

A417 – Missing Link

National Star

Written Representation December 2021

Client: National Star Foundation
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Gateley **HAMER**

Introduction

This Written Representation has been produced by Gateley Hamer on behalf of National Star Foundation (NS) in respect of the National Highways (NH) road improvement scheme known as the A417 Missing Link.

NS is an independent registered charity and specialist provider of services for people with disabilities, based at Ullenwood, immediately adjacent to the proposed A417 Missing Link development. One of the largest operations of The National Star Foundation is National Star College which provides education, personal development, therapies and care for young adults with a range of profound, severe and complex disabilities and associated medical and behavioural conditions.

The main site at Ullenwood provides help and support for over 200 residential, day and adult learners. Last year NS was able to provide c.500 young people and adults with disabilities with access to the National Star's various education, care and personal development programmes.

NS's Ullenwood site is the main residential and day campus (with associated off - site residential accommodation in Cheltenham & Gloucester) and is the specialist Hub for the charity's activities, providing specialist education, nursing and care accommodation, multi-disciplinary therapies, hydrotherapy pools and other specialist facilities. The Site is also the head office of the charity. Day student provision is also provided at other satellites sites for less complex disabilities. These services cannot be provided by any other facility within a reasonable travel distance/time of the NS. The NS has satellite campuses at Hereford and Torfaen, which are not within acceptable daily traveling distances for students from Ullenwood.

As a charitable foundation with an annual turnover of c.£30m and providing valuable education and welfare services to its students it is essential that the A417 Missing Link scheme has minimal impact on the operations of the NS and its students. It should also be noted that NS is a substantial local employer and economic contributor in the Cheltenham / Gloucester area with over a 1,100 staff. Staff travel in a wide radius of the Ullenwood site, requiring unimpeded access twenty-four hours a day, any disruption to the care and services and may have an adverse impact on these valuable jobs and local economy.

NS is broadly supportive of the need for the NH scheme however, there are a number of important considerations which need to be addressed to allow NS to continue providing its vital services throughout the period of the highway construction works. These issues are detailed within this report.

Meaningful Dialogue

There is a general feeling of a lack of any meaningful productive dialogue between NH and NS. Whilst there have been numerous meetings with an extensive professional team, representing NH, there has been little progress in bringing any concerns raised to an agreed satisfactory conclusion or resolution. The points raised in the Statutory Consultation in November 2019 and again in the Supplementary Consultation in October 2020 are still outstanding, leaving NS with a lack of confidence that their concerns are being properly considered or mitigated for. A copy of the original consultation letter dated 7th November 2019 and Supplementary Consultation October 2020 is attached for ease of reference, along with a copy of the most recent position statement.

There has also been little to no engagement in agreeing and securing any land needed for the scheme by negotiation. There has also been very little development of a Position Statement

with NH to consolidate and centralise the issues raised to date and bring those to an agreed position.

As previously mentioned, NS is in principle supportive of the scheme, however there are potential adverse impacts on the NS facility by the proposed scheme which to date have not been properly addressed or planned and mitigated for, as a consequence there are a number of issues detailed in this report which NS feels need to be explored as part of the examination process for the scheme.

1. Specialist Nature of National Star

As mentioned above, National Star operates a range of highly specialist programmes and services from its Ullenwood base, which provide young people and adults with severe and highly complex disabilities and protected characteristics access to educational, care, therapies and residential facilities.

The students and other service users who rely upon the NS facilities have a range of conditions which should not be considered within any routine or cursory consultation considerations. Each student requires individual specialist care, treatment, staffing and facilities to ensure a quality of services and care. Any interruption, change or break in service delivery will have a disproportionate impact and differential effect on the physical health and wellbeing of the young person as well as their ability to access their provision. Therefore, the potential impacts of the proposed scheme need to be very carefully assessed, reviewed, planned for and then monitored and minimised.

All of the points detailed below in this report are included for the protection of those who access and rely upon National Star's services.

The Equality Impact Assessment

An Equality Impact Assessment (EqIA) has been produced by ARUP for NH, however, it has not adequately taken NS into account, we are advised due to an administrative error. No contact was made with the charity or its service users by the report's authors in the drafting of the report, despite the history of NS contributing to the consultation and representation process and engaging with NH and therefore the report does not address any of NS's unique circumstances.

Given the above, NS is of the opinion that the consultation process has not taken account of or had due regard to the specialist nature of NS and those who access its provision for specialist care. NS has tried to bring this to the attention of the project through the Statutory and Supplementary Consultation processes as well as through project meetings. It has not been until very recently that the project team has proposed site visits with a view to understanding its activities and provision for care and to better inform the EqIA process.

NS has raised concerns at the project's approach to the Human Rights and Equalities Act requirements that should have been considered for the scheme, and therefore raised the question of the adequacy of the EqIA prepared and submitted for the scheme. NS have sought legal advice in relation to the potential failings of the EqIA process undertaken by NH and have been advised that NH has failed to demonstrate due regard to the students and service

users and operation of NS, having failed to engage with the organisation or its service users in drafting the EqIA.

NS is more than happy to provide any information or facilitate access for NH to carry out their consultation process to update the current EqIA and has proactively suggested information that it can provide to help inform NH.

2. Compulsory Acquisition

As a consequence of the proposed scheme as detailed by the Book of Reference (BoR), Land Plans (LP) and Statement of Reason (SoR), NS is currently subject to a number of areas for compulsory acquisition on a permanent and temporary basis. The plots are identified in the table below. NS has a limited land holding that was gifted to the charity when it was first established in 1967 and therefore is an important asset to the operation and future aspirations of the charity.

As mentioned previously, whilst NS supports the project in principle, NS has not been given the necessary details or comfort that the amount of land they are required to release is necessary for the scheme. As detailed and shown in the LP, BoR and SoR, NS land is required for the following;

Plots	Works No.	Purpose for which the land is required
2/24	1 -10	Required for the realignment of Leckhampton hill, construction of new private means of access, new drainage culverts, construction new drainage ditch, essential mitigation planting, and British Telecommunications diversions
2/24a	4	Required for the new Ullenwood junction.
2/24b	4c	Required for the realignment of Leckhampton hill.
2/24c	4c	Required for the provision of and to provide working space and temporary access for works associated with the provision of the realigned Leckhampton hill.
2/28	4, 4f and 22	Required for the new Ullenwood junction, construction of a new basin access, construction of new drainage culvert, construction of a drainage attenuation basin, essential mitigation planting and Western Power Distribution diversion.
2/28a	4f	Required for the provision of and to provide working space and temporary access for works associated with the provision of the attenuation basins and to provide screening works during construction.
2/28b	4f	Required for the provision of and to provide working space and temporary access for works associated with the provision of the attenuation basins and to provide screening works during construction.
2/28c	4f	New right to construct, use, protect, inspect and maintain new drainage channel or pipe
2/28d	4f	New right to construct, use, protect, inspect and maintain new drainage channel or pipe

Throughout the consultation process, NS has queried the need for plots 2/28c and 2/28d for the *New right to construct, use, protect, inspect and maintain new drainage channel or pipe*. NS is informed this pipe/channel is needed as an emergency overflow from the new attenuation basins. NS has consistently queried and challenged the need for these plots, as this would result in extensive sterilisation of a long length of land dissecting the charity's land asset, preventing future development opportunities for the charity and potentially have a further detrimental impact on its remaining land, through drainage discharge to an existing known low-point and flood area.

This land required for the project sits in a valley which arrives at a natural pinch point which naturally hold water in the ground during the winter. NS fears that any changes to this natural drainage could result in worsening the ground conditions. This pinch point is also the point where the land use changes from an agricultural field to a golf course, see below. The resulting ditch network through the golf course is not suitable for larger volumes of water under storm conditions. NS fears that during a storm event, highway run-off water will be fast tracked through the pipe down the valley to this pinch point, causing unknown issues to the neighbouring Golf Course and water course.

On numerous occasions the need for the overflow right has been queried with the project team. In an emailed dated 22nd July 2021 from Arup, it was explained that it was now considered that the overflow right would not be needed on permanent basis, however a temporary right would be needed during construction.

“Highways England have confirmed in writing that no permanent easement is being sought and that a 100% infiltration approach to the drainage basins is being made (subject to regulatory approval). As also explained a drainage route will also be required on a temporary basis during the construction of the basins themselves”.

NS found this to be a positive collaboration with the project team, however on review of the submitted application documents, the plots in question 2/28c and 2/28d remain in the BoR, LP and SoR and annotated on the plan as being required on a permanent basis. NS is therefore perplexed and anxious at the potential loss of the plots and the resulting sterilisation of the land and potential flooding risk at the outflow point.

On review of the works plans (Sheet 2 – HE551505-ARP-LSI-X_XX_XXXX_X-DR-ZL-00402) a well-defined drain is clearly shown, however it is not clear whether it is a permanent or a temporary situation. The works descriptions with the draft DCO also make no reference to a temporary drainage right.

NS would like the Examining Authority to explore on what basis are plots 2/28c and 2/28d required, whether the potential for flood risk downstream of the NS site has been fully reviewed and whether the proposed drainage network requires as much land as requested. If, as advised by the project team, a permanent drainage right is not required, then why is a temporary drainage right required and what consideration or modelling has been undertaken for the impact of the proposed drainage.

