

Script for written representation by Cllr Martin Horwood on behalf of Leckhampton with Warden Hill Parish Council at A417 examination open floor hearing on 24 January 2022

First of all can I thank you for facilitating me speaking at this hearing.

My name is Martin Horwood and for transparency I should say that while I am also a Cheltenham borough councillor, a trustee of Gloucestershire Wildlife Trust and a member of the Woodland Trust, as well as a former MP and MEP, I'm speaking now for Leckhampton with Warden Hill Parish Council.

(Background:)

We represent the south of Cheltenham closest to the Air Balloon. The C377 - route ID4 on your Transport Report maps - takes traffic north from the Air Balloon past National Star and down into Cheltenham and our parish. All our main roads are included in the scheme's 'Affected Road Network' identified by National Highways (APP-074).

Many of our residents use the A417 and the Air Balloon junction en route to Cirencester, Swindon, the M4 and Gloucester. And Crickley Hill is for us a really popular escape from the the urban area. And the escarpment provides a stunning setting for our town which is referenced in four local plans for its importance to Cheltenham residents and visitors alike.

But there has been huge local concern for years at the level of casualties and fatalities on the A417. So there is strong local support for 'something to be done' - and some frustration that it is taking so long.

Safety is a much bigger public concern than the 5 minute improvement to journey time forecast on p126 of the Scheme Assessment Report and the economic benefits that is supposed to deliver which should perhaps be updated post-pandemic. Our residents these days would probably prioritise the protection of the environment over speed but road safety remains the decisive local concern and the reason the scheme enjoys local support.

(Landscape and visual)

But that could change once the landscape impact of this scheme becomes clear if that impact is not adequately mitigated.

Tunnel Options were dismissed in 2017 on 'value for money' grounds yet they would have had far less visual impact than the huge open cutting in this scheme.

Gloucestershire Wildlife Trust, the Cotswold Conservation Board, the National Trust, the Council for British Archaeology and Gloucestershire Ramblers all still raise concerns that will also matter to local people about whether the applicants' 'landscape-led' claim is really being fulfilled in relation to the AONB. Natural England too highlight the potential 'landscape and visual impacts' and point out the 'strong presumption against any significant road widening.. in AONB, unless.. there are compelling reasons.. outweighing the costs very significantly.'

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That cost/benefit calculation could be more positive if the DCO mandated much more significant landscape protection. Value for money calculations should take into account the economic and social value of the landscape not just the road, and the biodiversity which is increasingly important in government policy. That could provide a quantifiable rationale for more extensive landscape mitigation.

One example of that mitigation could be more green bridging. The Ramblers' latest representation suggests this scheme could still include tunnelling of less than 150 metres at a time which would technically still constitute a series of bridges. They have also suggested natural *locations* for more extensive 'green bridges'.

(Traffic and transport:)

Another threat to public support comes from the traffic projections in the Transport Report. The applicants are right that the single-carriageway section of the A417 is an 'accident cluster site' and we're pleased that they forecast a significant reduction in serious and fatal accidents.

But we're alarmed by the forecast Annual Average Daily Traffic flows for route ID4 straight down the hill into our parish. Figure 7-1 on p50 of the Transport Report shows a huge increase of 51% in annual average daily traffic to 11,500 a day by 2041 compared to the 'do minimum' scenario.

This road is already busy and very steep as it enters Cheltenham here. The very first urban junction with Old Bath Road and Leckhampton Road is a known accident blackspot which is regularly closed in icy weather and there are even videos on YouTube featuring multiple collisions there in snowy conditions.

Motorists and even sports cyclists speed down the hill and our own traffic monitoring shows more than a third of motorists still exceeding the speed limit even further down Leckhampton Road. Traffic congestion is also a big local concern with a decision on 350 new homes here recently deferred by borough planning officers because of unanswered traffic management concerns.

Surely a 51% increase would risk *increased* traffic accidents here and really severe congestion.

At paragraph 8.4.10 (p59) the Transport Report says that 'disbenefits occur where forecast increases in traffic flows are shown to increase'. National Highways should be specifically asked to explain this. Does it mean that if traffic flows increase more than expected the improved accident rate starts to disappear?

