p>b) Do concerns remain about the prospect of the objectives within the AQMAs being prejudiced by the Proposed Development and, if so, what reassurances are required?</p>	<p>a) Yes, NH has correctly identified that within the Order limits, there is one AQMA, the Birdlip AQMA, declared by CDC for exceedances of the national annual mean nitrogen dioxide (NO₂) objective at the Air Balloon Roundabout.</p> <p>However, outside of the Order limits, but within the air quality study area, there is an additional AQMA, the Cheltenham AQMA, which is not correctly described in the air quality chapter of the ES [APP-036]. Cheltenham Borough Council revised this AQMA in 2020 from covering the whole borough to covering a limited number of properties in the town centre due to a general reduction in pollutant concentrations.</p> <p>b) It is accepted that the Scheme should reduce annual mean NO₂ concentrations within the Birdlip AQMA as a result of the relocation of the road. It is however, recommended that monitoring should be continued at this location once the Scheme is operational to ensure concentrations will actually reduce below the national objective with the Scheme and allow a revocation of the AQMA.</p>
1.2.10	GCC, TBC, CDC	<p>Mitigation</p> <p>a) Do you agree with the Applicant's position that any adverse impacts would be reduced to a negligible level by virtue of mitigation in the Environmental Management Plan?</p> <p>b) If not, why not and what level of impact would be experienced?</p>	<p>a) Yes, the Joint Councils accept that adverse impacts from construction dust would be reduced provided that appropriate mitigation measures are in place and are secured in an EMP. The measures currently within the EMP [APP-317] appear appropriate, although we would suggest that point AQ3 is strengthened to ensure all temporary roads are hard surfaced. We do not however agree that the impacts from construction traffic would be negligible, as discussed in the response to written question 1.2.11 (below).</p> <p>b) No response required.</p>
1.2.11	Applicant, GCC, TBC, CDC	<p>Mitigation</p> <p>a) Whilst paragraph 5.10.12 of ES Chapter 5 [APP-036] predicts no new exceedances of annual mean NO₂, receptors 50 and 51 would see a 0.5yg/m³ increase on top of the existing exceedance of 43.7yg/m³. What bespoke mitigation measures could be implemented to reduce the worsening of air quality for these residents?</p>	<p>a) The increase in annual mean NO₂ concentrations at receptors 50 and 51 during construction is expected to arise as a result of the increase in HGVs along the A417. The Joint Councils would welcome additional mitigation measures to reduce emissions in this area. These could include such measures as traffic management measures to reduce flows along this section at peak periods, or to reduce queuing outside Air Balloon Cottages.</p>

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		b) For what duration is construction predicted in the locality of these receptors?	b) This question is best answered by NH, although the Joint Councils understand that the duration of works is expected to be at least 33 months (see para 2.9.20 of chapter 2 of the ES [APP-033]).
1.3 - Biodiversity, Ecology and Natural Environment			
1.3.1.	Applicant, GCC	<p>Biodiversity Metric</p> <p>The ExA cannot locate a figure or appendix setting out the Applicant's assessment against the Biodiversity Metric 2.0 calculations. In this regard, can the Applicant:</p> <p>a) Present the calculation in full and set out the results (or direct the ExA to where the calculation exists).</p> <p>b) Detail how the results have influenced the approach to biodiversity net gain and mitigation.</p> <p>c) What effect, if any, would the re-purposing of the car park at the Barrow Wake viewpoint have on the Biodiversity Metric 2.0 calculations and, as a result, would that justify compulsory acquisition of the car park or would CA be necessary if retained by GCC and alternative management secured?</p> <p>d) Natural England released Biodiversity Metric 3.0 on 7 July 2021. Explain whether or not a calculation using this new metric should (or should not) be provided for this DCO application and, if so, how the Proposed Development performs against it.</p>	<p>a) GCC interprets this question as being directed to NH and has no specific response.</p> <p>b) GCC interprets this question as being directed to NH and has no specific response.</p> <p>c) GCC interprets the first part of the question (effects on any changes on Biodiversity Metric) to be as being directed to NH and has no specific response. For the second part of this question GCC directs the ExA to the GCC response to written question 1.3.14 (below).</p> <p>d) GCC believes it is for NH or ExA to decide which version of Biodiversity Metric (if any) to use and notes the statement on Natural England's website which indicates - Users of the previous Biodiversity Metric 2.0 should continue to use that metric (unless requested to do otherwise by their client or consenting body) for the duration of the project it is being used for as they may find that the biodiversity unit values metric 2.0 generates will differ from those generated by Biodiversity Metric 3.0 [http://publications.naturalengland.org.uk/publication/6049804846366720]. GCC would however encourage the use of the more recent and therefore most current Metric where possible. Whichever Metric is used (if any), GCC would encourage NH and the ExA to consider the key importance of calcareous grassland to the area and ensure that it is adequately valued in any calculations and to consider whether the steep topography in parts of the DCO boundary is adequately considered (taking note of that steep faces may be under counted in 2D plan view).</p>
