



**Application by National Highways (formerly Highways England) for
an Order granting Development Consent for the A417 Missing Link project**

Regarding the Agenda for Issue Specific Hearing 2 (ISH2) on Environmental Matters

TR010056-001136-A417MissingLink ISH2 EM Agenda.pdf

where it says on page 1 of 7 :-

About ISH2 on Environmental Matters

The main purpose of ISH2 is to undertake an examination of various environmental matters. In particular, to review environmental impact considerations, including matters arising from the application documentation and representations relating to:

- *Assessment of Alternatives;*
- *Biodiversity, ecology and the natural environment;*
- *Climate change;*
- *Cultural heritage;*
- *Landscape Quality; and*
- *Transport.*

Page 6 of 7 of TR010056-001136 says:-

3. Assessment of Alternatives

3.1 Do options need revisiting; has there been substantial change in circumstances?

3.2 Option 12: Explain why chosen over option 30 if this is 'landscape-led' scheme, and factors used appear to focus on cost and benefits?

3.3 Tunnelling options refer to bored twin tunnels. Were other cheaper options explored and discounted, and have circumstances changed that makes those assessments invalid?

In 3.2 does it appear that Options 12 and 30 been transposed?

Many of the above issues have already been raised by Gloucestershire Ramblers submissions.

This document is to highlight that 'tunnelling options' could involve types of bridges and that Option 30, if it's considered as a route location, could be tunnelled over part of its length.

For some time it's been said that tunnels would not be allowed within the scheme.

In 2014, GCC instigated a separate A417 loop consultation - the tail end of which evolved a green bridge below the Air Balloon site. It was realised that the difference between a bridge and tunnel is not the method of construction. The Design Manual for Roads and Bridges describes a bridge as being a tunnel of length less than 150 metres. It was confirmed that a bridge of up to 150 metres, even if it looked like a tunnel, would be allowable in the scheme.

It was later said that Option 30 is a surface route and that tunnel options would have a greater impact on the underlying aquifers of the Cotswolds. However Option 30 was not truly a surface route. It had deep cuttings in places. A tunnel, at the same depth as a cutting, requires less excavation above and to the sides and should therefore have less effect on the aquifers. Of the 30 options initially presented, 28 included tunnels without undue concern for these aquifers.

Some low cost tunnelling methods such as 'Cut and Cover' would unlikely be suitable as they destroy the surface landscape. Other low cost tunnelling methods retain the surface and landscape, as demonstrated by road schemes within the North and South Downs AONB.

Summary

Our representation asks that tunnelling options be properly considered - whether they're along the alignment of Option 30 or nearby, and whether or not they appear to be types of bridges.