

A417 Missing Link
TR010056

8.3 Responses to Relevant Representations

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A417 Missing Link

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Responses to Relevant Representations

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This document has been prepared by National Highways (the Applicant) for submission to the Examining Authority (ExA) under Deadline 1 of the Examination of the A417 Missing Link Development Consent Order (DCO) application.
- 1.1.2 This document provides the Applicant's response to Relevant Representations submitted to the ExA by Interested Parties.
- 1.1.3 In total, 110 Relevant Representations were submitted to the ExA by the deadline of 2 September 2021. However, since the 2 September 2021, 34 additional submissions have been accepted at the discretion of the ExA after this deadline had passed. These additional submissions have been considered by the Applicant in the same manner as Relevant Representations and for the purposes of this document. In total, therefore, 144 submissions (comprising of both Relevant Representations and additional submissions) have been received and considered by the Applicant.

1.2 Structure of this document

- 1.2.1 National Highways has reviewed the Relevant Representations submitted to the ExA and has identified matters or 'themes' that have regularly been raised by Interested Parties regarding the scheme. An Interested Party is any member of the public who wishes to make a Relevant Representation, and all Interested Parties will be invited to make further Written Representations and can take part in the Examination at hearings.
- 1.2.2 A response to these common themes is provided in this document to clearly set out the position of National Highways on the points that have been raised and provide clarification where required.
- 1.2.3 Whilst many of the matters raised are addressed in the DCO application documents, National Highways considers that it is helpful to the ExA and those who have made Relevant Representations to provide commentary on these matters and make cross references to relevant DCO application documents where appropriate.
- 1.2.4 In light of the above, National Highways has responded collectively in the second part of this document to the identified themes, rather than by providing a detailed response to each individual Relevant Representation.
- 1.2.5 It is, however, recognised by National Highways that some Interested Parties have raised matters that are more specific in nature, particularly amongst those submitted by Affected Persons or Statutory Parties, or by other Interested Parties with which National Highways is already engaged in discussions, such as through a Statement of Common Ground (SoCG). Therefore, the third and fourth parts of this document provide detailed responses to some individual Relevant Representations made by Affected Persons and Interested Parties respectively, where it is determined that it would be helpful to the ExA to do so. In some instances, National Highways has provided a response to a Relevant Representation directly to the Interested Party prior to submission of this document. This has occurred through ongoing engagement and correspondence with such parties.

1.2.6 Accordingly, this document is structured as follows:

- Chapter 2: Response on common themes raised in Relevant Representations
- Chapter 3: Response to Relevant Representations made by Affected Persons
- Chapter 4: Response to Relevant Representations made by Interested Parties subject to a Statement of Common Ground

2 Response to common themes raised in Relevant Representations

2.1 Introduction

2.1.1 This chapter provides National Highways' response to the key themes that were commonly raised in the Relevant Representations. Key themes have been identified by National Highways for the purpose of this document as a commonly raised issue pertinent to the scheme and its examination.

2.1.2 For each theme, the sections below first provide a summary of the matter raised and the comments that were received, and then sets out the National Highways position on the matter at the time of writing.

2.1.3 The following themes are considered and addressed in the remainder of this Chapter:

1. Carbon emissions and climate change
2. Impacts on the Cotswolds Area of Outstanding Natural Beauty (AONB)
3. Impacts on biodiversity and the Crickley Hill and Barrow Wake Site of Special Scientific Interest (SSSI)
4. Noise impacts
5. Air quality impacts
6. Impact on historic sites
7. Alternative options for the scheme
8. Traffic modelling and impacts of COVID-19
9. Cost and value for money
10. Adequacy of consultation and landowner engagement
11. Impact on trees
12. Construction impact on local roads
13. Safety
14. Impacts on Cowley village
15. Light pollution
16. Biodiversity Net Gain

2.2 Carbon emissions and climate change

Summary of matters raised in Relevant Representations

2.2.1 Some Relevant Representations cited objection to the scheme due to concerns that it would increase carbon emissions and would undermine the ability of the UK Government to meet national and international commitments to address climate change and reduce greenhouse gas (GHG) emissions.

National Highways response

2.2.2 Environmental Statement (ES) Chapter 14 Climate (Document Reference 6.2, APP-045), as submitted with the DCO application in May 2021, reports on the potential effects of the scheme on climate, in accordance with the Design Manual for Roads and Bridges (DMRB) LA 114 standard. It includes a GHG emissions assessment, which considers the effect on the climate of GHG emissions arising from the scheme, including how the scheme would affect the ability of government to meet its carbon reduction plan targets.

- 2.2.3 In June 2021, the UK Government set the 6th carbon budget in law. As this occurred following the submission and acceptance of the DCO application, National Highways has carried out an additional assessment of the scheme against the 6th carbon budget. An update to ES Chapter 14 was submitted to the ExA at Procedural Deadline A on 22 October 2021, in the ES Updates and Errata (Document Reference 6.7, AS-051). Accordingly, a summary of the updated position of the scheme in relation to its effects on climate is provided in the remainder of this section.
- 2.2.4 Section 14.9 of ES Chapter 14 Climate (Document Reference 6.2, APP-045) details how the scheme design has emerged as part of an iterative process to avoid or reduce embodied GHG emissions. This includes changes to the crossings, reduced depth of cutting through the escarpment (which removed the requirement for a number of retaining walls), reduced earthworks and minimising the requirement for energy consuming operational equipment. It also includes measures to be implemented during construction including a plan to reduce energy consumption in construction; selecting low maintenance planting; and; managing material resources to reduce waste and import.
- 2.2.5 ES Chapter 14 Climate (Document Reference 6.2, APP-045) sets out that the construction period for the scheme falls wholly within the fourth carbon budget. Operation of the scheme would commence in 2026 and was assessed against the fourth and fifth carbon budgets, up to 2032.
- 2.2.6 The assessment of scheme net emissions in Table 14-18 of ES Chapter 14 Climate (Document Reference 6.2, APP-045) identifies that construction of the scheme is estimated to contribute approximately 0.00380% of the fourth carbon budget. Operation of the scheme is estimated to contribute approximately 0.00114% of the fourth carbon budget and 0.00355% of the fifth carbon budget.
- 2.2.7 As reported in the ES Updates and Errata (Document Reference 6.7, AS-051) an assessment of the 6th carbon budget has confirmed that the operation phase of the scheme that would fall within the sixth carbon budget (2033 to 2037) and would give rise to a net increase in carbon emissions of 69,211 tCO₂e.
- 2.2.8 The scheme would contribute approximately 0.00717% of the sixth carbon budget. However, it should be noted that this assessment is conservative and likely to be an overestimate given that the uptake of electric vehicles is likely to be higher than that accounted for in the national projections¹ used for the assessment. Furthermore, the publication of DfT's Transport Decarbonisation Plan and National Highways' net zero plan are likely to further reduce carbon emissions.
- 2.2.9 Overall, the contribution of GHG emissions resulting from the scheme is assessed as a maximum of 0.00717% across all legislated carbon budget periods. It is considered that this magnitude of emissions from the scheme would not have a material impact on the ability of the government to meet its sixth carbon budget, and would therefore accord with the policy in paragraphs 5.17 and 5.18 of the National Policy Statement for National Networks (NPSNN).
- 2.2.10 National Highways is committed to rapidly cutting carbon across the Road Investment Strategy through its "Net zero highways: Our 2030 / 2040 / 2050 plan"

¹ Defra's Emissions Factor Toolkit (v10), which does not take account of an increased usage in electric vehicles beyond 2030.

published in July 2021. This plan sets out how England's motorways and A-roads will be decarbonised, so they can continue to bring significant benefits to people and businesses in a net-zero economy.

- 2.2.11 The net zero plan will put roads at the heart of England's net zero future through three key commitments; achieving net zero for its own operations by 2030; delivering net zero road maintenance and construction by 2040; and supporting net zero carbon travel on all National Highway roads by 2050. The plan maps how the company will progress rapidly in this area, focusing on innovation and zero carbon solutions while using offset only as a very last resort.

2.3 Impacts on the Cotswolds AONB

Summary of matters raised in Relevant Representations

- 2.3.1 Some Relevant Representations identified concerns over the impact of the scheme on the Cotswolds AONB, citing its visual impact and potential harm to the ecology and environment of the AONB. It was stated that the scheme does not appear to meet the threshold of benefits required to construct in an AONB.

National Highways response

- 2.3.2 National Highways has taken a landscape-led approach to the scheme, which seeks to deliver a safe and resilient free-flowing road, whilst conserving and enhancing the special character of the nationally important protected landscape of the Cotswolds AONB. The Design Summary Report (Document Reference 7.7, APP-423) provides a detailed account of how the landscape-led design approach was implemented and how its outcomes have contributed to conserving and enhancing the AONB.
- 2.3.3 The scheme is located entirely within the Cotswolds AONB. The NPSNN sets out specific policy tests that must be met in order for the Secretary of State (SoS) to be satisfied that development of nationally significant highways schemes can take place in nationally designated areas, including AONBs. The scheme must therefore satisfy these policy tests.
- 2.3.4 A detailed assessment has been undertaken of how the scheme complies with the tests of the NPSNN, which is set out in Chapter 7 of the Case for the Scheme (Document Reference 7.1, APP-417) submitted with the DCO application. Through this, National Highways considers that it is demonstrable that there are exceptional circumstances for the grant of consent for the scheme in the Cotswolds AONB, taking into account its need, the cost and scope of alternatives. The manner in which the detrimental effects of the alternatives on the environment, the landscape and recreational opportunities, have been moderated and assessed is also explained. It can also be demonstrated that there are compelling reasons for the scheme's enhanced capacity and that its benefits very significantly outweigh its costs. It is therefore concluded that the scheme would be in compliance with national policy tests for development of a nationally significant highways scheme in an AONB, and the NPSNN as a whole, when undertaken to high environmental standards.

