Leckhampton with Warden Hill Parish Council
Written representation to A417 examination

Thank you for the opportunity to participate in this examination. We have also today requested to attend any open floor hearing covering the matters in which we are interested.

Leckhampton with Warden Hill Parish Council represents the southern area of Cheltenham closest to the Air Balloon junction. The C377 north from the Air Balloon junction takes road traffic past National Star at Ullenwood and down the steep Cotswold escarpment into Cheltenham and our parish. Many local residents use the A417 and the Air Balloon junction en route to Cirencester, Swindon, the M4 and Gloucester. They probably also make up a significant proportion of the 190,000 visits a year to Crickley Hill Country Park.

We are well aware of the A417's terrible reputation as a dangerous road and believe most residents support action to reduce the risk of death or injury on these roads and that this was a much more significant public concern than the 5 minute improvements to journey time forecast even at peak time (Scheme Assessment report p126). The preferred Option 30 was widely supported locally as preferable in environmental impact and road safety terms to the alternative surface road Option 12 known as the 'Brown loop'. But we are also aware that the shortlisted tunnel Options 21, 24, 29 and 30 shortlisted were all dismissed in 2017 on 'value for money' grounds and all exceeded the cost range for the scheme set by HM Treasury (Scheme Assessment Report 2019 para 4.6.1, p80). But attitudes both to the environment and to public spending have moved on significantly since 2017 so a very through testing of whether the negative impacts of Option 30 are really justified is now necessary.

The documents and written submissions to this examination by other parties have raised significant concerns with the council. Specifically:

Traffic and transport

The council is concerned by the forecast Annual Average Daily Traffic flows resulting from the scheme on the C377 into Leckhampton (route ID 4). The data on the Figure 7-1 on page 50 of the Highways England 7.10 Transport Report May 2021 reveals (paragraph 7.3.18) 'forecast increases in traffic on the A417 in the vicinity of the scheme.. a result of traffic rerouting from various alternative routes, both local and strategic, to take advantage of the improvements to the route'.

In fact the forecasts show traffic volumes on this route rising hugely as a result of the scheme:

Baseline data		
2015	7,000	
Do minimum scenario		Do something scenario, including the scheme (difference %)
2026	7,300	9,700 **(+27%)**
2041	7,600	11,500 **(+51%)**

This would represent an enormous increase in traffic passing through Leckhampton with a consequent risk of increased traffic accidents including on the steep part of the C377 as it enters our parish down the Cotswold escarpment at Leckhampton Hill. Our own traffic monitoring on Leckhampton Road further down this section of road shows 33-37% of motorists still exceeding the speed limit as they enter the town.

The Transport Report correctly identifies the existing single carriageway section of the A417 as an 'accident cluster site' with significantly more casualties and fatalities than the national average for single carriageway roads presumably because of the speed at which most cars travel on the A417. The Transport Report forecasts a significant reduction in serious and fatal accidents but it is not clear from the simplified presentation whether this is just on that single-carriageway section of the A417 and at paragraph 8.4.10 (p59) the report says that 'disbenefits occur where forecast increases in traffic flows are shown to increase' but this is not explained.

We are concerned that accident data for this scheme appears to have focussed on the single carriageway section of the A417 and yet the 51% increase in traffic flows through Leckhampton may result in *more* accidents there which have not been properly forecast or quantified and we would want to explore this at examination. The same may apply to other local roads experiencing increased flows.

Air quality and emissions

The 2019 Scheme Assessment Report (p145) forecasts an increase in NO_2 pollution in Leckhampton Road in our parish from 17.2 to 19.3 µg/m3 but our own data suggests this is an underestimate.

Our own air quality monitoring at the end of the C3777 where the Leckhampton Road meets the A46 shows a rolling 12 month average for Nitrogen Dioxide (NO_2) of 22.34 µg/m3, rising to consistently higher levels in winter and peaking in September 2019 at 32.55 µg/m3, not far from the EU annual limit of 40 µg/m3. One monitor in town shows a monthly peak over 40 µg/m3. Although both these and our PM2.5 particulate pollution monitoring currently show air quality in Leckhampton is safe, we would be concerned at the impact of the projected 50% rise in traffic flows referred to above at a time when both we and Cheltenham Borough Council are trying to reduce traffic and air pollution.