1.3.14.	Applicant, Natural England, GCC, TBC, CDC and CCB	<p>Barrow Wake Car Park</p> <p>What would be the effects of closing the Barrow Wake car park, taking into account the need to manage recreational pressure within the Crickley Hill and Barrow Wake SSSI and for recreational use in the area generally?</p>	<p>The Joint Councils advise the ExA that the Barrow Wake car park should not form part of the DCO.</p> <p>As set out in the SoCG Matter Agreed 21.1 [APP-419], NH and the Joint Councils agree that suggestions made during public consultation to reduce, remove or relocate the Barrow Wake car park will be considered outside of the scope of the Scheme.</p> <p>The Joint Councils recognise that there is an opportunity at Barrow Wake car park to make potential changes that could support Biodiversity Net Gain in the area and address anti-social behaviour within the car park. The Joint Councils also recognise that there needs to be a thorough investigation of the pros and cons of any changes at the car park, which is why GCC is leading the Barrow Wake car park study. The study, which will investigate all options for the car park, has commenced but is unlikely to conclude during Examination if there is a need for public consultation.</p> <p>The Joint Councils will work with the local stakeholders including NH. NH has made a commitment through the SoCG with the Joint Councils to ensure the design of the Scheme is able to accommodate the existing car park arrangement and a future scenario where the car park is reduced or removed.</p>
1.4 - Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations			
1.4.22	Environment Agency, Natural England, GCC, CDC, TBC	<p>Other Consents</p> <p>The ES notes that the contractor appointed to undertake the construction works would need to apply for various environmental permits, discharge and other consents once detailed design is complete. Given that such applications have not been made, the Examining Authority and Secretary of State cannot be sure from the information provided if adequate avoidance or mitigation of environmental effects are possible, and therefore if all of these consents are achievable. Could the Environment Agency and the relevant local authorities with responsibilities in this area please provide an opinion on the likelihood of all such permits and consents being achieved?</p>	<p>In relation to the other consents that the Joint Councils are the relevant authority for, as listed below, it is considered that consents and permits could realistically be achieved. Although it must be noted that at Deadline 1 the Joint Councils do not have a clear picture of all of the consents that will be required to construct the Scheme:</p> <p>Demolition – Section 80 notice under the Building Act 1984</p> <p>Trade Effluent Consent - under the Water Industry Act 1991</p> <p>Section 61 Agreements – under Section 61 of the Control of Pollution Act 1974</p> <p>Land Drainage Consent – Section 23 of The Land Drainage Act 1991</p> <p>Throughout the pre-application stage the Joint Councils have been in discussions with NH about watercourse designs and the details have been agreed informally. Agreement of Land Drainage Consents is considered to be a formality, provided that the information submitted by NH to support applications for Land Drainage Consent reflect the details agreed informally already.</p> <p>It should be noted however, that NH seeks to disapply Land Drainage Consent in the Order. The Joint Councils consider this is not acceptable because details and drawings of the watercourse designs are not included in the application and there are no means of securing the informally agreed design in the Order. Further details are provided on this in the Joint Councils Written Representation submitted at Deadline 1.</p>
1.5 - DCO			
1.5.3	Applicant, Natural England, GCC, TBC,	Interpretation	a) The Joint Councils have raised concerns about the adequacy of archaeological investigations carried out thus far and consider that a significant program of investigation is still required prior to construction commencing. Given the need to carry this investigation out without delay to construction it is accepted that archaeological investigations should be excluded from the definition of 'commence' in the DCO. However, this would require that

ExA WQ1 ref	Question to:	Question	Joint Councils Response
	CDC and CCB	<p>a) Is the definition of 'commence' within the dDCO, including those elements that are excluded from that description, acceptable to the Local Planning Authorities?</p> <p>b) Similarly, is the definition of 'maintain' acceptable to the appropriate Authorities?</p> <p>c) In both cases, if not, why not?</p> <p>d) Is the Applicant satisfied that the definition of 'maintain' is consistent with other Development Consent orders?</p>	<p>the detail in the Detailed Archaeological Mitigation Strategy and Overarching Written Schemes of Investigation must be confirmed in the design-stage EMP [APP-317] to ensure it is appropriately secured in time for investigations to commence.</p> <p>b) The Joint Councils recognise that this is a standard approach for NH made DCOs and accept that it is appropriate.</p> <p>c) No response required.</p> <p>d) No response required.</p>
1.5.5	Environment Agency, Natural England, GCC, CDC, TBC	<p>Article 3</p> <p>a) Confirm whether consent has been given in accordance with section 150 of the PA2008 for the disapplication of the consent provisions in 3(a),(b),(c), (d),(i)?</p> <p>b) If not, which provisions need to be removed and why?</p>	<p>a) See response above in question 1.4.22 with regard to the disapplication of Land Drainage Act consents.</p> <p>b) Discussions are ongoing with NH. It may become necessary to remove provision for the disapplication of Land Drainage Act consents or for the parties to agree Protective Provisions (in the Explanatory Memorandum for the justification of Article 3, the Applicant has stated that it is discussing the need for protective provisions with the relevant regulators, but these discussions have not yet taken place with the Joint Councils.</p>
1.5.15	Applicant, GCC, TBC, CDC, CCB	<p>Articles 15, 19, 21, 23 – Deemed Consent</p> <p>There are a number of articles which contain deemed consent provisions, i.e. if the consenting authority does not respond within a certain time consent is deemed to be granted. Are the consenting departments happy with these provisions and the timescales set out?</p>	<p>The provision for deemed consent should be removed from Articles 15 and 19. The arrangements in relation to Article 15 and 19 have not been discussed with the Joint Councils. The Joint Councils would expect that NH will discuss and agree the details with the relevant departments within GCC prior to submitting applications or requests under Article 15 and 19.</p>