2.4 Impacts on biodiversity and the Crickley Hill and Barrow Wake Site of Special Scientific Interest (SSSI)

Summary of matters raised in Relevant Representations

- 2.4.1 Some Relevant Representations raise concerns about the impact of the scheme on the local ecological environment and in particular on the Crickley Hill and Barrow Wake SSSI. The Representations raise concerns that the scheme would destroy or irreversibly damage biodiversity, including through the destruction and increased severance of the SSSI habitat.

National Highways response

- 2.4.2 ES Chapter 8 Biodiversity (Document Reference 6.2, APP-039) submitted with the DCO application reports on the likely significant effects of the construction and operation of the scheme on biodiversity, including on designated sites, protected species and on habitats and other species of principal importance for the conservation of biodiversity. The effects of the scheme on biodiversity and the SSSI are also summarised in the Case for the Scheme (Document Reference 7.1, APP-417), which concludes that the scheme is compliant with NPSNN in that the benefits of the scheme would outweigh any harm to biodiversity.
- 2.4.3 A summary of specific measures that have been given consideration and implemented to reduce impacts on the SSSI is given below:

Habitat loss of the SSSI

- 2.4.4 Crickley Hill and Barrow Wake SSSI falls partly within the DCO boundary, although the scheme does not lead to any impacts on the Crickley Hill unit of the SSSI to the north of the A417. The loss of SSSI habitat has been avoided and reduced where possible during the design phase of the scheme with detailed dialogue between ecology and engineering disciplines. For example, existing and proposed public rights of way (PRoW) have been removed and repositioned.
- 2.4.5 There does however remain unavoidable loss of 0.09ha of calcareous grassland habitat for which the SSSI is notified, due to the widening of the existing A417. Approximately 0.056ha of this habitat would be permanently lost to the cutting embankment (rock face) and a drainage cascade. Approximately 0.034ha of habitat would be temporarily lost during the construction phase but would be reinstated as calcareous grassland following completion of the works. Creation of a roundabout on the B4070 would result in a further loss of 0.05ha of SSSI habitat, which is not considered to form part of the site's notified special interest features because it comprises road verge containing scrub, semimature trees and ruderal species.
- 2.4.6 The loss of SSSI habitat would be compensated for by creation of calcareous grassland (the qualifying habitat of the SSSI) within and adjacent to the SSSI, in excess of the area lost. This area of compensation would be part of a larger area of replacement Common Land as shown on ES Figure 12.4 Open Access Land (Document Reference 6.3, APP-257-9). The area of Common Land replacement includes compensation for loss of SSSI habitat through the conversion of approximately 0.36ha of hardstanding to calcareous grassland. Approximately 0.1ha of this hardstanding is already within the SSSI boundary, therefore the compensation would result in a net increase in the area of calcareous grassland within the existing SSSI boundary and provide additional adjacent habitat.

- 2.4.7 The residual effect of the adverse impacts of habitat loss within the SSSI during the construction phase is considered to be adverse and significant. The creation of calcareous grassland habitat within an adjacent to the SSSI is considered to be beneficial and significant. It is considered that the benefits of the creation of 0.36ha of calcareous grassland, including 0.1ha within the SSSI, would outweigh the unavoidable permanent loss of 0.056ha of habitat for which the SSSI is designated.

Severance of the SSSI

- 2.4.8 The widening of the existing A417 increases the existing fragmentation between the two units of the Crickley Hill and Barrow Wake SSSI. Two large habitat patches of calcareous grassland would be created to provide habitat 'stepping-stones' to the north and south of the scheme that would mitigate the impacts of fragmentation on the SSSI, by providing functional habitat connectivity for species associated with Crickley Hill and Barrow Wake SSSI units to disperse and allow movement of species between these SSSI. These habitat patches in the form of meadows would be located either side of the Gloucestershire Way crossing and link the calcareous grassland on the crossing itself, and can be seen on sheets 6, 8 and 9 of ES Figure 7.11 Environmental Masterplan (Document Reference 6.3, APP-173, APP-175 and APP-176). These areas would provide habitat stepping stones which would be contiguous with existing areas of semi-natural broadleaved woodland, calcareous grassland and scrub and are intended to be of sufficient size to meet the habitat requirements for relatively immobile organisms that do not actively move through the landscape, such as calcareous grassland plant species.
- 2.4.9 ES Chapter 8 Biodiversity (Document Reference 6.2, APP-039) concludes that, with this mitigation, increased habitat fragmentation would represent a negligible adverse impact upon Crickley Hill and Barrow Wake SSSI.

Other effects on the SSSI

- 2.4.10 Impacts from recreational pressure, pollution and changes in nitrogen deposition have been assessed for the operational phase of the scheme. Whilst an increase in recreational pressure at Crickley Hill and Barrow Wake SSSI results in a minor adverse impact from habitat degradation, the residual effect is considered not significant. In addition, during the operational phase of the scheme, there would be a minor beneficial impact at Crickley Hill and Barrow Wake SSSI due to a reduction in nitrogen deposition from vehicle emissions as the new A417 is further to the east. However, the residual beneficial effect is considered not significant.
- 2.4.11 With the implementation of the major alternative recreational routes provided by the scheme including new and diverted public rights of way, stopping up an existing footpath through the SSSI, and the provision of alternative additional parking, segregated routes, signage and other measures to deter public access from sensitive features, recreational impacts would not affect the integrity or key characteristics of the SSSI.

Summary

- 2.4.12 The benefits of the proposed calcareous grassland creation are considered to outweigh the impacts that would occur due to the unavoidable loss of a small area of the SSSI unit at Barrow Wake. In addition, the scheme would lead to wider

beneficial effects on the SSSI due to a reduction in nitrogen deposition from vehicle emissions with the scheme moving the A417 further away from the SSSI.

2.5 Noise impacts

Summary of matters raised in Relevant Representations

- 2.5.1 Some Relevant Representations raised concerns that the scheme would result in an increase in noise, which would have a detrimental effect on local residents and the Cotswolds AONB environment. In particular, concerns about noise are cited in relation to the A436/Ullenwood area; Cowley village and the surrounding area; and a section of the A417 south of the scheme in Daglingworth Parish.

National Highways response

Overview of noise effects

- 2.5.2 ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042) was submitted with the DCO application and describes an assessment of noise and vibration impacts of the scheme during construction and operation, following the methodology of DMRB LA 111. It also sets out how the design of the scheme has sought to minimise noise emissions through embedded mitigation such as the use of earth bunds, stone walls and vertical noise barriers and consideration of the horizontal and vertical alignment of the scheme.
- 2.5.3 ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042) identifies that the scheme would overall result in permanent significant beneficial effects to substantially more residential properties than those residential properties that would experience a permanent significant adverse effect. Furthermore, commitments in ES Appendix 2.1 Environmental Management Plan (EMP) (Document Reference 6.4, APP-317) secure monitoring of noise during construction through a Noise and Vibration Management Plan (NVMP) and operational noise controls, including verification of the effectiveness of any installed mitigation measures. Noise insulation would be offered if and where future noise levels exceed the noise level trigger value and the other requirements referred to in the Noise Insulation Regulations 1975.
- 2.5.4 The effects of the scheme on health have been assessed in ES Chapter 12 Population and Human Health (Document Reference 6.2, APP-043), including with regard to effects of noise. This assessment concludes that there would be a neutral effect on health relating to noise during both construction and operation of the scheme.
- 2.5.5 Table 7-13 in ES Chapter 7 Landscape and Visual Effects (Document Reference 6.2, APP-038) includes an appraisal of effects of the scheme on the special qualities of the Cotswolds AONB, including tranquillity. It finds that the scheme would have a permanent beneficial effect on the tranquillity of the area due to the removal of lit junctions and a better integrated carriageway to reduce noise and visual disturbance.

Impact on Cowley

- 2.5.6 The concerns raised about noise specifically in relation to Cowley village are responded to in section 2.15 of this document, where a number of other matters raised by Cowley residents are also considered.

Impact on the A436 / Ullenwood area

- 2.5.7 Some of the Relevant Representations raised concern that as a result of the scheme, there would be an increase in noise due to traffic on the A436, including at the residential properties known as the Oxford Cottages’.
- 2.5.8 ES Figures 11.3 and 11.4 (Document Reference 6.3, APP-250/251) show the operational noise level change contours to the northeast of the scheme within the study area along A436. Noise changes have been assessed as having a minor impact along the A436.
- 2.5.9 More specifically in relation to the residential properties cited in the Relevant Representations, including Oxford Cottages, R10 Crendon House is the most representative construction noise assessment location given in the ES for these receptors. Such receptors are shown on Fig. 11.1 Study Area Sensitive Receptors and Baseline Assessment Noise Contour Map (2026) (Document Reference 6.3, APP-248). Table 11-17 and Table 11-18 in ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042) shows that R10 Crendon House would have no significant effect from construction noise.
- 2.5.10 Furthermore, Table 11-23 in ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042) shows that there would be a minor beneficial noise effect once the scheme is operational at the series of properties on the A436 referred to in representations as the Oxford Cottages (including 1-2 Oxford Cottages, Old Ullenwood Lodge, The Grove, Crendon House, Mosella Cottage, Laurel Cottage, Lychett Cottage) This indirect effect would be as a result of changes in road traffic noise associated with non-scheme roads.
- 2.5.11 In summary, the scheme would not result in significant effects in relation to noise on the A436 or the residential properties referred to as the Oxford Cottages.

Impact on existing A417 in Daglingworth Parish

- 2.5.12 National Highways recognises that within the Relevant Representations, concerns have been raised that the scheme would result in increased traffic and, subsequently, an increase in noise on the existing A417 south of the scheme in Daglingworth Parish. There is particular concern that this existing stretch of the A417 has a concrete road surface which is noisy and should therefore be resurfaced with a material that would reduce this effect.
- 2.5.13 The concern summarised above was raised by Daglingworth Parish Council and members of the public in response to the statutory consultations held in 2019 and 2020 and which are summarised in the Consultation Report (Document Reference 5.1, APP-027).
- 2.5.14 In acknowledging the concerns raised at consultation, National Highways included this section of road within the analysis of traffic changes associated with the scheme, as reported in ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042). This assessment identifies that for properties close to the concrete section of the A417/A419 between Daglingworth and Latton, predicted traffic noise increases after the scheme opens would not exceed 0.5dB in the short term (i.e., opening year, 2026) and just over 0.5dB(A) in the long term (2041). Noise changes of less than 1dB in the short term and 3dB in the long term are classified as negligible. Negligible for the purposes of the ES assessment means the noise change will not cause changes to behaviour or response to noise and as such, will not give rise to a likely significant effect. In the absence of

the scheme, the assessment concluded that the long-term noise changes due to traffic growth would be around 0.5dB, and therefore little different to the scenario with the scheme in place.

