

Submission to the ExA for Deadline 3 " February 2nd 2022

I would like firstly to refer back to my Submission of December 14th 2021 as follows:

In 2018 the Government commissioned a Designated Landscape Review in response to their 25 year Environment Plan and, amongst the devastating results, is evidence that our SSSIs are in a downward trend and our National Parks and AONBs only just meet nature conservation standards for International recognition. In July 2019 Michael Gove said that " the UK is now among the most nature depleted nations in the world"

This is a national disgrace and the project, if implemented as proposed, will affect the area's environment and ecology for all time, there will be no going back and, even in the unlikely event that all mitigations were put in place, they would not compensate for what will be lost.

Option 30 is NOT a Landscape-led scheme, far from it, and is totally contradictory to the excellent aims and intentions of stated Government Policy.

The main aim of Option 30 appears to be to keep traffic flowing at 70mph, regardless of the risk this entails, thus avoiding congestion at the Cowley and Air Balloon roundabouts. However, all this will do is move it further down the A417 to areas which are already congested. The A46 into Cheltenham is a solid traffic jam at rush hour and more traffic, all at once, could see it queuing on the roundabout, possibly even down the slip roads. The Barnwood roundabout is traffic light controlled and the first major junction so would probably bear the brunt, becoming much slower, as would the traffic lights c200 yards further along. The roundabout between Longlevens and B4063 to Churchdown, where the A40 briefly merges with the A417, is only partly controlled by traffic lights and access to it from the B4063 causes very lengthy queues. It was my commute for 14 years and has recently got much worse due to a large housing development being built alongside it. I wonder if the effect of emissions on those occupants and pavement users was taken as seriously as the complaints by c280 residents of Birdlip. A large new roundabout is currently under construction between this one and the A38 junction which also suffers from congestion in all directions, so much for free flowing traffic. Whilst reducing congestion at the Air Balloon is necessary, some means of staggering its onward flow towards Gloucester should be seriously considered.

The Government's new ELMS is designed to replace EU Subsidies and Robert Jenrick has recently stated that grants will be available for farmers to turn land over to nature and to create more sustainable interaction with nature, to plant trees and protect the environment, that even small land changes in sufficient number will make a difference, yet Option 30 destroys two small and one large farm and will annihilate the majority of wildlife in the entire area by dissecting its habitat. The noise and light pollution from the road will deter all nocturnal wildlife and there is little likelihood that bats will take up residence in a disused bus shelter, it is much too close to human habitation and not nearly high enough. There will also be the removal of 5km of existing hedgerow which have long established eco-systems of their own, how is this in keeping with Government Policy and its commitment to climate change ? Who is going to be responsible for care and maintenance of the proposed replacements ?

The National Trust and GWT asked what plans there are to monitor the Green Bridge and what action would be taken if mitigation fails. The plan is flawed before it starts as it is planned to have calcareous grassland and hedges, the two are not compatible. Hedges require sufficient depth of soil to spread their roots and for moisture retention whereas calcareous grassland is defined as follows:

Calcareous grassland (or alkaline grassland) is an ecosystem associated with thin basic soil, such as that on chalk and limestone downland. ... Calcareous grassland is an important habitat

for insects, particularly butterflies, and is kept at a plagioclimax by grazing animals, usually sheep and sometimes cattle.

This is not the first time the introduction of calcareous grassland has been mentioned and in my December submission I said that it cannot just be produced at will. A study was carried out in Oxfordshire many years ago to establish the effects of climate change on it, this is an abstract of its findings:

The nature and rate of development of calcareous grassland from Elsevier 1991

The nature of the plant succession from disturbed land to species-rich ancient calcareous grassland communities was investigated by a survey of formerly disturbed sites adjacent to ancient grassland in southern Britain. The results are compared with previous studies documenting the nature of ex-arable grasslands. This succession takes from decades to centuries to stabilise. Any apparent conservation value of recently abandoned sites is shown to derive from species which are consistently characteristic of early-mid succession. The course of succession depends on site conditions and the availability of adjacent colonisation sources. Even on skeletal soils, management such as grazing is essential; otherwise, succession proceeds towards species-poor coarse grasslands or scrub.