3. Traffic

NS have been informed that traffic level will increase on the Leckhampton Hill, A436 and A417 as a result of the scheme during and post construction. Following the lack of meaningful

consultation, as outlined above, NS has concerns that the impact of the increased traffic on NS's Ullenwood site has not been fully explored and there could be extensive and far-reaching implications on the operations of the charity.

During Construction

NS has serious concerns about the effect on students, service users, residents and staff being held up in traffic during the construction phase of the project. Both residential and day students travel to and from the site throughout the day from a wide geographical area. Due to nature of the student's disabilities travel time that can be sustained by many is limited, any delays can have significant impacts on a student's wellbeing. Therefore, any increase in travel time for some students could result in their placements being untenable. There are only a handful of specialist providers like NS across the whole Country, places in which are in high demand and over-subscribed. Accessing another provider for those who attend National Star's services is simply not an option. The same will also apply to the highly trained staff that work at NS. NS staff need to provide care and support 24 hours a day, seven days a week, 52 weeks of the year. The staff provide require unimpeded access to carry out operational duties such as specialist care, therapy, nursing and education.

NS requirements for staff, students and emergency vehicles must be carefully and fully considered as part of the Construction Traffic Management Plan (CTMP) for the scheme. NS seeks and must have assurances from NH, ahead of the contract award, that the CTMP must be developed in conjunction with an appointed contractor to ensure the contractor is aware of the NS's unique requirements and is obliged to ensure that there is no detriment or delay to the continuity of access to NS at Ullenwood by its users, residents, visitors, contractors, emergency services and staff.

Post Construction

NS has been informed that after construction the modelling shows increased traffic indicated for Leckhampton Hill road, this is the main access to the NS site. This is a known accident "blackspot" due to visibility and road bends/incline. Any increased volume mentioned in the 10th September 2020 meeting could cause further problems, therefore NS has requested details of the daily percentage increase in vehicle traffic on each road leading to the NS and how this will be mitigated for in order to ensure safe access to NS

Therefore, NS needs to be completely satisfied that there will be no disruption to the access to NS during the construction phase of the scheme and urgently requests dialogue and undertakings by NH to ensure that NS can continue to function in its present form. If NH does not fully engage with NS on this matter to provide the undertakings required and to plan for the obligations that will be required of a contractor and continues to state that this is a matter for the contractor when one is appointed, the NS will have no alternative but to maintain a full objection to the scheme.

4. Environmental Impacts on NS and its service users

Noise

The NH/ARUP project team explained in the 10th September 2020 MS Teams meeting that the noise assessments undertaken so far have been for a Preliminary Environmental Impact Report. NS understands this is a preliminary assessment and is subject to change and no clear indication has been forthcoming that NS's concerns have been fully considered or addressed. In any event the project team could not confirm that there would be no adverse impact on NS and those who use its services across its rural site due to scheme noise. ARUP on behalf of NH carried out a virtual noise test simulation for NS, however, no further

information has been provided and an on site noise test simulation has not yet been undertaken.

Therefore, as it stands, NH has not addressed the NS's concerns over noise from the construction works with the resultant impact on its vulnerable service users and unless NH takes on board and resolves NS's concerns, then NS will have no choice but to object to the scheme.

Air Quality

NS has concerns on the potential impact of air quality on their students, service users and residents during both the construction and post construction phases of the works. The campus lies north east of the works at the bottom of a valley, the prevailing south westerly wind will naturally channel any pollutants to the main residential site.

NS have a number of students and residents with respiratory issues and complex medical conditions (which can also include life limiting conditions); therefore, NS require commitments from HE that mitigation measures and agreed parameters will be put in place ahead of construction and proactive continuous monitoring is carried out throughout the period of construction works and that if unacceptable levels are reached then works will be suspended until air quality returns to an acceptable level. However, NS has also reiterated that the point that proactive air quality monitoring identifies a problem, it will already be too late and that the emphasis needs to be on careful and diligent planning and risk mitigation.

Landscaping

NS feels there has been a missed opportunity to screen the works and future road network from the NS campus. NS would welcome the opportunity to discuss and agree with the project team effective mitigation measures that would screen NS from the highway and development area. NS would like to see as much mitigation work as possible carried out at the start of the works rather than the end as this will help limit disruption to the running of NS and the welfare of its students, residents and service users.

5. Consequential Losses

In 2020/21, NS was able to provide 500 young people and adults with disabilities with access to the National Star's education and personal development programmes. These services are provided through the charity with a turnover in excess of £30m through a variety of income streams.

The funding required per student can vary significantly with some students requiring £400,000 p.a of funding per year. An average residential placement requires c.£190,000 p.a of funding and a day student c.£80,000 p.a. NS has real concerns that any impacts on the accessibility to, or quality of, its provision will result in placements becoming untenable or service users choosing to withdraw, which could reduce the NS ability to undertake its operating model. This could have unknown implications on wider service delivery, operational requirements and staffing.

As previously documented in the NS previous consultation responses, NS also has a variety of additional income streams in which it achieves the budget to fund its charitable activities; for example, lettings, conferences, meeting facilities, glamping, golf and bistro. NS has concerns that, without the detailed dialogue and liaison in preparing the CTMP these income

generating activities could be significantly affected and impact on the charity's financial viability.

6. Summary

As stated in the introduction, NS are broadly supportive of the need for this scheme. However, as far as the NS is concerned no meaningful progress has been made with NH and its advisors to mitigate the concerns that NS has regarding the matters set out above during the November 2019 consultation and raised in subsequent consultation responses and project meetings. NS understood the meeting on the 10th September 2020 would address their concerns, it did not, and since that meeting limited dialogue has taken place and since the original consultation, the situation has been worsened by the changes to the proposed land take and introduction of drain and easement

NS have maintained a willingness to engage with NH throughout the process (at the expense of its own management time) and would wish to engage with NH as soon as possible on the above matters to ensure they are fully and properly resolved, so that NS can continue with its vital work.

NS has received limited fees support for its Land Agent representation and has borne its own legal costs and internal management costs. As a charity, it has been unable to commit further professional fees for specialist consultants to review or verify the information provided to date or submitted by NH to fully assess the impact of the scheme. NS considers that this leaves the charity in a disadvantaged and unfair position against the scale of NH's professional team.



gateleyhamer.com



National Star

Realising the aspirations
of people with disabilities

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By Email: a417missinglink@highwaysengland.co.uk

07 November 2019

Dear Sirs

Your ref: TR010056/S42(1)(d)Cat1&2/September 2019

National Star Foundation: Plots 1192/1

A417 Missing Link Statutory Consultation

Further to our discussions at our meeting with the consultation representatives on 10th October 2019, I am writing to confirm National Star Foundation's (National Star) views in relation to the proposal and to record some initial matters that we believe will require further consideration and agreement in due course.

Land – Temporary Possession and Compulsory Acquisition

We note that it is intended that an area of land will be needed as indicated on Drawing HE551505-ARP-VGT-X_XX-XXX-X-DR-G-000144 for use during the project construction period, with a smaller area (yet to be determined) being subject to compulsory acquisition. We understand that further discussion in relation to this will progress in Spring 2020, when the extent of land required has been established and assessment of current and alternative use land values will be considered. We will wish to understand the intentions relating to land re-instatement and landscape enhancements to the land adjoining National Star and believe that there should be consideration to extensive planting that will enhance the area longer term, mitigate for the impact of the scheme and improve the screening of National Star's Ullenwood site from the scheme and associated infrastructure routes.

Proposed Drainage Attenuation Basins

We understand that the scheme currently intends for drainage attenuation basins to be located on the indicated land on the drawing referenced above. We would request that further information is provided in relation to the design, visual appearance, operation and engineering details of these. In particular, we will want to understand that modelling of the drainage scheme and where the water attenuation comes

from, how it is discharged and where to; in order to be assured that there will be no adverse impact to the quality of National Star's adjoining land or change to the water levels and drainage of the surrounding land. We would also request further information on the safety and security measures which will be incorporated into the scheme design to ensure that both the proposed attenuation ponds, and National Star's Ullenwood site, remain secure during and following any construction works.

Access to National Star's Site

As discussed at our consultation meeting, unimpeded access to National Star's site during all phases of the scheme is of paramount importance to us. National Star provides residential and day placements to young people and adults with a range of complex disabilities and associated medical and behavioural needs. Supported by c.1,000 staff, our services operate 365 days a year and are dependent on staff efficiently accessing the site at all times of the day and night on shift patterns. We also have a wide range of visiting organisations and individuals – over 33,000 last year – who need to access our location. The site is not served by any public transport provision, and therefore we are dependent on students, residents and service users accessing the site by minibus, coaches, taxis and contracted transport. Similarly, our staff access the site by cars, motorbikes, cycle and staff minibus. Given the nature of our location, our staff are drawn from all surrounding areas, conurbations and transport routes.

A number of our service users are also accommodated off-site in Cheltenham and Gloucester and are transported to and from the Ullenwood site on a daily basis to access their scheduled programmes and specialist facilities and therapy support. The nature of the disabilities of our students and service users means that any diversions or other transport delays to accessing the Ullenwood site would have a significant detrimental impact on their welfare and provision.

Similarly, given the nature of those resident at Ullenwood and our operations, it would be imperative to ensure that access by all emergency services is unhindered during the scheme period.

Therefore, as the preparations for the scheme progress, we would wish to secure assurances and operational details as to how Highways England will guarantee unimpeded access and mitigate for any potential delays. We would welcome the opportunity to consider additional measures such as provision of dedicated priority transport routes and we ask for early and detailed consideration of this essential issue.

