

# Gloucestershire Ramblers Area GR-A417 DCO Representation 14th December 2021

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#### **Summary**

Ramblers have campaigned here for over 20 years, to remove through-traffic from local roads (preferably with a tunnel) to make them crossable and walkable again, the landscape remaining much the same.

Although the crossing of the A417 at the Air Balloon roundabout can be said to be difficult, it is said that some 80,000 people walk the Cotswold Way each year. The Gloucestershire Way also crosses here and many walkers use the landmark and historic Inn as a base.

Our aims for this scheme can be summarised as

- Keep the Cotswold Way and Gloucestershire Way on their Authors' line
- Ensure safe footpath crossings
- Retain the landmark Air Balloon Inn a meeting place for walkers
- -'Green-up' proposals for the new road in preference to the current road .

It is not clear that the Applicant's proposals for Option 30 as a way of resolving the issue of the 'Missing Link at the Air Balloon' meet the requirements for a road scheme within an AONB or the scheme aims of 'landscape-led' and 'recreational enhancement.'

The scheme could be improved for walkers (and wildlife) by introducing green bridges for footpaths and tracks for example a 150 metre green bridge under the Air Balloon car park. Keeping the road low in the landscape would minimise noise and visual intrusion along the route including at Emma's Grove Neolithic site.

Simplified Option 30 in our 2019 submission avoids increasing A436 journey distances. Longer tunnelling options such as from Grove Farm to Shab Hill could also be considered using low cost tunnelling techniques or even revert to Option 3 discounted for the 2019 consultation. Once underground the road alignment can be varied without affecting surface features.

In all the above the so called Air Balloon Way, (the present A417 Birdlip Bypass) should at least go to the Air Balloon Inn and be kept in place for local traffic including a bus route for the Cotswold Way stop at Barrow Wake.

Many people are expecting the Applicant to make good on the scheme aims of 'Landscape-Led' and 'Recreational Enhancement'. The Air Balloon still standing alongside the long distance walking trails, with through-traffic gone, will be a sign that this has been achieved.



#### **Outline Representation Sept 2021:**

This scheme for a new dual carriageway within an Area of Outstanding Natural Beauty is fundamentally flawed, in its claims of 'landscape-led' and 'recreational enhancement', without proper consideration of tunnelling.

'Landscape led': The current road from Brockworth to Cold Slad turn has a noticable 7% gradient and is low in the landscape to minimise visual and noise intrusion. The plans increase the gradient to 8%, to cover a step change in height of terrain, and include a flyover at the highest point, Shab Hill. Part of a SSSI is removed and the landmark Air Balloon demolished.

'Recreational enhancement': Paths and tracks are severed or diverted, facilities and heritage are lost at the Air Balloon, local connection between villages is removed and popular parking at Barrow Wake reduced. Where footpaths are changed to include broader use, this would not be generally considered beneficial by walkers.

'Government National Planning Policy Framework' says

Para 174 – decisions should contribute to and enhance the natural and local environment Para 176 – Great weight should be given to conserving and enhancing landscape and scenic beauty in..... Areas of Outstanding Natural Beauty.

The proposals sever the historic landscape and natural connectivity.

Instead the road could be kept low in the landscape. Short tunnels or vegetation covered bridges would increase connectivity, including between Barrow Wake and Crickley Hill SSSIs, enhance the environment for both walkers and wildlife and retain the Inn.

'The Design Manual for Roads and Bridges LA 112 Population and Human Health' Table 3.11 has a 'very high' sensitivity for National Trails, promoted routes and existing employment sites.

Table 3.12 lists WCH diversions greater than 500 metres (0.3 mile) as a 'major adverse impact'.

#### Section 3.15 says:

- a) identify alternative design/route options that avoid the requirement to compulsory purchase property, land and assets; and
- b) identify alternative design/route options that avoid introducing or worsening severance and avoid reducing WCH provision/increasing journey times.

The proposal extinguishes or diverts existing footpaths, worsens severance and increases journey times.

An alternative design could retain connectivity and avoid compulsory purchase of the Air Balloon (an employment site) where the Cotswold Way National Trail meets the Gloucestershire Way.

'Tunnelling' should be properly considered.

The North and South Downs AONB use a low-cost reinforced sprayed concrete method to maintain footpaths and the landscape above new roads. The HS2 and Network Rail infrastructure upgrade also use various types.

For this project, tunnels were discounted largely on grounds of cost, with the use of expensive twin tunnel boring machines.

However by going underground, surface features can be maintained and gradients reduced. A step change in height of terrain could contain a tunnel entrance.

Ramblers have campaigned here for over 20 years for through traffic to be removed from local roads so that roads become crossable and walkable again, preferably with a tunnel so the landscape remains much the same.

If proposals were reconsidered, footpaths and the countryside could be retained within the scheme for enjoyment by future generations.

(493 words)



#### **Background**

Footpath crossings of the A417 trunk road have become increasingly difficult, with increased traffic volumes, as the road is gradually upgraded from single to dual carriageway.

The A417 has been dualled from Cirencester to Cowley Roundabout (and the connecting A419 dualled from Swindon M4 junction 15 to Cirencester).

The single carriageway A417 Birdlip Bypass was completed in the mid 1990s and also bypasses Barrow Wake viewpoint on its way to the Air Balloon roundabout (named after the nearby Inn, which in turn was renamed in the late 1800s to recognise activity at Crickley Hill).

A new A417 dual carriageway from the M5 junction 11A bypassing Brockworth was also completed around 1990. It is a 3 lane single carriageway to climb Crickley Hill to the Air Balloon. Together with the A436 from there to Seven Springs and Andoversford this section effectively forms a bypass for the A40 through Cheltenham.

The missing dual carriageway from Brockworth to Cowley Roundabout has been referred to as the A417 Missing Link at the Air Balloon for a number of years.

The A417 dual carriageway has not connected every major road. The A435 Cheltenham to Cirencester road through Seven Springs was not linked and has led to traffic finding a rat-run through Elkstone village where the A417 and A435 are close.

One suggestion has been to create a dual carriageway from the A417 past Elkstone to Seven Springs to meet a dualled A436 Cheltenham Bypass from the Air Balloon.

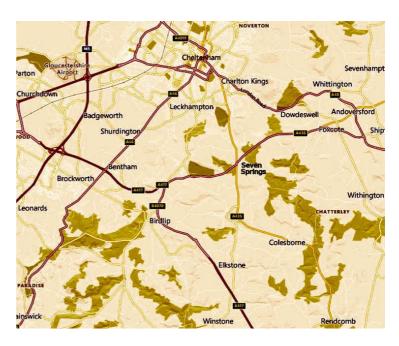
The B4070, Leckhampton to Birdlip, is another road from Cheltenham that seems to have taken A435 traffic.

The countryside relies on connections between one place and other. A new road scheme can influence the traffic loads on those routes.

Some crossings have effectively become obstructed during large parts of the day as traffic volumes have increased over the years. Removing this traffic to a new road or providing suitable bridges or underpasses should bring footpaths back into use. Instead a number of crossings are lost in the plans.

(see representation to ExQ1).

Our response to the Highways England A417 Missing Link Public Consultation in November 2019 demonstrated the need for an examplar road scheme within the landscape of the Cotswolds AONB.



Currently the applicant's proposals for Option 30 as a way of resolving the issue of the 'Missing Link at the Air Balloon' seem unlikely to meet the requirements for a road scheme within an AONB. The new road itself should be greened up to minimise demolition, disconnect and severance before trying to compensate by introducing more disconnect and severance.

Returning the gradient of the new road from the currently proposed 8% to the previous 7% (same as much of current) would allow a 150 metre green bridge under the Air Balloon site (minimising any intrusion on Emma's Grove) and keep the road low in the landscape. Alternatively, use of a 1km tunnel from Grove Farm to Shab Hill would allow a reduced gradient of 6% and avoid use of deep cuttings.

A full flow junction could be considered for the A436 at Shab Hill to avoid roundabouts. However journey distances would still increase by 2 miles over current and add fuel consumption for taking traffic to the top of Shab Hill and down again.



#### A417 scheme vs Road schemes within other AONBs

Notable comparable schemes may be in the North and South Downs.

The South Downs A27 Shoreham Bypass (shown right) could have used a cutting to pass through nearby Southwick Hill. Instead the New Austrian tunnelling method was used, retaining the landscape and 4 footpaths.

At Hindhead in the North Downs the A3 was taken underneath the Devil's Punchbowl, a National Trust site. Again a low cost sprayed concrete method was chosen. One end of the route involved tunnelling through sand but the engineers were up to the challenge.



#### Would a tunnel be cost effective here?

Hindhead was completed within budget at £371m including a significant sum for landscaping. Allowing for 25% inflation gives a figure of £465m to 2021. The scheme was longer at  $6.5 \, \text{km}$  vs.  $5.2 \, \text{km}$  for Brockworth to Cowley and included dual  $1.8 \, \text{km}$  tunnels.

It was hoped that for the 2019 consultation that Option 3 with its 1km tunnel was going to be put forward alongside Options 12 and 30. However it was discounted due to applying costing for an expensive twin tunnel boring method at £875m.

Budget for the scheme had been set to £500m

An early scheme, Option 3, was designed to only take the A417 traffic through a tunnel, leaving local traffic to use the local road network and retaining much of the landscape.

However the limited junction arrangements could be applied to a much shorter scheme such as the 2014 GCC instigated A417 loop consultation arriving at a 150metre green bridge with the Air Balloon on the top, together with a migration route for wildlife and retaining the line of the Cotswold and Gloucestershire Ways.

An intermediate Option could follow the alignment of Option 30 but use the step change in height of the landscape near Grove Farm as one end of a 1km tunnel to the back of Shab Hill.

#### **Mitigation**

In all of the above schemes elsewhere, mitigation has been provided by taking the new road underneath a key part of the landscape. Reduced traffic on local roads provides further mitigation.

The Applicant's approach here with the A417 scheme seems to be to take the road through the landscape severing paths and tracks and demolishing almost anything along the route. Subsequent proposals for mitigation result in closure of local roads to local people and loss of parking to increase green space.

#### **Barrow Wake View Point and Parking**

Barrow Wake is unique along the edge of the escarpment. It allows people to park up and enjoy the views, across Gloucester, the Severn Vale and beyond, no matter the weather perhaps enjoying a cup of tea, sandwiches or fish and chips.

Currently there are 70 spaces (with 2 disabled) at the View Point. However the access road from Birdlip is also used for parking to avoid cluttering the view point and has about 80 spaces, some with views. The Air Balloon has approx 30 spaces plus another 30 overflow used by walkers.

The proposals use the access road as the main link to Birdlip so lose the 80 spaces and if the Air Balloon is demolished, those 60 spaces are lost. If the viewpoint parking is removed to try to compensate for loss of SSSI (green bridges may be better), altogether 210 spaces may be lost from where to take a walk or break to enjoy the views across Gloucester and beyond.



#### **Notes on Applicant's Submission**

Early on we understood that there would be an Environment Heritage and Landscape Technical Working Group that our Countryside Officer would be able to attend. Apparently the EHL TWG only met once and its output missed the Air Balloon Inn - a place regarded as an Historic Landmark on both the Cotswold and Gloucestershire Ways.

Ramblers aims include defending footpaths and protecting the countryside. We're keen to ensure that we're included in discussions on Countryside matters - Environment Heritage and Landscape.

It is important that our position within this scheme is fairly portrayed and represented.

- to remove through traffic from local roads so they become walkable and crossable again, preferably with a tunnel so the landscape remains much the same.
- The Air Balloon Inn is an historic and well known landmark on both the Cotswold and Gloucestershire Ways and a popular base for walking.

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TR010056-000589-6.4 Environmental Statement - Appendix 12.2 - Walking, Cycling and Horse Riding Review at Preliminary Design-1.pdf

page 65 of 89

2.10.27

Comment:

The paragraph could usefully have ended with

Crossing should be improved by moving through (vehicular) traffic away from the popular Trails and the Air Balloon (rather than diverting the former and demolishing the latter).

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TR010056-000589-6.4 Environmental Statement - Appendix 12.2 - Walking, Cycling and Horse Riding Review at Preliminary Design-1.pdf Page 83 of 89

- 2.1.4. Predominantly the affected public right of way network is for general leisure activities, with the following key destinations identified:
- Crickley Hill Country Park
- Barrow Wake Viewpoint
- Birdlip Village
- Golden Heart Public House
- Emma's Grove (Scheduled Monument)

Comment: Surely the Air Balloon Inn should have been included in this list. Procedurally our Walking Environment Officer was waiting to be called to an Environment, Heritage and Landscape Technical Working Group but the EHL TWG did not become active. Is it acceptable that there was no EHL TWG through the consultation? Many members and walkers believe that as the scheme is to be landscape-led, the Air Balloon will stay as part of the landscape.

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TR010056-000604-7.11 Cotswold Way National Trail Diversion Report.pdf page 27 of 27

4th 4 February 2021 end of para

Relevant matters discussed

All parties agreed with the proposed diversion of the National Trail across the Cotswold Way crossing.

Comment: Obviously this would not be Ramblers position as it means not only diversion of the Trails but also demolition of the historic landmark Inn on the trails.

In the Statement of Commonality

TR010056-000607-7.3 Statement of Commonality.pdf

Page 323 of 368 shows that the meeting was one where Highways England was running through its latest proposals.