1.5.36	GCC, TBC, CDC, CCB	<p>Requirement 3</p> <p>Are there any concerns regarding the ability of the Applicant to undertake potential noise generating activity outside of normal working hours, as listed in Requirement 3(2)(d)?</p>	<p>With respect to noise, there are no concerns regarding the ability of NH to undertake works outside of normal working hours.</p> <p>NH has limited the evening, night time and weekend works to those that cannot be carried out during normal working hours. In addition, the EMP [APP-317] will include measures to reduce the potential for significant adverse noise effects where possible, and be prepared in consultation with relevant planning authority and the local highway authority.</p>
1.5.48	Applicant, GCC, TBC, CDC	<p>Explanatory Memorandum [APP-023]</p> <p>With regards to the justification of Article 5(2) given in the Explanatory Memorandum, are there any known local acts or legislative provisions that may be implicated by the Proposed Development?</p>	<p>The Joint Councils can confirm that to the best of their knowledge, there is no other legislation that may affect land in the proximity of the Scheme.</p>

1.7 – Heritage

1.7.9	Historic England, Conservation Officers/ County Archaeologist in GCC, TBC, CDC	<p>Impacts on Heritage Assets</p> <p>a) Do you agree with the summaries contained in Tables 6-6 and 6-8 of ES Chapter 6 [APP-037]?</p> <p>b) Are there any specific entries into that table where either the setting, the nature of the impact, magnitude of impact or significance of effect are disputed?</p> <p>c) If so, which entries and why?</p>	<p>a) The Joint Council have identified no issues in Table 6-6 of ES Chapter 6 [APP-037] with possible exception of Leckhampton hillfort, which has long, open (albeit relatively long) view towards and along the Scheme as it climbs Shab Hill. Further understanding of detailed design of the cutting and junction in this location will be required. No issues have been identified in Table 6-8, although it could do with updating to reflect results of the archaeological evaluation which identified further non-designated archaeological remains.</p> <p>b) & c) See concerns regarding Leckhampton hillfort scheduled monument at part a) above.</p>
1.7.13.	- GCC	<p>Archaeological Works</p> <p>What is the County Archaeologist's view on the findings on the construction impacts and effects on known archaeological assets set out in Chapter 6 of the ES [APP037]?</p>	<p>The scale and methodology of the assessment and evaluation techniques used to inform the ES [APP-037] is inadequate to properly identify potential, character and significance of the archaeological resource across the Scheme.</p> <p>The definition of 'commence' in the dDCO [APP-022] excludes archaeological investigations. As such the Detailed Archaeological Mitigation Strategy and Overarching Written Schemes of Investigation secured under Requirement 3 would not have been agreed and discharged in advance of the investigations commencing.</p> <p>As such, the design-stage EMP will need to provide certainty that adequate additional assessment and evaluation work is undertaken to inform any final archaeological mitigation design for the Scheme. This will need to be undertaken well ahead of construction commencing in order to fit the archaeological mitigation programme. The final archaeological mitigation design must then be further developed to appropriately and proportionately deliver a targeted, research and landscape led approach to the archaeological potential along the Scheme during examination.</p>

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			Not to do so will introduce considerable uncertainty and a very real risk of unexpected and potentially important archaeological discoveries during construction impacting significantly on programme and budget. Currently proposed timescales for archaeological mitigation are also based on a limited understanding of the resource and therefore may prove inadequate.
1.8 Landscape and Visual			
1.8.7.	GCC, TBC, CDC, CCB	Landscape Mitigation a) Does the Applicant's landscape-led approach go far enough to secure adequate mitigation for the Proposed Development? b) If not, which aspects of the proposed landscaping mitigation are deemed insufficient or requiring work and why?	<p>a) The Joint Councils consider that NH's landscape-led approach does broadly provide adequate mitigation for the adverse effects of the Scheme on the majority of environmental aspects affected.</p> <p>b) The Joint Councils do however have some concerns with the methodology for assessment of historic landscape (outlined within Chapter 6 of the ES [APP-037]) as the assessment fails entirely to be driven by a landscape led approach utilising broad brush HLC. The assessment needed to drill down more holistically and in much finer detail to get to grips with how that landscape has developed over time and whether 'hidden' historic features can be drawn back out and integrated into the proposed landscape design.</p> <p>The Joint Councils also consider that some of the proposed ponds (as shown on the Environmental Masterplan, Figure 7.11 sheets 1-25 [APP-166-APP-192]) could be better integrated into the landscape with a less engineered shape and that more existing vegetation could be retained, limiting the loss of existing vegetation to that necessary.</p> <p>The Joint Councils believe that written approval of the detailed design proposals for the Environmental Mitigation/Landscape Design and of the external appearances of the Cotswold Way National Trail and Gloucestershire Way bridges over the A417 should be secured via a DCO requirement following consultation with the relevant local authorities.</p>