Environmental Impact

Due to the close proximity of the Ullenwood National Star facilities, we are concerned about the potential for impact from disturbance, noise, traffic, construction dust and pollution – particularly for those students with emotional and behavioural needs or compromised health conditions. We would look for assurances as to how the National Star site can be screened from disturbance and for measures to ensure that there is no environmental impact that could be detrimental to our students, residents, service users and staff. We would also wish to understand potential areas for impact from the nature of construction, for example; rock blasting, and the measures that you will implement to mitigate for any detriment to our service users, who can be extremely sensitive to noise and disturbance. Given the sensitivities of our service users, we would request Highways England prepares an early impact assessment in respect of the construction and use of the scheme, specific to National Star's Ullenwood rural site and accounting for the sensitivities of our service users.

Disability Access to Crickley Hill and the Re-purposed former A417

We believe that the scheme can provide welcome opportunity for disabled and mobility access to be enhanced to the surrounding countryside. We would encourage the scheme design to ensure that new opportunities are provided for a wide range of access to be provided to the existing National Trails and to Crickley Hill Country Park and beyond, to the proposed Green Link Bridge and the proposed leisure trail on the re-purposed former A417. This would require the scheme to address wider disability accessible routes from the Leckhampton Hill road across to Crickley Hill Country Park and beyond, but would provide a much needed facility for people with mobility challenges to access this part of the Gloucestershire countryside. National Star have plans to incorporate a nature trail within the adjoining land and would be keen to understand any potential for connectivity.

Disturbance and Potential for Financial Loss

Whilst National Star are supportive of the long term benefits that the scheme may provide and improved safety to the main routes surrounding the Ullenwood site, we are concerned about the areas of disturbance that may be associated with the scheme and its implementation period and any resultant loss or detriment to the charity.

National Star is dependent on many areas of additional income generation to supplement the statutory funding received for placements. For example; income generated from lettings, conferences, meeting facilities, glamping, golf, bistro – which may well be impacted during the scheme and causing financial losses to the charity, as well as loss of benefits of engaging with a wider community of visitors and supporters. Similarly, each residential placement at National Star represents a very high level of fee income and any placement that chooses not to come to National Star as a consequence of the scheme (for example, due to concerns about impact, disturbance or accessibility, etc) will represent a significant financial loss to the charity's operating model. Our day student cohort also come from a wide radius, including Bristol, South Gloucestershire, Worcestershire, Warwickshire, Wiltshire and the viability of their placement is dependent on the reasonableness of their journey to and from our site. Again, any loss of placements of day students would significantly impact financially and operationally on the charity.

Surrounding road network

We believe that the A436 and the Leckhampton Hill Road will remain very busy key routes and may potentially become busier routes as a result of the scheme. We would ask that the scheme should address measures to improve road safety and speed constraints in the surrounding road network. In particular, the Leckhampton Hill Road from Crickley Hill towards Cheltenham and the A436 from the scheme to Cowley Crossroads.

Public Transport

Whilst recognising that public transport is not directly the subject of the scheme consultation, we stress that the absence of a public transport service to the Ullenwood area from any of the surrounding towns and especially Cheltenham and Gloucester, causes additional traffic pressures, which will be exacerbated by the construction and implementation of the scheme. National Star would welcome any coordination between relevant parties to enable the scheme to be a catalyst for the establishment of appropriate public transport routes to access the Ullenwood area and the wider leisure areas associated with the scheme.

In summary, National Star recognise the importance of the A417 Missing Link scheme and the potential for it to provide long term improvements to road safety and infrastructure. However, we have numerous areas outlined above that would require much further detailed consideration, assurance and mitigation, as well as areas of concern for impact and potential financial loss. We would welcome the opportunity to discuss these in greater detail as your plans progress.

Yours faithfully,



Peter Horne
Deputy Chief Executive

Email: 

A417 – Missing Link

National Star College Consultation

Client: National Star Foundation
Instructed by: National Star Foundation - Peter Horne and Hugh Piggott
Author: Toby Feirn
Approver: Ian Miles
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This report is confidential. No responsibility whatsoever is accepted to any third party and neither the whole of the Report, nor any part, nor references thereto, may be published in any document, statement or circular, nor in any communication with third parties without our prior written approval.

Gateley **HAMER**

Introduction

This consultation document has been produced by Gateley Hamer on behalf of National Star Foundation (NS) in respect of the Highways England (HE) road improvement scheme known as the A417 Missing Link. The A417 and A419 provide a route between Gloucester and Swindon that helps connect the Midlands/North to the South of England. This scheme is designed to improve traffic flows and improve road safety on the A417 around the vicinity of Air Balloon roundabout.

NS is an independent and somewhat unique specialist charity based at Ullenwood Manor, near Cheltenham. One of the largest operations of The National Star Foundation is National Star College which provides education, personal development, therapies and care for young adults with a range of profound, severe and complex disabilities and associated medical and behavioural conditions.

The main site at Ullenwood provides help and support for over 200 residential, day and adult learners. Last year the NS was able to provide 500 young people and adults with disabilities with access to the National Star's education and personal development programmes.

Ullenwood is the only residential campus (with associated off - site residential accommodation in Cheltenham & Gloucester) and Ullenwood is the only specialist Hub for the charity, providing specialist therapies, pools, hydro, physio, OT, speech and language specialists. The Site is also the main 'head office' of the charity. Day student provision at the other satellites is for less complex disabilities, students who can access local day student provision rather than those needing to access a national residential centre of excellence & expertise. These services cannot be provided by any other facility within a reasonable travel distance/time of the NS. The NS also has satellite campuses at Hereford and Torfaen, which are not within acceptable daily traveling distances for students from Ullenwood.

NS is broadly supportive of the HE scheme however, there are a number of important considerations which need to be addressed to allow the NS to continue providing its vital services to students throughout the period of the highway construction works.

Despite previous attempts to engage with HE and their consultants no attempt has been made to address the NSs "real" concerns as set out in a letter dated 7th November 2019. The NS submitted the letter to HE setting out its concerns but to date have not received a substantive or written response.

As a charitable foundation with a turnover of £30m and providing valuable education and welfare services to its students it is essential that the A417 Missing Link scheme has minimal impact on the operations of the NS and its students. It should also be noted that NS is a substantial local employer in the Cheltenham / Gloucester area with over a 1,100 staff of which 800 are full time employees. The staff travel in a wide radius of the Ullenwood site requiring unimpeded access twenty-four hours a day, any disruption to the services may have an adverse impact on these valuable jobs and local economy.

S42 Consultation September 2019

Under Planning Act 2008 section 49 HE has a duty to take account of responses to consultation and publicity. As part of the S42 Statutory consultation the NS submitted a detailed response dated 7th November 2019 to the proposed scheme including;

- Land take



- Drainage attenuation Basins
- Access to NS Site
- Environmental Impact
- Disability Access to Crickley Hill and the Re-purposed former A417
- Disturbance and Potential for Financial Loss
- Surrounding road network
- Public transport

A copy of the letter is attached for ease of reference. Since submitting their statutory consultation letter there has been no meaningful dialogue or consultation from HE and the issues raised in the letter have not been addressed. The below table provides a chronology of the consultation between NS and HE to date.

Date	Communication/Consultation Details
10 th October 2019	Meeting with consultation representatives from HE
7 th November 2019	NS submitted S42 response letter
10 th January 2020	Site meeting proposed to discuss consultation. Meeting was convened by HE & Arup at NS but was abandoned (at HE & NS agreement) due to poor preparation and insufficient data or information to address the points raised.
23 rd March	Cancelled project team meeting by HE due Covid 19.
9 th June	Cancelled re-scheduled project team meeting due to proposed new consultation process and associated revised project timescales
8 th September	Updated Land Plans and meeting agenda shared
10 th September 2020	Virtual project team meeting to review proposed scheme changes and outstanding issues
13 th October	Virtual meeting to discuss agents' fees, professional representation and outstanding issues.

October 2020 Consultation

Design Changes

- 1 – Removal of the Green Bridge – the NS has no comment.
- 2 – Main carriage incline change – the NS has no comment.
- 3 – Detrunking old A417 – The NS would like further clarification and commitment that HE will provide disability access to the new recreational areas.

Outstanding Issues

Noise

The HE/ARUP project team explained in the 10th September MS Teams meeting that the noise assessments undertaken so far have been for a Preliminary Environmental Impact Report. NS understands this is a preliminary assessment and is subject to change and no clear indication has been forthcoming that the NS concerns have been considered or addressed. In any event

the project team could not confirm that there would be no adverse impact on the NS due to scheme noise.

As set out above the NS is home to students with sensitive issues, due to the nature of their complex disabilities or behavioural challenges any changes to the environment could have an impact on the student's well-being. The NS is concerned that the NS campus sits in a natural valley north east of the main works. There are concerns that the prevailing south westerly wind could funnel noise down the valley towards the NS buildings and its main day student facility. The NS also has a glamping business which sits at the bottom of the valley and there is concern that any increased noise will have an effect on this business.

Therefore, as it stands, HE has not addressed any of the NSs concerns over noise from the construction works and unless HE takes on board and resolves the NSs concerns, the NS will have no choice but to object to the scheme.