### **GR-A417 DCO Representation Dec 2021**

6/6



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TR010056-000607-7.3 Statement of Commonality.pdf

Comment: This document was originally referred to as a Statement of Common Ground SoCG. Unlike a previous consultation, run by the local authority, to try to establish a common ground between all parties, (and which concluded with a green bridge for wildlife retaining the Air Balloon above a new road) this consultation only established which organisations are in line with the proposals.

For example if it was proposed to divert the Cotswold Way and Ramblers as the relevant body on walking matters objected, but no one was else had an opinion either way, is it reasonable to exclude the objection?

Procedurally should a statement of commonality indicate common ground between parties or which parties have common ground with the proposal?

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TR010056-000703-A417 Rule 6 Letter.pdf

Comment: Just after the rule 6 letter was issued a number of submissions were made from one village to counter those already made from another village about whose village the new road should be nearest.

Ramblers had followed previous suggestions that if the new road proposals go ahead, the road should be kept low in the landscape with green bridges to minimise impact on both villages.



# Gloucestershire Ramblers Area GR-A417 Response 12th November 2020

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# A417 Missing Link at the Air Balloon Response to

Highways England Supplementary Consultation 13th October - 12th November 2020



Ramblers & other organisations held 'toot for a tunnel' protests on the Cotswold and Gloucestershire Ways during 2001 and 2004 outside the landmark Air Balloon Inn.

Following completion of the 1995 Birdlip Bypass and the Brockworth link to the M5, traffic levels had increased to make crossings of the A417 virtually impassable.

The campaign continues to try to remove through-traffic from local roads to make them walkable and crossable again, the landscape remaining much the same.

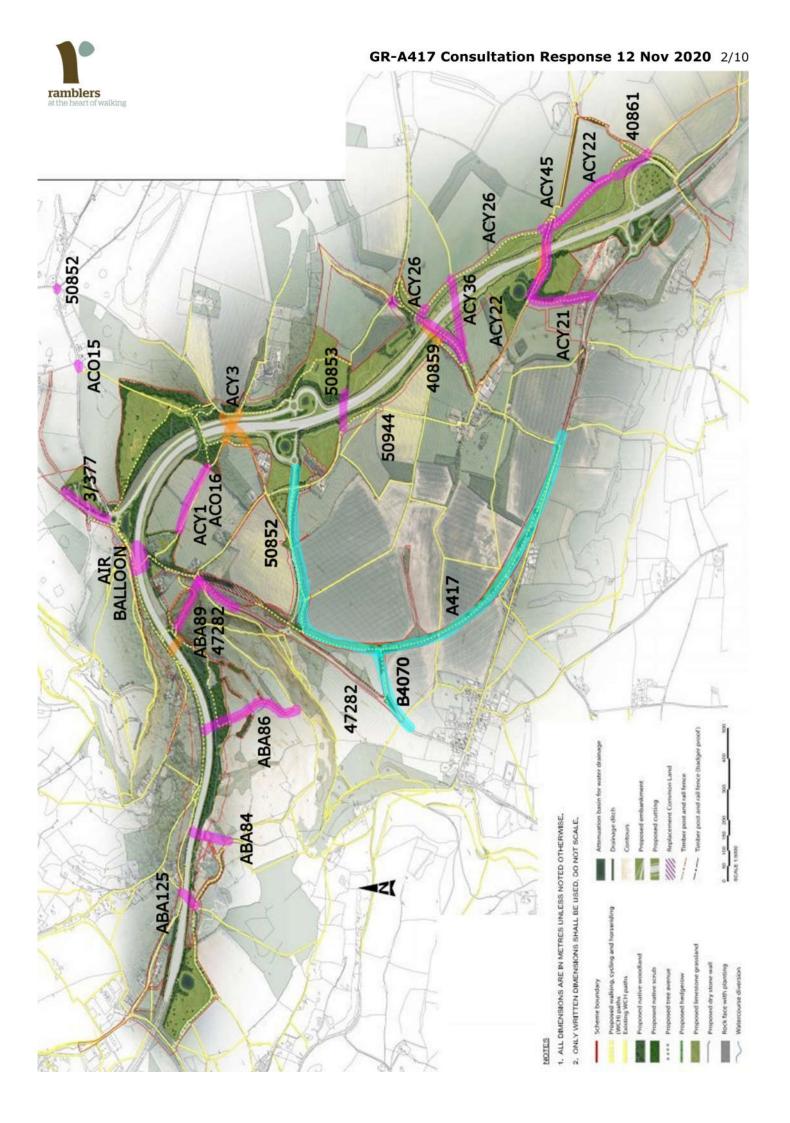
Four key aims - Keep the Cotswold and Gloucestershire Ways on their Authors' line

- Retain the Air Balloon as an historic landmark

- Ensure safe crossings

Use green bridges for connectivity

1a	New crossing Cotswold way	Strongly Oppose - unsuitable bridge. Would support green bridge
1b	New crossing Gloucestershire Way	Support – would Strongly Support if wider and closer to FP crossings
2	Increased gradient	Oppose , Support if crossings retained
3	Design of Cowley Junction	Oppose , would Support if new underpass for WCH+local traffic
4	Birdlip Link in barrow Wake	Oppose , would Support if link kept away from Barrow Wake
5	Improvements for WCHD	Strongly Oppose, would Support if retained more crossings and paths
6	Replacement of Common Land	Neither Support nor Oppose
7	Environment	Road should be lower in landscape to keep paths, minimise noise
8	Design comments	Loss of paths, loss of Air Balloon, keep Shab Hill low
9	Comments	Ramblers is a broad church supporting walking and walkers







#### 1. New crossings: Cotswold Way and Gloucestershire Way crossings

Responding to your feedback, and with the benefit of new survey information, we're now proposing two key new crossings of the A417. (More information on this section can be found on pages 8 and 9 of the consultation booklet.)

#### 1a Cotswold Way crossing

a new crossing in the region of 5m wide that would enable users of the Cotswold Way National Trail to safely cross the A417.

1a. To what extent do you support the Cotswold Way crossing? Strongly Oppose, Oppose, Neither support nor oppose, Support, Strongly Support Can you explain why you've chosen this option?

Ramblers strongly oppose these plans for a Cotswold Way Crossing.

It is welcome that an A417 crossing for the Cotswold Way and Gloucestershire Way is near its present alignment. However the design and materials and materials for the bridge are inappropriate for the location.

Ramblers could support proposals for a green bridge at the Air Balloon - as a landmark on both Trails.

Design Manual for Bridges LA 112 Population and human health 3.11 has a 'very high' sensitivity for National Trails, promoted routes and existing employment sites.

The proposed Boomerang Bridge shape could be adapted to create the 150 metre mixed use Green Bridge described in previous proposals. It should also act as a link and a road noise shield for Neolithic Emma's Grove in the Beech woods opposite.

Highways England claims the scheme benefits recreation so should include the popular Inn as a social receptor - a base for walks, cycling and other activities. Other organisations have raised the lack of replacement facilities such as toilets or somewhere to grab a bite to eat.

DMRB continues at section 3.15 with 'identify alternative design/route options that avoid the requirement to compulsory purchase property, land and assets'.

Proposed Air Balloon Bridge and alternative concept with Air Balloon retained Emma's Grove is in the trees to the right





(combined Google Earth imagery with Highways England fly-through video)



#### 1b Gloucestershire Way crossing

A new crossing in the region of 25m wide that would enable users of the Gloucestershire Way to safely cross the A417, without having to navigate the busy Shab Hill junction. It would also be planted with hedgerows to help bats and other animals such as badgers and barn owls cross safely.

1b. To what extent do you support the Gloucestershire Way crossing? Strongly Oppose, Oppose, Neither support nor oppose, **Support**, Strongly Support Can you explain why you've chosen this option

Ramblers support a crossing here for the Gloucestershire Way and would Strongly Support if it could be wider and closer to the current meeting point of track 50852 and footpaths ACY3 and ACO16 to avoid diversions.

This crossing has been necessary ever since plans were first proposed and it's welcome that it provides interconnect as a wildlife crossing too.

Two sympathetic approaches to construction may be possible:either use a dig-under method to keep the surface landscape intact or temporarily divert routes so they pass alongside until construction of the bridge is complete.

Keeping the surface features in place retains the hedgerows for bats badgers and barn owls. If the bridge is wide enough it should also retain migration routes during construction of the road.

The landscape at this location is open with views across to the escarpment at Crickley so could generally be retained as grassland rather than planted as forest.

A crossing is also required south of the Shab Hill junction for popular walking routes along 50853 and 50944 and could be implemented in a similar way for wildlife access to a nearby area of conservation.

Image of a similar green bridge elsewhere in Europe continuing a dual carriageway with a link road alongside.

Note the bridge includes grass flanks to benefit wildlife, flora and fauna.





#### ilding 2. The change in gradient of the A417 as it climbs the escarpment near Crickley Hill

At consultation in 2019, we proposed to reduce the road's gradient from 10% to 7% to improve safety and congestion but there were concerns about the impact of the required cutting through the escarpment, which at its deepest point would have been approximately 20 and 25 metres deep.

As a result of your feedback, and to conserve and enhance the special character of the Cotswolds Area of Outstanding Natural Beauty (AONB), we're now proposing to change the gradient of the A417 as it climbs the escarpment at Crickley Hill to 8% rather than 7%. This will include a third climbing lane to help heavy goods vehicles climb the escarpment.

More information on this section can be found on pages 10 and 11 of the consultation booklet.

2. To what extent do you support the change in gradient of the scheme? Strongly Oppose, **Oppose**, Neither support nor oppose, Support, Strongly Support Can you explain why you've chosen this option

Ramblers oppose the increase in gradient as an overall benefit has not been demonstrated. Ramblers could support if there was demonstrable increase in crossings for paths and retention of the heritage and landscape of the area.

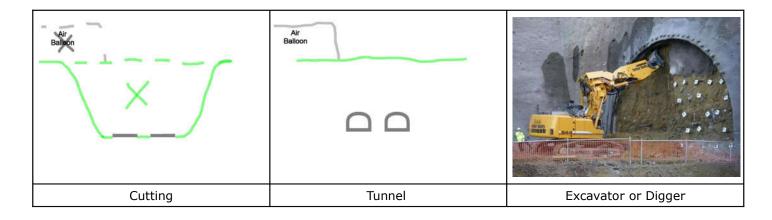
The quoted 10% is a peak gradient near the Air Balloon that would have been avoided by the scheme anyway. The proposed gradient of 8% is greater than the lower slopes of the present A417.

Although a peak gradient of 8% may be useful in places it should only be used where it might be necessary and not where it could detract from the landscape. For example raising the road onto an embankment at tree height could lead to visual and noise intrusion. An embankment could offer under-passes rather than over-bridges for footpaths, bridleways and tracks.

There is a step change in height of the landscape east of Grove Farm. A 1km tunnel between there and Shab Hill would have a maximum gradient of 6% and may not need a crawler lane.

Some sketches illustrating that tunnels whether 150 metres or 1km long require much less excavation and disposal than cuttings at the same depth.

Also shown an Excavator about to begin work.





#### 3. The design of Cowley junction

Feedback received during our consultation in autumn 2019 highlighted concerns about safety and rat running at the proposed Cowley junction.

As a result of this, we've redesigned the roundabout at Cowley junction to prevent vehicles from accessing Cowley Lane from this junction. Access would, however, be retained along Cowley Lane for local properties, as well as for walkers, cyclists and horse riders, including disabled users.

More information on this section can be found on page 12 of the consultation booklet.

3. To what extent do you support the changes to Cowley junction? Strongly Oppose, **Oppose**, Neither support nor oppose, Support, Strongly Support Can you explain why you've chosen this option

#### Ramblers opposes this proposal as it

- -mixes a low traffic walking cycling and riding route with that of traffic from the A417 to Nettleton and beyond. It also diverts footpath ACY22
- converts ACY22 to a Restricted Byway -loss of a field footpath. Many walkers would not consider change of use of a footpath, for other uses, as a benefit.

#### Ramblers could support if

- ACY22 was retained as a footpath to link with footpath ACY40.
- a redesign of the junction if it provided a separate bridge or underpass for A417 linking traffic perhaps using the old Quarry.

As described in the proposal, the aims of this junction seem to be to

- allow direct access from the new A417 dual carriageway to Nettleton/ Birdlip traffic along the current A417 which is proposed to be detrunked (i.e. taken under local authority control).
- keep local connections separate between Cowley & Watercombe along 40861 to allow use for local people, business and farms etc. but still allow indirect access to the A417 if required.

Proposed underpass access diverting ACY22 and Cowley.



Alternative arrangement with new underpass at the Quarry avoiding diversions of current paths and roads.





#### 4. The rerouting of the B4070 to Birdlip via Barrow Wake

We're planning to reroute the B4070 to Birdlip via the entrance of Barrow Wake car park and along the existing road to Birdlip. We're proposing a new, safer roundabout on the road leading to Barrow Wake, which will help slow traffic and deter large goods vehicles from using the road. This change would see the road follow its historic alignment, improve safety, accessibility and natural surveillance of the area, and make Barrow Wake a more welcoming place to visit.

More information on this section can be found on page 13 of the consultation booklet.