1.8.8.	National Trust, Natural England, GCC, TBC, CDC, CCB	Compliance with NPSNN Notwithstanding any disputes over landscaping and the effectiveness thereof, what are the parties' views of how the Proposed Development complies with the National Policy Statement for National Networks specifically in regard to development within an AONB?	<p>The Joint Councils consider that the assessment of the Scheme against the NPSNN policy tests for developments in AONBs, as set out in Chapter 7 of the Case for the Scheme [APP-417], is fair, thorough and demonstrates compliance.</p> <p>With regard to paragraph 5.151 of the NPSNN, the Joint Councils consider that the Scheme meets the exceptional circumstances required for development in the AONB:</p> <p>Need - The local and national need for the Scheme is well established, justified by its inclusion by Department for Transport in the Road Investment Strategy (2020-2025). Section 7.3 of the Case for the Scheme [APP-417] describes the needs case well.</p> <p>Alternatives - Extensive work by NH throughout the past 20 years has demonstrated that there is no reasonable alternative transport modes or road alignments that could avoid the AONB while also addressing the road safety issues and congestion on this section of the network. Chapter 3 of the ES [APP-034] describes the alternatives.</p> <p>Detrimental effect on the environment - Significant adverse effects are expected on major linear infrastructure projects. The Joint Councils are broadly of the view that where NH has assessed significant effects it has sought to avoid them through design changes. Where this has not been possible, it is clear that in most cases significant effects would be limited where possible by mitigation to be secured in the DCO. The Joint Councils Written Representations and Local Impact Report, both submitted at Deadline 1, set out where the dDCO [APP-022] could be improved to secure mitigation where it is presently lacking.</p> <p>With regard to paragraph 1.152 of the NPSNN, the Joint Councils consider that the benefits of the Scheme would very significantly outweigh the costs and that this is well detailed in the Case for the Scheme [APP-417]. The ES (Chapter 16 [APP-047] demonstrates that the majority of significant beneficial effects of the Scheme would be experienced permanently, whereas the majority of the significant adverse effects would be temporary or isolated to the construction phase.</p> <p>With regard to paragraph 5.153 there is an essential need to ensure high environmental standards are secured through the DCO:</p> <p>Schedule 2 Requirement 3 will be used to ensure high environmental standards during construction. The appropriate mitigation measures and procedures to be implemented during the construction phase would be based on the commitments made in the EMP [APP-317]. The Joint Councils are broadly in support of the contents of the design-stage EMP [APP-317] and note that prior to development commencing, the EMP would be further developed in consultation with the Joint Councils before being approved by the Secretary of State.</p> <p>Having regard to siting, operational and other relevant constraints, the Scheme aims to avoid or minimise harm on the landscape, gives due consideration to its location within the AONB and aims to avoid adverse effects on the Special Qualities of the AONB, providing suitable mitigation and enhancement measures. However, the Joint Councils consider that in order to ensure suitably high environmental standards in relation to design and operation of the Scheme – and to comply with paragraph 1.153 of the NPSNN, written approval of the detailed design proposals for the Environmental Mitigation/Landscape Design and of the external appearances of the Cotswold Way National Trail and Gloucestershire Way bridges should be secured via DCO requirements following consultation with the relevant local authorities. The bridge structures will be widely visible, and NH has committed to creating high quality landmark designs which should be subject of consultation prior to approval.</p>
1.8.10.	Applicant, Natural England, CCB, GCC, TBC, CDC	Viewpoints a) Clarify what consultation was undertaken with stakeholders on the locations of viewpoints used for photomontages and whether agreement was reached. If agreement was not reached, provide details of the	a) The Joint Councils raised a request at the 2019 Public Consultation that more viewpoint locations should be included. Additional viewpoints were added to the Preliminary Environmental Information accompanying the 2020 Supplementary Consultation and are described within ES Chapter 7 [APP-038].

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		<p>differences between parties.</p> <p>b) Do you have any comments on the presentation of baseline photographs and visualisations?</p> <p>c) Are additional viewpoints required and, if so, show these using maps and explain the rationale as to why such viewpoints need evidencing?</p>	<p>b) The baseline photographs and visualisations could be better annotated to aid the reader however, otherwise they are considered appropriate. The photomontages are a reasonable representation of predicted visual effects of the Scheme.</p> <p>c) It is not considered that additional viewpoints are required.</p>
1.8.15.	GCC, TBC, CDC, CCB	<p>Adverse and Beneficial Effects</p> <p>a) Is there agreement on the scope of adverse and beneficial effects listed in paragraph 7.12.13 and 7.12.14 of ES Chapter 7 [APP-038]?</p> <p>b) Are there any areas of dispute?</p> <p>c) Would the benefits, taken as a whole, outweigh the purported adverse effects, or how do the authorities suggest these effects are balanced?</p>	<p>a) The Joint Councils broadly agree with the scope of adverse and beneficial effects as listed in paragraphs 7.12.13 and 7.12.14 of ES Chapter 7 [APP-038]. It should be noted that these effects are overall assessments and the detailed effects described within Table 7-13 of ES Chapter 7 [APP-038] should be considered.</p> <p>b) There are no areas of dispute.</p> <p>c) The Scheme would cause adverse effects on each of the Special Qualities of the AONB to some degree, changing the views and landscape character during construction and, for the most part at year 1. However, given the proposed landscape mitigation measures, taken as whole, the benefits would outweigh the adverse effects on the Special Qualities of the AONB.</p> <p>The Joint Councils consider that there are more areas of vegetation that could be retained, and the Joint Councils would expect to see that the detailed design of the Scheme, together with well-considered construction techniques, limit the loss of existing vegetation to that absolutely necessary. In turn, this would help to limit the effects on the Special Qualities of the AONB. Similarly, advanced planting and local seed source collection should be used where feasible. The Joint Councils believe that written approval of the detailed design proposals of the external appearances of the Cotswold Way National Trail and Gloucestershire Way bridges over the A417 should be secured via DCO requirements following consultation with the relevant local authorities. The bridge structures will be widely visible, and NH has committed to creating high quality landmark designs which should be subject of consultation prior to approval.</p>