We would like to see these numbers explored and justified at examination.

We also note with concern National Star's statement (Gateley Harmer on behalf of National Star Foundation, 2 August 2021) that '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.'

Biodiversity, ecology and natural environment

We note Table 14-17 of the Environmental Statement (p34) shows the scheme emitting over **902,895 *additional* tonnes of CO_2 equivalent** compared to the 'do minimum' scenario over an assumed 60 year life cycle despite the Highways England 6.2 Environment Statement Chapter 16 summary very oddly stating under 'climate' that it will have 'no likely significant effects' (p6). Nearly a million tonnes of additional CO_2 equivalent seems to us an extremely serious and very worrying effect in an era of acknowledged climate emergency. We note the credible evidence of Dr Andrew Boswell that these emissions are hard to reconcile with the UK's planned carbon budgets and the government's Transport Decarbonisation Plan (TDP).

We note the concerns in a series of earlier submissions about the impact of the scheme on biodiversity, ecology and the natural environment.

Natural England (Letter 2 September 2021) highlight a net loss of biodiversity 'in the region of 20-25%'.

Their other remaining concerns - which also concern us and seem to be hugely underestimated in the Highways England summary environment report - include:

- Valuable and sensitive habitats that could be affected including 9 'irreplaceable' ancient semi-natural woodlands within 2km of the scheme, 9 non-statutory sites of national importance within 2km of the scheme, 21 broadleaved veteran trees of national importance within or adjacent to the scheme (one of which is considered to be ancient) and 5 Priority Habitats within the consent order boundary including lowland mixed deciduous woodland, lowland calcareous grassland and lowland meadow. Traditional orchard and wood pasture and parkland are also present within 2km of the scheme.

- The constructing of a new road with in an Area of Outstanding Natural Beauty causing 'landscape and visual impacts during construction and operation'. Within national planning policy there is a strong presumption against any significant road widening or the building of new roads in AONB, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Given that the traffic and economic data on which the scheme is based was pre-pandemic, this needs to be throughly tested at examination.

- They conclude that 'the scheme would adversely impact the Barrow Wake part of Crickley Hill and Barrow Wake SSSI [Site of Special Scientific Interest], as a result of land take and increased recreational activity. There are also potential impacts on Bushley Muzzard, Brimpsfield SSSI through delivering mitigation for the loss of tufaceous habitats within the SSSI boundary.' They 'consider that this is a step in the wrong direction for the conservation of this site' and 'disagree with the scheme design in this area because headlights from vehicles using this roundabout after sundown could cause a lighthouse effect giving visual impacts within the AONB.'

- The scheme will result in losses of Priority habitat, including lowland calcareous grassland, calcareous species-rich grassland, broadleaved woodland, hedgerows, veteran trees, and the Annex 1 habitat Petrifying springs with tufa formation (Cratoneurion).

- The scheme will impact on many protected species including 'bats, barn owls, great crested newts, otter, Roman snails, badgers, breeding and wintering bird assemblages, terrestrial invertebrates, aquatic invertebrates and fish.'

We would like their call for significant improvements to the scheme fully explored at examination, and note the contradiction they see between this damaging environmental impact and both the scheme's stated objective of 'conserving and enhancing the special character of the Cotswolds AONB' and new national policy such as Schedule 15 of this year's Environment Act which will make it a requirement for national infrastructure projects like this to deliver a minimum of 10% biodiversity net *gain* from 2023. They point out that 'national landscapes such as AONBs are seen as vitally important to achieving nature recovery, as described in the Glover Review' and that 'Highways England itself has a strategic aim to achieve no net loss of biodiversity across the strategic road network by 2025 and biodiversity net gain by 2040.'

We also note that **Gloucestershire Wildlife Trust** (submission, 31 August 2021) regard the 20-25% net loss of biodiversity as contradicting Highways England's aims 'to enhance the biodiversity value of land 'and 'to achieve no net loss of biodiversity across the strategic road network by 2025'. They also highlight the Environment Bill's requirement that Nationally Significant Infrastructure Projects deliver 10% biodiversity net gain from 2023.