Drainage

The NS has been informed that the NS land required for the scheme has increased since the initial S42 Consultation period and now impacts on two registered titles. This was communicated via email 8th September two days before the Project Team meeting 10th September, with no explanation or justification and clearly the NS are concerned about the design of the scheme if such changes can take place without landowner engagement. During the meeting the Project Team explained the red line boundary now include a new pipe required temporarily to support construction works. A 14m wide permanent easement is also now proposed cutting through the NSs land holding. The NS have been advised that this easement is required for drainage from the balancing ponds. It would appear from what has been said that the easement and pipe end just prior to the back road to the campus with no consideration as to any additional flooding this may cause or any impact on the water course and other land belonging to the charity beyond the proposed land drain pipe end

HE have advised the NS that ownership/responsibility for the balancing ponds and easement will be transferred to Gloucestershire County Council Highways (GCCH), however, there had previously been no mention of this, and the NS have not been consulted on how GCCH will maintain the balancing ponds.

In the meeting on the 10th September HE advised the NS that water from a HE balancing pond would also be directed into the GCCH balancing ponds and then drain onto NS land. The NS consider this totally unacceptable and would like the drainage to be reversed whereby the GCCH ponds drain into the HE pond and the water is discharged from there into the Severn catchment area. This would remove the need for unacceptable drainage and the easement and so not preclude or prejudice any future development proposals the NS may have.

HE has attempted to provide justification for the easement, however the NS feels that fast tracking water from the overflowing balancing ponds during a flood event to a natural pinch point which during said flood event will be at its natural full capacity this could result in reduced access to the NS for staff, students and emergency vehicles and users of both golf courses. The NS have not been advised on the likely amounts of water that may be discharged on to the NS land and the two golf courses below the discharge point, one of which is a separate landowner. The NS understands this landowner has not been consulted or the impacts modelled and surveyed on the land. Given this area currently floods it seems strange that HE is proposing to make a bad situation worse.

The NS feels the need for drainage pipe has not been justified and is merely the cheapest solution HE has come up with. The NS do not want the easement to cross its land as this will potentially sterilise a large area of land. The NS has a proposed a workable alternative to the easement across its land and request HE to consider this proposal.

Traffic

The NS have been informed that traffic level will increase on the Leckhampton Hill, A436 and A417 as a result of the scheme during and post construction.

During Construction

The NS has serious concerns about the effect on students being held up in traffic during the construction period. Both residential and day student travel to and from the site throughout the day from a wide geographical area. Due to nature of the student's disabilities travel time that can be sustained by many is limited, any delays can have significant impacts on a student's wellbeing. Therefore, any increase in travel time for some students could result in their placements being untenable. there are only a small handful of specialist providers like National Star across the whole Country, all of which are under extreme demand. Accessing another provider is not an option as any possible alternative would be a significant distance to the North or South but in most cases these facilities will not have spare capacity. The he same will also apply to the highly trained staff that work at the NS. The NS staff need to provide care 24 hours a day seven days a week. The staff provide require unimpeded access to carry out operational duties such as specialist care, therapy, nursing and education.

NS requirements for staff, students and emergency vehicles must be considered as part of the Construction Traffic Management Plan (CTMP) for the scheme. The NS seeks and must have assurances from HE ahead of the contract award that the CTMP must be developed in conjunction with an appointed contractor to ensure the contractor is aware of the NS's unique requirements.

Post Construction

The NS has been informed that after construction the modelling showed increased traffic indicated for Leckhampton Hill road, this is the main access to the NS site. This is a known accident area due to visibility and road bends/incline. Any increased increased volume mentioned 10th Sept meeting could cause further problems, therefore the NS has requested details of the daily percentage increase in vehicle traffic on each road leading to the NS. This information has not yet been provided.

Therefore, the NS needs to be completely satisfied that there will be no disruption to the access to the NS during the construction phase of the scheme and urgently request dialog with HE to ensure the NS can continue to function it in present form. If HE does not engage with the NS on this matter, the NS will have no alternative but to object to the scheme.

Air Quality

NS has concerns on the potential impact of air quality on their students during both the construction and post construction phases of the works. The campus lies north east of the works at the bottom of a valley, the prevailing south westerly wind will naturally channel any pollutants to the main residential site.

The NS have a number of students with respiratory issues; therefore, the NS require commitments from HE that mitigation measures and agreed parameters will be put in place ahead of construction and proactive continuous monitoring is carried throughout the period of construction works and that if unacceptable levels are reached then works will be suspended until air quality returns to an acceptable level.

Disabled Access

At the present time students and staff travel to Crickley Hill from the NS in the NS minibus. The NS have previously discussed with Michael Goddard the potential for creating a route from the NS to Crickley Hill without a vehicle. The NS is awaiting comments or commitments from HE.

Landscape

The NS feels there has been a missed opportunity to screen the works and future road network from the NS campus. The NS would welcome the opportunity to discuss with the project team mitigation measures that would screen the NS from the highway. The NS would like to see as much mitigation work as possible carried out at the start of the works rather than the end as this will help limit disruption to the running of the NS and welfare of the students.

Financial Losses and Compensation

In 2019 the NS was able to provide 500 young people and adults with disabilities with access to the National Star's education and personal development programmes. These services are provided through the charitable foundation with a turnover of £30m through a variety of income streams.

The funding required per student can vary significantly with some students requires £300,000 p.a of funding per year. An average residential placement on requires £180,000 p.a of funding and a day student £80,000 p.a. The NS has real concerns that any impacts to the students receiving unimpeded access and supply of services resulting in students not using the NS, could reduce the NS ability to undertake its operating model. This could have unknown implications on wider service delivery, operational requirements and staffing.

As previously documented in the NS previous consultation response the NS has a variety of income streams in which it achieves the budget to fund its charitable activities for example Lettings, conferences, meeting facilities, glamping, golf and bistro. The NS has concerns without the detailed dialogue and liaison in preparing the TMP these businesses could be significantly affected.

During the meeting 10th September the NSC has requested a meeting with HE's compensation specialists, to date no meaningful communication has been occurred.

Land take and land Interest

As discussed above the amount of land required for the scheme has considerably increased during the course of the consultation process. The NS is concerned that further additional land may be required for the scheme before the final design for the scheme is submitted., The NS requires as much consultation as necessary with HE to ensure that only the minimum amount of land required for the scheme is taken.

The NS is a charitable foundation and therefore governed by the Charities Act 2011. The current management of the charity have a duty to the trustees that any disposal of land is necessary and is in the charity's best interests or impediment to the charity's assets. The management understands the need for the highway's improvement scheme and recognises the need for it and can appreciate that the permanent land take area is at the furthest point of the charity's site and, subject to demonstrating that the charity is being appropriately recompensed and that the area is no greater than it needs to be, that the CPO of that area may be acceptable to the trustees. Any additional obligation or impediment by way of land drain and/or easement would not be acceptable to the charity. . However, their duty to the trustees and the charity overrides this scheme

European Convention on Human Rights (ECHR)

In order to obtain compulsory purchase powers to acquire land or the ability to occupy land on a temporary basis it is necessary to show that there is a public need to acquire the land and that this requirement outweighs the private individual's rights. There are three rights that are considered relevant in this scheme which are safeguarded by the European Convention on Human Rights:

Article 6 – a right to a fair trial, which includes determination of the issues (compensation) within a reasonable time.

Article 8(1) – a right to respect for private and family life including the respect for those person's family home.

Article 1 of the First Protocol – a right to protection of property.

The ECHR requires that a fair balance needs to be struck between the public interest and an individual's right to peaceable enjoyment of his property. Any interference with these rights must be necessary and proportionate.

The definition of proportionally in this instance is;

- Can the objectives of compulsory purchase be achieved by means that interfere less with an individual's rights?
- Does compulsory purchase have an excessive or disproportionate effect on the interests of the affected person?

The NS is of the opinion that up to this point in the consultation process, no account has been taken of this important legislation.

Summary

As stated in the introduction the NS are broadly supportive of this scheme. However, as far as the NS is concerned no meaningful dialog has been entered into by HE and its advisors to mitigate the concerns the NS has regarding and of the matters set out above during the November 2019 consultation. The NS understood the meeting on the 10th September would address their concerns, it did not, and since that meeting no further dialog has taken place and actually since the original consultation, the situation has been worsened by the changes to the proposed land take and introduction of drain and easement

The NS wish to engage with HE as soon as possible on the above matters to ensure the NS can continue with its vital work and look forward to early constructive dialog.



National Star

Realising the aspirations
of people with disabilities

Ullenwood
Cheltenham
Gloucestershire
GL53 9QU

Highways England
Temple Quay House
Bristol
BS1 6HA

By Email: a417missinglink@highwaysengland.co.uk

07 November 2019

Dear Sirs

Your ref: TR010056/S42(1)(d)Cat1&2/September 2019

National Star Foundation: Plots 1192/1

A417 Missing Link Statutory Consultation

Further to our discussions at our meeting with the consultation representatives on 10th October 2019, I am writing to confirm National Star Foundation's (National Star) views in relation to the proposal and to record some initial matters that we believe will require further consideration and agreement in due course.

Land – Temporary Possession and Compulsory Acquisition

We note that it is intended that an area of land will be needed as indicated on Drawing HE551505-ARP-VGT-X_XX-XXX-X-DR-G-000144 for use during the project construction period, with a smaller area (yet to be determined) being subject to compulsory acquisition. We understand that further discussion in relation to this will progress in Spring 2020, when the extent of land required has been established and assessment of current and alternative use land values will be considered. We will wish to understand the intentions relating to land re-instatement and landscape enhancements to the land adjoining National Star and believe that there should be consideration to extensive planting that will enhance the area longer term, mitigate for the impact of the scheme and improve the screening of National Star's Ullenwood site from the scheme and associated infrastructure routes.