1.9 – Noise and Vibration			
1.9.1	GCC, TBC, CDC	<p>Methodology</p> <p>a) Are there any concerns about the assessment methodology set out in section 11.4 of ES Chapter 11 [APP-042], or is it accepted to be appropriate and proportionate to the Proposed Development?</p> <p>b) Are you satisfied with the thresholds and criteria in respect of National Star College given its sensitive occupation?</p>	<p>a) The Joint Councils have no concerns regarding the assessment methodology for construction noise, construction vibration or operational noise, as provided in Section 11.4 of Chapter 11 of the ES [APP-042]. The methodology is appropriate and proportionate to the Scheme, and in line with LA 111.</p> <p>b) The thresholds and criteria for the National Star College, which is an educational facility for young people with complex disabilities, are considered to be appropriate. The predicted noise levels are well below the LOAEL threshold at this location.</p> <p>As outlined in the ES Chapter 11 [APP-042], the assessment shows that during construction the noise levels are likely to be acceptable with windows closed, and later provide specific recommendations for mitigation which include the provision of mechanical ventilation at National Star College; so that windows could be closed if necessary.</p> <p>Due to the large distance (400m+) between the edge of the works and the College, noise barriers would not be effective.</p> <p>Once the Scheme is operational the change in noise is not considered to be significant.</p>
1.11 - Traffic and Transport			
1.11.2.	Applicant, GCC, TBC, CDC	<p>General</p> <p>a) Are you satisfied that the traffic modelling and underlying assumptions remain valid and reasonable in the light of the Covid pandemic?</p> <p>b) Please justify and explain your reasoning.</p>	<p>a) The Joint Councils are satisfied that the traffic modelling and underlying assumptions remain valid and reasonable in the post-Covid situation. Whilst the immediate impact of Covid was a reduction in traffic and subsequent increase, the long-term impact on road traffic volumes, mode choice and travel patterns remain unclear. The recovery from Covid is evidenced by the GCC weekly record of traffic changes. The lowest weekly traffic level recorded during the pandemic was 66.5% lower in comparison to pre-pandemic levels. Traffic is now back to 97% of pre-pandemic levels (November 2019 compared to November 2021).</p> <p>b) Specifically, for the A417, from the NH WebTRIS data for the existing A417 traffic monitoring site 5297 located immediately to the south of the Scheme (see Figure E-1 in Appendix E of the Combined Modelling and Appraisal Report [APP-422]), the most recent data shows that daily traffic flows are now back to 97% of pre-pandemic levels (November 2019 compared to November 2021).</p> <p>While it has been shown from the County data that peak hour traffic flows have fallen since the pandemic, and on the A417 AM peak is 12% down, generally over an 18-hr daily period traffic has almost returned to pre-pandemic levels (94% on the Southbound link of the A417).</p> <p>With traffic directly on the A417, it is evident that the economic factors and some traffic generators have changed. For example, the Honda factory at Swindon has closed and the Scheme would have provided economic benefits and time savings for trips to/from Honda. However, traffic levels suggest that any reduction in trip generation from factories and production have been replaced with other trips (such as small-scale distribution,</p>

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			<p>home deliveries etc). It is considered that the need for the Scheme has therefore not been materially changed as a result of the change in trip generations.</p> <p>In terms of allowing for alternative traffic growth scenarios (which could include Covid), to account for potential uncertainty around the core scenario (and in line with TAG unit M4) the Do Something Scheme assessment has included a set of low and high growth sensitivity tests. These are reported on in the Combined Modelling and Appraisal Report (see section 10.6 – Forecast matrix development – high and low growth [APP-422]), with the resultant economic appraisals using these high and low growth demand assumptions presented in section 15.2. From that appraisal, it is evident that even with the application of lower background traffic growth the Scheme would still result in moderate to high scheme benefits (showing an initial Benefit to Cost Ratio of 1.35, increasing to 2.38 when wider economic benefits are included).</p> <p>As noted in the Case for the Scheme’, section 4 – Transport Case for the Scheme [APP-417], fundamental to the need for the Scheme are the existing road safety concerns. Observed casualty rates on the single carriageway section of the A417 between Brockworth bypass and Cowley roundabout are significantly higher than the national average for single carriageway roads particularly for fatal and serious casualties (refer to Combined Modelling and Appraisal Report’, section 2.4 - Transport Problems and contributing factors, Figure 2-4 ‘Number of Casualties per PIA [APP-422]). These adverse personal injury accident statistics are partially due to the high volumes of traffic, poor forward visibility and challenging gradients, and the results from the economic appraisal confirm that the Scheme would result in significant accident benefits, whether under high or low traffic growth assumptions.</p>