4. To what extent do you support the rerouting of the B4070 to Birdlip via Barrow Wake?

Strongly Oppose, **Oppose**, Neither support nor oppose, Support, Strongly Support Can you explain why you've chosen this option

Ramblers Oppose the the new link road to Birdlip taking this quiet section of old road used for Walking Cycling and Riding. Ramblers could support another route for the link road away from this edge of the Escarpment.

The whole length of the existing road 42782 into Barrow Wake car park has good views from the edge of the escarpment. There are often 20-30 vehicles parked up either taking a break or for longer term parking for walks etc. If the proposal to use the road for the Birdlip link was to progress, these vehicles could fill up the Barrow Wake car park viewpoint.

These proposals take the Birdlip link road through the Barrow Wake underpass and install a roundabout at the view point car park entrance. The quiet walking and cycling road 50852 to Shab Hill is to be repurposed as the link between the new A417 and Birdlip village.

An alternative route for the Birdlip link road could use the section of the current A417 north from the Birdlip junction. It would avoid the underpass and instead use the field edge alongside the 50852.

There has also been a suggestion for a direct link from Birdlip to the new A417 across a depression in this field. This should be a recreational benefit as it would keep Birdlip traffic away from the quiet 50852.

Barrow Wake accessibility may also be improved by opening the north end of the car park through to the Air Balloon so as to allow relevant traffic to pass through.





#### 5. Improvements for walkers, cyclists, and horse riders, including disabled users

Both users of the Cotswold Way National Trail and the Gloucestershire Way currently cross the busy A417, which impacts on the experience of visitors to the area and locals alike. There's also a wider network of footpaths, bridleways and other routes with public access rights, which makes the area attractive to walkers, cyclists and horse riders, including disabled users.

We've been working closely with stakeholders, who have given up their time to help us develop proposals for a new and improved network for walkers, cyclists and horse riders, including disabled users.

More information on this section can be found on page 14 of the consultation booklet.

5. To what extent do you support the changes to public rights of way? **Strongly Oppose**, Oppose, Neither support nor oppose, Support, Strongly Support Can you explain why you've chosen this option

Ramblers **Strongly Oppose** the current proposals because of too many downsides for walkers. Ramblers would support a scheme that retained access to paths, tracks and local roads keeping the landscape much the same.

It is welcome that the tarmac route linking Bentham to the Air Balloon along the north side of the A417 looks to be retained. It's shown as a bridleway. For shared use of road bikes and walkers it should be at least 5 metres wide. From the Air Balloon the route currently continues around to the north end of Barrow Wake car park.

There are a number of crossings lost in the plans. The Design Manual for Roads and Bridges LA112 for Population and Human Health section 3.12 lists diversions greater than 500 metres (0.3 mile) as a major adverse impact.

This list of issues, for walkers, generally follows the scheme from Brockworth to Cowley and on to Barrow Wake :-

- ABA125 Bridleway the A417 crossing is lost. The southern linking footpaths ABA 74,77,78, 80 and 126 are diverted onto a Private Means of Access, to the Bentham underpass to return along Dog Lane 1.0 mile extra. The long term status of a PMA needs clarification.
- ABA80 footpath A417 crossing removed resulting in a 1.25 mile detour via Bentham underpass.
- ABA86 footpath lost change in use to a bridleway no crossing -diversion via Grove Farm is 0.7miles
- ABA89 footpath in woods extinguished proposed alternative in open fields.
- Cotswold Gloucestershire Way surfaced path alongside the Air Balloon amenity lost proposed to be replaced with metal bridge with no facilities nor heritage.
- 3/377 (Leckhampton Hill Rd) footway alongside road to be replaced with bridleway other side.
- ACO16 ACY3 Gloucestershire Way crossing now to be provided but it is off-line with 0.5 mile diversion.
- 50853/50944 track no crossing provided diversion through busy junction 0.6 mile (Issues of noise and visual intrusion with the new A417 kept high in the landscape at Shab Hill and beyond.)
- 40859 minor road with avenue of lime trees trees are lost. The plans don't keep the A417 low in the landscape. A high bridge means restricted byway ACY26 is diverted and potential loss of a veteran hedgerow. Lowering the A417 by a few metres keeps aligns the bridge with the lime trees, avoids diversion of ACY26 and retains the hedge.
- ACY36 restricted byway extinguished and crossing is lost diversion 0.5mile
- ACY21 footpath lost change in use to restricted byway
- ACY22 part footpath lost change in use to bridleway A417 Cowley bridge is offline
- ACY22 part footpath lost change in use to bridleway -diversion around Cowley junction 0.5 mile
- 47282 is currently used for long term parking for views or walking/riding. Instead it is proposed to be used as the link road to Birdlip Link. Parking is proposed at a new car park at Nettleton 3 miles round trip.
- 50852 guiet lane for walking riding to be used instead for the Birdlip link

It's not clear if the current A417 Birdlip Bypass is closed to local traffic. With through-traffic gone, and the road repurposed as a minor rural route to Nettleton, it should be useful for local people, business and farm traffic as well as proposed walking, cycling and horseriding. (The parallel old road through Birdlip is already in use for WCH too).

ACO15 and 50852 are crossing points on the A436 outside of the red line boundary of the scheme. They can already be difficult and may require some mitigation if traffic levels increase on the A436 due to the scheme.

Ramblers are aware that what may be seen as an improvement to one person or organisation may not be seen as an improvement to another. Retain, maintain and keep are useful key words.

Since 2014 it has been said that any new road here should be kept low in the landscape with flat bridges across the top for safe crossings. There should be little need for the diversions or extinguishments listed above.

Many recent road schemes incorporate bridges with grass flanks for the benefit of fauna, flora and wildlife.



#### 6. Replacement of common land

The scheme will result in some loss of common land near Crickley Hill and at Barrow Wake. We're proposing to replace this with an area of new common land next to Barrow Wake which would be made up from the repurposed A417, north of the proposed new Air Balloon Way. It would be connected to the existing area of common land and Crickley Hill and Barrow Wake Special Site of Scientific Interest (SSSI), be bigger than the area lost, and could be used for the same purposes.

As it's an area of common land, it would not be accessible to cyclists or horse riders. This would, however help protect Crickley Hill and Barrow Wake SSSI. This location has been identified following an assessment, which is summarised in Chapter 12 of our Preliminary Environmental Information (PEI) report.

More information on this section can be found on page 15 of the consultation booklet.

6. Do you agree with our proposals for replacement common land? Strongly Oppose, Oppose, **Neither support nor oppose**, Support, Strongly Support Can you explain why you've chosen this option

No Comment made

#### 7. Environment

More information on this section can be found on pages 17-21 of the consultation booklet and our Preliminary Environmental Information report.

7. Do you have any comments on the likely environmental effects that have changed since the previous consultation?

Ramblers have been able to lead a number of walks around the Area before Covid-19 and during with suitable restrictions. It's apparent that the tranquillity of Emma's Grove (a sacred copse) is only likely to be achieved if the new road is in a covered cutting or short tunnel. The same would also allow retention of the Air Balloon.

Previously the aim was to keep the road low in the landscape to help minimise noise and visual intrusion. It's questionable whether the proposed increase in gradient from 7% to 8% will be beneficial from Brockworth to the Air Balloon. The 8% gradient should only be used where it's beneficial.

The construction of bridges, using tunnelling methods, may give better environmental outcomes for a financial cost within the scheme budget. Digging underneath keeps surface features intact rather than the usual create a cutting and build a bridge over. An example could be to try to retain the Lime Tree avenue at Stockwell Cowley lane 40859.

The visual and noise impact of the section of road from Shab Hill flyover to Cowley Junction could be minimised by taking it lower in the landscape so that bridges are flatter and path diversions eliminated.

The scheme discusses planting areas of woodland, but open areas of grassland or a suitable mix may be more appropriate for this landscape with its open views.

With the environment high on most everyone's agenda and traffic levels expected to nearly double when the road is in place, is the proposed scheme the best way of meeting the needs of an AONB and its SSSI? Every bridge across the new road should be for wildlife as well as human activity.



#### **General commentary**

# 8. Do you have any comments on any of the other design changes that have been introduced since the previous consultation?

The loss of footpaths in the scheme is disappointing. Change in use of a footpath to a bridleway or track is not generally considered by walkers to be an improvement. A diversion of a public right of way may not seem significant to users on horse or bike but could be significant to walkers. On the other hand if Ramblers managed to secure a bridleway crossing, other users have said they would welcome it.

The loss of Air Balloon as a landmark on the Cotswold Way and other walking routes will also be disappointing to many people who believe it is to be retained as part of the landscape. An underpass for the road there would also benefit nearby Emma's Grove in terms of traffic noise and visual intrusion. (It seems inappropriate to rename the Birdlip Bypass as the Air Balloon Way if the destination no longer exists.)

Shab Hill junction is to be sited in a tranquil part of the landscape. Keeping it low should help minimise noise transmission and allow a flat overbridge for 50853 and the linking 50944 – both green tracks used for circular walking routes.

This scheme is within an AONB and perhaps soon a National Park. The proposal contains severance not only for recreational users, local people and business but also for wildlife.

With some improvement it could become an examplar scheme, containing green flanked bridges and underpasses to help retain this special landscape.

#### 9. Do you have any other comments?

It has to be said that Ramblers is a broad church. Like the walking public there is a range of views from those wanting the new road in place yesterday, to those not wanting the road at all – citing environmental concerns or perhaps seeking road pricing as a means to reduce traffic levels.

However many of those wanting the road yesterday are willing to accept that Ramblers would press to retain footpaths and the landscape. Similarly many who don't want the road at all are willing to accept, that if it is still to be constructed, that Ramblers would try to retain footpaths and the landscape.

This response tries to represent a balance of the views of Ramblers across the Area. Although the A417 scheme has improved in places, it is still a concern that it may not meet the requirements of a road scheme within an AONB. Ramblers continue to press for improvements to the scheme so that it can receive the necessary consents and becomes an asset to the Cotswolds National Landscape.

#### **Summary**

The campaign continues to try to remove through-traffic from local roads to make them walkable and crossable again, the landscape remaining much the same.

Four key aims - Keep the Cotswold and Gloucestershire Ways on their Authors' line

- Retain the Air Balloon as an historic landmark
- Ensure safe crossings
- Use green bridges for connectivity

1a	New crossing Cotswold way	Strongly Oppose - unsuitable bridge. Would support green bridge		
1b	New crossing Gloucestershire Way	Support – would Strongly Support if wider and closer to FP crossings		
2	Increased gradient	Oppose , Support if crossings retained		
3	Design of Cowley Junction	Oppose , would Support if new underpass for WCH+local traffic		
4	Birdlip Link in Barrow Wake	Oppose , would Support if link kept away from Barrow Wake		
5	Improvements for WCHD	Strongly Oppose would support if retained more crossings and paths		
6	Replacement of Common Land	Neither Support nor Oppose		
7	Environment	Road should be lower in landscape to keep paths, minimise noise		
8	Design comments	Loss of paths, loss of Air Balloon, keep Shab Hill low		
9	Comments	Ramblers is a broad church supporting walking and walkers		



Highways England A417 Missing Link Public Consultation Response - Summary & Index November 2019

gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk

#### **Summary**

Ramblers' aims for this scheme can be summarised as

- Keep the Cotswold Way and Gloucestershire Way on their Authors' line
- Ensure safe footpath crossings
- Retain the landmark Air Balloon Inn a meeting place for walkers

And in order to demonstrate the environmental credentials of the project, where possible use green flanked bridges for the crossing points of the new road for biodiversity interconnect.

Highways England could build this road with no diversion or extinguishment of paths or tracks if suitable bridges, short tunnels or underpasses were installed along the route. If longer tunnels were allowed, a tunnel option could be used to replace the deep cutting described in Option 30.

Lack of a crossing point for all users at the Air Balloon site not only results in long diversions for users of the Cotswold and Gloucestershire Ways but also leaves Cyclists and Horse Riders seeking another route.

A similar lack of a suitable crossing point at Shab Hill not only affects users of the Gloucestershire Way but also users of a number of popular walking routes – it's a junction of 5 types of path or track.

The Options & Alternatives for the A417 Missing Link are discussed in GR-HE-A417-PCR-2019-11-4a.pdf Tunnel Option 3 can be discounted if Government refuses to fund tunnels of length 150 metres or more.

Only two Options remain that meet the above project aims.

#### Simplified (or Greened-Up) Option 30 retains many of the benefits of option 3

Journey distances are the same or shorter than current journey distances.

It retains the Air Balloon roundabout and uses it to connect the A436 to the new A417 via slip roads. No Shab Hill junction or link road – instead the current road is used as the link.

#### Option 30 with Alternative 2 and retaining the Air Balloon Inn

- Offers the possibility of repurposing the road next to Barrow Wake as Calcareous Grassland.
- It has longer journey distances for A436-A417 traffic (2 miles).
- The Shab Hill junction should be inverted to better fit with the landscape.
- The 4 lane road outside the Air Balloon could be repurposed for other uses.

Both options include a wildlife green bridge. However the design should be reviewed asking whether it is green enough and whether it fits well within the landscape.

A vegetation flanked green bridge seen in other recent road schemes could be more appropriate.

The pre-1990 A417 road (now Dog Lane) is not only a quiet walking, cycling and riding route to the Air Balloon, it also acts as a link between current A417 crossings. It can do the same for the new road.

