

Issue 1

The question remains as to why the two designs that went to consultation had very different junction designs, with Option 12 having three junctions, whilst Option 30 only one¹. It can be clearly seen from the scheme proposals presented for consultation², that Option 12 had additional junctions that were considered not necessary for Option 30. This was meant to be explained by the traffic expert during ISH2 Agenda Item 8, but it was not.

Highways in their summary of Oral Submissions at Issue Specific Hearing 2 (ISH2)³ stated that *Junction layouts differed between the two schemes for engineering reasons related to level differences and geology.*

Our proposed route options: an overview

This section provides a high-level description of our two route options.

Option 12

A four mile surface route reusing sections of the existing A417 on Crickley Hill and Birdlip. New sections of road will be built at Nettleton and Emma's Grove. This option would include three

new junctions – one at Cowley roundabout, one on the existing A417 close to the B4070 junction at Birdlip and one to the north of Barrow Wake. There would be three lanes of carriageway going up Crickley Hill and two lanes coming down.

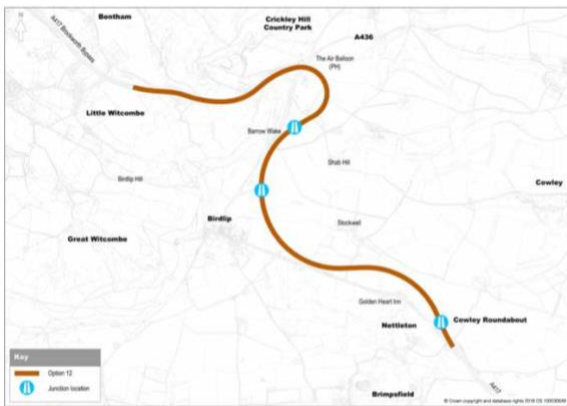


Figure 7. Option 12

Option 30

A 3.4-mile surface route following the alignment of the existing A417 at Crickley Hill with less of a slope. A new section of road will be built through Shab Hill to the east of the existing A417, re-joining the existing road near Cowley roundabout.

Option 30 would include two new junctions – one at Shab Hill and one on the existing A417 close to Barrow Wake with a link road in-between. There would be three lanes of carriageway going up Crickley Hill and two lanes coming down.

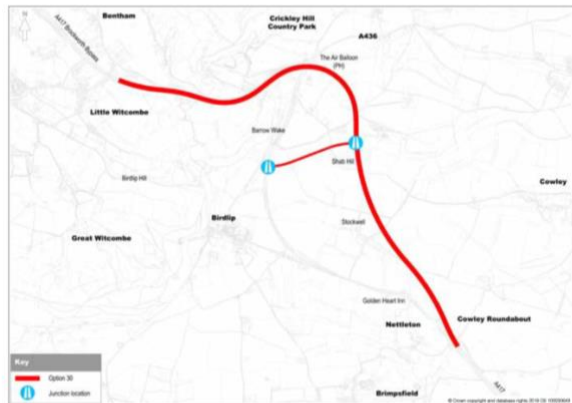
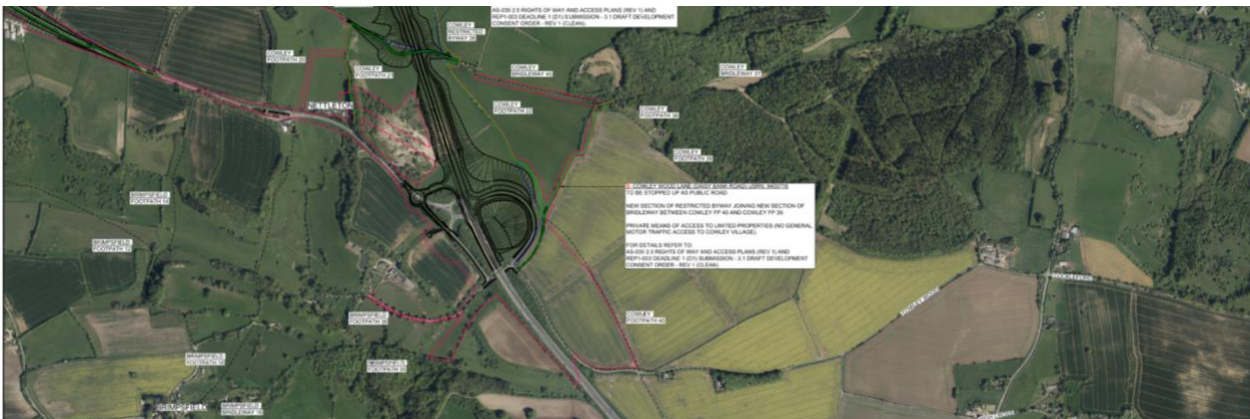


