

Summary

In view of the number and scope of the ExA's questions I have provided a preface which gives an overview, including references to a few questions, together with some background information that the ExA may not be party to.

I have gone on to comment, sometimes in great detail as I consider the issues are so vital, on a number of points in the questionnaire; many of the issues I had concerns about have been raised. This project, if implemented, will affect the area's environment and ecology for all time, there will be no going back and, even in the unlikely event that all mitigations were put in place, they would not compensate for what will be lost.

Finally I have added a suffix raising an unmentioned issue and request for ASIs and road viewing. I would respectfully ask the ExA to find time to read the whole document.

Preface

In 2018 the Government commissioned a Designated Landscape Review in response to their 25 year Environment Plan and, amongst the devastating results, is evidence that our SSSIs are in a downward trend and our National Parks and AONBs only just meet nature conservation standards for international recognition. In July 2019 Michael Gove said that "the UK is now among the most nature depleted nations in the world" yet National Highways are planning to destroy vast swathes of nature for, if they are to be believed, no better reason than to avoid a 50mph speed limit over a distance of approximately .6 of a mile in one of the worst weather areas of the Count; see 1.11.5

Their own Preliminary Assessment on Significant Environmental Effects reads like a horror story and it is extremely likely that they have minimised the effects reported to them from various surveys.

Three local MPs seem to think their kudos in having solved a problem that exists for 15/20 hours per week is more important than the national and global issues we face. The entire scheme is in need of a drastic re-think.

Even the title "Missing Link", having been changed from "Missing Loop" is deliberately misleading as it implies that the road is fragmented. In fact there has been an unbroken route since Roman times. Ermin Way ran from Silchester in the east to Caerleon in Wales via Corinium, where it linked to the Fosse Way, and Glevum

Had the village of Cowley been included in the Consultation Process many of the environmental issues would have been brought to the fore but this was not the case. I spoke personally to [REDACTED], the Applicant's Project Manager, at public consultations in both Witcombe & Bentham Village Hall and the mobile unit in Cirencester in November 2019. On one occasion I asked him why Cowley residents had not been consulted and he told me that he had offered to hold a public meeting in Cowley but that [REDACTED] had told him that he spoke for the village and it wasn't necessary: this was completely untrue, nobody in Cowley was made aware of the offer, see 1.1.19.

On the other occasion I suggested that the existing A417 would be better used for local access and as diversionary route, see 1.1.28, the only beneficiary from re-purposing being Birdlip village.

Questionnaire

The ExA's extensive and very pertinent questions have raised so many issues that would not be relevant with Option 12 and I refer to them as follows:-

1.1.6 The scheme is not in keeping with para 116 of NPPF Policy, updated July 2021, for an AONB

1.1.7a.b. The ExA rightly states that Option 12 was stated to be the landscape led design, there was never any mention of same with Option 30.

1.1.7d.e. There is absolutely no comparison between the overall environmental impacts of Option 12 and Option 30. Option 12 does what is necessary to upgrade the existing section to dual carriageway whilst Option 30 is an environmental and ecological disaster which will take nature a generation to recover from, if at all.

1.1.13 Temporary lighting would drive away all nocturnal wildlife and vehicle lights and emissions on completion would prevent their return as the road dissects their habitat. With Option 12 the effect would be minimal as there is already a road so additional noise and light would just drive it to safety further across Stockwell Farm

1.1.14/16 COP 26 was the culmination of a series of International meetings and a turning point in the world's attitude to Climate Change and the Environment, Boris Johnson spoke at them as follows.

At the UN in New York he said "countries must have the maturity and wisdom to act"

At pre-COP in Milan he said “young people have a right to be angry about the state of Climate Change, they are paying the price for the reckless actions of their elders”. What is this scheme if not reckless ?

At COP 26 he said “this is the world’s moment of truth, if we fail here the world will go backwards”.

Alok Sharma said “if we act now, and we act together, we can protect our precious planet”, and “ensure that where Paris promised, Glasgow delivers” and Prince Charles said “it is last chance saloon”

Option 30 flies in the face of all this so why have National Highways put it forward and why are 3 local MPs trying to sabotage their own Government’s Policies by supporting it when there is a cheaper and more environmentally friendly alternative ?

1.1.18 Mitigation measures are already inadequate and, with ever escalating costs, it is likely that even these will not be honoured.

[REDACTED]

1.1.20 If the EMP is revised every six months it is likely that less and less money will be made available for environmental restoration, as 1.1.18. Will this be monitored by a separate body with no vested interests ?