- 2.5.15 Taking into account the factors outlined, National Highways concluded that the request for resurfacing of the A417/A419 south of Cowley – which would be outside of the scheme boundary - should not be implemented as part of the scheme.

2.6 Air quality impacts

Summary of matters raised in Relevant Representations

- 2.6.1 Some Relevant Representations raised a concern over the effects of the scheme on air quality in the area, including within the context of the sensitive local environment. Some comments related specifically to air quality in Cowley village, which is considered in section 2.15.

National Highways response

- 2.6.2 ES Chapter 5 Air Quality (Document Reference 6.2, APP-036) describes an assessment of the air quality impacts of the scheme. It concludes that the scheme would not have significant adverse effects on air quality for human health during operation in accordance with DMRB LA105 section 2.90. Overall, the scheme is considered to have a beneficial impact on local air quality due to the reductions in NO₂ concentrations within the Air Quality Management Area (AQMA).
- 2.6.3 The assessment of construction phase significance takes into account the scheme's effect on human health, designated habitats and the outcome of the air quality effects arising from emissions from construction HGVs using the road network. The assessment of construction traffic has predicted no new exceedances of the Air Quality Objectives due to the construction of the scheme. Impacts from construction dust would be managed through best practice mitigation measures as outlined in the EMP ES Appendix 2.1 Environmental Management Plan (Document Ref 6.4, APP-317). With best practice construction mitigation measures the impact of construction dust would be reduced to a negligible level.
- 2.6.4 There are two AQMAs within 200m of the affected road network (ARN); AQMA in Cotswold District and Cheltenham AQMA in Cheltenham Borough. The assessment concludes that there are no significant effects predicted in AQMAs.
- 2.6.5 As set out in the Case for the Scheme (Document Reference 7.1, APP-417) this is compliant with the requirements of national policy within the NPSNN. Overall, there are no air quality effects which are contrary to national policy.
- 2.6.6 As set out in ES Chapter 16 Summary (Document Reference 6.2, APP-047) there would be no likely significant effects on human health arising from the scheme in relation to air quality.

2.7 Impact on historic sites

Summary of matters raised in Relevant Representations

- 2.7.1 Some Relevant Representations raised concerns that the scheme would have adverse effects on cultural heritage, including through impacting archaeological heritage assets during construction.

National Highways response

- 2.7.2 The effects of the scheme on the historic environment are set out in ES Chapter 6 Cultural Heritage (Document Reference 6.2, APP-037) and the compliance of this assessment and its findings with the NPSNN are considered in Chapter 10 of the Case for the Scheme (Document Reference 7.1, APP-417).
- 2.7.3 The Case for the Scheme (Document Reference 7.1 APP-417) sets out that the construction and operation of the scheme would not result in the total or partial loss of any designated heritage asset. However, it would result in significant adverse effects to the setting of two designated heritage assets, one of which would experience both construction and operational effects. In addition, the scheme would result in the total or partial loss of a number of non-designated heritage assets during construction. More detail regarding this is provided in ES Chapter 6 Cultural Heritage (Document Reference 6.2, APP-037).
- 2.7.4 Whilst National Highways has demonstrated in the Design Summary Report (Document Reference 7.7, APP-423) how the landscape-led design approach has sought to avoid effects to the historic environment and to identify opportunities for enhancement, it also recognises that the resulting harm to the setting of a Grade II Listed Building and the setting of a Scheduled Monument requires a clear and convincing justification in accordance with the NPSNN.
- 2.7.5 In Chapter 7 of the Case for the Scheme (Document Reference 7.1 APP-417), National Highways has clearly demonstrated that the scheme would provide substantial public benefits which would outweigh the likely harm to two designated heritage assets, in compliance with the NPSNN.
- 2.7.6 In relation specifically to archaeological heritage assets and the potential for harm during construction, Section 6.9 of ES Chapter 6 Cultural Heritage (Document Reference 6.2, APP-037) identifies how direct impacts (physical damage) to heritage assets would be mitigated through recording.
- 2.7.7 Archaeological remains would undergo 'preservation by record' in which they would be investigated prior to construction, artefacts would be analysed, and the results published following the construction of the scheme. The approach taken would vary depending on the significance of the impacted heritage resources and may include detailed archaeological excavation of high value buried archaeological remains; a strip-map-sample where archaeological remains are expected to be present dispersed over a wide area; or an archaeological watching brief in areas of lower archaeological potential. The type and location of mitigation required has been agreed with the Gloucestershire County Council (GCC) Archaeological Officer as set out in Annex C Detailed Archaeological Mitigation Strategy and Overarching WSI of ES Appendix 2.1 EMP (Document Reference 6.4, APP-320).
- 2.7.8 The programme of mitigation set out in Annex C of the EMP would be secured by DCO requirement 9 of the draft DCO (Document Reference 3.1, APP-022).

2.8 Alternative options for the scheme

Summary of matters raised in Relevant Representations

- 2.8.1 Some Relevant Representations have expressed objection to the route alignment selected for the scheme (known as Option 30) and have instead expressed a preference for an alternative alignment, primarily the route known as Option 12, which was presented alongside Option 30 at the non-statutory consultation in 2018.
- 2.8.2 In addition to comments on the selection of Option 30, some Relevant Representations have suggested alternative approaches to the scheme, such as widening the existing A417, reducing the speed limit or introducing traffic signals on the existing road. It has also been suggested that an alternative option to the scheme would be promotion of sustainable travel methods. Finally, several Relevant Representations indicated their preference for a scheme which utilises a tunnel.

National Highways response

Overview

- 2.8.3 The matter of alternative options to the scheme, or alternative design choices within the scheme, is considered in various documents within the DCO Application:
- Chapter 2 of the Case for the Scheme (Document Reference 7.1, APP-417) summarises the history of the scheme and provides an overview of how the scheme was developed through an iterative process, in which alternative options for the route have been considered.
 - Paragraphs 7.3.42 to 7.3.64 of the Case for the Scheme (Document Reference 7.1, APP-417) specifically consider how the cost and the scope of development alternatives were considered by National Highways, in accordance with NPSNN policy tests for development within an AONB.
 - ES Chapter 3 Assessment of Alternatives (Document Reference 6.2, APP-034) sets out the main reasons for the choices made by National Highways taking into account the environmental effects.
 - The Consultation Report (Document Reference 5.1, APP-027) and related appendices (Document Reference 5.2, APP-028/APP-029) set out how the scheme design has been developed taking into account feedback received during non-statutory and statutory consultation and engagement with the public, Persons with an Interest in the Land (PILs) and relevant stakeholders.
- 2.8.4 The Scheme Assessment Report (Document Reference 7.4, APP-420), the Route Options Consultation Report (Document Reference 7.5, APP-421) and the Technical Appraisal Report (Document Reference 7.9, APP-425) are documents which detail the appraisal of alternatives and route selection process, leading to the Preferred Route Announcement (PRA) of Option 30 in March 2019.

Route selection

- 2.8.5 Thirty initial route options, including both surface and tunnel route options, underwent a four-step sifting process to identify six options for full assessment and appraisal. That assessment concluded that four tunnel options offered poor value for money, in which the costs would exceed the estimated returns, and

would have significant adverse environmental effects. As a result, two surface options (Option 12 and Option 30) were taken forward for non-statutory public consultation.

- 2.8.6 At the route options consultation, over 1,951 responses were received and 72% of all respondents stated they either agreed or strongly agreed with National Highways' proposal for Option 30. In contrast, 8% of respondents stated a preference for Option 12. Taking into account feedback from that consultation, further comparative assessment of the two options was carried out with respect to various impacts under the themes of economy, environmental, social and public accounts (cost).
- 2.8.7 The assessment identified that Option 30 had greater support from the public and would be lower cost, better value for money and provide greater benefits than Option 12, whilst also delivering a more direct route and reliable journeys on the A417 and strategic road network. It would also provide opportunities for further landscape and environmental design development, by diverting the strategic road network away from the Cotswolds escarpment edge (a key aspiration of stakeholders). As a result of the consultation and further assessment, National Highways published a PRA in March 2019 confirming that the scheme would be taken forward for design using the Option 30 route alignment.

Consideration of tunnels

- 2.8.8 In Autumn 2017, a cost envelope for the scheme was set at £250 million to £500 million. The results of the economic appraisal undertaken as part of the options selection process showed that tunnel options were going to provide poor value for money for the taxpayer, and with a high cost exceeding the cost range for the scheme. In comparison, the surface route (Option 30) provided positive value for money and was within the cost range. As stated above, Option 30 was selected as the preferred route in March 2019.
- 2.8.9 Following engagement with stakeholders on the proposed design for the Option 30 alignment, National Highways undertook a high-level feasibility study of a 'cut and cover' design on the Option 30 alignment. This was an option proposed by some stakeholders and members of the public, as documented in the Consultation Report (Document Reference 5.1, APP-027).
- 2.8.10 The high-level feasibility study - Cut and Cover Tunnel Feasibility Study (Document Reference 8.6) - carried out by National Highways of the suggested alternative cut and cover option identified that it would result in the following adverse impacts:
- Introduction of additional safety risks during both construction and operation which would be contrary to Construction (Design and Management) Regulations to try and avoid risks in design.
 - Significant delays to programme by up to six years, resulting in the ongoing issues with the existing A417 continuing during that time.
 - A significantly increased cost, potentially around three times that of the scheme.
 - Environmental impacts including greater risk to buried archaeological remains; greater visual impact during construction; increased adverse effects to biodiversity and noise/vibration during construction; and increased GHG emissions due to increased use of concrete and steel.