National Highways need to much clearer that they are factoring the local roads network into their accident forecasts not just the A417 itself.

The Joint Councils' Local Impact Report submitted to you in December says at para 3.1.15 that National Highways 'should provide more information to demonstrate how the impacts associated with the traffic increases on the local road network can be mitigated and how these measures would be secured and implemented. The DCO should secure a mechanism for funding local highway authority schemes to address the identified traffic increases.'

We support that call and I hope inspectors will insist that it is done.

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And the forecast increase in traffic through our parish is not just a matter of road safety and congestion.

(Air quality and emissions:)

Air quality and emissions are such a worry locally that we carry out our own air quality monitoring to professional standard and it suggests to us that the Scheme Assessment Report forecast (p145) of an increase in NO₂ pollution on Leckhampton Road here from 17.2 to 19.3 µg/m³ for Option 30 is a significant underestimate.

Our data shows a significantly higher rolling 12 month average of 22.34 µg/m³, peaking at 32.55, not that far below the EU limit of 40. This and our particulate pollution monitoring currently show air quality in Leckhampton is safe. But a 51% increase in traffic will obviously increase all these numbers.

National Highways use accurate local data in their air quality predictions and I hope the DCO can mandate monitoring and mitigation measures for air quality and the funding to support them.

(Biodiversity, ecology and natural environment:)

You will be looking at **biodiversity, ecology and natural environment in more detail shortly but we are as concerned as anyone about the twin environmental crises of nature loss and climate change and we would want** outstanding concerns raised by various environmental organisations to be very seriously examined.

Table 14-17 of the Environmental Statement (p34) shows the scheme causing nearly a million additional tonnes of CO₂ equivalent compared to the 'do minimum' scenario despite NH's 6.2 Environment Statement Chapter 16 summary very oddly stating under 'climate' on p6 that it will have 'no likely significant effects'. We note the credible evidence of Dr Andrew Boswell that these emissions are hard to reconcile with the UK's planned carbon budgets and the government's Transport Decarbonisation Plan (TDP).

The projected 20-25% net loss of biodiversity is equally serious and seems to directly contradict not just National Highways' stated aim 'to achieve no net loss of biodiversity across the strategic road network by 2025' but also the brand new Environment Act's requirement that NSIPs deliver 10% biodiversity net gain from next year. You've heard more expert witness on this from Mr Parry.

And we're very worried by the range of outstanding environmental concerns raised by Natural England, Gloucestershire Wildlife Trust and the Woodland Trust.

These are detailed in our written submission but they include impacts on hedgerows, ancient woodlands and veteran trees of national importance, negative impacts on many protected species according to Natural England and the loss of Priority habitats.

They include an adverse impact on the Barrow Wake SSSI which forms a core area of Gloucestershire's Nature Recovery Network - a key local strategy not even mentioned in the applicants' evidence.

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There seems to add up to a catalogue of serious environmental concerns with this scheme which have not been resolved and which may contradict the thrust of global, national and local policy.

We'd like you to fully explore these organisations' calls for significant improvements to the scheme such as more land for habitats, greater green bridging and buffers to protect ancient woodlands.

(Cultural heritage:)

Finally on cultural heritage, our local history and archaeological societies are well aware that Crickley Hill is the most important ancient site in Gloucestershire. The first neolithic settlement dates back 5700 years making it older than Stonehenge. Nearly a million artefacts have been unearthed at this site. Emma's Grove nearby dates back to the bronze age.

We note the **Council for British Archaeology's** view that 'for a major infrastructure scheme in a National Landscape to be 'landscape-led' it 'must treat landscape in this context as encompassing not just natural beauty but also archaeology, heritage and the historic environment' and that this scheme falls short.

(Conclusion:)

So in summary we do want this scheme to stop the accidents, deaths and casualties on the A417 but we don't want it to cause more in Leckhampton and other local communities. And we want the maximum mitigation possible for the currently planned damage to this economically, historically and environmentally important landscape, for the huge net increase in carbon emissions and the reduction in biodiversity which are all against the thrust of local and national policy now.

Cllr Martin Horwood
on behalf of **Leckhampton with Warden Hill Parish Council**
24 January 2022