Proposed Drainage Attenuation Basins

We understand that the scheme currently intends for drainage attenuation basins to be located on the indicated land on the drawing referenced above. We would request that further information is provided in relation to the design, visual appearance, operation and engineering details of these. In particular, we will want to understand that modelling of the drainage scheme and where the water attenuation comes

from, how it is discharged and where to; in order to be assured that there will be no adverse impact to the quality of National Star's adjoining land or change to the water levels and drainage of the surrounding land. We would also request further information on the safety and security measures which will be incorporated into the scheme design to ensure that both the proposed attenuation ponds, and National Star's Ullenwood site, remain secure during and following any construction works.

Access to National Star's Site

As discussed at our consultation meeting, unimpeded access to National Star's site during all phases of the scheme is of paramount importance to us. National Star provides residential and day placements to young people and adults with a range of complex disabilities and associated medical and behavioural needs. Supported by c.1,000 staff, our services operate 365 days a year and are dependent on staff efficiently accessing the site at all times of the day and night on shift patterns. We also have a wide range of visiting organisations and individuals – over 33,000 last year – who need to access our location. The site is not served by any public transport provision, and therefore we are dependent on students, residents and service users accessing the site by minibus, coaches, taxis and contracted transport. Similarly, our staff access the site by cars, motorbikes, cycle and staff minibus. Given the nature of our location, our staff are drawn from all surrounding areas, conurbations and transport routes.

A number of our service users are also accommodated off-site in Cheltenham and Gloucester and are transported to and from the Ullenwood site on a daily basis to access their scheduled programmes and specialist facilities and therapy support. The nature of the disabilities of our students and service users means that any diversions or other transport delays to accessing the Ullenwood site would have a significant detrimental impact on their welfare and provision.

Similarly, given the nature of those resident at Ullenwood and our operations, it would be imperative to ensure that access by all emergency services is unhindered during the scheme period.

Therefore, as the preparations for the scheme progress, we would wish to secure assurances and operational details as to how Highways England will guarantee unimpeded access and mitigate for any potential delays. We would welcome the opportunity to consider additional measures such as provision of dedicated priority transport routes and we ask for early and detailed consideration of this essential issue.

Environmental Impact

Due to the close proximity of the Ullenwood National Star facilities, we are concerned about the potential for impact from disturbance, noise, traffic, construction dust and pollution – particularly for those students with emotional and behavioural needs or compromised health conditions. We would look for assurances as to how the National Star site can be screened from disturbance and for measures to ensure that there is no environmental impact that could be detrimental to our students, residents, service users and staff. We would also wish to understand potential areas for impact from the nature of construction, for example; rock blasting, and the measures that you will implement to mitigate for any detriment to our service users, who can be extremely sensitive to noise and disturbance. Given the sensitivities of our service users, we would request Highways England prepares an early impact assessment in respect of the construction and use of the scheme, specific to National Star's Ullenwood rural site and accounting for the sensitivities of our service users.

Disability Access to Crickley Hill and the Re-purposed former A417

We believe that the scheme can provide welcome opportunity for disabled and mobility access to be enhanced to the surrounding countryside. We would encourage the scheme design to ensure that new opportunities are provided for a wide range of access to be provided to the existing National Trails and to Crickley Hill Country Park and beyond, to the proposed Green Link Bridge and the proposed leisure trail on the re-purposed former A417. This would require the scheme to address wider disability accessible routes from the Leckhampton Hill road across to Crickley Hill Country Park and beyond, but would provide a much needed facility for people with mobility challenges to access this part of the Gloucestershire countryside. National Star have plans to incorporate a nature trail within the adjoining land and would be keen to understand any potential for connectivity.

Disturbance and Potential for Financial Loss

Whilst National Star are supportive of the long term benefits that the scheme may provide and improved safety to the main routes surrounding the Ullenwood site, we are concerned about the areas of disturbance that may be associated with the scheme and its implementation period and any resultant loss or detriment to the charity.

National Star is dependent on many areas of additional income generation to supplement the statutory funding received for placements. For example; income generated from lettings, conferences, meeting facilities, glamping, golf, bistro – which may well be impacted during the scheme and causing financial losses to the charity, as well as loss of benefits of engaging with a wider community of visitors and supporters. Similarly, each residential placement at National Star represents a very high level of fee income and any placement that chooses not to come to National Star as a consequence of the scheme (for example, due to concerns about impact, disturbance or accessibility, etc) will represent a significant financial loss to the charity's operating model. Our day student cohort also come from a wide radius, including Bristol, South Gloucestershire, Worcestershire, Warwickshire, Wiltshire and the viability of their placement is dependent on the reasonableness of their journey to and from our site. Again, any loss of placements of day students would significantly impact financially and operationally on the charity.

Surrounding road network

We believe that the A436 and the Leckhampton Hill Road will remain very busy key routes and may potentially become busier routes as a result of the scheme. We would ask that the scheme should address measures to improve road safety and speed constraints in the surrounding road network. In particular, the Leckhampton Hill Road from Crickley Hill towards Cheltenham and the A436 from the scheme to Cowley Crossroads.

Public Transport

Whilst recognising that public transport is not directly the subject of the scheme consultation, we stress that the absence of a public transport service to the Ullenwood area from any of the surrounding towns and especially Cheltenham and Gloucester, causes additional traffic pressures, which will be exacerbated by the construction and implementation of the scheme. National Star would welcome any coordination between relevant parties to enable the scheme to be a catalyst for the establishment of appropriate public transport routes to access the Ullenwood area and the wider leisure areas associated with the scheme.

In summary, National Star recognise the importance of the A417 Missing Link scheme and the potential for it to provide long term improvements to road safety and infrastructure. However, we have numerous areas outlined above that would require much further detailed consideration, assurance and mitigation, as well as areas of concern for impact and potential financial loss. We would welcome the opportunity to discuss these in greater detail as your plans progress.

Yours faithfully,



Peter Horne
Deputy Chief Executive

Email: 

This representation has been produced on behalf of National Star Foundation (NS).

NS is broadly supportive of the proposed Highways England (HE) A417 Missing Link scheme, however, there are a number of issues which still need to be addressed where, despite engagement with Highways England and its representatives, NS have not been given satisfactory assurances

Equality Impact Assessment (EqIA)

A EqIA has been produced by ARUP for HE, however, it has not taken the work of NS, its services and its service users (with protected characteristics) into account. No contact was made with the charity or its service users by the report's authors in the drafting of the report and it is clear from the report that it does not address any of NS's unique circumstances.

Traffic

NS have been informed that traffic levels will increase on the Leckhampton Hill, A436 and A417 during and post construction.

NS requirements for unimpeded access to the Ullenwood site for its staff, students, service users, suppliers and emergency vehicles must be fully considered as part of the Construction Traffic Management Plan (CTMP) for the scheme. NS seeks and must have assurances from HE ahead of the contract award that the CTMP will be developed in conjunction with an appointed contractor to ensure the contractor is aware of the NS's unique requirements and the critical importance of ensuring ease of access. Failure to adequately address this issue could lead to placements being unsustainable, students and service users being deprived access to their provision and staffing levels not being met.

Noise and Air Quality

The HE/ARUP project team have not yet confirmed that there would be no adverse impact on NS due to scheme noise and air quality.

NS is home to students with sensitive issues. NS is concerned that the campus sits in a natural valley north east of the main works and could suffer adversely due to the works. There are concerns that the prevailing south westerly wind could funnel noise and pollution down the valley towards the college and impact on the users of its residential and day student accommodation, recreational access to its grounds and income generation from its glamping site.

Disabled Access to Scheme Enhancements

NS have previously discussed with Michael Goddard the potential for creating a route from NS to Crickley Hill without a vehicle. NS is still awaiting comments or commitments from HE.

Land take and land Interest

HE have now confirmed that there will not be a need for a permanent drainage easement across the remaining land (which NS was strongly opposed to) after the proposed land take. There are however ongoing discussions regarding a temporary easement proposed during the construction works. HE have failed to provide any reasoning for the temporary easement or provide any assessment of how the water will be dealt with at the outfall of the temporary drainage in the middle of the charity's site at the golf course car park.

Landowner Position Statement – National Star College (NSC)

1.1 Purpose of this Document

- 1.1.1 Highways England have prepared a series of position statements with landowners directly impacted by the A417 Missing Link project. These have been prepared in collaboration with the District Valuer Services (DVS), Highways England Property and Compensation Team and Highways England Project Management Team to inform ongoing discussions with landowners.
- 1.1.2 The purpose of the position statements is to provide a 'live' document which captures the key engagement held with landowners and a formal record of important matters raised and the Highways England position to such matters.
- 1.1.3 The detail recorded within this position statement relates to the communication and engagement regarding NSC's position as a landowner impacted by the scheme.
- 1.1.4 Further detail relating to any consultation responses submitted by NSC during targeted landowner and statutory consultation periods can be found in the Consultation Report and associated appendices submitted in support of the DCO application (Document References 5.1 and 5.3).