- 2.8.11 The feasibility study did identify some likely long-term impacts of a cut and cover option that would result in better outcomes than a surface route, including:
- Benefits to Emma’s Grove monument, prehistoric settlement at Crickley Hill and the Cotswold Way National Trail.
 - Reduced visual impacts during operation (although lighting of the tunnel would impact dark skies).
 - Reduced noise emissions in the immediate area of the tunnel.
- 2.8.12 Whilst the feasibility study identified a mix of positive and adverse impacts, many of the adverse impacts were found to be contrary to national and local policy. It was therefore concluded that overall a cut and cover scheme design would not result in better outcomes than the proposed surface scheme and does not represent a viable alternative to meet the need for the scheme. The cut and cover feasibility study was shared with stakeholders including but not limited to Cotswolds Conservation Board (CCB).

Summary

- 2.8.13 It is considered that National Highways has clearly demonstrated how a range of alternative options to the scheme have been considered throughout its development and this is presented within various documents submitted in support of the DCO Application. National Highways has demonstrated why Option 30 was ultimately selected over Option 12 as the preferred route, taking into account both the results of technical assessment and the feedback from consultation.
- 2.8.14 National Highways has given due consideration to a tunnelled route alignment as an alternative to Option 30 and to a partially tunnelled design within the Option 30 alignment. Assessment of such options has resulted in them being discounted due to their adverse effects and failure to provide positive value for money. National Highways considers that Option 30 represents the best opportunity to deliver a landscape-led highways improvement which delivers a return on investment.

2.9 Traffic modelling and impacts of COVID-19

Summary of matters raised in Relevant Representations

- 2.9.1 There have been some concerns raised in Relevant Representations that the scheme would result in increased traffic and/or ‘rat running’ on various parts of the surrounding road network. This includes:
- the stretch of the A417 south of the scheme near Daglingworth;
 - on the A436; and
 - local settlements such as Cowley and Elkstone.
- 2.9.2 There has also been some concern raised that the traffic modelling undertaken for the scheme and reported on in the DCO Application may be out of date due to the effects of the COVID-19 pandemic on travel patterns and traffic flows.

National Highways response

- 2.9.3 As reported in the Case for the Scheme (Document Reference 7.1, APP-417) and the Combined Modelling and Appraisal Report (Document Reference 7.6, APP-422) submitted with the DCO Application, traffic modelling has been carried out throughout the development of the scheme. This shows that as a result of the

scheme, a number of local roads would see a decrease in traffic, including the A436, and those in Elkstone and Daglingworth. These reductions are predicated because the scheme would deliver improvements to journey times and journey time reliability on the A417. A combination of local and long-distance traffic would therefore reassign to the A417 from various alternative routes to make use of this improved and more reliable route.

- 2.9.4 In Cowley, there is a forecast increase in traffic on Cowley Lane due to the proposed closure of Cowley Wood Lane. Whilst the forecast increase is a significant, the two-way Annual Average Daily Traffic flows in 2041 increase from 18 to 188 vehicles with the scheme, it equates to a relatively low number of actual vehicles (e.g., a forecast of 23 vehicles in the 2041 PM peak). Access to Cowley village via the proposed Cowley junction and Cowley Wood Lane was removed from the scheme following statutory consultation in 2019, in which local residents raised concern over the safety and suitability of the road for general traffic. It is now proposed that Cowley Wood Lane would provide access for residents and walkers, cyclists and horse riders only.
- 2.9.5 Whilst the modelling shows there would be increases in traffic to some local roads, the assessment reports that overall, there would be an increase in traffic on the A417 and decreases on local roads. This demonstrates how the scheme would achieve its objective of discouraging rat-running by having a high-capacity free flowing road with improved journey times and reliability that encourages vehicles to use this strategic route rather than local routes.
- 2.9.6 In relation to the impacts of COVID-19 on traffic modelling, as of December 2021, it is difficult to forecast the medium and long-term impact that COVID-19 would have on traffic flows and travel patterns. This is because the pandemic is still ongoing and the country needs to return to a level of normality before the impact of COVID-19 on travel patterns can be determined. Even then it may take a while for the impact and long-term travel trend to become apparent. The economic appraisal is over a 60-year period from the opening year (2026) of the scheme and therefore the medium and long-term travel patterns are of more importance than short-term travel patterns in the scheme appraisal.
- 2.9.7 National Highways believes the medium and long term predictions of traffic growth remain accurate and valid for the appraisal of the scheme based on current evidence indicating that traffic flows have increased as the country comes out of lockdown and that traffic levels have increased since March 2020 and are close to pre-lockdown levels.
- 2.9.8 National Highways has undertaken analysis of traffic flow data from permanent counters on the A417 Missing Link between Cowley Lane and the A417/B4070 junction to Birdlip. Traffic data for the period January 2015 to September 2021 has been downloaded for eastbound and westbound directions at this location. Using monthly traffic data from this location, the average daily traffic flows for each month between 2015 and 2019 have been calculated to provide a baseline for comparison to September 2021.
- 2.9.9 The 2015-2019 average westbound traffic flow for September is 14,421 vehicles. The average traffic flow for September 2021 is 13,435 vehicles or 93% of the 2015-2019 September average.

- 2.9.10 The 2015-2019 average eastbound traffic flow for September is 15,562 vehicles. The average traffic flow for September 2021 is 14,377 vehicles or 92% of the 2015-2019 September average.
- 2.9.11 The scheme's traffic model has been built and follows the Department for Transport's (DfT) Transport Analysis Guidance (TAG) and information available as of May 2020. TAG requires that two sensitivity tests are undertaken to account for higher and lower than expected growth in traffic. The DfT have indicated that the low growth scenario can be considered as an approximation of impact the COVID-19 pandemic could have on travel patterns and there are fewer trips on the network. The low growth sensitivity test results in an adjusted Benefit Cost Ratio (BCR) of 2.38.
- 2.9.12 National Highways is therefore confident that its medium and long term traffic modelling remains reliable. Even in the event a low growth environment were to emerge, the scheme would continue to deliver a suitable BCR.

2.10 Cost and value for money

Summary of matters raised in Relevant Representations

- 2.10.1 Some Relevant Representations raised concerns regarding the overall cost of the scheme and that this does not represent value for money. Some Relevant Representations suggest money could instead be spent on improving existing roads or invested into public transportation.

National Highways response

- 2.10.2 Chapter 5 of the Case for the Scheme (Document Reference 7.1, APP-417) submitted with the DCO Application outlines the economic case for the scheme.
- 2.10.3 Over the sixty-year appraisal period the scheme is forecast to achieve total transport economic efficiency benefits, including journey time changes and vehicle operation cost changes, of £255.8 million. This is a result of the additional capacity and reduced delay provided by the scheme. The scheme is forecast to achieve significant reliability benefits of £70.5 million. This reflects the high levels of travel time variability currently experienced on the existing single carriageway section of the A417.
- 2.10.4 For the wider economic impacts of the scheme, impacts around agglomeration and labour supply have been calculated alongside impacts around increased output, which is based on an estimated 10% uplift to business user benefits. Over the sixty-year appraisal period the scheme is forecast to achieve significant wider economic benefits, totalling £140.3 million.
- 2.10.5 The significant forecast accident benefits valued at £64.9 million across the sixty-year appraisal period is expected to support the objective of providing a safe, resilient, and efficient network, with fatal and serious casualties reduced substantially. This is forecast to be a reduction of 66 fatal and 201 serious casualties over the appraisal period.
- 2.10.6 The BCR is a cost-benefit analysis calculation which indicates, in quantitative terms, the overall value for money of a project. Chapter 5 of the Case for the Scheme (Document Reference 7.1, APP-417) concludes that the scheme achieves an initial BCR of 1.49, and an adjusted BCR of 2.51 when reliability and

wider economic benefits are included. Based on the DfT's Value for Money Framework, the scheme is in the 'medium' value for money category.

2.11 Adequacy of consultation and landowner engagement

Summary of matters raised in Relevant Representations

- 2.11.1 Some Relevant Representations cited concerns around the consultation on the route options and selection of Option 30. Other Relevant Representations have raised concerns over the representation of Cowley and Birdlip Parish Council when engaging with National Highways on the scheme. Some residents consider there to be a conflict of interest within the Parish Council due to the fact that it represents both the settlements of Birdlip and Cowley, which have differing views and potential impacts arising from the scheme.
- 2.11.2 Finally, some Relevant Representations also considered that consultation with landowners was not sufficient and did not allow for meaningful discussions to take place.

National Highways response

Adequacy of consultation

- 2.11.3 The Consultation Report (Document Reference 5.1, APP-027) and related appendices (Document Reference 5.2, APP-028/APP-029) submitted with the DCO Application demonstrate that National Highways has met its statutory duties in relation to undertaking pre-application consultation.
- 2.11.4 The report identifies that a non-statutory route options public consultation was carried out in 2018. The purpose of this consultation was to inform the public about the proposals and seek feedback on the scheme while it was at a formative stage of development, focusing in particular on the route options of Option 12 and Option 30.
- 2.11.5 National Highways analysed the responses to the non-statutory consultation to inform selection of a preferred route for the scheme to take forward for preliminary design. Comparative assessment of Option 12 and Option 30 concluded that Option 30 had greater support from the public and would be lower cost, better value for money and provide greater benefits than Option 12, whilst also delivering a more direct route and reliable journeys on the A417 and strategic road network. The Route Options Consultation Report (Document Reference 7.5, APP-421) and Scheme Assessment Report (Document Reference 7.4, APP-420) provide further information on this decision.
- 2.11.6 Having selected a preferred route, National Highways carried a statutory public consultation in Autumn 2019 and made changes to its design in response to feedback provided and further environmental and technical assessment. A supplementary consultation was therefore held in Autumn 2020 to consult on these design changes.
- 2.11.7 Outside of formal consultation periods, the Consultation Report (Document Reference 5.1, APP-027) documents that National Highways has continued to engage with stakeholders to provide updates on the progress of the scheme and to discuss any technical matters relevant to the preparation of the scheme design, environmental assessment and SOCGs, prior to submission of the DCO Application.