1.1.28 Re-purposing a section of the existing A417 as a recreational area brings together walkers, horse riders and cyclists which do not mix with the general public, especially the disabled, it would be a recipe for chaos with no direct access for emergency services and local single track lanes would be blocked by drivers seeking a direct route, thus causing accidents. Neither would it be beneficial to the environment; wild life would be driven away by human activity and become trapped by the new road. Grasses and wildflowers would be trampled underfoot and new hedges/trees would take many years to mature sufficiently to be environmentally useful. I suggested to [REDACTED] that, if Option 30 was adopted, it would be better to leave it open for local traffic and as a **diversionary route when the dual-carriageway was closed to which he replied that he “did not envisage the need ever to close it”. What a truly frightening lack of foresight from a Senior Manager**, there is not a road in the country that doesn’t have to be closed and, with traffic travelling at 70mph 940 feet above sea level where weather conditions can change from misty to thick fog or rain to blinding snow in a matter of seconds, it is inevitable

1.1.33 In respect of the new Environment Act 2021, Option 30 is totally contrary to LNRSs and NRNs contained therein, also to the proposed Environmental Land Management Schemes consisting of SFI, LNR and LR which the ExA does not mention but may not yet have Royal Assent. The Government prides itself on being a world leader in reversing climate change but cannot hope to influence other, poorer countries if its own Policies and targets are ignored in this way. It begs the question are they just there for show ?

Further, the c200acres of virgin farmland being taken from Stockwell for Option 30 is permanent pasture which is a significant carbon sink, storing up to 60 tonnes per acre, depending on how long it has remained untouched. That carbon would be released into the atmosphere and the ability to store gone forever, along with the farms ability to rear sheep to produce food from those acres. Two small farms would have sections removed from their boundaries, making them completely unviable commercially. One has already lost a sale because of the road, leaving its elderly owner with no real options.

1.3.2/6 There can be no net gain in biodiversity because, for example, whilst National Highways state that they will plant c2km more hedgerow than they remove (it is to be hoped they would not bulldoze between March and September when hedge cutting is not allowed because of nesting birds) it will take 20 years to establish a new habitat and eco-system by which time even more wildlife will be extinct. Similarly, existing mature trees are holding significant amounts of CO2, it will be 20- 50 years before newly planted have the same capacity. Who would be responsible for nurturing young trees and hedge plants during heat waves and droughts for the first years and paying for failed replacements ?

Calcareous grassland cannot be replaced, its very definition requires thin, limestone rich soil which would have to be transported from elsewhere, thus depleting the donor site

Wildlife crossings would require sufficient depth of soil for plants to withstand the heat waves and excessive rainfall that climate change is producing. Again, whose responsibility to monitor and maintain ? The ongoing cost would be prohibitive.

1.3.14/15 Closing Barrow Wake car park is in direct contravention the 2020 Public Consultation to re-route the B4070 whose stated aim is to “improve accessibility and natural surveillance of Barrow Wake”, with a resurfaced car park, it cannot be both. Opening up SSSIs to more people would cause existing flora to be trampled and new not to grow at all, narrow footpaths to become wide, muddy tracks and the areas to be covered in litter. Long term monitoring and cost thereof ?

1.4.14 In the 2019 Consultation the cost of Option 30 was estimated at £485m, by 2020 it had been changed to £250/500m and I queried a possible saving of up to 51%. There is now a ceiling of £500m, despite massive increases in the cost of steel, concrete, fuel and wages and construction is not due to start until 2023 when costs will doubtless be substantially higher so this target is obviously unachievable and environmental protections will be the first casualty.

Whilst costs for Option 12 would rise by the same percentage two massive over bridges , requiring huge quantities of steel and concrete, to reconnect Stockwell Farm’s severed land and the Gloucestershire Way Crossing would not be required, their cost alone must account for a large proportion of the whole, neither would the Compulsory Purchase of 200 acres of prime farmland, be necessary, just a small amount from the edge of Stockwell and none from the other two farms being completely destroyed.

1.4.20 If contaminated water from the development is discharged into the River Churn it will flow down into Cobberley where there are water voles and crested newts as well as damsel flies, together with dormice which will also be affected if contaminated water seeps into the land. All of these species are protected.

1.5.23 Thank you for raising this point, it would be akin to issuing a blank cheque and would almost certainly be abused.

1.5.41 As above

1.6.10 I would invite the ExA to question whether the main compound site has already been agreed with the owner of land in Birdlip, which would also be viable for Option 12.