DRAFT

Table 1 Record of key landowner engagement

Date	Form of correspondence	Key Topics Discussed and Key Outcomes
27/09/19	Land Interest Consultation Invitation - Letter	Meeting arranged for the 10 October 2019.
10/10/2019	Meeting	At the meeting with NSC, the following issues were discussed: <ul style="list-style-type: none"> • Blight and compensation • Construction works mitigation. • Environmental impact • Land access • Noise impacts; and • Public Right of Way routes.
09/11/2019	Statutory Consultation Response	NSC submitted a Section 42 response letter for the statutory consultation for the scheme.
10/01/2020	Meeting	Site meeting to discuss consultation. The meeting began but it was agreed that further work was required to help inform discussions. Meeting date rearranged for the 30 th January 2020.
13/01/2020	Land Interest Consultation Invitation - Letter	Meeting arranged for the 30 January 2020.
30/01/2020	Meeting	The main concerns raised by the NSC at the meeting were: <ul style="list-style-type: none"> • Construction impacts and mitigation required. • Land impact on NSC's land • The schemes impact on the College's existing drainage infrastructure. It was agreed that an additional meeting was to be arranged between Arup and Highways England specialists to cover Air Quality, Noise, Construction, Traffic Management and Drainage.
23/03/2020	Meeting	Meeting cancelled due to Covid-19.

Date	Form of correspondence	Key Topics Discussed and Key Outcomes
09/06/2020	Meeting	A project team meeting was arranged with NSC but was cancelled due to key scheme design changes occurring resulting in landowner meetings being rescheduled.
28/07/2020	Email Correspondence	Meeting invite issued to NSC. Meeting date requested by NSC was the 10th September 2020.
08/09/2020	Email correspondence	Updated Land Interest Plans and meeting agenda shared.
10/09/2020	Meeting (Virtual)	<p>The purpose of the meeting was to review the recent design changes for the scheme. It was explained that the green bridge has been removed as part of the scheme design. Two separate crossings; at the Air Balloon Cottages and connecting to the Gloucestershire Way, will be constructed instead.</p> <p>Issues relating to noise, drainage, traffic, air quality, landscape and access were discussed. An action from the meeting was for a call to be arranged between the District Valuer Services, Arup, Highways England and the College to discuss accommodation works, land acquisition and compensation.</p> <p>The College requested that communication between the project team and National Star is improved.</p>
13/10/2020	Meeting (Virtual)	Financial support available for land agent fees was explained to NSC. It was agreed that Highways England will provide financial support for two land agents if sufficient justification that two land agents are required. NSC agreed to provide justification in writing.
13/10/2020	Statutory Consultation Notification	Correspondence issued to NSC notifying them of the beginning of the statutory consultation.

Date	Form of correspondence	Key Topics Discussed and Key Outcomes
11/11/2020	Meeting (Virtual)	<p>The purpose of this meeting was to review the recent design changes for the scheme and the issues discussed at the landowner meeting on the 10th September.</p> <p>NSC submitted a statutory consultation response outlining concerns relating to the scheme including air quality, noise, traffic management, drainage, disabled access, landscape, compensation, land take and the European Convention on Human Rights.</p> <p>Issues relating to drainage was the key focus of the meeting, but other concerns were also discussed including construction works, disabled access and landscape proposals.</p> <p>A number of actions were taken at the meeting for the project team. Follow up discussions are to be arranged when the relevant technical specialist guidance has been sought.</p>
04/12/2020	Email Correspondence	Consultation Response and Drainage Note issued to NSC for comment.
09/12/2020	Meeting	<p>An in-person site walkover of NSC's site took place to discuss the drainage design proposed. The alternative drainage designs at the College were discussed. It was agreed that infiltration testing will be completed to determine the viability of the 100% highway infiltration design option.</p> <p>NSC stated that the permanent easement proposed as part of the current drainage design was the main reason for their objection. The College raised concerns that the permanent easement would impact future development opportunities on their site.</p>
23/12/2020	Email Correspondence	Comments received from NSC about the Consultation Response and Drainage Note issued.
13/01/2021	Meeting (Virtual)	<p>Meeting to discuss the drainage design at NSC with Gloucestershire County Council (GCC). The drainage technical note issued to NSC was discussed and further detail was provided to address issues identified by the College.</p> <p>NSC stated they would object to the scheme if the permanent easement proposed was not removed. Detail was provided about the proposed 100% infiltration design option.</p> <p>Work to be undertaken to determine the viability of the 100% infiltration design.</p>
29/01/2021	Email Correspondence	Draft accommodation works plans issued to NSC for comment.

Date	Form of correspondence	Key Topics Discussed and Key Outcomes
29/01/2021	Email Correspondence	<p>Comments provided by NSC about the accommodation works plans. NSC raised concerns that the plans do not contain any accommodation works in relation to the College's land. NSC's understanding is that the works relate to Highways England's land that they are proposing to acquire on a permanent basis from the College.</p> <p>NSC requested a post and rail fence on the boundary of the permanent land take and the colleges' retained land. NSC requested that appropriate screening in the form of tree planting needs to be provided.</p>
08/02/2021	Targeted Landowner Consultation	<p>Correspondence issued to NSC notifying them of the beginning of the targeted landowner consultation. NSC were impacted by the targeted landowner consultation as a result of the half width land designated to the College. Letter issued to NSC making the commitment to not require a permanent easement across the Colleges land in response to concerns about the drainage route. Sent 23/03/21.</p>
10/03/2021	Meeting (Virtual)	<p>Meeting to provide an update on the drainage design works at NSC with GCC in attendance. It was explained that the preliminary testing to determine the viability of the 100% infiltration design has been positive.</p> <p>Infiltration design and results to be shared with NSC when available for issue (April/May 2021). Meeting to be arranged when further update on the drainage design is available.</p>
07/05/2021	Site Visit	<p>Site visit to discuss air quality and landscape proposals and impacts as part of the scheme. The scheme landscape specialist explained that the trees proposed as part of the landscape works will focus around the boundaries of NSC's land impacted by the scheme and the northern section of the infiltration dip in the landform discussed.</p> <p>The scheme air quality specialist explained that if the scheme mitigation is carried out in accordance with the Environmental Management Plan and construction best practice there is predicted to be no significant effect from dust at any receptors within 200m of the DCO boundary.</p> <p>The scheme air quality and landscape specialist agreed to provide further detail at the Microsoft Teams Meeting on the 19th May.</p>

<p>19/05/2021</p>	<p>Meeting (Virtual)</p>	<p>An overview of the DCO process from the point of submission for the application was provided. The DCO was confirmed to be on course to be submitted late May/early June 2021. NSC will have opportunities throughout the DCO process to engage and comment on the application. Highways England confirmed that engagement with NSC will continue post DCO submission. NSC stated that their financial concerns are not about valuation but other matters including but not limited to financial loss under disturbance. It was explained that NSC can submit compensation claims for loss of earnings, but appropriate evidence needs to be provided. Design works for the proposed 100% infiltration for the drainage infrastructure at the College show positive results. Good infiltration characteristics have been found and assessments show that pollution levels are within acceptable limits. Yet, additional treatment is required. No significant changes are proposed to the ponds which differ from the previous design. The planned maintenance and operation of the basins on NSC's land has not changed. This is GCC will maintain and operate basin group 5 and basin group 3a will be maintained and operated by Highways England. NSC requested a conclusive letter stating that a permanent easement will not be provided as part of the scheme and that addresses their comments provided previously to Michael Goddard. The scheme landscape specialist stated that the trees proposed as part of the landscape works will focus around the boundaries of NSC's land impacted by the scheme and the northern section of the infiltration dip in the landform discussed. The ponds on the northern side of the field will not be permanently full of water and will have a parkland like character. 3D imagery to be produced showing the landscape proposals in greater detail. A plan showing the temporary and permanent areas to be pegged out to be shared with NSC. Air Quality Assessments have been completed at the College which includes a consideration of dust generated from the construction site. Highways England explained that if the scheme mitigation proposed is carried out in accordance with the Environmental Management Plan and construction best practice there is predicted to be no significant effect from dust at any receptors within 200m of the DCO boundary. The DCO will include air quality commitments that Highways England will need to adhere to. NSC raised concerns about the assessments completed. Air quality monitoring (typically used on high impact air quality construction projects in areas where existing air quality levels are poor) is to be provided throughout the duration of the scheme. A commitment for this will be included within the Position Statement which will later be submitted at DCO acceptance. Highways England explained a meeting to discuss the Construction Traffic Management Plan (CTMP) will be arranged when the construction contractor contractually begins working on the</p>
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Date	Form of correspondence	Key Topics Discussed and Key Outcomes
		<p>scheme. Their appointment is imminent, so a meeting is likely to take place in the next few weeks.</p> <p>Highways England agreed to provide a written response explaining professional fee compensation for the scheme.</p> <p>NSC raised concerns about the Equality Impact Assessment (EqIA) completed for the scheme. Concerns related to the methodology adopted for the assessment and why NSC were not considered in greater detail throughout. Highways England to provide a separate response to the concerns raised.</p> <p>A summary of the Environmental Designated Fund opportunities relating to the scheme were provided. NSC stated they would be interested in reviewing these opportunities further and request a further meeting is arranged to discuss.</p>
08/06/2021	Meeting	<p>Meeting between the DVS and NSC to discuss blight and compensation. NSC stated they do not feel they are in a position to continue blight and compensation discussions until other matters outstanding are addressed in relation to the scheme.</p>