Both Options would meet Ramblers aims as described above.

Both utilise a short tunnel (or green bridge) of less than 150 metres below the Air Balloon car park. This retains the Cotswold and Gloucestershire Ways on their authors' line. It also protects the site of Neolithic Emma's Grove nearby and the trees around the site including a veteran apple tree.

The choice between the two options will depend on other considerations.

Ramblers have continually pressed Highways England to consider cost effective tunnelling options. Some would be short enough to be considered bridges. However no satisfactory response has been received.

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#### Index of the documents submitted in this PCR Public Consultation Response

- Summary & Index (2 pages) This document

# 0. Introduction (2 pages)

GR-HE-A417-PCR-2019-11-0a.pdf

A discussion of missing path crossings using Highways England video fly through.

#### 1. Brockworth to Shab Hill (9 pages)

GR-HE-A417-PCR-2019-11-1a.pdf

Is the green bridge green enough?

#### 2. Green Bridge (2 pages)

GR-HE-A417-PCR-2019-11-2a.pdf

A discussion of Shab Hill to Cowley Junction using Highways England video fly through

#### 3. Shab Hill to Cowley Junction (5 pages)

GR-HE-A417-PCR-2019-11-3a.pdf

Is alternative 2 better than other options and alternatives?

#### 4. Alternative 2 (1 page)

GR-HE-A417-PCR-2019-11-4a.pdf

How much of the current road can be repurposed?

#### 5. Current A417 repurposing (1 page)

GR-HE-A417-PCR-2019-11-5a.pdf

Will footpaths stay open during construction?

#### 6. During Construction (1 page)

GR-HE-A417-PCR-2019-11-6a.pdf

Discuss the landscape and other environmental issues not covered elsewhere

#### 7. Environmental Information (2 pages)

GR-HE-A417-PCR-2019-11-7a.pdf

#### 8. Anything Else

Response to Walking, Cycling and Horseriding Technical Working Group (7 pages) GR-HE-A417-PCR-2019-11-8a.pdf

HE-Proposals-Review (6 pages)

GR-A417-HE-Proposals-Review-2019-10.pdf

A review of Highways England proposals including Option 3 the 1km tunnel, their Option 30, a simplified (greened up) version Option 30 and an update showing use of 'Alternative 2' with Shab Hill junction. Also includes a list of footpath numbers and highways numbers.

Green bridges tunnels and cuttings (1 page) GR-A417-green-bridges-tunnels-2019-07.pdf

The A27 tunnel just below surface in the South Downs (1 page) GR-A417-A27-tunnel.pdf



Highways England A417 Missing Link Public Consultation Response
0. Introduction November 2019

gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk



Ramblers have been campaigning here for around 20 years for through traffic to be removed from local roads (preferably with a tunnel) to make them walkable and crossable again. The landscape would stay the same. The aims can be summarised as

- Keep the Cotswold Way and Gloucestershire Way on their Authors' line
- Ensure safe footpath crossings
- Retain the landmark Air Balloon Inn a meeting place for walkers

#### The current proposals

- Divert the Cotswold Way and Gloucestershire Way
- Extinguish footpath crossings
- Demolish the Air Balloon.

### Ramblers' Charitable Aims

Defend footpaths, protect places we like to walk, improve access, let the public know what we do.

In March 2018 Ramblers rejected both options 12 and 30 but offered to work with Highways England to 'green up' Option 30.

Simplified or Greened Up Option 30 was evolved which

- deletes the direct link road to Birdlip (none of the tunnel options have a link road)
- keeps the roof on the tunnel as it passes below the Air Balloon car park
- uses green flanked bridges where possible along the route for gain in biodiversity interconnect At no stage has taking the road below the Air Balloon site (using relatively low cost tunnelling methods such as at Hindhead) been considered as part of the consultation.

In January 2019 Ramblers became concerned about the direction of proposals for the scheme & agreed that landscaping funds should be used to 'green up' the new road in preference to the current one.

With the new road at depths of 30metres (100ft) HE option 30 could be said to be a tunnel without a roof.

Footpath (and bridleway etc) crossings of the current A417 have become increasingly difficult as traffic levels have increased. It was anticipated the scheme would incorporate bridges or underpasses of the new road to allow rights of way to be fully used again.

However it seems Highways England instead proposes extinguishing or diverting these routes. Other organisations are also showing their disappointment with proposals and have raised the prospect of delay until tunnel options are properly considered.

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#### **Background**

The Cotswold Way is said to be a 'Jewel in the Crown' for Ramblers. It was first mooted following the passing of the National Parks and Access to the Countryside Act of 1949, which made provision for the designation and creation of long distance paths.

The Gloucestershire Committee of the Ramblers Association submitted plans to the National Parks Commission in 1953. Gloucestershire County Council designated the Cotswold Way route using existing public rights of way and the scheme was launched during Footpath Week in May 1970.

On 24 May 2007 The Cotswold Way was officially inaugurated as a National Trail a 102-mile (164 km) long-distance footpath. It follows the edge of the Cotswold escarpment from Bath to Chipping Campden visiting many towns, villages and landmarks along the way.

Meanwhile traffic levels have been increasing along a cross country route from the M4 near Swindon to the M5 near Gloucester generally following the old Roman Ermin Street (or Way) from Gloucester to Cirencester and on to Silchester. The road has been upgraded to dual carriageway from the M4 at Swindon to Cowley Roundabout. Due to topology the old Gloucester to Oxford turnpike road (A436) has instead been dualled from the M5 as far as the Brockworth Bypass. The B4070 joining the two became very busy and led to creation of the single carriageway A417 Birdlip Bypass in 1995. The roundabout on the A436 junction next to the Air Balloon Inn at Crickley Hill soon became notorious for congestion. This road scheme is to create a dual carriageway for the A417 missing link between Brockworth and Cowley Roundabout.

The Air Balloon Inn is an historic landmark. It's situated on the junction of the Gloucester to Oxford A436 turnpike road and the Old Bath Road from Cheltenham (B4070). The roads predate many of the towns and villages they link today. An indication is the site of Neolithic Emma's Grove round barrows close to the junction. The Air Balloon Inn is many hundreds of years old and was renamed after one of the first balloon flights from Berkeley on the River Severn by Edward Jenner (of smallpox vaccine fame) landed nearby.

In 2001 and again in 2004 Ramblers and other local organisations held 'toot for a tunnel' placard protests on the Cotswold Way outside the Air Balloon, with the aim to remove through traffic from local roads. A number of footpath crossings had become effectively impassable.

In 2014 Gloucestershire County Council instigated the A417 loop consultation, the tail end of which evolved a minimal tunnel, 150 metres, to pass a new A417 dual carriageway beneath the Air Balloon site.

March 2018 saw a Highways England consider 30 Options before offering two for public consultation. The consultation was flawed in a number of ways:-

- Option 12 was sometimes referred to as the 'dead duck' option as it included a tight bend with a camera controlled speed limit. Option 30 was in effect the only available Option.
- None of the options considered the short tunnel beneath the Air Balloon, instead demolishing the landmark Inn with a 30 metre deep cutting.
- Tunnel options were discounted due to the use of expensive tunnel boring machines rather than more cost effective tunnelling methods digging from either side.
- The two submitted options were referred to as surface routes, yet included the 30 metre deep cutting that was likely to have greater environmental impact than a tunnel at that depth. If the surface routes were said to be tunnels without a roof, the roof could be kept in place at key points along the route.

Gloucestershire Ramblers, in rejecting both options, offered to work with Highways England to 'green up' Option 30 based on the lowest cost tunnel - Option 3. A 150 metre version of the tunnel could pass below the Air Balloon car park, & keep the Inn and Cotswold Way in place. It would also retain the Gloucestershire Way as it passes both the Air Balloon Inn and Emma's Grove.

This Highways England A417 Missing Link Public Consultation Response (November 2019) demonstrate that Ramblers still press for an examplar road scheme that's landscape led within the Cotswolds AONB.



Highways England A417 Missing Link Public Consultation Response
2. Green Bridge November 2019

gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk

#### 2. Do you have any comments on our proposed green bridge?

As seen in section 1, the wildlife bridge is quite high up and lands within the Crickley Hill SSSI. It could be relocated for a better fit within the landscape either to one side or the other of the SSSI or at a different elevation. Below is a cross section view. The depth of the new A417 cutting is almost 30 metres below current ground level. Further along the Air Balloon Inn is proposed to be demolished and bridleways footpaths etc diverted back across what was supposed to be the Wildlife Green Bridge. Keeping a bridge at the Air Balloon site would keep the Cotswold and Gloucestershire Ways on their authors' line.

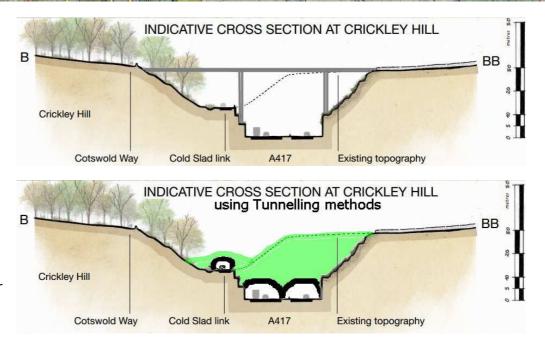


#### **Concrete Bridge above**

This image illustrates the height of the proposed concrete bridge.
A layer of vegetation on the top allows it to be referred to as a Green Bridge.

#### **Green Flanked Bridge**

Green 'flanked' bridges could be installed instead. A standard inverted U bridge as used in the Dorset AONB could cover the minor Cold Slad link road (the current A417). A tunnelling method similar to Hindhead could be used for the new A417 to retain the existing topography.



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#### Landscape note

The currently proposed "green" bridge appears to be concrete with grass on a flat surface, compared to other green bridges being constructed countrywide on current road projects ( see note on Green bridges and note on A27) Can it really be said to be a good fit within the landscape of the Cotswolds AONB?

It would be preferable for a green bridge if suitably located to have green flanks and mixed native vegetation along the sides rather than concrete pillars.

Further green bridges are proposed in this response to ensure that footpaths are retained in their current location and crossings are retained. The planting of native wildflower grassland areas and hedges along bridges would contribute to the landscape-led theme of this project.



Highways England A417 Missing Link Public Consultation Response
3. Shab Hill to Cowley junction November 2019

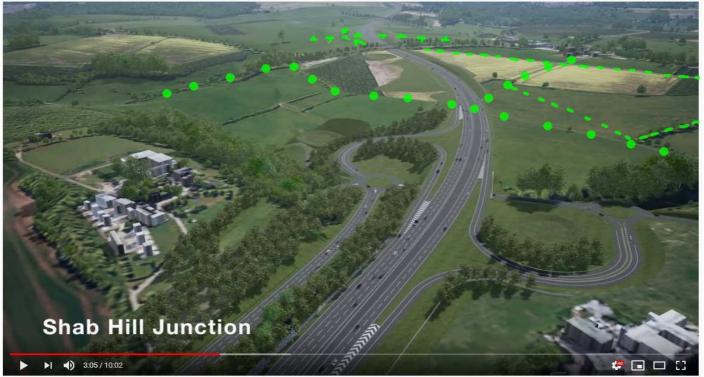
gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk

#### 3. Do you have any comments on our proposed route from Shab Hill to Cowley Junction?

This response uses still images from Highways England Video Flythrough.

Looking south east again, the image below shows the missing crossing point for ORPA (Other Route of Public Access) 50853 at the southern end of Shab Hill Junction indicated with green dots across the new A417. ORPA 50944 heading from Stockwell farm to the top right meets ORPA 50853 here.

(Green Dots = ORPA. Short Dashes = Footpaths. Dash with sidebars = Restricted Byways)



Below is a closer view of the Cowley Lane Bridge and Restricted Byway ACY36 with no crossing point. Restricted Byway ACY26 (not shown) follows the line of a historic hedge heading initially left before heading centre distance.



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Here is another view from Google maps this time showing the sign post for Restricted Byway ACY26 and the historic hedge alongside it. Centre view a solitary lime tree



In the year 2000 under the CROW act many RUPPs Roads Used as Public Paths were blanket changed to Restricted Byways without fully checking their status. ACY26 may well be an ancient road alongside the ancient hedge.

The map image right overlays option 30 onto an OS map. An avenue of lime trees heads north east from Stockwell Farm either side of the current lane. Highways England proposal is to break a small road through the lime trees, build a bridge in parallel with the current lane, then demolish some of the rest of the avenue with the new dual carriageway.

The previous flythrough video image shows new trees planted on the flanks of the new bridge i.e. not inline with current.

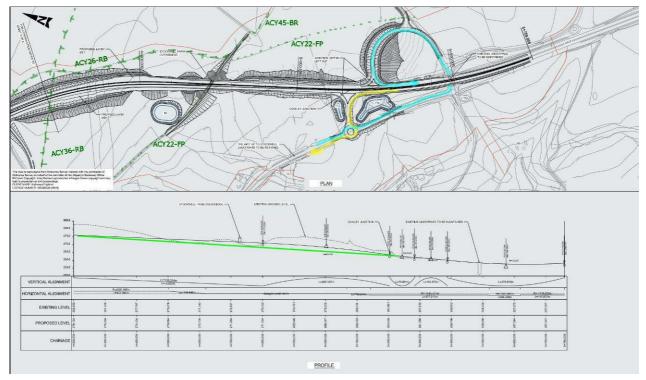
An option here would be to build the new bridge on line within the lime trees where possible and replant new or reuse trees in line with the present ones.