The Netherlands have carried out studies on 25 sites, over a period of 30 years, to try to turn derelict arable land into calcareous grassland and to create new, this is a summary of their conclusion:

Conclusion

Several phases can be distinguished in the restoration attempts for species-rich chalk grasslands in The Netherlands: Pre restoration stage, Initial restoration stage, Consolidation stage and Long term conservation

In other words, this is not a quick fix but a very long term project which requires constant monitoring and attention over a period of many decades and, you will note, colonisation from neighbouring land. How is the Applicant proposing to achieve this when the area is designed for constant use by walkers etc. Further, why is it considered to be too difficult to turn the .37 of a hectare of car park at Barrow Wake into calcareous grassland when the area of the Green Bridge is infinitely smaller. With respect to Mr. Casey, I don't think he has done his homework on the subject.

In respect of the two Cowley overbridges, it is stated that they will have hedges either side but has the necessary width and depth required for this, and the resultant cost, been factored in to the Budget. Both have to be wide enough to carry a combine harvester, the Cowley Lane Bridge will also carry all traffic including delivery and refuse lorries and the hedges will require a sufficient width and depth of soil in order to flourish and of course care in their early years.

As to the proposed Air Balloon Way, it was stated at the latest Hearing, in answer to Dr. Gareth Parry's concerns regarding over usage of Crickley Hill and Barrow Wake, that it would take visitors away from those sensitive areas and "spread the load". Since it was agreed by all concerned that the main purpose of visiting those areas was the far reaching views I fail to see how the repurposed A417 will provide a substitute since there will be no views beyond that actual area.

There has been much talk about the "unique micro climate" in the Birdlip area but are the full implications really being taken into consideration? The ExA's visit last September was marred by fog so that they were unable to get a proper appreciation of the landscape, its beauty and diversity. This was daylight in early autumn, by November and December the fog is much thicker and rush hours are in darkness, there is also the probability of heavy snowfall and, with climate change, weather patterns are becoming more unpredictable. A 70mph speed limit, with heavy traffic filtering in from the A436, is a frightening prospect, have these scenarios been discussed

with the Police and other Emergency Services who will be left to cope with the results of this reckless scheme ? With the existing A417 removed there will be no accident relief road so all traffic will divert through the villages, just as it does now, and, since an end to rat running was one of the stated aims of the project, the whole thing will have been a total waste of money and environment loss, with a likely increase in the accident rate.

Option 12 with its 50mph at this point, or indeed a tunnel, would be infinitely safer and of course emissions are far lower at 50mph than at 70mph so less damaging to the environment. It has already been shown that the time difference is c.21 seconds.

With regard to Cowley Lane itself, perhaps National Highways could define exactly where they consider Cowley Lane to start and finish, i.e. is it from the A417 to the A435 and, if not, at what point in the village does it end ? Also, we would like to know what traffic model was used to determine the amount of traffic passing along the lane. Figures produced by another IP will show that the underestimation, if it were not so serious, would be risible and it is anticipated to increase exponentially with Option 30. Whilst NH state that no construction vehicles will pass through the village, can they give the same guarantee with regard to the workers ? When the inevitable accidents block the lane traffic will then pour through the centre of the village, endangering our lives, our children walking and on bicycles, our pets and our properties as gateways are used as passing places. My field gateway on Cowley Lane is already so churned up and muddy in winter that I am unable to access my stables by car and if I put log barriers in the way they are merely thrown aside by drivers.

COWLEY IS NOT A THROUGH ROUTE, NEITHER ARE WE A DISPOSABLE COMMODITY
Because we have five lanes in and out of the village we are a mecca for horse riders and walkers. We are a rural community, partly in a conservation area