1.11.6.	GCC	<p>South West Regional Traffic Model</p> <p>a) Is the South West Regional Traffic Model the appropriate traffic model for this Proposed Development?</p> <p>b) What, if any, are the shortcomings of the model that the ExA should be aware of and how would these affect or influence interpretation of the results obtained by the Applicant?</p>	<p>a) GCC are satisfied that the South West Regional Traffic Model (SWRTM) was the most appropriate tool to be used as the initial basis for developing the A417 Missing Link at Air Balloon traffic model, and to test the Scheme.</p> <p>The main reason is that the SWRTM was one of a set of five Regional Traffic Models developed by NH covering the whole of England, designed specifically to provide the basis for the development and appraisal of schemes with regional / national importance relevant to the Road Investment Strategy (RIS) and Road Investment Programme (RIP) schemes development, with the base models intended to be representative of average weekday traffic conditions during March 2015. The Scheme is a RIS scheme within the SWRTM. Also, to facilitate a more accurate modelling assessment exercise, the SWRTM was specifically tailored for use on the A417 Scheme for Project Control Framework (PCF) Stage 1 and subsequent Stages 2 and 3 use. A brief summary of the model refinements includes the following:</p> <p>While the boundary of the A417 model detailed simulation area has remained unchanged from the SWRTM to the north and west, it was significantly reduced in size to the south and east. To the south, the detailed area now extends to include the M5 Junction 16 (south of the M4/M5 Almondsbury interchange) and the M4 to Junction 15 south east of Swindon. To the east, the detailed model boundary generally follows the Gloucestershire county boundary.</p> <p>Detailed local network was added in the vicinity of the Scheme and the remainder of the SWRTM modelled area was converted into buffer network to allow movements into/out of and through the study area to be correctly allocated.</p> <p>The SWRTM trip matrices were adapted with additional local zones added to better represent the distribution of trips local to the Scheme.</p> <p>The development of the highway model has relied on the data used in the SWRTM and some additional surveys carried out in autumn 2016.</p> <p>The refined A417 model successfully met the WebTAG criteria at all stages of the subsequent model development.</p> <p>As a result of the refinements to the SWRTM, the tailored A417 Missing Link model, in addition to local reassignment from known existing rat-runs onto the A417, has also allowed for reassignment from the long-distance alternatives of the M40/A34 and the M5/M4 therefore, capturing the main forecast strategic effect of the Scheme.</p> <p>At the time when the decision was made to utilise the SWRTM as the basis for assessment of the Scheme, GCC’s transport planning term consultants were in the latter stages of developing the Central Severn Vale (CSV) SATURN traffic model which, similar to the SWRTM, was a highways assignment model,</p> <p>However, while the CSV model comprised a set of peak hour models (rather than an ‘average hour’ within the peak periods, as modelled in the RTMs), the base year was representative of traffic conditions in September 2013. Unlike the SWRTM, the CSV model did not incorporate VDM (variable demand modelling), which allows for assessing variations in the level of traffic demand dependant on congestion. Also, the focus of the detailed (simulation) network comprised primarily only the main Cheltenham and Gloucester urban areas within the Central Severn Vale.</p> <p>For these reasons as well as the need to be able to accurately capture the potential longer distance traffic reassignment effects resulting from the Scheme improvement, it was decided to utilise the SWRTM for assessment and appraisal purposes.</p> <p>However, where a lack of network detail was identified in specific sub-areas within Cheltenham and Gloucester in the SWRTM, such issues were addressed at the PCF Stage 1 by transferring network link / junction coding from the local Central Severn Vale (CSV) Model where appropriate.</p> <p>b) In terms of identifying any shortcomings of the SWRTM, the following potential weaknesses are known:</p> <p>(i) The SWRTM is a highways assignment’ model only, and not multi-modal. However, it is not considered material for this Scheme that the model is ‘highways’ only. This is because, as detailed in the ES Chapter 3 Assessment of Alternatives [APP-034], NH undertook a study to understand the potential for modes of transport other than highways to be used to address the problems identified on the existing section of the A417 between</p>

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			<p>Brockworth bypass and Cowley junction, the outcomes from which concluded that while a package of alternative mode initiatives could potentially complement the Scheme, these alternative measures could not realistically provide an effective solution on their own. Such interventions would not address the inherent road safety issues associated with the existing route.</p> <p>Also, given the dominance of medium and longer distance trips currently on the A417 route, it is considered that the alternative mode most likely to encourage modal shift away from road travel is rail, with active travel (non-motorised) or local public transport modes (e.g. local bus services) unlikely to be able to achieve anything other than a minor (and insignificant) reduction in car-based travel on the route. However, rail services along the A417/A419 corridor between Swindon, Gloucester and Cheltenham are generally uncompetitive compared to road travel when service frequency and journey times are considered. While improvements would deliver some modal shift from car to rail, this would be expected to be very modest in comparison to the scale of mode shift necessary to achieve the benefits of the Scheme with regard to reducing congestion.</p> <p>(ii) The SWRTM 2015 base year models comprise a set of assignment models covering a single 'average hour' flow across four time-periods on a March weekday, rather than modelling actual peak hour traffic conditions within the respective AM and PM peak periods. However, this is not considered material as the future year forecasts for scheme assessment purposes (air quality and noise assessment) as well as for economic appraisal are based on annual average daily traffic (AADT) flows or equivalent average 18-hour derivations of the flow data.</p> <p>Where weekday AM and PM peak hour flows have been required for detailed assessment of the operational performance of specific scheme junction designs (Ullenwood Junction, Shab Hill eastern roundabout, Shab Hill western roundabout for 2041), a set of 'uplift' factors were derived by NH at the PCF Stage 2 to convert the average hour flows into peak hour equivalents (see the Combined Modelling and Appraisal Report, Appendix J – Operational Assessment Technical Note [APP-422]).</p> <p>(iii) At the outset of the development of the five RTMs, given the scale and complexity of these regional models it was acknowledged that the focus should be on the strategic road network (SRN) along with the 'A' and 'B' road networks. Ultimately, this has raised key issues such as zone sizes, network coverage and acceptable levels of model calibration / validation.</p> <p>For those schemes where it was planned to use SWRTM for future appraisal work it was therefore anticipated that the regional model would need to be adapted for each scheme, with modifications expected to include changes to the network and trip matrices in the local area to better represent local traffic movements.</p> <p>Hence, to facilitate a more accurate modelling assessment exercise the SWRTM has been specifically tailored for use on the A417 Missing Link scheme for PCF Stage 1 and subsequent Stages 2 and 3 use.</p> <p>Note that the modelling was undertaken by the applicant and their consultants, not by GCC who only undertook a logic checking and overseeing role.</p>