Cowley and Birdlip Parish

- 2.11.8 In accordance with section 42 of the Planning Act 2008 (the Act), Cowley and Birdlip Parish Council are a prescribed consultee and therefore National Highways has a duty to consult the Parish Council under section 42(1)(b) of the Act. National Highways formally notified the Parish Council of the 2019 and 2020 statutory consultations.
- 2.11.9 Consultation and engagement have been undertaken through various mechanisms and has sought to keep key stakeholders informed about the scheme. For example, National Highways formed a Strategic Stakeholder Panel (SSP) and Technical Working Groups (TWGs) to provide high-level two-way dialogue between the A417 project team and stakeholder organisations through collaborative working. Representation from Cowley and Birdlip Parish Council attended the Communications TWG, the purpose of which was to share communications regarding the scheme and raise awareness of the statutory consultation periods. National Highways also engaged separately with Cowley and Birdlip Parish Council through formal consultation and engagement on matters raised by or affecting the residents they represent.
- 2.11.10 National Highways has sought to work collaboratively with Parish Councils to raise awareness of the scheme and statutory public consultations, such that all members of the community can participate. This has included briefing the Parish Councils prior to consultation and where possible, agreeing with them that consultation materials or advertising can be distributed or displayed from their premises.
- 2.11.11 This approach was of particular importance during the 2020 supplementary statutory consultation, during which National Highways took all reasonable steps to engage with local residents during the COVID-19 pandemic, involving Parish Councils to help overcome challenges to engaging with residents face-to-face. This approach also helped to involve residents through Parish Council representation as part of focused discussions on specific issues pertinent to local communities.

Landowner Engagement

- 2.11.12 National Highways has liaised with affected landowners throughout the development of the scheme. This has included engagement both within and outside of the formal consultation periods, including the non-statutory route selection consultation in 2018.
- 2.11.13 Formal engagement with Persons with an Interest in the Land (PILs) under section 44 of the Act has been undertaken during statutory consultation periods between 2019 and 2021. This is summarised in the Consultation Report (Document Reference 5.1, APP-027) and related appendices (Document Reference 5.2, APP-028/APP-029).
- 2.11.14 Outside of periods of formal consultation, landowner meetings and communication has been ongoing throughout the development of the scheme. This has included written communication and phone calls, as well as meetings where identified as necessary. Landowner meetings have been agreed with landowners and in some cases their respective land agents (if employed), considering the limitations and guidance associated with COVID-19. In some cases, online meetings have been held, in addition to or instead of face-to-face meetings.

- 2.11.15 Discussions have informed design decisions and where appropriate have involved relevant specialists of the National Highways project team, to help share technical information or advice where relevant to the points of discussion.
- 2.11.16 National Highways has prepared a series of position statements with landowners affected by the scheme. The position statements have been prepared in collaboration with the District Valuer Services to inform and assist ongoing discussions with the relevant landowner(s). The purpose of the position statements has been to provide a 'live' document that captures the key engagement activities and discussions held with landowners and their agents as appropriate. They provide a formal record of matters raised and the National Highways position in response where appropriate.
- 2.11.17 Appendix B of the Statement of Reasons (Document Reference 4.1, APP-024) submitted with the DCO Application further sets out how National Highways has engaged with affected landowners in relation to compulsory acquisition and temporary possession of land.

2.12 Impact on trees

Summary of matters raised in Relevant Representations

- 2.12.1 Relevant Representations have raised concerns regarding the damage to and/or removal of trees as part of the scheme. Some Relevant Representations state their objections based on the destruction of ancient woodland and removal of veteran trees. Other Relevant Representations have highlighted the damage to Ullen Wood due to noise, dust pollution and nitrogen deposition.

National Highways response

- 2.12.2 As stated in the Case for the Scheme (Document Reference 7.1, APP-417) submitted with the DCO application, every effort has been made to avoid veteran trees throughout the design process which has led to 18 trees being retained. These are situated either within land required temporarily for construction works or are adjacent to the DCO Boundary and will be protected and retained. Veteran trees that can be retained would be protected using methods in accordance with the British Standards BS 2837:2012 to include fencing of root protection areas and applying protective buffer zones in accordance with Natural England Guidance.
- 2.12.3 Of the 21 broadleaved veteran trees within and adjacent to the scheme, three would be unavoidably lost due to their location directly beneath the scheme alignment. The trees that would be lost are a sycamore (T57) near Stockwell Farm, and beech trees (T126 and 127) between Emma's Grove and Ullen Wood. As partial compensation for the loss of veteran trees, young trees of the same species as those to be lost will be planted as standard trees within a meadow south of Ullen Wood, which is in close proximity to the veteran trees to be lost.
- 2.12.4 ES Chapter 5 Air Quality (Document Reference 6.2, APP-039) identifies that there would be a significant effect in relation to nitrogen deposition on Ullen Wood ancient woodland and a veteran tree. Further assessment of the impacts of the scheme in relation to this is provided in ES Chapter 8 Biodiversity (Document Reference 6.2, APP-039). It should be noted that the increase in nitrogen deposition would not result in the loss of irreplaceable habitat, and even in the

absence of the scheme, the level of nitrogen deposition on these features would be at triple the amount at which significant degradation of the habitat is predicted.

- 2.12.5 Nonetheless, following the precautionary assessment methodology within DMRB LA 105 the predicted increase in nitrogen deposition arising from the scheme is of an amount (>0.4kg N/ha/yr) considered to lead to permanent degradation of the ancient woodland through a reduction in species richness and/or changes in species composition. Permanent degradation to the condition of the veteran tree is predicted on the same basis.
- 2.12.6 A Woodland Management Plan is proposed as an enhancement for Ullen Wood to improve the woodland structure and biodiversity and reduce existing pressures on the woodland so that it suffers less degradation from the increased nitrogen deposition. This will be achieved through introduction of conservation-led woodland management measures to areas of impacted woodland at the extremities of Ullen Wood.
- 2.12.7 In addition, an area of woodland and scrub totalling 2.1ha would be planted adjacent to Ullen Wood in a location where the predicated change in nitrogen deposition is below the 0.4kg N/ha/yr threshold for habitat degradation, to compensate for the area of woodland that is considered to be subject to degradation as a result of nitrogen deposition.

Summary:

- 2.12.8 National Highways has avoided direct loss of any ancient woodland and avoided loss of the majority of the veteran trees within or adjacent to the scheme. In response to the unavoidable loss of three veteran trees and predicted degradation of ancient woodland and one further veteran tree from nitrogen deposition, National Highways has provided mitigation measures where feasible, and appropriate compensation measures where mitigation is unfeasible. These measures, together with commitment BD50 in ES Appendix 2.1 EMP (Document Reference 6.4, APP-317) which seeks to explore additional enhancement proposals, will conserve Ullen Wood ancient woodland and many of the veteran trees within the scheme boundary during the operation of the scheme and into the future.

2.13 Construction impact on local roads

Summary of matters raised in Relevant Representations

- 2.13.1 Some Relevant Representations have raised concern that the construction of the scheme would cause disruption to the local road network, including in increase in traffic on roads that may not be able to safely or appropriately accommodate it.

National Highways response

- 2.13.2 National Highways recognises concerns over the disruption to the local road network and communities during construction of the scheme and will seek to reduce disruption while maintaining highway safety. National Highways has produced ES Appendix 2.1 EMP (Document Reference 6.4, APP-317) and ES Appendix 2.1 EMP Annex B Construction Traffic Management Plan (CTMP) (Document Reference 6.4, APP-319) as part of the DCO Application which outline how the impact of construction on the environment, the road network and local communities will be managed. National Highways has worked with the local

highways authority, GCC, to identify any potential mitigation measures required for the local road network as a result of the scheme and will continue to engage with the relevant authorities during construction.

2.14 Safety

Summary of matters raised in Relevant Representations

- 2.14.1 Some Relevant Representations have raised concerns that the scheme may not sufficiently address the safety issues of the existing A417 (including inclement weather and the steep gradient) and may result in increased road accidents due to increased traffic and traffic speeds, particularly on local roads such as the A436.
- 2.14.2 There has also been a concern raised that the proposed repurposing of the existing A417 as a route for walking, cycling and horse riding (including disabled users) may result in accidents due to conflicts between users and may increase anti-social behaviour.

National Highways response

Road safety

- 2.14.3 As identified in the Case for the Scheme (Document Reference 7.1, APP-417), the existing A417 has a poor safety record and improving road safety on the A417 is a key objective of the scheme.
- 2.14.4 Factors which contribute to the poor safety record of the existing A417 include:
- an existing alignment and design which is unsuitable for the traffic speeds and volume of traffic it accommodates;
 - a steep vertical gradient of up to 10% on Crickley Hill;
 - limited opportunities for safe overtaking and poor forward visibility in some locations;
 - numerous at-grade junctions and accesses to minor roads and private properties where traffic enters, exits or crosses the main A417 carriageway;
 - severance of PRow and at-grade crossings for walkers, cyclists and horse riders;
 - an elevated and exposed location on the Cotswolds escarpment which is vulnerable to extreme winter weather events such as snow; and
 - poor journey times and reliability, leading to 'rat running' on local roads which are not suitable for heavy traffic.
- 2.14.5 Safety has been a key consideration during the design of the scheme, which has sought to address some of the existing issues outlined above. This includes through the dualling of the mainline, the reduction of the gradient on Crickley Hill to 8%, the installation of a concrete safety barrier to mitigate vehicle crossovers from one carriageway to the other, and the introduction of a southbound climbing lane to enable overtaking opportunities. This will improve journey time reliability by providing safe overtaking opportunities and reducing driver frustration, particularly while HGVs climb the escarpment.
- 2.14.6 The scheme also proposes grade-separated junctions and access points to enable safer entry/exit from the mainline. The scheme has been designed to meet forecast traffic capacity requirements, which would enable a free-flow of traffic

and greater resilience in the case of breakdowns, incidents or extreme weather events. The increased capacity and journey time reliability would reduce the amount of rat-running on local roads by inappropriate traffic.