Highways England Plan4 shows the gradient of the proposed A417 through Stockwell Lane and Stockwell farm track. If the gradient could be flattened as per the green line, the two bridges could fit lower in the landscape.

Also highlighted the main traffic flows east (cyan) and west (yellow) on and off the new A417.

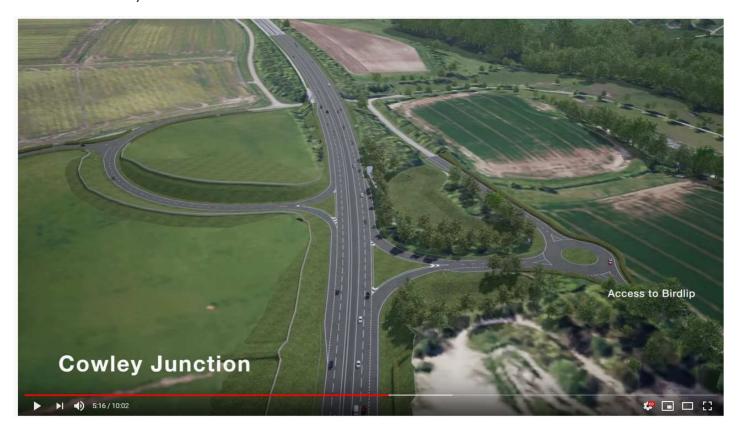


Below the proposed bridge for Stockwell Lane farm track marked as a footpath ACY22. The quarry can be seen off to the right and just in front of the bridge the present line of the track. The footpath is historically wide – some 10 metres. A green flanked bridge here could have planted hedgerows either side to retain the enjoyment of the path.





**Cowley Junction** 

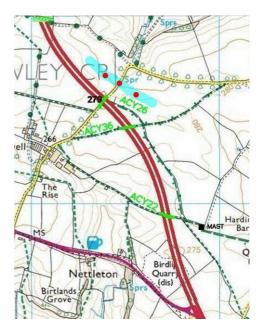


The video caption to the right says there is 'Access to Birdlip' from this junction (for local traffic). However Highways England proposal suggests closure of the road to all traffic from the Stockwell Farm Cowley Lane junction onwards.

# Possible alternative route east of Stockwell Farm

Some of the proposed Option 30 route is elevated, for example on the west side of ACY26 at grid ref. SO 944-145 Page 3 of this document discusses dropping the route deeper into the landscape to reduce the impact on the avenue of lime trees. A natural dip in the landscape has been noticed nearby (SO 944-146) which could offer an alternative alignment for the road to the east of ACY26 (shown in cyan with red dots below right), avoiding the lime trees and heading south towards the west of MAST. Much of ACY26 follows an ancient hedgerow. A technical review has been requested via the Environment, Heritage, Landscape Technical Working Group to evaluate visual & noise impact of this alternative route compared to the current proposal.

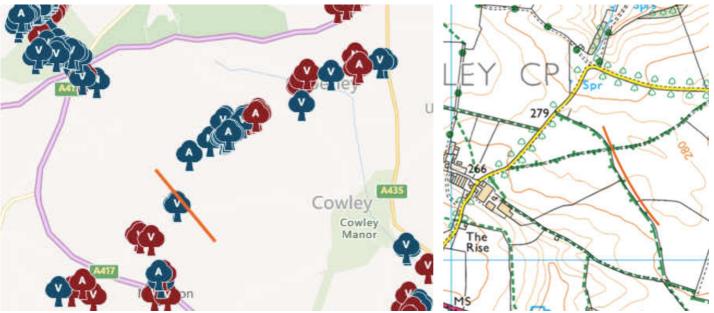






#### Historic hedge along ACY26

A species-rich historic hedge incorporating veteran and notable trees currently runs along the east side of Restricted Byway ACY26 from Grid ref SO 945-145 to grid ref SO 947-143 Some of the trees in the hedge are listed on the ancient tree inventory. The hedge is a valued and pleasant countryside feature, enjoyed by the walking public, rich with insects, birds and butterflies. According to the inventory this hedge crosses a line of veteran and ancient trees that run from Nettleton towards Dowdeswell.



Ancient woodland inventories map
The orange line passes through a veteran Beech tree

OS map with hedge shown in orange

Close up of the map from the ancient woodland inventories map. Note there is an extensive route of the veteran and ancient tree-line from west of Nettleton in the south towards Seven Springs to the north east. It extends onwards to Dowdeswell. To the north west note the number of veteran trees close to the Air Balloon junction on the A417.

#### A Walking, Cycling and Horseriding route within the proposed scheme

From the Air Balloon to the Birdlip turning Junction a Walking, Cycling and Horseriding route could follow a route through barrow Wake car park or head up an ORPA to Shab Hill.

The current A417 to Cowley junction should also be suitable once it becomes a low traffic route after the new dual carriage way is built. The old Roman Road through Birdlip is also available.



Highways England A417 Missing Link Public Consultation Response
4. Alternative 2 November 2019

gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk

#### 4. Do you have any comments on our proposal for Alternative 2 as the preferred A436 link road?

To preserve and protect the woodland and hedgerows in this area, any replanting of new trees and hedgerows must be with indigenous species typical to the Cotswold scarp and not with fast growing trees that are not typical of this region. The region is renowned for its oak, ash and beech woods and for the calcareous grassland habitat. The link road should be low enough to ensure that countryside and woodland views from footpaths along this section are not blocked, especially views across to the wooded Ullenwood area.

However, as described in the fly through commentary, the Shab Hill junction is the wrong way up. The A417 dual carriageway should remain in its cutting and pass underneath the junction. The efforts are appreciated to keep the Barrow Wake link road in a dry cutting but it doesn't quite fit resulting in elevated roundabouts. It gives more reason to take the A417 underneath.

GR-A417-HE-Proposals Review-2019-10.pdf discusses the various options for the route including Alternative 2. Here is a recap of the other options before considering Alternative 2.

#### **Tunnel Option 3**

This is the lowest cost tunnel option that was not put forward for consultation. However it's a useful benchmark for traffic flows. It keeps open the current A417 as a local link from Cowley roundabout to Nettleton, Birdlip, Barrow Wake, the Air Balloon Inn, Crickley Hill and on to Cheltenham. Journey distances are the same as current for all local traffic including A436- A417. The tunnel is a more direct link so through traffic distances are less. The option retains the landscape such as the Air Balloon and uses the roundabout for the A436-A417 link, so has no Shab Hill to Barrow Wake link road. The Cotswold and Gloucestershire Ways stay on line.

#### **Simplified Option 30**

This uses the same principles as Option 3 but follows the line of Option 30 and keeps the deep cutting from the Air Balloon to Shab Hill. It retains the Air Balloon Inn on a green bridge and uses the roundabout for connection of the A436 to A417. Like Option 3 journey distances are the same as present except for through traffic which is shorter. It also has no Shab Hill to Barrow Wake link road.

#### **Highways England Option 30 with alternative 2**

This relocates the Air Balloon roundabout and uses a new junction at Shab Hill to link the A436-A417. These journey distances are some 2 miles longer than previous options. It also requires a Barrow Wake – Shab Hill link road. The Air Balloon Inn is demolished and the Cotswold and Gloucestershire Ways are rerouted.

#### Highways England Option 30 with Alternative 2 retaining the Air Balloon Inn

Retaining the Air Balloon on a green bridge keeps the Cotswold and Gloucestershire Ways on line & avoids diverting horseriders and cyclists too.

With both of the Alternative 2 Options there is the opportunity to repurpose the current road at Barrow Wake and use it for calcareous grassland.

All options have a 50 metre wildlife Green bridge. However where the crossing at the Air Balloon is removed a long diversion of both Cotswold and Gloucestershire Ways is proposed to take humans over the wildlife bridge.

In all cases it would seem preferable to retain the Birdlip bypass so that local traffic doesn't have to use the busy new Road and that all footpath, bridleway etc crossing points of the new road are retained on green flanked bridges for biodiversity gain.

In January 2015 the Air Balloon Inn sold for £31,345,000 leasehold.

https://nethouseprices.com/house-prices/gl48jy

This cost is likely to be comparable to the cost of tunnelling underneath to create a green bridge.

In summary if the Air Balloon Inn is to be saved and hence the Cotswold and Gloucestershire Ways kept on line (and discounting tunnel option 3) only two options seem viable:-

Simplified Option 30 retains the road past Barrow Wake but has no Shab Hill junction or link road to Barrow Wake.

HE option 30 with Alternative 2 would allow removal of the road past Barrow Wake and the route returned to nature. However it has the Shab Hill junction in the landscape and adds 2 miles to A436-A417 journey times.

Input from other organisations should help decide which of the two is preferable.

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Highways England A417 Missing Link Public Consultation Response
5. Repurposing November 2019

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#### 5. Do you have any comments on our proposal for repurposing the existing A417?

It is assumed that this proposal is for repurposing the whole section of the current A417 from The Air Balloon Roundabout to the Cowley roundabout junction. Document GR-A417-HE-Proposals Review-2019-10.pdf discusses the various options for the route.

It may be best to split the route into three sections and compare to the maps in the above document.

#### Cowley Roundabout to Cowley Lane that passes Stockwell Farm

This section of the current road will be required for access to local villages. Traffic numbers should be low allowing it to be repurposed as a typical of a B road suitable for Riding and Cycling and walking along if necessary.

#### Cowley Lane to Birdlip Junction - the Birdlip Bypass

This section of the current road will be required for access to local villages while avoiding the busy new road. There should be a hierarchy in roads so that local traffic doesn't have to use through traffic routes. Traffic numbers should be low allowing this section to be repurposed as a typical of a B road suitable for Riding and Cycling and Walking along if necessary. However in parallel is the ancient Ermin Way Roman Road which is already used by cyclists, riders and walkers as a quiet route. It is stopped up at the eastern end to vehicular traffic.

There was a suggestion to reopen Ermin way to traffic if the Birdlip Bypass was completely closed to traffic but it was felt preferable to keep open the Birdlip Bypass with the projected low traffic volumes.

#### **Birdlip Junction to Air Balloon roundabout**

With Simplified Option 30 (and various other options involving alternative 1) this section of the current A417 would be required for access from local villages to the Air Balloon Roundabout and onto Cheltenham.

With options involving Alternative 2 this section of the current A417 could still be used for access from local villages to the relocated Air Balloon Roundabout and onto Cheltenham.

However the parallel A436 link to the A417, although reasonably busy at 6,000 vehicles per day (but nowhere near the 48,000 projected for the new dual carriageway), could also be used for this local traffic. This would allow this section of the road to be closed to through traffic.

The piece from the Birdlip Junction to the emergence of the Cotswold Way from Barrow Wake could be completely returned to nature, and Calcareous grassland has been suggested.

It appears access would be available for cyclists riders and walkers from Barrow Wake car park to the remaining section of road past the Air Balloon Inn to the roundabout.

This short section of currently 4 lane road could be repurposed for all sorts of uses including perhaps as a parking area for visitors using the Cotswold Way and Gloucestershire Way that follow the footway along the verge.

# Heritage and places for walking public to meet and eat - 18th century Inns

Two Inns are present within this zone -the Air Balloon Inn and the Golden Heart Inn. The Air Balloon is considered a landmark of the Cotswold and other Ways. Both are used for many walking routes and are places where the walking public and visitors meet, to purchase food and drink refreshments and perhaps fill water bottles. Both should be retained as key places in the Cotswolds and kept accessible to the walking public.

The Air Balloon has existed since at least the late 1700s and was renamed following a famous balloon flight of Edward Jenner, pioneer of the smallpox vaccine, which ended close by on 2<sup>nd</sup> September 1784. The Golden Heart is a 16<sup>th</sup> century coaching inn situated on the current A417 at Nettleton Bottom.

As a B road, nature can be left to take its course, and landscape recovery take place with the growth of wildflowers, orchids and grasses typical of the area, flanked by native hedgerows.

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Highways England A417 Missing Link Public Consultation Response
6. Construction November 2019

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# 6. Do you have anything you think we will need to consider as we develop our construction plans further?

This is a very popular walking area with the Cotswold Way, Gloucestershire Way and a number of circular walking routes based on Birdlip, Crickley Hill, the Air Balloon, Nettleton Bottom, Ullenwood, Cowley and as far as Seven Springs. Tourism accounts for a significant part of the Gloucestershire economy, and walking is good for well being and health.

Construction must be planned so that temporary closures of Public Rights of Way and the various classes of Highway including ORPAs have suitable signed temporary diversion routes in place.

At other times access can be provided through the site with suitable fencing and warning notices.

The construction planning must ensure that the routes of the Cotswold Way and the Gloucestershire Way are continuously available for walkers.

Care should also be taken particularly to keep Neolithic Emma's Grove intact and to not disturb the historic hedges or other features in the landscape.



# Highways England A417 Missing Link Public Consultation Response 7. Environmental Information November 2019

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#### 7. Do you have any comments on our PEI Report and other proposed mitigation measures?