1.11.7.	GCC	<p>'Do Something' Scenarios</p> <p>a) With reference to Tables 4-3 to 4-6 in The Case for the Scheme [APP-417], do you consider the 'Do-Something' scenarios (with the Proposed Development in place) to be realistic projections?</p> <p>b) Given that some journey times would reduce (in the region of 3-4 minutes in general) but others might increase (in the region of 1 minute), what are your conclusions on the overall benefits of the Proposed Development?</p> <p>c) Given the reduction in journey times by 3-4 minutes, how likely is it that (as the Applicant asserts in the Transport Report [APP-426], paragraph 7.3.19): "At the local level, traffic is forecast to re-route away from existing known rat runs including via Elkstone towards Cheltenham and also via Birdlip Hill towards Gloucester"?</p>	<p>a) GCC are of the opinion that the Do Something scenarios are still realistic projections for the currently estimated 2026 Scheme opening year and the 2041 Scheme design year and have not been significantly changed since the modelling was completed by NH. Note that the overall benefits of the Scheme are not restricted purely to predicted reductions in journey times and associated vehicle operating cost savings as a result of local reassignment from known existing rat-runs onto the A417 as well as reassignment from long distance alternatives, but also with the potential for significant reductions in road accident casualties.</p> <p>In terms of reviewing Tables 4-3 to 4-6 in The Case for the Scheme [APP-417], which provide analysis of the impact of the Scheme on forecast journey times on the following two example routes, as shown in Figure 4-3: A417 between the A429 junction at Cirencester and the M5/A417/B4641 roundabout (Tables 4-1 and 4-2); and A40/A436 junction at Shipton to the M5/A417/B4641 roundabout (Tables 4-3 and 4-4).</p> <p>b) In the route one analysis, Tables 4-3 and 4-4 [APP-417] clearly show significant journey time reductions in both directions along the A417 when compared to the Do Minimum. These are reflective of the significant reduction in delay overall, particularly in the westbound direction, as a result of the Scheme and the removal of the delays currently experienced at the existing Air Balloon roundabout.</p> <p>The increases in journey time on route two are due to the increased journey distance travelled compared to the Do Minimum. However, for westbound traffic (Table 4-5), the PM journey times in the Do-Something scenario are predicted to decrease because of the significant reduction in congestion and queueing as a result of the new Ullenwood Junction, even with the longer distance travelled. In the eastbound direction, journey times in the Do-Something scenarios (Table 4-6) are however slightly longer due to the increased journey distance compared to the Do Minimum. Overall, it is the view that journey times are reduced by the removal of congestion at the key junctions, and where there may be longer distances to travel, the new links are safer than previously.</p> <p>c) In so far as any traffic assignment model is a mathematical logical interpretation of predicted vehicle trip movements across a defined highway network, the results of the future year forecasts are realistic and sound in terms of traffic re-routing away from local rat-runs on account of the introduction of the Do Something network improvements. Individual driver behaviour is of course not always 100% logical and based totally on a clear knowledge of available journey time savings and can for example be affected by sat-nav guidance. However, with the new A417 route being quicker as a result of the Scheme and together with the proposed signing strategy, it is to be expected that traffic will predominately migrate to the less congested and quicker routes, as identified in the modelling exercise.</p>

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1.11.20.	Applicant, GCC	Leckhampton Hill Paragraph 7.3.27 of the Transport Report [APP-426] states that Leckhampton Hill would experience an increase in traffic as a result of the Proposed Development. Appendix J to the ComMA report does not provide great detail on this. Provide a Technical Note describing the effects upon traffic flow, queue, delay and overall performance of Leckhampton Hill as a result of the proposed new Ullenwood roundabout junction and whether any effects are considered to be adverse or severe in nature compared to the current baseline.	<p>GCC have previously expressed concerns about the forecast increases in traffic on the local road network as a result of the Operational Scheme, primarily on Leckhampton Hill.</p> <p>GCC are still of the view that remedial works will be required on Leckhampton Hill to reduce the potential scale of traffic reassignment / mitigate the resultant effects for the Scheme to be acceptable, and that GCC do not have funds for these works and GCC will be looking to NH to provide funding. At present it is not fully understood what works will be required and further work is needed to present a suitable solution (therefore, is required to be funded by NH).