- 2.14.7 The scheme also proposes installation of CCTV cameras to monitor the operation of the road. This will aid in any incidents being identified quickly, so that the appropriate measures can be taken to secure the safety of road users and get the road back to full operational capacity as quickly as possible.
- 2.14.8 New segregated crossings for PRow are proposed and a traffic-free route via the Air Balloon Way, which would enable safe crossings and improve accessibility for walkers, cyclists and horse riders.
- 2.14.9 As part of the economic appraisal of the scheme, the impact of the scheme on safety has been assessed and monetised. The benefits of the scheme in terms of accidents are forecast to be £65million over the 60-year appraisal period. The appraisal forecasts a decrease in the number of Personal Injury Accidents (PIAs) of 52 compared to without the scheme (a PIA is an accident event that could include several vehicles). This amounts to 66 fewer fatalities, 201 fewer seriously injured casualties, and an increase of 29 in the number of casualties with slight injuries.
- 2.14.10 The majority of benefits are achieved from the removal of the existing single carriageway section of the A417, which has a high incidence of serious and fatal accidents. However, other benefits occur on routes on which traffic is forecast to reassign from, including existing rat runs at Birdlip Hill and Elkstone. Further information on the economic appraisal of the scheme is provided in the Case for the Scheme (Document Reference 7.1, APP-417).
- 2.14.11 It is acknowledged that some concern has been raised regarding increased traffic speeds on the A436 as a result of the scheme. Traffic modelling shows the increase in speeds on the A436 to be minimal at an average of 2 - 3km/h. The enforcement of speed limits on operational roads is a matter of policing.

Safety on the re-purposed A417

- 2.14.12 Concerns about the potential for conflict between users of the repurposed A417 (Air Balloon Way) and requests for further detail on its design were raised in response to statutory consultation, as set out in the Consultation Report (Document Reference 5.2, APP-027). Proposals for the Air Balloon Way include a segregated path, the preliminary design of which has been influenced by key stakeholders such as members of a Walking, Cycling and Horse riding Technical Working Group.
- 2.14.13 Further consideration of the design of this route (such as surfacing, signage and enclosures) will be given at the detailed design stage of the project, in consultation with key stakeholders and GCC. This has been included as a commitment in ES Appendix 2.1 EMP Annex F PRow Management Plan (Document Reference 6.4, APP-323).
- 2.14.14 In relation to the potential for anti-social behaviour on the repurposed A417, this is also a matter that has been raised through pre-application consultation and engagement. As set out in section 10.4 of the Consultation Report (Document Reference 5.1, APP-0270), concerns were raised that the parking area proposed to serve the repurposed A417 would be vulnerable to anti-social behaviour (an existing issue at nearby Barrow Wake car park).

- 2.14.15 Taking into account this feedback, National Highways engaged with the Cowley and Birdlip Parish Council alongside some local residents to consider their suggestions for alternatives and reviewed the location of the proposed car parking to help to address these concerns. As a result, National Highways decided to amend the proposals for the parking near the Air Balloon Way. General and horse box parking is now proposed to be located adjacent to the Golden Heart Inn, whilst a smaller disabled parking area would be provided off the Stockwell Farm junction, located further away from the village (east).
- 2.14.16 National Highways has therefore sought to take into account concerns relating to anti-social behaviour. Addressing such issues should they arrive once the scheme is operational will be a matter for the Gloucestershire police and GCC.

2.15 Impacts on Cowley village

Summary of matters raised in Relevant Representations

- 2.15.1 Some Relevant Representations have raised concerns about the potential impact of the scheme on Cowley village. This has included concern that the scheme would result in increased noise, air pollution and traffic in the village. There was additionally concern that the proposals to restrict access to Cowley Wood Lane from Cowley junction are not sufficiently detailed and that the scheme may impact on property value in Cowley. Some Relevant Representations submitted by residents of Cowley were concerned with the selection of Option 30 and the way that consultation on the scheme has been carried out, particularly in relation to the Cowley and Birdlip Parish Council.

National Highways response

- 2.15.2 Some of the matters raised by residents of Cowley have been discussed and addressed in other sections of this document as they also relate to themes more broadly raised in the Relevant Representations – please refer to the following sections:
- Alternative options for the scheme (Section 2.8)
 - Traffic modelling (Section 0)
 - Consultation (Section 2.11)
- 2.15.3 The remaining themes raised in responses made by residents of Cowley village are considered in turn below.

Noise impacts

- 2.15.4 Concerns in relation to noise effects at Cowley have previously been raised in response to statutory consultation in 2019 and 2020. National Highways has considered the tranquil quality of the Cotswolds AONB within the design of the scheme, proposing to implement a lower noise surface on the scheme to minimise the noise emission, as well as extensive earth bunding and stone walls alongside the proposed new alignment to provide noise screening.
- 2.15.5 In terms of assessing the impact of construction activities, DMRB LA 111 notes that a study area of 300 metres from the closest construction activity is normally sufficient to encompass noise sensitive receptors, although variations in the study area can be defined for individual projects. As a result of stakeholder concerns at Cowley, the study area was extended to the north and to the east to include

Cowley village (for the assessment of construction and operational noise). For construction, the study area covered a distance of approximately 1100m to 2000m (i.e., across the village) away from the closest construction activity.

- 2.15.6 As set out in ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042), and in line with DMRB standard, receptors have been located to assess the noise impact in that particular area during construction. Pertinent to Cowley village is Receptor R17, Nothill, Cowley.
- 2.15.7 The construction noise levels at Cowley are, at most, assessed as minor impacts and not significant based on the LA 111 standard. The construction noise impacts at Coberley and Ullenwood are also not significant based on the LA 111 standard. The minor impact is reported in paragraph 11.10.24 in ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042), with the noise level data for Receptor R17 given in Table 11.17.
- 2.15.8 For construction works, ES Appendix 2.1 EMP (Document Reference 6.4, APP-317) outlines that a NVMP must include the requirement to undertake noise and vibration monitoring to ensure compliance with agreed threshold levels (NV5). Also, Best Practicable Means is embedded mitigation to control construction noise in the form of low noise emission plant and processes. These controls will be secured by Requirement 13 of the DCO.
- 2.15.9 The operational noise impacts at Cowley to the east of the scheme within the study area, have been fully assessed and are reported in ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042). ES Figures 11.3 and 11.4 (Document Reference 6.3, APP-250 and APP-251 respectively) show the noise level change contours for the village of Cowley. The assessment has shown that there are no significant adverse effects at Cowley. Noise changes have been assessed as a minor impact at the centre of the village. At the eastern part of the village there would be a noise decrease (minor beneficial impact) due to reduced traffic on local roads to the east. Noise changes at Coberley and Ullenwood have been assessed as a minor impact and therefore not significant overall.
- 2.15.10 To mitigate operational noise impacts and as part of a landscape-led approach, National Highways has proposed the use of landscaped bunding to reduce the effect of the road on the landscape and the existing noise levels. This would include an earth bund with 1.2m stone wall at Stockwell Overbridge to Cowley Overbridge along the north and southbound carriageways. Also, the mitigation would include an earth bund with 1.2m stone wall at Cowley Lane (currently an unclassified road with public access rights) to Cowley junction along the southbound carriageway and at Cowley junction eastern loop. These would be of most benefit to the areas closest to the scheme (as any acoustic screening is most effective closer to the noise source). There would be diminishing benefits at larger distances from the scheme, including more distant receptors such as those at Cowley.

Air pollution

- 2.15.11 As set out in ES Chapter 5 Air Quality (Document Reference 6.2, APP-036), detailed assessments have been carried out using an atmospheric dispersion model (ADMS- Roads v5.0) to determine the potential effects on annual mean nitrogen dioxide (NO₂) concentrations at selected sensitive receptors. Receptors H58, H59, H61 and H77 are close to or within Cowley (H59 is within the village),

where modelled concentrations have been compared with the annual mean objective for NO₂ following the DMRB standard.

- 2.15.12 The assessment for local air quality has been undertaken for the following scenarios:
- 2016 Baseline scenario;
 - 2026 Do-minimum (DM) scenario: the traffic scenario at the modelled opening year without the scheme; and
 - 2026 Do-something (DS) scenario: the modelled opening year with the scheme.
- 2.15.13 During construction, additional construction traffic would travel on the existing A417 alignment. Annual mean NO₂ concentrations were predicted at receptors H58, H59, H61 and H77. The predicted change in concentration at each of these receptors was <0.1µg/m³ and can be considered a negligible change. The highest predicted concentration at these receptors during the construction phase is 11.0µg/m³ which is below the annual mean objective (40µg/m³). There is no significant effect predicted at these receptors.
- 2.15.14 During construction, potential air quality effects arise from emissions of construction dust and particulate matter from construction activities. Dust has the potential to cause nuisance to property, and very high levels of soiling can affect plants and ecosystems. There is the potential for dust nuisance on receptors within 200m of construction and haulage routes associated with the scheme. Given Cowley village is not within 200m of the scheme, it is not anticipated that dust would be a nuisance in the village. In addition, best practice mitigation measures would be in place to reduce dust impacts to a negligible level, as secured via ES Appendix 2.1 EMP (Document Reference 6.4, APP-317). There are no significant dust effects predicted during the construction phase.
- 2.15.15 During the operational phase in the opening year (2026), annual mean NO₂ concentrations were predicted at receptors H58, H59, H61 and H77 for the DM and DS scenario. H77 is approximately 450m east of the new A417 alignment and 110m north of the ARN and is the closest of the four Cowley village receptors to the new alignment. H77 is predicted to have an annual mean concentration of 8.0µg/m³ and an increase of 0.3µg/m³ as a result of the scheme. The highest concentration in Cowley village is predicted to be 8.5µg/m³, a reduction of 0.6µg/m³ at receptor H58 as a result of the scheme. All receptors in Cowley are predicted to be below the annual mean objective (40µg/m³) as a result of the scheme and no significant effect is predicted.