Date	Form of correspondence	Key Topics Discussed and Key Outcomes
27/05/2021	Virtual Noise Demonstration	<p>Highways England provided an overview of what will be heard as part of the virtual noise demonstration. It was explained that the virtual noise demonstration has been organised instead of attending an in-person acoustic sound lab presentation (which includes an acoustic controlled demonstration).</p> <p>NSC are not considered to be a sensitive receptor for noise during the construction of the scheme in consideration of DMRB guidance. Yet, it has been agreed that NSC will be treated as a sensitive receptor to help address concerns identified by the College relating to the sensitivity of the students at the College to noise impacts.</p> <p>The sound demonstration has been taken from the southern building of the site as it's the closest to the works. The demonstration can only be done from one location on site.</p> <p>The main noise sources for NSC are the haul road route along the line of the scheme and the cutting excavation works.</p> <p>It was explained that the rock breaker would create the highest noise level in relation to the scheme. Highways England were unable to specify how long the rock breaker will be used for. In some instances, it may be used for a week and then not used for weeks after that.</p> <p>The noise levels presented at the demonstration were:</p> <ul style="list-style-type: none"> • Ambient level outside of the southern building • Construction noise sources of cutting excavation and haul road. • Occasional breaking noise. • Move listening location inside (with windows open). <p>NSC asked if there will be a record that the College accept the noise levels created by the scheme in consideration of the noise impacts presented in the noise demonstration. Highways England agreed to include this commitment in the Position Statement (see Table 2 below).</p> <p>Noise levels will be monitored throughout the construction of the scheme. If noise levels increase to a certain level then they will be appropriately mitigated. NSC can contact Highways England at any point during the construction of the scheme if they have any issues with the noise levels created.</p> <p>Highways England to explore possibility of doing face to face noise demonstration in the future when possible in consideration of COVID restrictions.</p>

Table 2 Support / Matters Agreed

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
1	Public transport	NSC raised concerns about the poor public transport that exists in the local area. The College explained that they will welcome any coordination between relevant parties to enable the scheme to be a catalyst for the establishment of improved public transport routes.	<p>The scheme seeks to improve travel conditions for all users of the strategic road network. Public transport facilities are not the responsibility of Highways England and are outside the scope of the scheme. As the local highway's authority, Gloucestershire County Council would be responsible for any changes to the bus stops in the area, which could be progressed alongside, or following the completion of the scheme.</p> <p>NSC were invited to input into a meeting with GCC on the 29th September 2020 to discuss the local public transport network. This provided an opportunity for NSC to inform the future local public transport network.</p> <p>NSC's comments were discussed at the meeting with GCC..</p>
2	De-trunking of the current A417	In their 2020 consultation response, NSC sought clarity and commitment that Highways England will provide disability access to the new recreational areas.	At the meeting on 11 th November 2020, Highways England explained to NSC that the proposals for the 'Air Balloon Way' would be suitable and accessible for disabled users. The Disabled Ramblers have been represented as part of the Walking, Cycling and Horse-riding (WCH) Technical Working Group and had been influential in shaping Public Rights of Way (PRoW) / WCH proposals more generally across the scheme.

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
3	WCH routes	NSC asked whether motorcyclists could use the two new bridges identified for the use of WCH.	<p>The PRoW Management Plan at Annex F of ES Appendix 2.1 Environmental Management Plan (Document Reference 6.4) sets out route user guidelines for WCH's to use PRoW's that form part of the scheme.</p> <p>A draft of the Management Plan was issued as part of the 2020 Consultation and a copy was sent to NSC on the 20th November.</p> <p>It is proposed that bridleways run across both the Cotswold Way crossing and Gloucestershire Way crossing and therefore will not be accessible for motorcyclists.</p>
4	Intrusive site investigation works licence	The licence for the intrusive site investigation works was issued to NSC for review and signature.	The intrusive site investigation works licence was agreed and signed by NSC.
5	Ecology Survey	NSC made a request at the landowner meeting on the 10 September for the ecology survey findings reports relevant to their land to be shared.	Full details about the ecological findings at NSC can be found in Chapter 8 Biodiversity of the Environmental Statement (ES) submitted as part of the DCO application.
6	Environmental Impact	<p>NSC request that the scheme design has a minimal environmental impact.</p> <p>NSC raised concerns that only Preliminary Environmental Impact Assessments have been completed to date for the scheme.</p>	<p>A technical note was issued to NSC on the 4th December 2020 to help address environmental concerns the College have about the scheme.</p> <p>Full detail of the environmental impacts and mitigation proposed as part of the scheme are included within the ES submitted in support of the DCO application.</p>

7	Surrounding road network	<p>NSC believe that the A436 and Leckhampton Hill will become busier routes because of the scheme.</p> <p>NSC ask that the scheme improves road safety in the surrounding road network, in particular the Leckhampton Hill Road from Crickley Hill towards Cheltenham and the A436 from the scheme to Cowley Crossroads.</p>	<p>Transport impacts were explained to NSC at the landowner meeting on the 10th September. Detail was provided that traffic levels on Leckhampton Hill and the A417 are expected to increase as a result of the scheme. Yet, traffic on the wider surrounding road network is expected to decrease at a rate greater than the increase anticipated on Leckhampton Hill and the A417. The scheme will result in improvements to the road network in the area surrounding the College. The scheme should reduce congestion and improve road safety more generally in the local area.</p> <p>A note was issued on the 4th December 2020 to NSC providing detail about the traffic impacts and management. The note contained detail about the traffic modelling completed to inform the design of the scheme and looked at traffic impacts with and without the scheme.</p> <p>Journey times on Leckhampton Hill are included in the note from the traffic model to demonstrate the impact scheme has on the road. The traffic model shows that there has been limited impact of the scheme on those travelling northbound from the Air Balloon roundabout with only a decrease of one or two seconds as a result of the scheme in 2024. Southbound, the scheme decreases 2024 journey times by 15 to 18 seconds. This decrease is due to the removal of the A417 traffic from passing through the new Ullenwood junction and that this junction is designed to accommodate the predicted traffic flows. In 2039, the traffic model results show that northbound there is an increase in journey time for traffic flow peaks during the day. This increase is due to the increase in traffic on Leckhampton Hill. Southbound, there is a decrease in journey times between 21 and 31 seconds. As with 2024, this is due to the scheme removing the A417 traffic from Ullenwood junction and the junction is designed to cope with the predicted traffic flows.</p> <p>GCC will be responsible for managing localised issues on the network around the scheme. It should be noted that the</p>
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Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
			scheme aims to improve traffic flow by reducing congestion and improving road safety.
8	Drainage Basin Management	NSC asked what drainage basins on their land will be managed by GCC and which ones Highways England.	GCC will maintain and operate basin group 5. Highways England will maintain and operate basin group 3a.
9	Noise	<p>NSC raised concerns that the assessments completed to date have not addressed the noise concerns NSC have raised.</p> <p>NSC have students with complex disabilities or behavioural challenges which mean that they are more sensitive to the impact increased noise creates on health and wellbeing.</p>	<p>NSC are not considered to be a sensitive receptor for noise during the construction of the scheme in consideration of DMRB guidance. Yet, it has been agreed that NSC will be treated as a sensitive receptor to help address concerns identified by the College relating to the sensitivity of the students to noise impacts.</p> <p>A virtual noise demonstration took place on the 27th May 2021.</p> <p>NSC requested that Highways England make a commitment that the noise levels created by the scheme won't exceed the levels in the noise demonstration. The scheme noise specialist explained commitments are made in the DCO and the Environmental Management Plan. NSC requested that a note is recorded in this Position Statement that Highways England commit to maintaining the noise impacts at the levels presented in the noise demonstration. Highways England agreed to this commitment at the noise demonstration.</p> <p>Highways England to explore the opportunity for an in-person noise demonstration at the College in September 2021.</p>
10	Landscape Plan	NSC requested a plan showing the temporary and permanent areas to be pegged out as part of the scheme.	Area of permanent land take staked out in June and stakes now removed to allow grass mowing.

Table 3 Issues / Matters Outstanding

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
1	Drainage Design	<p>NSC question the need for the permanent easement across the College's land.</p> <p>NSC state that the permanent easement proposed will impact NSC's long-term development plans.</p> <p>NSC raised concerns about the management of the easement when it is operational.</p> <p>NSC raised concerns that the drainage infrastructure proposed will create flooding issues on their land.</p>	<p>In consideration of the comments received from NSC, a 100% infiltration design alternative has been developed. The testing completed for the infiltration design has found the ground at NSC to be appropriate for infiltration but additional treatment stages are required.</p> <p>Highways England will look for opportunities for NSC to continue using their land once the drainage infrastructure is in place.</p> <p>NSC requested conclusive correspondence from Highways England that a permanent easement won't be included as part of the scheme. Formal correspondence was issued to NSC on 23rd March 2021. NSC requested that the caveat of required approval from Gloucestershire County Council & the Environment Agency is removed from the letter. Highways England are unable to remove this caveat as the new drainage design cannot be formally agreed until regulatory approval is achieved.</p>
2	Temporary Easement	<p>NSC raised concerns about the requirement and management of the temporary easement as part of the scheme.</p>	<p>It was explained that the contractors will have the appropriate site and drainage management plans in place during construction.</p> <p>Further detail about the site and drainage management plans for the scheme will be confirmed during the detailed design stage of the scheme and the appointment of the construction contractor to develop the scheme.</p>