</p> <p>Referring to Appendix J of the Combined Modelling and Appraisal Report [APP-422], the purpose of that document was to carry out an assessment of the operational performance of specific Scheme junction designs and did include any traffic analysis of individual routes. The three roundabout junctions assessed in the 2041 Scheme design year were:</p> <ul style="list-style-type: none"> • Ullenwood Junction, • Shab Hill eastern roundabout, and • Shab Hill western roundabout <p>Focussing on the Leckhampton Hill route, a transport modelling and analysis technical note was provided by NH/Arup in April 2020 the purpose of which was to assess in detail the potential impact of the Scheme on routing between the A417 and Cheltenham. The note provided details of predicted traffic flows, journey times and junction delays between the Do-Minimum (without the Scheme) and Do-Something scenarios (with the Scheme) for Leckhampton Hill. Sensitivity tests have also been undertaken to reflect mitigation from traffic increases on Leckhampton Hill.</p> <p>Minor changes have been made to the model subsequently however, the Scheme design changes resulting from the consultation feedback were relatively minor (in traffic modelling terms) and will have had an insignificant effect on the traffic assignment outcomes. GCC have however requested NH revise this technical note to take account of the refined Scheme and reissued with only the Leckhampton Hill results included.</p>
1.11.22.	Applicant, GCC	Road Safety Audit Has the road safety audit adequately considered the impacts on local country roads in terms of the nature of their speed, usage and the type of traffic that actively uses them?	<p>Although not included with the DCO application documents, NH has provided GCC with copies of the following documents:</p> <p>A417 Missing Link Road Safety Audit (RSA) Stage 1 – Designers Response dated 11 March 2020. This is the designer's response to the audit that took place in October 2019; and</p> <p>A417 Missing Link Road Supplementary Road Safety Audit Stage 1 - Designer's Response dated 30 July 2020. This is a supplemental Road Safety Audit following a number of design changes that have taken place on scheme since the original RSA1 described above.</p> <p>A RSA only considers the safety of the preliminary design of the scheme and does not consider safety impacts outside of the designed elements of the scheme. Therefore, the RSA Stage 1 does not consider impacts on local country roads.</p> <p>At this early stage during the design process, GCC considers that the audit(s) carried out have adequately considered all possible safety concerns that can be identified from an office-based desktop audit. Some of the problems identified by these RSA(s) have been addressed by changes to the Scheme, the other remaining problems will be further considered by NH during detailed design and during a RSA Stage 2 a copy of which will be provided to GCC during the subsequent Technical Approval check process that will take place once the detailed designs have been completed and passed to GCC for approval.</p> <p>The design speed and posted speed limit of the local roads have been agreed with NH. The traffic modelling takes into account usage and type of traffic using the local roads and is suggesting that the Scheme will reduce "rat running" by providing more reliable journey times.</p>
1.12 - Water Environment and Flood Risk			
1.12.12.	GCC	Drainage Adoption Are GCC in agreement to adopt all highway drainage except for the mainline and junction slip road aspects, as proposed in paragraph 4.2.1 of Appendix 13.10 [APP406]?	In principle GCC agrees to adopt all local road highway drainage assets. Where possible GCC are keen to ensure that the drainage systems for GCC adoption are kept separate so that identification of any issues can be easily identified. GCC is working with NH to identify the boundaries between local roads and the Strategic Road Network.
1.12.13	Applicant, GCC	Existing A417 Would there be any benefit, considering climate change, in retaining the existing drainage features under the repurposed A417 in assisting with land drainage or surface water attenuation?	<p>There would be a great benefit in retaining the existing above and below ground drainage features within the 5m wide footprint of the de-trunked and repurposed A417. These drainage features will become the maintenance responsibility of GCC.</p> <p>All above ground highway assets beyond the 5m footprint to be repurposed will be removed and replaced with calcareous grassland, native hedgerow, dry-stone walling and trees.</p> <p>A more detailed review of what would be best to retain and what can be removed will be carried out and agreed with NH during detailed design stage.</p>
1.12.14	Applicant, GCC	Finished Road Surface Would any part of the Proposed Development be at risk from	GCC expects that there will not be any such occurrences of pooling or puddling of surface water on the local roads it inherits on the basis that NH is competent following well established industry design standards and processes during the detailed design and construction stages:

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		<p>the pooling or puddling of surface water and, if so, how would the drainage of these areas be managed so as to lower the risk of aqua-planing based accidents?</p>	<p>NH will procure a competent design consultant to manage the detailed design stage. This consultant will follow all appropriate design standards whilst undertaking the design.</p> <p>During the design of the finished road surface the designer will produce a 3D model with contours which will identify locations where pooling or puddling may take place.</p> <p>Once the horizontal and vertical alignment of the finished road surface has been finalised the specialist drainage design team will design a drainage system that will remove all surface water during rain events.</p> <p>On completion the final completed design will be subject to a Road Safety Audit, undertaken by an independently appointed road safety team who will review the design and identify any problems or issues.</p> <p>During construction adequate levels of supervision by both the contractor and NH will be provided.</p> <p>Once complete, all elements of the Scheme, including the local roads will be subjected to a further Road Safety Audit, designed to review the Scheme in operation.</p> <p>Once a Construction Completion Certificate has been issued, the contractor has a 12-month defects liability period in which any issues that come to light will be resolved.</p> <p>GCC are confident that with all the checks, balances and processes in place as described above there will be a very reduced risk to the travelling public of aqua-planing type accidents.</p>

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