It could be useful to quote

Legislative and Policy framework from Section 7.2.3 in Highways England A417 Missing Link | HE551505

Great weight should be given to conserving landscape and scenic beauty nationally designated areas (National Parks, the Broads and AONBs). These areas have the highest status of protection in relation to landscape and scenic beauty. In decisions, the Secretary of State has a statutory duty to have regard to the statutory purposes which help ensure their continued protection. The Secretary of State should refuse development consent except in exceptional circumstances and where it can be demonstrated that it is in the public interest.

For any significant road widening or the building of new roads in these areas, compelling reasons for the new or enhanced capacity are required, and with any benefits outweighing the costs very significantly. The applicant should ensure that the project will be carried out to high environmental standards and where possible include measures to enhance other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered (paragraphs 5.150 -5.153).

Ramblers have been campaigning here for around 20 years to remove through traffic from local roads (preferably with a tunnel) to make them walkable and crossable again. The rest of the landscape would stay the same.

This road scheme could be implemented with no modifications to any Public Rights of Way or unsurfaced highways. Bridges (or underpasses) can be used along the route and tunnelling options considered where necessary. Tunnels less than 150metres in length are considered to be bridges irrespective of method of construction. Short tunnelling methods could be considered for the Air Balloon site or for any of the crossing points or for the Green wildlife bridge.

If funding arrangements allowed, longer tunnel options could be used instead of the deep cutting either side of the Air Balloon site whilst remaining within the Preferred Option 30 route corridor.

Taking the new road under the Air Balloon site would resolve many issues at probably the most used crossing on the new A417 route, retain the landmark & historic Inn and maintain the long distance walking trails, the Cotswold Way & the Gloucestershire Way, on their authors' line.

As well as a 50 metre wildlife, flora and fauna green bridge to connect the Crickley Hill SSSI with the Barrow Wake SSSI, smaller green bridges along the route for footpaths, bridleways and tracks could go some way towards mitigating environmental concerns of the scheme.

Document GR-A417-HE-Proposals-Review-2019-10.pdf discusses implementation of some of the proposals

There should be a hierarchy of roads on completion of such a scheme. Although the new route is to satisfy demand for cross-country traffic, local traffic should still be able to make local journeys without using the busy new route.

The hierarchy of roads includes quiet country lanes and unsurfaced ancient highways (marked on OS maps as Other Route of Public Access or ORPA).

Types of Public Right of Way (PRoW) include Footpaths, Bridleways, Restricted Byways & Byways Open to All Traffic.

Walking routes can include all these types of PRoWs and roads. Other user groups can use a subset. The Cotswold Way is a designated National Trail. It links places of interest, following the edge of the escarpment or dropping down into towns and villages. Its route uses footpaths, bridleways, tracks and roads - the variation in character is part of the enjoyment of the trail.

#### **Shab Hill Junction**

It has been said that this proposed junction could do with sinking and rethinking.

The junction is at almost the highest point in the landscape and takes the busy new A417 dual carriageway over the top of the A436 link, on a flyover. Prior to the junction the A417 is within a deep cutting. This cutting should be continued so as to keep the new road low in the landscape to travel below the A436 link, reduce visual impact and minimise spread of traffic noise. Keeping it low should also facilitate the use of bridges nearby for popular walking and riding routes.

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#### 7. Environmental Information GR HE A417 public consultation response Nov 2019 2/2



#### **Tunnels vs. Cuttings**

Also see GR-A417-green-bridges-tunnels-2019-07.pdf and GR-A417-A27-tunnel.pdf
Highways England claims that the proposed Option 30 is a surface route from Brockworth Bypass to Cowley
roundabout junction. However much of the route is within a deep cutting, some 20-30 metres below surface, at the
depths of a tunnel but without a roof. In places the roof could be kept on the cutting to form a tunnel-like structure.
Highways England has said that provided it is for a length of less than 150 metres it would be deemed a bridge and
allowable within the scheme. However a longer tunnel would not currently be fundable within the scheme.

In places the route is challenging. The cutting has steep sides to avoid historic and other features. The landscape is built up of layers of underlying rock some easier to excavate and retain in place than others. Similar issues could apply to the construction of a deep cutting as to a tunnel.

The current projected cost of the scheme apparently including contingency is £435m well within the budget of £250m- £500m. Scaling from other schemes that use low cost tunnelling methods such as at Hindhead in the South Downs suggests tunnelling options could be within range.

#### Landscape

Ramblers' Charitable Aims enables us to defend footpaths and protect places we like to walk.

The current proposals

- Divert the Cotswold Way and Gloucestershire Way
- Extinguish footpath crossings
- Demolish the landmark Air Balloon Inn
- Impinge on the site of Emma's Grove Neolithic round barrows

The documents included as part of this response demonstrate that all of these can be protected. Either Simplified (or greened up) Option 30 or Option 30 with Alternative 2 retaining the Air Balloon can

- Keep the Cotswold Way and Gloucestershire Way on their Authors' line
- Ensure safe footpath crossings
- Retain the landmark Air Balloon Inn a meeting place for walkers and in order to demonstrate environmental considerations of the scheme, include green flanked bridges across the new road to allow migration of wildlife, flora and fauna.

Highways England could create an examplar scheme that is a good fit within the landscape of the Cotswolds AONB.

#### PEI Report and proposed mitigation measures

This scheme is located within a national character area – the Cotswolds AONB. The landscape viewed and enjoyed from along a PRoW needs protecting and enhancing. The current proposal does not provide adequate detail of the landscape enhancements and mitigations that will occur.

Hedgerows alongside footpaths can enhance the walking experience, provide habitat for wildlife and provide some mitigation from noise and pollution created by the new road. Where hedgerows already exist they need to be conserved where possible and new hedgerows planted within the scheme.



Ramblers footpath teams have surveyed all the paths likely to be affected by the scheme and the design of crossing points can be reviewed. Green flanked bridges can be constructed by digging underneath from either side of a path. Alternatively a standard green bridge structure can be installed, the path surface reinstated & hedgerows replanted. There should be no need for standard concrete bridges with railings either side. Although a path might rise towards the centre of the bridge, the result can be a path that has the same character after construction as it did before.

The grounds of the Air Balloon Inn contain a registered veteran apple tree. Retaining the site keeps this tree and other trees around the site for future generations.

At Emma's Grove there should be a thorough assessment of the veteran and notable trees. If a deep cutting is used for the route of the new road a retaining wall is proposed at this location which would sever some of the woodland. This would not enhance the woodland experience here, of the Gloucestershire Way. Some thinning of the woods is proposed but beech woods alongside the path should be left undisturbed as the area is noted for its ancient beech.



Highways England A417 Missing Link Public Consultation Response
8. Responses to WCH TWG Questions

November 2019

gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk

# Gloucestershire Ramblers' Response to Ten Questions posed by Allan Pitt (Arup) to the Walking, Cycling and Horse Riding Technical Working Group (WCH TWG)

#### **Introduction**

This response should be read in conjunction with Gloucestershire Ramblers' position on the A417 Missing Link.

Gloucestershire Ramblers are not opposed in principle to the building of the new road, the A417 "Missing Link". However, the new road will cut a swathe through the Cotswolds Area of Outstanding Natural Beauty (AONB), severing a number of Public Rights of Way (PRoW). Ramblers feel that not enough has been done in the proposals, as they stand at present, to mitigate the effects on the rights of way network and to meet one of Highways England's (HE) own objectives for the scheme:

Community and Access: to reduce queuing traffic and pollution, improve access for local people to the strategic road network, and **support residents' and visitors' enjoyment of the countryside.** 

(p3 of the A417 Missing Link public consultation brochure handed out at the Roadshows).

To enable an informed position on the consultation, Gloucestershire Ramblers have undertaken a comprehensive survey of the PRoW impacted by the A417 proposals. More than thirty paths have been walked and recorded.

It is within the context of the HE objective and the charitable aims of The Ramblers that Gloucestershire Ramblers' responses are made.

The first two charitable objectives of The Ramblers are:

The provision and protection of footpaths and other ways over which the public have a right of way or access on foot.

and

The protection and enhancement for the benefit of the public of the beauty of the countryside, including by **encouraging the provision**, **preservation and extension of public access to land on foot.** 

Gloucestershire Ramblers hope to work with HE to improve the provision of PRoWs.

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In particular, Ramblers want to see:

- the Cotswold Way and the Gloucestershire Way kept on their authors' original lines
- bridges where existing PRoW cross the line of the new road to maintain the footpath network
- safe footpath crossings across roads
- retention of the Air Balloon Inn, a landmark on the Cotswold Way where walkers meet.

In addition, construction must be planned so that where temporary diversions are not possible any temporary closures of Public Rights of Way are kept to a minimum. The construction planning must ensure that the routes of the Cotswold Way and the Gloucestershire Way are continuously available for walkers.

# **General Overview**

The proposed line of the A417 Missing Link cuts through the Cotswolds AONB which is a popular walking and riding area. The current proposed plans for the new road will not enhance peoples' enjoyment of the countryside.

In particular, the countryside north of Shab Hill, where there is some excellent tranquil "wold" walking with extensive views over open country, and the village of Coberley, are cut off from easy access from Barrow Wake car park.

There are currently six points between the Air Balloon and Cowley Roundabout where PRoW cross the line of the new road. The current HE Option 30 proposal is to reduce the crossing points to three, with a possible fourth using PRoW diversions through the Shab Hill interchange.

One of the crossing points being severed is that near Birdlip Radio Station at Shab Hill, where ORPA 50852 – a popular walking and riding route towards Coberley – crosses the Gloucestershire Way. Shab Hill is a focal point for rights of way in this area. Four other popular RoW are all within 250 yards of where the Gloucestershire Way crosses the ORPA. Without a crossing over the new A417 at Shab Hill, the connectivity of the RoW network is seriously disrupted and walkers and other users will be faced with long diversions, some alongside busy roads; this is not acceptable.

On the western portion of the new A417 below the Air Balloon roundabout, several PRoW were severed by the A417 when it was upgraded in the 1980s. In the current HE Option 30 proposal, there will be no crossing points between the green bridge and the point where the lane between Witcombe and Bentham passes under the A417, a distance of 1.2 miles. Again, this means long diversions. A bridge to reconnect Dog Lane with ABA80 and ABA125 would improve the connectivity of the footpath network and public access to the countryside.

# Responses to the Ten points from Allan Pitt for consideration by the WCH TWG

1. The proposed diversion of the Cotswold Way National Trail over the proposed green bridge, replacing the section that currently navigates the Air Balloon junction.

# Response:

# Ramblers object to diverting the Cotswold Way from its current line.

The current crossing of the A417 at the Air Balloon is so difficult, because of the volume of traffic, that a bridge would be an improvement. However, it would be preferable to have a wide green bridge located where the Air Balloon crossing is now. The Air Balloon Inn, which is a historic landmark on the Cotswold Way, should be retained. The proposed diversion over the wildlife green bridge will not give walkers the same enjoyment.

An additional crossing is needed over the A417 at the site of the Air Balloon, to keep the Cotswold Way as close as possible to its current line and to avoid the long diversions of the Gloucestershire Way on the proposed plans.

2. The proposal to retain and \*upgrade a short section of the Cotswold Way National Trail south of Crickley Hill Country Park as bridleway, to connect Coberley Bridleway 117 to the north, to the bridleways that would join the proposed green bridge to the south. There is also the opportunity to divert and extend Coberley Bridleway 117 to connect into the western arm of proposed new roundabout in the vicinity of the old Air Balloon Pub adjacent to the existing Ullenwood Bharat Cricket Club access.

# Response:

\* **Note:** converting a footpath to a bridleway is not an "upgrade", it is a change of use.

These diversions and change of use could all be avoided by providing a bridge over the new A417 at the Air Balloon site.

Ramblers do not generally support changing footpaths to bridleways not only for heritage reasons but because horses churn up the surface of the path and it can quickly become excessively muddy and slippery for walkers. Also, a cyclist coming up fast, and without warning, from behind a walker can be intimidating and potentially dangerous. Any application for a change of use is considered on a case-by-case basis.

Both the Cheltenham Road down Leckhampton Hill and the A436 are busy at most times of the day and very busy at peak times. Proper protected safe crossings of these roads would be needed for walkers and riders.



3. The diversion of the Gloucestershire Way onto a new section of footpath near the proposed A436 Link Road to reconnect into the Cotswold Way National Trail at Crickley Hill Country Park.

#### Response:

# Ramblers object strongly to the proposed diversion of the Gloucestershire Way.

The long diversion proposed in Option 30 will not pass the tests "is it necessary?" and "is it commodious?", the first tests which Ramblers apply when considering any application for the diversion of a footpath.

The Gloucestershire Way should continue to go through Emma's Grove on ACY1, its author's original line, and be linked directly to ACY3 by means of a bridge over the new road near Birdlip Radio Station at Shab Hill. This would keep the current route of the ORPA open for non-motorised users and maintain the connectivity of the RoW. Shab Hill is a focal point in the RoW network for several popular walking and riding routes. (See General Overview). Four other RoW are all within 250 yards of where the Gloucestershire Way crosses ORPA 50852: ORPA 50853 (from A417 to Cowley Lane past Shab Hill Farm), Footpath ACO15 (Shab Hill to A436 through Ullenwood), ORPA 50852 (Shab Hill to A436 and the Star College via South Hill) and ACO17 (Restricted Byway to Coberley). The survey for the PEIR showed 14 walkers using the ORPA at Shab Hill (survey point 13).