Cowley Wood Lane

- 2.15.16 The design of the scheme presented at the 2019 statutory consultation included provision at Cowley junction for access between Cowley and the A417 via Cowley Wood Lane. However, many comments were received in response to the consultation that highlighted concerns that there would be an increase in traffic and 'rat running' on Cowley Wood Lane, and that an increase in traffic would cause disruption in Cowley village.
- 2.15.17 As a result, National Highways reassessed the need for this access and decided to amend the design of the junction to prevent vehicles from access Cowley Wood Lane. Access would, however, be retained along Cowley Wood Lane for local properties (with any potential enclosures to be subject to discussion and

agreement at the detailed design stage), as well as a route for walkers, cyclists and horse riders, including disabled users.

- 2.15.18 These changes were consulted on in the 2020 supplementary consultation. Overall, the feedback received on this change was positive. However, some respondents raised concerns about how National Highways could help ensure that the access along Cowley Wood Lane would be restricted to prevent general traffic, and some sought greater clarification and commitment in the scheme design for details about enclosures (for example, the use of gates or collapsible bollards). There was concern that the route, if not effectively controlled, would still result in rat running.
- 2.15.19 To prevent rat running, National Highways would 'stop up' the highway from Cowley junction to Cowley via Cowley Wood Lane, meaning that there would be a restriction to general traffic. It would become a private means of access to local properties along with PRow designation to allow access to walkers, cyclists and horse riders. Signage and other measures would make these access arrangements clear and prevent access by general traffic. With the scheme in place, Cowley village would be accessed via Cowley Lane and join the A417 at the new Cowley Junction, or via the A435/A436/A436 Link Road and the new Shab Hill junction.
- 2.15.20 At this preliminary stage of the scheme design, it is not possible to confirm in detail what signage, surfacing and enclosures (such as gates and bollards) would be implemented. This would be determined at the detailed design stage following the approval of the scheme, if granted. Accordingly, National Highways will engage with its contractor, the local highways authority (GCC) and residents affected by this matter at the detailed design stage. National Highways would also work with relevant interested parties including but not limited to the Parish Councils.

Property value

- 2.15.21 A diligent inquiry, under section 44 of the Act, was undertaken by National Highways to identify and list landowners that may be affected by the scheme. Such persons are listed in the Book of Reference (Document Reference 4.3, APP-026) and have been consulted about the DCO application in accordance with section 42(1)(d) of the Act as described in the Consultation Report (Document Reference 5.1, APP-027).
- 2.15.22 In accordance with Part I of the Land Compensation Act 1973, National Highways considers properties to be devalued when physical factors caused by the use of a new or altered road reduce a property's value. Compensation can be claimed by people who own and also occupy such properties. Physical factors include noise, vibration, smell, fumes, smoke and artificial lighting and the discharge on to the property of any solid or liquid substance.
- 2.15.23 Loss of view or privacy, personal inconvenience and physical factors arising during construction of the road are not covered under Part I compensation.
- 2.15.24 Where there would be an impact on the village, these are considered to be minor. For more information regarding noise and air quality please see sections above or ES Chapter 5 Air Quality (Document Reference 6.2, APP-036) and ES Chapter 11 Noise and Vibration (Document Reference 6.2, APP-042).

2.15.25 If residents of Cowley consider the value of their property to have gone down as a result of the physical factors caused by the use of a new or altered road then a Part I claim can be made personally or through an agent. National Highways will then use the Highways Agency Method to calculate the level of fees and repay the amount to an agent for the successful claims which have been negotiated. Compensation for a property is based on the physical effects arising from the scheme against the value of a property based on property prices current on the first claim day.

2.16 Light pollution

Summary of matters raised in Relevant Representations

2.16.1 Some Relevant Representations raised concerns regarding light pollution, particularly on the impact that headlights may have on the AONB and local wildlife. Other Relevant Representations state that any lighting proposed should utilise a mix of standard and innovative lighting solutions which balance highway safety, ecology and landscape concerns.

National Highways response

2.16.2 The scheme's road junctions are all located in the Cotswolds AONB. While the AONB is not a designated International Dark Sky Reserve (IDSR), it is well known for its dark sky environment, with dark skies forming a special quality of the AONB and therefore the preference is to promote and maintain dark sky conditions akin to those found in an IDSR.

Consideration of lighting in scheme design

- 2.16.3 Modern car headlights are directional, resulting in much less light spill than in the past. However, light spill from vehicles would be screened through the implementation of false cuttings (landscape earthworks), Cotswold stone walls and tree planting.
- 2.16.4 The preliminary design for the scheme doesn't include any road lighting provision with the exception of on-demand lighting at Grove Farm underpass, which has been provided primarily for the benefit of walkers, cyclists and horse-riders.
- 2.16.5 The preliminary design includes the following mitigations for the lack of lighting provision on the scheme, primarily on the basis of safety:
- In locations where an increased risk to drivers has been identified, high quality retroreflective signage, road studs and road markings are to be provided. Additional mitigation measures will be considered at detailed design such as on demand traffic signs, rumble strips and countdown signage.
 - Where risks associated with pedestrians and two-wheelers are identified, dedicated off-road routes are proposed.
- 2.16.6 National Highways has received a letter from the local highways authority (GCC) on 18 October 2021 which states that it does not support the proposals by National Highways for no road lighting specifically at Ullenwood junction. GCC has requested that the scheme provides enabling infrastructure (such as concrete footings and cable ducting) for future lighting of the junction, allowing for installation of lighting should post-construction monitoring by GCC identify that it is required. National Highways has responded via letter on 15 November 2021 to

confirm that it will undertake an assessment of this approach to better understand any potential impacts of doing so.

- 2.16.7 Discussions on this matter with GCC continue and the latest position is recorded in the Statement of Common Ground with the Joint Councils in Appendix A of the Statement of Commonality (Document Reference 7.3, Rev 1).

Assessment of effects

- 2.16.8 ES Chapter 7 Landscape and Visual Effects (Document Reference 6.2, APP-038) assesses the impact of light pollution during construction and operation of the scheme. It reports that the construction phase of the scheme would require additional temporary lighting. Outside daylight hours, task lighting would be required and where overnight working is dictated by road closure, the area will be generally lit with additional task lighting. Construction compounds will be lit during working hours and will require background lighting for safety and security reasons outside working hours. All lighting will be directed inwards to minimise impact and will make use of landscape screening to reduce light spill.
- 2.16.9 During the operational stage the assessment states that the scheme would not be lit. However, the visual assessment includes a qualitative assessment of the predicted changes in light levels/ light pollution due to traffic movement along the scheme.
- 2.16.10 The assessment concludes that the scheme layout and design would enhance the tranquillity and dark skies of the AONB (special qualities) as the road carriageway would be sunk into the landscape reducing noise pollution, light spill and skyglow as a result. This would also remove the visual disturbance of moving vehicles across this part of the AONB.

2.17 Biodiversity Net Gain

Summary of matters raised in Relevant Representations

- 2.17.1 Some Relevant Representations have cited concerns that the scheme will result in a biodiversity net loss, contrary to the vision of the scheme to be landscape-led and national legislation. Other Relevant Representations have also queried whether all possible avenues of reducing net loss have been pursued.

National Highways response

- 2.17.2 There is no policy or legal requirement for this scheme to deliver Biodiversity Net Gain.
- 2.17.3 National Highways has adopted a corporate target of no net loss of biodiversity across its activities by 2025, progressing towards delivering a net gain in biodiversity by 2040. This means that, individually, some schemes will report a net loss and others a net gain. The focus for the A417 scheme is on maximising biodiversity delivery within the land acquired for the scheme design.
- 2.17.4 National Highways has worked collaboratively with environmental bodies such as Gloucestershire Wildlife Trust, Natural England, National Trust, GCC and CCB to consider the evolving DEFRA Biodiversity Metric tool.
- 2.17.5 Using a beta version of the Biodiversity Metric 2.0, the scheme currently scores a loss, largely due to the way that the proposed large net gain in area of high-

distinctiveness habitat creation (lowland calcareous grassland) scores relatively poorly within the calculation. The Metric heavily discounts the biodiversity unit score of this locally appropriate habitat on the basis that it is difficult to create.

- 2.17.6 National Highways has reached agreement with some stakeholders, including Natural England, CCB and GCC, that it is correct to focus on providing locally appropriate priority habitats, which are in keeping with the special qualities of the Cotswolds AONB, rather than habitat types that score more highly in the Metric due to taking less time to establish or reach a target condition, but are not appropriate for the Cotswolds AONB. This is documented in the relevant Statements of Common Ground (see Statement of Commonality, Document Reference 7.3, APP-419).

Summary

- 2.17.7 The scheme would result in an overall biodiversity loss when calculated using the DEFRA Biodiversity Metric tool. The level of loss is driven by adhering to the agreed design vision which delivers relatively poorly scoring high-distinctiveness habitat that are specific to the Cotswolds AONB. This approach has been collaboratively arrived at with key environmental stakeholders prior to DCO submission and there has been a general agreement that National Highways' approach to delivering habitat in the scheme is appropriate, and is aligned with current extant policy and Chartered Institute of Ecology and Environmental Management guidance
- 2.17.8 Outside of the DCO Application, National Highways is continuing to investigate further opportunities to achieve a neutral or better metric score through looking at other off-site measures and use of separate Environmental Designated Funds.

3 Response to Relevant Representations made by Affected Persons

3.1 Introduction

- 3.1.1 This chapter provides the National Highways response to Relevant Representations made by Affected Persons. Whilst some of the matters raised by Affected Persons are considered in the common themes discussed in the preceding Chapter, National Highways considers that some of the Relevant Representations submitted by Affected Persons required a specific response and will be writing to the Affected Person, as part of ongoing engagement.
- 3.1.2 Position Statements have also been drafted with landowners, and these have helped to inform previous and ongoing engagement with Affected Persons. Where relevant, the National Highways response to Relevant Representations draws on those draft Position Statements, which will be shared with the landowner(s) as part of ongoing engagement.
- 3.1.3 This Chapter therefore does not seek to respond in full to Relevant Representations made by Affected Persons. Instead, it provides a summary of how National Highways has responded to the relevant Affected Persons and the outcome of any direct engagement with the Party since the Relevant Representation was submitted. The Relevant Representation reference, Affected Person(s) name and National Highways response is set out in Table 1 below.