1.8.1 Option 30 was not promoted as being landscape led until after it had been chosen but it had almost certainly been pre-determined before any Consultation Process began. Option 12, following the corridor of the existing A417 would have very little impact on the landscape, there are already some wide verges, owned by Glos.CC, which were left for the purpose c25years ago.

1.8.4 Shows the Gloucestershire Way Crossing as being 37m wide whereas National Highways latest booklet is only stating 25m so it has already been slimmed down.

1.11.1 I am unsure if this question relates to accidents, if not I apologise but would say that figures have been manipulated to show the worst possible scenario. In the five years from 2016 there have been 3 fatal and 5 serious accidents between the Cowley and Air Balloon roundabouts. Whilst every one is a tragedy all fatalities took place at night, 2 in winter, and of the 5 serious 4 were at night, the daytime one being August Bank Holiday Sunday 2019 so completely unrelated to the twice daily congestion. By contrast there were 5 fatal and 8 serious accidents in the same period between the Air Balloon and Brockworth, all fatalities again being at night.

1.11.5 The 2018 Route options consultation promotes Option 30 as being a shorter route with significant savings to journey times, with Option 12 having increased travel costs. **The difference is .6 of a mile so additional time at 70mph would be 51 seconds whilst at 50mph it would be 72 seconds, is a possible saving 21 seconds really worth more destruction of our fragile planet ?** The slower speed would more than offset the negligible additional fuel so a complete red herring. **It also states that the 70mph proposed for Option 30 “will need to be considered further as part of the next stage in the project’s development” so Highways are not even convinced by their own principle argument.**

1.11.2 & 9 I suggested in an unanswered letter to the Secretary of State that, in view of post pandemic hybrid and flexible working and the dramatic change in public opinion regarding the environment, together with the closure of the Honda Plant in Swindon, that perhaps a major infrastructure project with such huge environmental implications, and cost to the Tax Payer, was out of date and that a simpler, local scheme should be considered. A single carriageway link road for the A436, by passing the Air Balloon roundabout to join a newly created roundabout between the current Birdlip and Stockwell junctions, with access to both, would solve most of the congestion and resultant pollution issues, leaving Gloucester/M5 traffic to flow freely at the Air Balloon, which would need to be re-designed. With traffic travelling at 50/60mph, it would not only reduce emissions but save

the countless accidents which would ensue from A436 traffic joining vehicles travelling at 70mph, from a very short slip road, at one of the worst weather spots in the County. Indeed it would also be better than Option 12.

1.11.26 I would reiterate that there is no such thing as Birdlip and Cowley Parish Council, it is, and always has been, Cowley Parish Council. Birdlip is a village within the Parish

Suffix

There do not appear to be any questions relating to the additional lanes on Crickley Hill and it is unclear whether the change in gradient is proposed only for the new lanes or if the existing lanes are also to be reduced. If the former how would a two gradient road work and if the latter, apart from the massive cost of such an undertaking, how would traffic be re-routed whilst work was carried out. ? It would be an utter disgrace to remove too much of the beautiful escarpment and could also have safety implications. During the floods of July 2007 the dual carriageway was flooded from the Barnwood roundabout to the bottom of the hill and, from the A46 junction to the hill, was up to 40 cm deep. High wheelbase vehicles, travelling too fast in the outside lane, were creating bow waves that swamped those of us in the inside lane, a truly terrifying experience as all visibility was lost, it was a miracle that there were no serious accidents. With more extreme weather events predicted, it is unlikely to have been a one off event. Whilst the oolitic limestone of the escarpment has low porosity and water retention, the soil and vegetation it supports holds considerable quantities and, if this is removed, more water would pour down the hill to flood the lower level and could, especially with a reduced gradient, cause surface water on the hill itself, as happens on the A435 at Charlton Hill. This would apply equally to both Option 12 and Option 30 as the route here is the same. There are also countless trees on both sides of the existing carriageway, many quite old, and their carbon storing properties would be lost.

I would urge the ExA to arrange accompanied visits with the landowners so that they can properly appreciate the beauty and biodiversity which will be lost. Also to drive not only the local lanes, especially through Cowley and Stockwell, which will give an indication of the problems faced now and how much worse the situation could become if the existing A417 is closed; there will be nowhere for delivery lorries to turn and no way out, this would apply to refuse lorries and the emergency services, but also the A417 to the far side of Gloucester. The road is controlled by roundabouts and traffic lights, therefore not all 70mph, so to continue that scenario to the Cowley roundabout would not be out of keeping