Currently the Gloucestershire Way through Emma's Grove is under-used because local people know it is difficult to cross the Cirencester arm of the A417 opposite the Air Balloon. Even so, the user statistics for survey point 11 (at the end of ACY1 opposite the Air Balloon) showed 14 pedestrians and that will surely increase once the new road is in use and pedestrians can easily cross the re-purposed A417. ACY1 should connect to Crickley Hill Country Park by means of a bridge over the A417 at the Air Balloon.

# The proposed new section of footpath alongside the A436 Link Road:

This footpath is part of the long diversion to join ACY3 to Crickley Hill Country Park and would not be needed if there are bridges at the Air Balloon (see response to Q.1) and near Birdlip Radio Station (see above). Additional link footpaths are always welcome, but this new section of footpath alongside the A436 Link Road should not be part of the Gloucestershire Way. A landscaped path would be preferable to a footway alongside the A436 Link Road.

4. The proposed Gloucestershire Way route diversion south of the proposed new roundabout in the vicinity of the old Air Balloon Pub. Would you prefer a route north of the roundabout, where there would be reduced viewpoints but less impacts from traffic?

#### Response:

Unequivocally, Ramblers does not support a route diversion for the Gloucestershire Way.

When making additional provision for walkers alongside the new roundabout for the A436 and Cheltenham / Leckhampton roads, it would be preferable for walkers to stay on the level and not go up-and-down the embankments, so the north side is preferred. Safe crossings would be needed on the A436 and the Cheltenham / Leckhampton Road. (see response to Q.2 above).

5. The extension of Cowley Footpath 1 (currently part of the Gloucestershire Way) at its western end to join the proposed the green bridge and Cotswold Way National Trail, and at its eastern end to join the existing unclassified road / ORPA.

#### Response:

<u>Western End</u>: Ramblers object to any diversion of the Gloucestershire Way. A **bridge** should be provided at the Air Balloon site to allow the Gloucestershire Way to remain on its current route.

<u>Eastern End</u>: Ramblers object to the plans for the eastern end of the Gloucestershire Way. A bridge is needed at Shab Hill near Birdlip Radio Station where the Gloucestershire Way crosses the ORPA 50852, to connect ACY1 with ACY3, to protect and maintain the current network of rights of way (see response to Q above).

6. The proposal to extend the Badgeworth Bridleway 125 near Flyup 417 Bike Park along the southern embankment of the A417 to the proposed Green Bridge, joining the diverted Cotswold Way National Trail. Would you prefer a route that would instead see Badgeworth Footpath 84 upgraded to a bridleway to then connect Badgeworth Bridleway 125 near Flyup 417 Bike Park to the proposed Green Bridge via Badgeworth Bridleway 87?

#### Response:

Ramblers would prefer a bridge over the A417 from bridleway ABA125 to Dog Lane, near to where ABA80 meets the A417, to restore a north-south link between Crickley Hill SSSI and Barrow Wake and improve the connectivity of the PRoW network here including footpaths ABA74, ABA77, ABA80 and ABA91.

However, we would also welcome a footpath all the way along the southern embankment of the A417 to the Air Balloon instead of an extension to the bridleway and would not support a change of use from footpath to bridleway.



7. The proposed upgrading of Cowley Footpath 7 to bridleway and extending it to join the proposed Cowley Lane Overbridge via an upgraded section of Cowley Footpath 44 with steps and/or ramp in order to allow all non-motorised users to cross the proposed A417 at that point.

# Response:

ACY7 is an unsurfaced field path joining ACY44 to the ORPA 50853 which comes past Shab Hill Farm. Any application for a change of use of a footpath to a bridleway will be strongly resisted if it is detrimental to the interests of walkers. (See response to Q.2 above).

A crossing (bridge or underpass) is needed where ORPA 50853 crosses the proposed line of the new road.

The arrangements proposed to join ACY44 to the Cowley Lane overbridge appear to be satisfactory. The proposed change of use of ACY44 to a bridleway would be considered using Ramblers' criteria. The overbridge should have wide green verges to assist wildlife to cross the new road.

ACY26 is to be diverted at its northern end to meet the Cowley Lane overbridge. It would be preferred that the new road is lowered to allow ACY26 to continue to the overbridge on its present line, but if that is not possible then the diversion needs to be done sensitively to protect the historic hedge which lies between the copse at the Cowley Lane end and the junction with ACY27.

8. Not to designate a PROW through the proposed Shab Hill junction but instead allow cyclists and other users to navigate the junction and its carriageway if they choose to cross at that point instead of using the alternative routes that would be available.

#### Response:

Ramblers object strongly to this proposal on road safety grounds. Suitable crossing points are needed for RoW north and south of Shab Hill junction.

If walkers are to be allowed to navigate Shab Hill junction, a protected footway must be provided alongside the new link road from ACY44 and through the junction.



9. The proposed new footpath to connect Barrow Wake and the Cotswold Way National Trail to the proposed Cowley Lane Overbridge via Cowley Footpath 44 via an at-grade crossing of new B4070 Birdlip link road.

#### Response:

This is not a "new footpath", it is a re-classifying of the existing ORPA and access rights will need to be re-examined.

This is currently a popular walking, cycling and riding route because of the connection to Barrow Wake car park through the underpass. Due to the likely increase in traffic levels on the new B4070 link road compared to the current traffic using the ORPA which goes (mainly) to Birdlip Radio Station and Rushwood Kennels, a protected safe crossing will be needed where ACY44 crosses the Link Road, together with a safe route for walkers along the section of the Link Road which will use the present line of the road to the Radio Station.

10. The proposal to repurpose the existing A417 from the Golden Heart Inn to the existing underpass near Barrow Wake as bridleway, to connect walkers, cyclists and horse-riders via a new trail over the proposed green bridge and beyond.

# Response:

The current A417 should be retained for local traffic from Birdlip village to the Golden Heart Inn. The remaining section of the carriageway, from the current Birdlip / Stroud junction to the Air Balloon, should be stopped up to motorised traffic, except for traffic requiring access to the property "Crickley Ridge", and nature allowed to take its course in reclaiming the land. Subject to the needs of the SSSI, the resources that would have been spent on "re-purposing" the old carriageway should be focussed on providing additional bridges over the new road.

**In Conclusion:** Serious consideration should be given to the Gloucestershire Ramblers' proposal "Greened-Up Option 30" which would avoid the majority of the problems raised by points 1 -10 above.



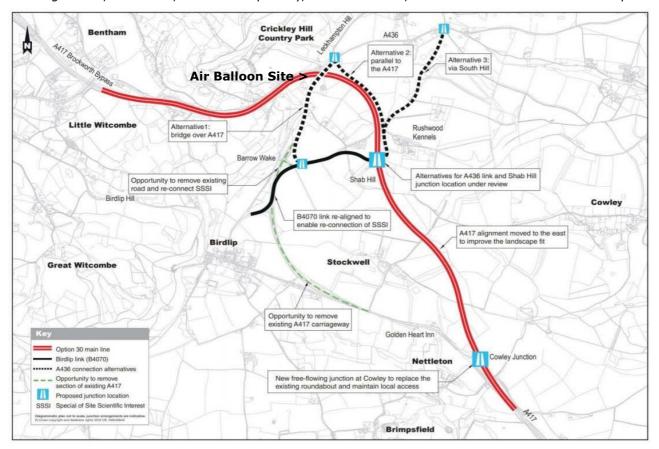
# Gloucestershire Ramblers Area A417 proposals review October 2019

gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk

On 25th July Highways England provided an update on its Preferred Route Announcement in advance of the upcoming Environmental Impact Assessment. In August, HE confirmed that Alternative 2 was its preference. This document was updated in October. Views would be sought in the consultation due to close 8th November.

The July update included a copy of the plan of the Preferred Route with the new A417 shown in red. It's essentially the previous Option 30 with a slight realignment east near Stockwell.

The plan offered some 'Alternatives' within Option 30. These are indicated with black dots and show three suggested alternatives (1) (2) (3) for connection to the A436. Unfortunately all of these have longer journey distances than incorporating the Air Balloon roundabout (call this Alternative 4). An extra 1 or 2 miles may not sound significant, but with 6,000 vehicles per day, that's at least 6,000 miles worth of extra fuel used per day.



Also shown in black is the proposed link road from Birdlip to a major new double roundabout/ flyover junction at Shab Hill. This wasn't necessary for any of the previous tunnel Options and has adverse effects on the landscape, walking and riding. It could also help direct traffic through Birdlip to create a new rat-run.

An 'Opportunity' to bend the current A417 around the boundary of the Barrow Wake SSSI may be favourable. However an 'Opportunity' to remove the existing A417 Birdlip Bypass leads to adverse effects. It necessitates the link road and forces local farm and other traffic to use the busy through route – not the original intention.

Ramblers have pressed, for many years now, for through-traffic to be removed from local roads so that they become walkable and crossable again (preferably using a tunnel to minimise the impact on the landscape). Ramblers haven't pressed for closure of local roads, removing through-traffic from them should be enough.

Demolition of the landmark Air Balloon Inn isn't mentioned. The Preferred Route Announcement shared concern of its possible loss. Taking a deep cutting through the site has many other implications for the local environment, heritage and the Cotswold and Gloucestershire Ways.

A short tunnel (or bridge) under the car park, would be allowable, removes worries about Emma's Grove, saves trees and hedgerows around the site, & has resultant benefits for wildlife and the walking trails.

One combination of Options, Alternatives and Opportunities should satisfy the above & 'Green Up' Option 30. The Ramblers' Association (Ramblers) is a registered charity (England & Wales no 1093577, Scotland no SC039799) a company limited by guarantee, registered in England & Wales (no 4458492). Registered office: 2nd floor, Camelford House, 87-90 Albert Embankment, London SE1 7TW Tel: +44 (0)20 7339 8500. Our privacy policy ramblers.org.uk/technical-stuff/privacy-policy b



#### **Highways England and the 3 Alternatives**

It's accepted that Highways England should provide a clear position before submitting the Environmental Impact Assessment. However with Environmental considerations becoming more prominent, it seems a number of organisations may challenge the assessment since the scheme vision is to be landscape-led.

The 25th July update says of the 3 Alternatives:-

Each alternative option has its own merit, as shown by the following information on the A436 connection alternatives.

- Alternative 1 although on first sight would seem to be the shortest route, yet it has the greatest potential for adverse effects on the setting of two designated cultural heritage assets and biodiversity interests, including internationally designated sites
- Alternative 2 has a number of advantages as a result of running alongside the A417 mainline, particularly regarding the environmental opportunities this presents. It could cause significantly less disruption to the local environment, landscape and ecology during construction. One of the key aims of the A417 Missing Link scheme is to be landscape led, and this option best matches this objective.
- Alternative 3 has benefits above that of Alternative 2 regarding traffic. However, it performs worse under environmental opportunities particularly for landscape which is an important factor in the AONB.

Unfortunately this summary misses some important points.

For Alternative 1, if the works demolish the landmark Air Balloon Inn then of course that has a directly negative effect. However keeping the Air Balloon site and roundabout not only confirms Alternative 1 as the shortest route, it also removes concerns of adverse effects on the designated sites.

For Alternative 2 the note is misleading as if the Air Balloon site is to be demolished, the concerns about impact on heritage sites such as Emma's Grove, the Cotswold and Gloucestershire Ways still remain.

Alternative 3 has similar concerns as Alternative 2 and has additional impact on woodland and popular tracks.

Where the Shab Hill link road is used as an alternative to the Air Balloon roundabout, it has longer journey distances & leads to adverse environmental effects. It uses & affects a quiet popular walking and riding route.

#### Summary

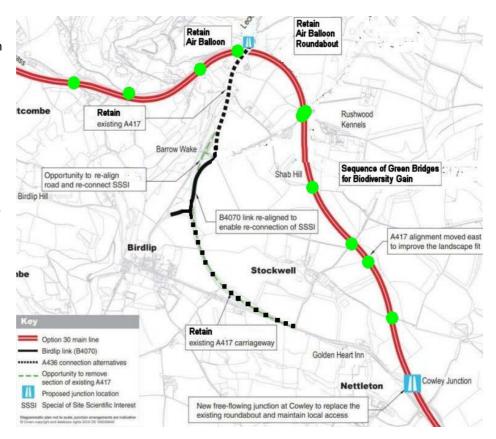
A bridge constructed as a short tunnel (less than 150metres is in Highways terms a bridge) under the Air Balloon site continues to be the key that overall offers least impact on the countryside.

The next two pages show the way that the discounted tunnel Option 3 (1km) led to Simplified or 'Greened up' Option 30.

The image right keeps the Preferred Route of the new A417 and adds a sequence of green bridges to minimise its impact within the landscape.

Save for a minor realignment of the current road around the Barrow Wake SSSI everything else stays the same but with all the through-traffic removed.

If funding arrangements could be re-assessed there is still the opportunity to replace all the deep cutting with a 1km tunnel.



#### Conclusion

Greening Up Option 30, takes the new A417 underneath the Cotswold & Gloucestershire Ways, the landmark Air Balloon & avoids historic Emma's Grove. It uses green bridges along the route for biodiversity interconnect and to minimise the impact on the landscape. Unlike the alternatives it also keeps travel distances same or better than current. Ramblers continue to offer to work with Highways England & other Organisations to 'green up' the Preferred Route Option 30 to achieve an examplar road scheme within the Cotswolds AONB.