3.2 National Highways response to Relevant Representations submitted by Affected Persons

Table 1 National Highways response to Relevant Representations submitted by Affected Persons

Examination Library Reference	Affected Person(s)	National Highways response
RR-007 & RR-089	Bruton Knowles on behalf of Mrs Patricia Lesley de Lisle Wells & R.W de Lisle Wells	National Highways is writing to Mr & Mrs de Lisle Wells and their agents as part of ongoing engagement. A Position Statement has been developed with the Affected Person which covers issues raised within the Relevant Representation.
RR-011	Carter Jonas LLP on behalf of Alan Dick	National Highways is writing to Mr Alan Dick and his agents as part of ongoing engagement. A Position Statement has been developed with the Affected Person which covers issues raised within the Relevant Representation. It is considered that the Position Statement negates the need for a SoCG with this party as suggested within the Rule 6 Letter [PD-005].
RR-012	Cellnex UK	National Highways has engaged with Cellnex UK and has prepared a SoCG with the organisation as suggested within the Rule 6 Letter (PD-005). This is submitted as part of the updated Statement of Commonality (Document Reference 7.3, APP-419).

Examination Library Reference	Affected Person(s)	National Highways response
RR-020 & RR-026	Converse Law on behalf of Mr David Allen John Field & David Allen John Field	National Highways is writing to Mr Field and his agents as part of ongoing engagement. A Position Statement has been developed with the Affected Person which covers issues raised within the Relevant Representation.
RR-036	Fisher German LLP on behalf of Alexander & Angell Ltd	National Highways is writing to Alexander & Angel Ltd and its agents as part of ongoing engagement. A Position Statement has been developed with the Affected Person which covers issues raised within the Relevant Representation.
RR-037	Fisher German LLP on behalf of FlyUp Limited	National Highways is writing to Flyup Limited and their agents as part of ongoing engagement and to provide an update on matters raised within their Relevant Representation. A Position Statement has been developed with the Affected Person for review and agreement. It is considered that the Position Statement negates the need for a SoCG with this party as suggested within the Rule 6 Letter (PD-005).
RR-039 & RR-078	Gateley Hamer on behalf of National Star Foundation & National Star Foundation	National Highways is writing to National Star Foundation and their agents as part of ongoing engagement. A Position Statement has been developed with the Affected Person which covers issues raised within the Relevant Representation. It is suggested that the Position Statement negates the need for a SoCG with this party as suggested within the Rule 6 Letter (PD-005).
RR-069 & RR-071	Moore Allen & Innocent LLP on behalf of Mr B J Ford & Moore Allen & Innocent LLP on behalf of Mrs C E Ford	National Highways is writing to Mr & Mrs Ford and their agents as part of ongoing engagement. A Position Statement has been developed with the Affected Person which covers issues raised within the Relevant Representation.
RR-070	Moore Allen & Innocent LLP on behalf of Mr I F Medlock	National Highways is writing to Mr Medlock and his agents as part of ongoing engagement. A Position Statement has been developed with the Affected Person which covers issues raised within the Relevant Representation.
RR-098	Stephen Mendel	National Highways is writing to Mr Mendel as part of ongoing engagement. A Position Statement has been developed with the Affected Person which covers issues raised within the Relevant Representation.

4 Response to Relevant Representations made by Interested Parties subject to a Statement of Common Ground

4.1 Introduction

- 4.1.1 This chapter provides the National Highways response to Relevant Representations made by Interested Parties who are currently engaged in a SoCG with National Highways.
- 4.1.2 Whilst some of the matters raised by the Interested Parties are considered in the common themes discussed in Chapter 2, National Highways considers that some of the Relevant Representations submitted by these Interested Parties require a specific response. This has included through providing a direct response to the Interested Party prior to Deadline 1 as part of ongoing SoCG meetings (see Statement of Commonality, Document Reference 7.3, APP-419).
- 4.1.3 Responses in this chapter are limited to matters that National Highways considers requires a response, for example to clarify a position or update the ExA on a matter raised in a Representation. This chapter therefore does not seek to respond in full to Relevant Representations made by Interested Parties.
- 4.1.4 Table 2 below summarises the response of National Highways to the relevant Interested Parties and the outcome of any direct engagement with the Party since the Relevant Representation was submitted.

4.2 National Highways response to Relevant Representations submitted by parties subject to an SoCG

Table 2 National Highways response to Relevant Representations submitted by parties subject to an SoCG

Examination Library Reference	Interested Party	National Highways response
RR-004	Atkins on behalf of Joint Councils (Gloucestershire CC Cotswold DC & Tewkesbury BC)	The Joint Councils have provided helpful updates to their positions recorded in their SoCG (see Appendix A of the Statement of Commonality, Document Reference 7.3 Rev 1). All matters previously to be determined have been resolved as agreed or outstanding, or removed from the SoCG as no longer relevant. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3, Rev 1). Discussions in relation to the Draft DCO (Document Reference 3.1 Rev 1) is ongoing with the Joint Councils and will be reflected in a future update to the SoCG.
RR-006	British Horse Society	The British Horse Society has positively engaged with National Highways as part of the Walking, Cycling and Horse riding Technical Working Group, with its position recorded in their SoCG (see Appendix H of the Statement of Commonality, Document Reference 7.3 Rev 1). The British Horse Society in its Relevant Representation raises two matters captured in Table 2-1 of the SoCG (see entries for 10/19 February 2020; 23/28 October 2020; 10 February 2021; and 29 March 2021) about:

Examination Library Reference	Interested Party	National Highways response
		<ol style="list-style-type: none"> 1. Coberley 10 and the road linking back from the Air Balloon roundabout towards the Leckhampton Hill road past the National Star College; and 2. Connectivity around Shab Hill. <p>These matters have been responded to previously and updated positions are now captured in their SoCG under matters outstanding, Table 5-1 ref 8.4 and 9.4 respectively. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3 Rev 1).</p>
RR-015	Cheltenham & Tewkesbury Cycling Campaign	<p>The Cheltenham & Tewkesbury Cycling Campaign (CTCC) has positively engaged with National Highways as part of the Walking, Cycling and Horse riding Technical Working Group, with their positions recorded in their SoCG (see Appendix H of the Statement of Commonality, Document Reference 7.3 Rev 1). CCTC in their Relevant Representation raise their ongoing concerns and suggested alternative to the scheme with an additional pedestrian crossing of the existing A417 (to the west of the scheme). These matters have been responded to previously and where appropriate, these are captured in their SoCG under matters outstanding, Table 5-1. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3, Rev 1).</p>
RR-021	Cotswold Conservation Board (CCB)	<p>CCB has provided helpful updates to their positions recorded in their SoCG (see Appendix E of the Statement of Commonality, Document Reference 7.3 Rev 1), and where appropriate, these are captured in their SoCG. In particular, National Highways through its SoCG discussions with CCB has sought clarity over their Representation which makes reference to tunnelled alternatives to the scheme. It is now understood that CCB does not intend to continue to support those previously considered suggested alternatives. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3, Rev 1).</p>
RR-035	Environment Agency	<p>The Environment Agency has provided helpful updates to their positions recorded in their SoCG (see Appendix B of the Statement of Commonality, Document Reference 7.3 Rev 1), and where appropriate, these are captured in their SoCG. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3 Rev 1).</p>
RR-040	Gloucestershire Local Access Forum	<p>The Gloucestershire Local Access Forum (GLAF) has positively engaged with National Highways as part of the Walking, Cycling and Horse riding Technical Working Group, with their positions recorded in their SoCG (see Appendix H of the Statement of Commonality, Document Reference 7.3 Rev 1). GLAF in their Relevant Representation raise their ongoing concerns and suggested alternative to the scheme with an additional pedestrian crossing of the existing A417 (to the west of the scheme). These matters have been responded to previously and where appropriate, these are captured in their SoCG under matters outstanding, Table 5-1. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3 Rev 1).</p>
RR-041	Gloucestershire Ramblers	<p>The Gloucestershire Ramblers has positively engaged with National Highways as part of the Walking, Cycling and Horse</p>

Examination Library Reference	Interested Party	National Highways response
		riding Technical Working Group, with their positions recorded in their SoCG (see Appendix H of the Statement of Commonality, Document Reference 7.3 Rev 1). The Gloucestershire Ramblers in their Relevant Representation raise their ongoing concerns and suggested alternatives to the scheme. These matters have been responded to previously and where appropriate, these are captured in their SoCG under matters outstanding, Table 5-1. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3 Rev 1).
RR-042	Gloucestershire Wildlife Trust	Gloucestershire Wildlife Trust has provided helpful updates to their positions recorded in their SoCG (see Appendix F of the Statement of Commonality, Document Reference 7.3 Rev 1), and where appropriate, these are captured in their SoCG. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3 Rev 1).
RR-047	Historic England	Historic England has provided helpful updates to their positions recorded in their SoCG (see Appendix D of the Statement of Commonality, Document Reference 7.3 Rev 1), and where appropriate, these are captured in their SoCG. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3 Rev 1).
RR-079	National Trust	National Trust has provided helpful updates to their positions recorded in their SoCG (see Appendix G of the Statement of Commonality, Document Reference 7.3, Rev 1), and where appropriate, these are captured in their SoCG. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3 Rev 1).
RR-080	Natural England	Natural England has provided helpful updates to their positions recorded in their SoCG (see Appendix C of the Statement of Commonality, Document Reference 7.3, Rev 1), and where appropriate, these are captured in their SoCG. An updated version of this SoCG is submitted at Deadline 1, in the Statement of Commonality (Document Reference 7.3 Rev 1).