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
3	Landscape	<p>NSC question the land re-instatement and landscape enhancements proposed. NSC believe that there should be consideration of extensive planting that will enhance the area in the long term.</p> <p>NSC request that the planting improves the screening of National Star's Ullenwood site from the scheme.</p> <p>NSC request that landscape mitigation works begin as soon as possible.</p>	<p>A technical note was issued to NSC on the 4th December 2020 explaining proposed landscaping works. It was explained that a landscape bund could be put in place to provide some visual screening during construction works.</p> <p>At the landowner meeting on the 9th December it was discussed that advanced planting could begin winter 2021 but could impact groundwork investigation.</p> <p>Meetings took place in May 2021 to discuss scheme landscape proposals.</p> <p>The trees proposed as part of the landscape works will focus around the boundaries of NSC's land impacted by the scheme and the northern section of the infiltration dip in the landform discussed.</p> <p>Further detail about the landscape design proposals at NSC will be determined during detailed design.</p>
4	3D Landscape Imagery	<p>NSC requested 3D imagery at the boundary of their field next to the Air Balloon to show the landscape proposals as part of the scheme.</p>	<p>Highways England to provide the 3D Landscape Imagery when the landscape design has progressed during the detailed design stage of the scheme.</p>

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
5	Construction Traffic Management	<p>NSC look to secure assurances and operational details about how Highways England will guarantee unimpeded access during the construction and operation of the scheme.</p> <p>NSC request that Highways England consider additional measures such as the provision of dedicated priority transport routes as part of the scheme's design.</p>	<p>At the landowner meetings with NSC, it was explained that access will be maintained to the College during the construction and operation of the scheme.</p> <p>Operational details and mitigation required for the construction works will be developed as part of the CTMP. The CTMP will be developed in collaboration with NSC as the scheme progresses.</p> <p>NSC will have an opportunity as part of the DCO Examination process to raise their concerns and input into the delivery of the CTMP but the detail of this is not yet available.</p> <p>A meeting will be arranged with NSC when the construction contractor for the scheme contractually begins working on the project.</p> <p>Highways England have provided assurances that ongoing engagement will occur with NSC during the preparation of the CTMP and construction of the scheme with final details and arrangement to be drawn up between Highways England and the contractor (once appointed).</p> <p>Highways England will appoint a landowner liaison for the scheme (currently Nick Cooper). One of their roles on the project will be to engage with NSC and provide a consistent point of contact into the later stages of the scheme, should the DCO be granted.</p> <p>Meeting to be arranged between Highways England, NSC and the construction contractor in due course.</p>

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
6	Air quality	<p>NSC raised concerns about the potential impact on air quality for students during the construction and operation of the scheme. NSC explained that a number of students who attend the College have respiratory issues.</p> <p>NSC are seeking commitments from Highways England that mitigation measures will be in place if unacceptable air quality levels are reached.</p>	<p>An aim of the scheme is to improve air quality and reduce pollution caused by congestion. The effects of the scheme on air quality are assessed and reported upon in ES Chapter 5 Air Quality (Document Reference 6.2). The assessment considers the impact of the scheme during both construction and operation and concludes that impact on air quality is anticipated during the operation of the scheme.</p> <p>During construction, it is not anticipated that the College will be a significant receptor to negative air quality impacts. Appropriate DMRB guidance has been followed as part of the air quality assessments.</p> <p>Appropriate air quality mitigation and monitoring programmes are included within the Construction Environmental Management Plan for the level of impact created by the scheme.</p> <p>Air quality monitoring is to be provided at the College. The monitoring to be provided would be typical to that of a construction site with higher air quality impacts anticipated in a location with poor existing levels of air quality.</p> <p>Highways England have committed to NSC that they will provide the monitoring throughout the duration of the construction works.</p>
7	Disturbance and Potential Financial Loss	<p>NSC raised concerns about the negative financial impact the scheme could have upon the College. Particular concerns were noted about the financial impact that traffic delays caused by the scheme could create for the College.</p>	<p>A meeting has been held between NSC and the District Valuer Services to discuss disturbance, potential financial loss and compensation for the scheme.</p> <p>Disturbance and potential financial loss conversations to be advanced when matters outstanding relating to drainage, air quality, landscape and the EqIA are agreed.</p>

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
8	Accommodation works	Accommodation works to be provided as part of the scheme are to be agreed with NSC.	Comments relating to the accommodation works have been received from NSC. Comments currently being reviewed and actioned. Accommodation works discussions will be progressed when a construction contractor contractually begins working on the scheme.
9	Land acquisition	Land acquisition discussions with NSC to begin. NSC request timescales for the temporary land take to be acquired as part of the scheme.	Land acquisition discussions will be progressed by the District Valuer Services. Timescales for temporary land acquisition to be provided to NSC when a construction contractor is appointed and has prepared a programme of works. Highways England to provide timescales for temporary land to be acquired as part of the scheme late summer 2021.
10	Professional Fees	NSC request financial compensation to instruct technical specialists to review the scheme.	Highways England are unable to financially compensate NSC to instruct their own technical specialists for the scheme. Highways England have reassured NSC that the technical specialists undertaking the relevant assessment's follow the relevant guidance, legislation and working practices of a professional person. At a meeting with NSC on the 6 th and 19 th May 2021, the College emphasised their position that they request professional fees to review the scheme. Highways England property and compensation team (Alistair Reason) provided a written response to NSC on why the professional fees requested can't be reimbursed as part of the scheme in 9 th June 2021.

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
11	European Convention on Human Rights	In the consultation response submitted by NSC, the College raised concerns that ECHR legislation has not been considered as part of the development of the scheme.	<p>Highways England's legal counsel reviewed the article's quoted by NSC in the consultation response. A response was issued to NSC explaining how the article's quoted are being achieved through the work done as part of the scheme.</p> <p>NSC raised further concerns about the scheme achieving the Human Rights Articles quoted in their response. Highways England legal counsel is currently reviewing the comments received from NSC.</p> <p>A meeting is to be arranged in August/September 2021 to discuss issues relating to Human Rights and the EqIA with NSC.</p>
12	EqIA	<p>NSC raised concerns about the EqIA completed for the scheme. Concerns related to the assessment methodology and data sources.</p> <p>NSC request that the EqIA is shared with the College in confidence.</p> <p>NSC asked if the EqIA could be shared with their legal representatives.</p>	<p>Highways England shared the EqIA in confidence with NSC on the 14th May 2021. The EqIA was shared with NSC's legal representatives on the 4th June 2021.</p> <p>Highways England explained the EqIA adopts a standard methodology through the use of the EDIT Tool (equality, diversity and inclusion tool). The EDIT Tool is an accepted means of EqIA on other nationally significant projects Highways England are involved in.</p> <p>Meeting to be arranged between Highways England and NSC to discuss the EqIA in August/September 2021.</p>
13	EDF Opportunity	NSC requested a meeting to discuss EDF opportunities at the College.	Highways England to arrange a meeting to discuss EDF opportunities late 2021.

Issue No.	Sub-section/ Discipline	Landowner/Occupier Comment	Highways England Response
14	PRoW	NSC have requested that Highways England explore the opportunity for a non-vehicular route between Crickley Hill and the College.	<p>The proposed non-vehicular route cannot be provided as a traffic light-controlled crossing would be required.</p> <p>A crossing in this location would negatively impact traffic flows at the junction and would fail to accord with safety standards.</p> <p>Highways England to provide further information about non-vehicular controlled crossing late summer 2021.</p>

National Star – Registration of Interest

National Star Foundation is registered charity, supporting people with disabilities, based at Ullenwood, immediately adjacent to the proposed A417 Missing Link.

One of the charity's largest operations is National Star College which provides education, personal development, therapies and care for young adults with a range of profound, severe and complex disabilities and associated medical and behavioural conditions, both on a day and residential basis. The main site at Ullenwood is at the heart of the charity's activities and is a specialist hub for its wide range of services and activities.

National Star (NS) employs over 1100 staff, providing specialist services for young people and adults with disabilities on a local, regional and national basis and is considered a centre of excellence.

NS is broadly supportive of the Highways England (HE) A417 Missing Link scheme. However, there are a number of issues to be adequately addressed by HE. It is vital that NS is assured of the absolute continuity of its services to students and service users throughout the period of the construction phase of the works, without detriment or disturbance, or impact on its ability to operate and to be accessed.

Equality Impact Assessment (EqIA)

The EqIA has not adequately taken the work of NS and its service users (with protected characteristics) into account. The EqIA process did not engage with NS or its service users in the drafting of the report in order to appropriately assess the disproportionate and differential effect and impact of the scheme on those who rely on NS's services.

Traffic

NS have been informed that traffic levels will increase on the Leckhampton Hill, A436 and A417 as a result of the scheme during and post construction.

Due to the nature of service user's disabilities, travel time to and from the Ullenwood site is critical. Delays can have significant impact on wellbeing and ability to access critical services. This relates to day students from Gloucestershire and surrounding counties and residential students accessing Ullenwood from accommodation in Cheltenham and Gloucester.

NS requires unimpeded access for staff, students, service users, suppliers and emergency vehicles. Failure to adequately address the critical issue of ease of access could lead to placements being unsustainable, students and service users being deprived access to their provision and staffing levels not being met.

Noise and Air Quality

The project team have not confirmed that there would be no adverse impact on NS due to scheme noise and air quality.

NS is home to disabled students with sensitive issues. There are concerns that the prevailing south westerly wind could funnel noise and pollution down the valley and impact on users and activities.

Disabled Access to Scheme Enhancements

NS have previously discussed the potential for creating a route from NS to Crickley Hill but are awaiting comments from HE.

Land take and land Interest

HE have failed to provide reasoning for the proposed drainage temporary easement or assessment of how the water will be dealt with at the outfall in the middle of the charity's site.