# Gloucestershire Ramblers Area 3/6 A417 review October 2019

gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk

#### Option 3 - Review. The 1km tunnel Option that didn't reach public consultation

Many organisations were disappointed that Option 3 wasn't offered alongside Options 12 and 30 for the March 2018 non-statutory consultation.

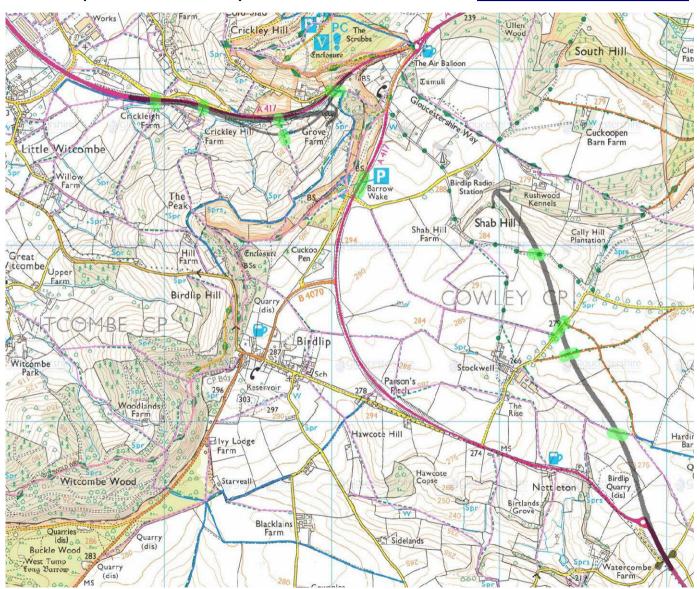
Option 3 has a 1km tunnel to allow the new A417 through the edge of the Cotswold Escarpment. The route takes through-traffic from one side to the other with journey distances the same or better than present. The rest of the landscape is unaffected with local roads kept for local traffic and no impact on the Cotswold & Gloucestershire Ways. The Air Balloon Inn is retained and the roundabout used to link the A436 Seven Springs, Oxford Road to the new A417. For biodiversity gain, a few green bridges are shown either side of the tunnel & the current A417 could be adjusted to avoid the boundary of the Barrow Wake SSSI.

The issue was cost. Highways England projected it at £875m, significantly more than the £500m budget. However the scheme did allow for expensive twin Tunnel Boring Machines, that are normally only used in longer schemes.

For comparison the low cost tunnel method used below National Trust property at Hindhead in the South Downs is almost twice as long at 1.8km. The scheme was longer at 6.5km vs. the 5.2km here. Hindhead also had a significant landscaping budget but the overall cost was £371m. Allowing for 25% inflation gives a figure of £465m to 2021.

For the A417 Government has said that no tunnels would be allowed within the scheme. However the 2014 GCC A417 loop consultation found that a short tunnel below the Air Balloon site would be considered as a bridge, in Highways terms, if it was less than 150 metres in length.

With this in mind Option 3 was adapted with the tunnel ends reduced to 150 metres apart, either side of the Air Balloon site. It became Simplified Option30, the same route as Option30 but with no link road, a better fit within the Cotswolds AONB.



Option 3 overlaid onto an OS map.



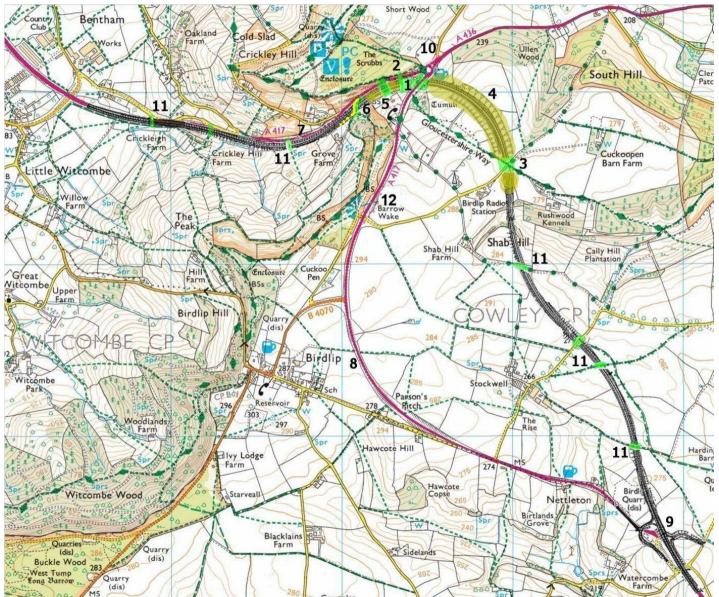
#### Simplified (or Greened Up) Option 30

Greening up Option 30, removes the link road, retains many benefits of Option 3 (for access, heritage, landscape) & keeps the route of Option 30.

1. Keep Air Balloon site with 150 metre tunnel (called a bridge) underneath the Car Park.



- 2. Opportunity for 50 metre Green extension over the current A417 north of the Air Balloon
- 3. Green bridge east over new A417 junction of South Hill track & the Gloucestershire Way,
- 4. 100ft deep cutting between the 2 Bridges. (possible conversion to a 1km tunnel)
- 5. Possible 50 metre Wildlife-Only Green Bridge west, south of The Scrubbs (or at 6?)
- 6. Eastbound slip from the new A417 to the current A417. Add westbound bridge (yellow) across new A417 from current A417.
- 7. Retain the lane alongside the new A417 for Walkers, Horses and Cyclists (& possibly light traffic) and to connect Bentham to Cold Slad.
- 8. Retain Birdlip Bypass for local traffic & now amenable for Walkers, Horses and Cyclists.
- 9. Free flow & return junction at Cowley.
- 10. Consider a small satellite roundabout at A436 Leckhampton turn north to Cheltenham.
- 11. A series of Green Bridges for footpath, tracks, bridleways and for biodiversity interconnect. New A417 kept low in the landscape for traffic noise minimisation.
- 12. Potential Barrow Wake boundary update.



Greened Up Option 30 (no link road) overlaid onto OS map



#### Option 30 with Alternative 2 but retaining the Air Balloon and keeping the Cotswold & Gloucestershire Ways

Highways England Option 30 with Alternative 2 moves the Air Balloon Roundabout to the Leckhampton turn and adds a new A436 -A417 link. However the Air Balloon Inn is demolished and the Cotswold & Gloucestershire Ways diverted.

The new A436 junction at Shab Hill also links to Birdlip and moves that traffic onto a quiet popular walking and riding route (mauve).

A wildlife green bridge is included.

To improve the scheme, a 150 metre Green Bridge (yellow) could retain the Air Balloon Inn, allow access to nearby properties & keep the Cotswold and Gloucestershire Ways in place. The current road past Barrow Wake (cyan) could be returned to Calcareous Grassland.

Keeping the current Birdlip Bypass allows movement of local traffic to Stockwell or past the Golden Heart at Nettleton and onto Cowley without using the busy new road.

The use of Green Bridges for all crossing points of the new A417 (green) could be a key landscape benefit.

#### **Environmental Assessment**

Alternative 2 trades the benefits of removing the road near Barrow Wake vs. the huge junction in the landscape at Shab Hill and A436 to A417 journey distances are a mile longer than Simplified Option 30 (perhaps significant with 6,000 vehicles per day).





Foot Paths, Bridleways and Tracks cross reference (ORPA = Other Route of Public Access)

https://www.nmc-ramblers.org.uk/ Map and route planner OS or Satellite view www.streetmap.co.uk accepts 12 character OS Grid Ref.

Access:- Walking, Cycling, Horseriding, Biodiversity, Farm-traffic

From start (metres)	PROW	Street	Name	Grid Ref	Access	Proposed Over or under the A417	Comment
	ABA54 BADGEWORTH FP 54		Old Coach Road Bridge	SO 90915 16446	WCHF	Over	Apparently plan to demolish. Replace with Green bridge for WCHBF?
			Bentham Lane	SO 91410 15977		Under	Existing road
400	ABA125 BADGEWORTH BW 125 ABA74 BADGEWORTH FP 74 ABA77 BADGEWORTH FP 77 ABA80 BADGEWORTH FP 80 ABA91 BADGEWORTH FP 91		South side End of A417 DC South of A417 North of A417	SO 91890 15834 SO 92026 15827	WCHBF	Over	Links BW125 & FPs across end of A417 DC via gates to Dog Lane/ old A417
700	ABA84 BADGEWORTH FP 84	A417	South of A417	SO 92233 15794	WCHBF	Over	
	ABA90 BADGEWORTH FP 90	, , , _ ,	North of A417	000122001070	1101121	None	Connects to Dog Lane
1200	ABA86 BADGEWORTH FP 86	A417	South of A417	SO 92677 15734	WB	Over	Biodiversity gain
1600	ABA87 BADGEWORTH BW 87 ABA89 BADGEWORTH FP 89	A417	South of A417	SO 93008 15899	WCHBF	Over	Crossing to Cold Slad Lane
1800			Wildlife only bridge	SO 93265 16014	В	Over	Suggested wildlife-only green bridge
2000	ACO51 COBERLEY FP 51 ACO117 COBERLEY BW 117 ACY1 COWLEY FP 1		Cotswold Way Gloucestershire Way Gloucestershire Way	SO 93481 16114	WCHBF	Over	A417/ A436 Air Balloon Site Significant 150 metre green bridge/tunnel
2900	ACO16 COBERLEY FP 16 ACY3 COWLEY FP 3 ORPA 50852		Gloucestershire Way Gloucestershire Way South Hill	SO 93973 15581	WCHBF	Over	Junction of Ullenwoood to Shab Hill ORPA track and Gloucestershire Way FP
3500	ORPA 50853 ORPA 50944		Shab Hill Farm	SO 94053 14994	WCHBF	Over	50944 part missing from map where it meets 50853
4000	ACY26 COWLEY RB 26		Stockwell lane	SO 94382 14563	WCHBF	Over	
4000	ACY36 COWLEY RB 36			SO 94524 14413	WCHBF	Over	
4700	ACY22 COWLEY FP 22	_	Track	SO 94716 13940	W BF	Over	Track shown as FP



#### **Green Bridges, Cuttings or Tunnels?**

# Gloucestershire Ramblers Area A417 update July 2019

gloucestershireramblers.org.uk/A417 A417@gloucestershireramblers.org.uk

A green bridge can refer to standard concrete bridge with a layer of vegetation on the top. However below left shows where the National Trust helped secure green flanked bridges on the Weymouth link in the Dorset AONB that assist migration of all manner of wildlife, fungi, fauna etc.







Above shows where National Trust property at Hindhead in the South Downs AONB, was threatened by a bypass, and saved using a new, relatively low cost, method for digging 1.8km tunnels underneath.

The image left shows twin green bridges over a dual carriageway in Norway.
The A465 dualling, west of Abergavenny, uses the same.

#### What is the difference between a bridge & a tunnel?

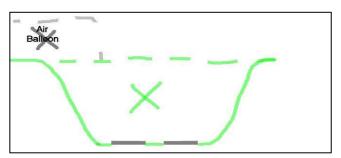
It might be thought that a tunnel is dug under, while a bridge is built over. However in Highways terms, the distinction is made by length. Even if it looks like a tunnel, if it's less than 150metres it's a bridge. It's a useful distinction. Government has said 'no tunnels' for the new A417 scheme & led to proposals for a 25-30 metre (100ft) deep cutting through the Air Balloon site, demolishing the landmark Inn & rerouting the Cotswold Way.

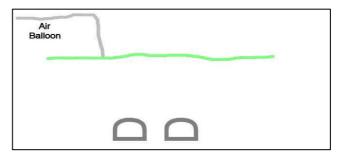




However taking the road (shown black above) underneath the site car park would only need a tunnel or bridge less than 150 metres, keeping the trees and hedgerows around the site, and meet the funding requirements.

The sketches below show that tunnelling methods not only save the landscape above ground, they should also minimise excavation works below the surface and reduce the impact on underlying water courses etc.





30 metre deep cutting at the Air Balloon Inn vs. Dual tunnel type bridge underneath its car park The Ramblers' Association (Ramblers) is a registered charity (England & Wales no 1093577, Scotland no SC039799) and a company limited by guarantee, registered in England & Wales (no 4458492). Registered office: 2nd floor, Camelford House, 87-90 Albert Embankment, London SE1 7TW Tel: +44 (0)20 7339 8500. Our privacy policy ramblers.org.uk/technical-stuff/privacy-policy



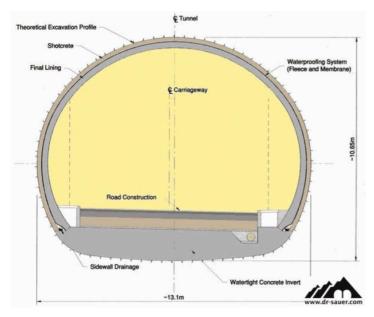
# Gloucestershire Ramblers Area A417 – A27

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A27 example tunnel /green bridge

The A27 at Southwick near Brighton 1992-194 was the first example of a Hindhead type tunnel in the UK. It's 390 metres long and like Hindhead has some involvement with the National Trust. It also isn't that far below ground around 10 metres, 20 metres to the base, yet still justifiable vs. 25-30metres for the A417.









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