GWT point out that mitigation aimed at creating substantial new priority habitat is 'high-risk': 'Establishing priority habitat of equivalent quality is not guaranteed and could take more than 30 years'. Success will be dependent on many variable factors which haven't been assessed. They disagree that the estimated time lag between destruction and replacement is reliable and poses no significant risk to biodiversity.

They agree with NE that 'considerable irreplaceable habitat, particularly ancient woodland, will be lost or degraded' and ask 'how design decisions aligned with the mitigation hierarchy, to ensure that all possible avenues to avoid loss of priority and irreplaceable habitat' were considered.

GWT also highlight the important Gloucestershire Nature Recovery Network (NRN): 'The NRN is not referenced as a key evidence document despite being a key part of the strategy for nature's recovery in Gloucestershire'. They say 'The impacts of habitat loss on network viability are not investigated sufficiently. One concern is that 85% of important hedgerows will be removed (8.10.81) an action that could affect the viability of the ecological network in this landscape.'

We support their request that the NRN is referred to as a key evidence document and a network analysis is completed to investigate the NRN resilience impact of the loss of priority habitats.

The **Woodland Trust** object to the proposed scheme (submission, 2 September 2021) on the grounds of detrimental impact to ancient woodland and direct loss of veteran trees: 'We hold significant concerns regarding the removal of two veteran beech trees and a veteran sycamore tree referenced as T57, T126 and T127 within the applicant's Arboricultural Impact Assessment (AIA) [APP-353], alongside potential detrimental impact to a number of other veteran trees adjacent to the scheme boundary. In addition, we are also concerned about damage and detrimental impact to Ullen Wood, an area of ancient semi-natural woodland recorded on the Ancient Woodland Inventory. Whilst the Trust acknowledges that there will be no direct loss of ancient woodland to facilitate the proposed scheme, we are concerned that Ullen Wood will be subject to noise and dust pollution during construction, as well as increased nitrogen deposition.'

We want their request for stronger mitigation and buffer zones to protect ancient woodland to be fully explored at examination.

These seem to add up to a catalogue of serious environmental concerns with this scheme which have not been resolved and which may contradict the thrust of global, national and local policy. We hope this will be fully explored at examination.

Cultural Heritage

Crickley Hill is the most important ancient site in Gloucestershire, its origins dating back 5700 years to the first neolithic settlement, older than Stonehenge, and including the remains of an important iron age hill settlement. Nearly a million artefacts have been unearthed at the site. Emma's Grove, a set of barrows south of the current Air Balloon pub, dates back to the bronze age at least 3400 years ago.

We note the **Council for British Archaeology**'s view (27 August 2021) that 'the minimum requirements for a major infrastructure scheme in a National Landscape to be 'landscape-led 'must treat landscape in this context as encompassing 'natural beauty 'and archaeology, heritage and the historic environment. Our representation will state that in our opinion the current proposals fail to address adequately this key landscape impact and that the proposed landscape mitigation falls short of what is required to adequately retain the setting of Crickley Hill and the wider landscape importance of the AONB'.

We would want their concerns for the unique and irreplaceable archaeology and its setting to be fully explored at examination.

Landscape and Visual

The huge cutting, new road and extensive additional roundabouts and access roads will inevitably have an enormous visual impact on this beautiful landscape and while there is widespread public support for safety issues to be tackled without further delay, it is likely that public opposition and concern will grow when construction commences. Other options like the tunnel schemes discarded largely on cost grounds will suddenly look more attractive again.

Natural England's submission expresses concern at the construction of a new road within an Area of Outstanding Natural Beauty causing 'landscape and visual impacts during construction and operation'. They point out correctly that within national planning policy 'there is a strong presumption against any significant road widening or the building of new roads in AONB, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly.'

It is of paramount importance therefore that road safety and economic justifications are subjected to real scrutiny, especially given that the traffic and economic data on which the scheme is based was pre-pandemic and travel patterns may now have changed permanently. This needs to be thoroughly tested at examination.

Cllr Martin Horwood
on behalf of **Leckhampton with Warden Hill Parish Council**