Figure 8. Option 30

Image taken from A417 Consultation Brochure, showing the 2 route options that were presented at the time of the Public Consultation in 2018. Clearly there is no junction at the Cowley Roundabout for Option 30, and Highways state that this is *for engineering reasons related to level differences and geology.*

The current proposal for a junction at the Cowley Roundabout for Option 30 is⁴:



I think it is clear from the above that *level differences and geology* were not reasons for omitting a junction at the Cowley Roundabout at the time of Consultation, as the current Option 30 has a junction in the same location as that for Option 12.

Question: Put simply, can the ExA be appraised **again** as to why Option 12 had a junction at Cowley Roundabout in the design put forward for consultation, whilst it was assessed that Option 30 did not require it. The Applicant's response to the previous question has not provided a credible response. The ExA must now

¹ TR010056-000602-7.9 Technical Appraisal Report (February 2018), Page 129, Table 7.2
² TR010056-000608-7.4 Scheme Assessment Report (March 2019), Pages 88, 89
³ TR010056 - Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 (ISH2) (February 2022), Page 2, Para 3.1.12
⁴ TR010056 - 8.21 Comments on Responses received by Deadline 2 (February 2022), Annex A

seriously question whether at the time of Consultation, Highways descope the design for Option 30 to keep the cost of the Option within the estimated cost range of 250 - 500 million. Highways have been given the opportunity to explain why, but they have clearly contradicted themselves in their latest response - *level differences and geology* clearly were not the reasons.

Question: Can the ExA be appraised as to whether at the time of the consultation, if the junction layouts had been of similar number and design, would the monetised costs and benefits of both options have been more similar or even in favour of Option 12?

Issue 2

In addition, for a road that is only 14% (800m) longer, it is hard to comprehend that the Economic Efficiency⁵ for Option 30 would be 64% higher than that of Option 12! In the Combined appraisal summary results⁶ referred to in ISH2 show for 'Commuting and other users' the benefit of Option 30 to be 85% higher than Option 12!

The Technical Appraisal Report states⁷ that 'Option 12 is the cheapest option that has been considered at this stage, but the lower scheme cost is offset by the comparatively poor levels of benefit that are generated, which result in an initial BCR of 0.55 and an adjusted BCR of 0.68'. The 'poor levels of benefit' are predominantly driven by the perceived Economic Efficiencies.

Highways in their summary of Oral Submissions at Issue Specific Hearing 2 (ISH2) stated at Item 3 the background to why Option 30 was chosen⁸. It is evidently clear that the choice was purely monetary based, and there is no reference at all to the landscape leading the decision.

Question: Are the ExA **totally** satisfied that Option 30 was landscape led, and not driven by cost and ease of construction to the detriment of the AONB.

Issue 3 – I do not believe that Highways have responded to this issue

At the time of consultation, it was stated that Option 30 would divert the strategic road network away from the Cotswolds escarpment⁹. However, what was not pointed out at the time of consultation was that the existing A417 (on the Cotswold escarpment) would be used to connect the A436 to the Shab Hill junction. Assuming that Option 12 would have been along the same alignment of the current A417, it could be fairly assumed that the feeder route for Option 30 would have the same impact on the escarpment as Option 12 would have.

Question: Are the ExA satisfied that at the time of consultation, the true impact of Option 30 on the Cotswolds escarpment was accurately portrayed, especially as this is one of the main 'perceived benefits' of Option 30 at the time of consultation and was used in the Cost Benefit analysis.

Question: Can the ExA be appraised as to what the impact, if any, Option 12 would cause on the escarpment over and above what is there now with the current A417. In addition, can the ExA be appraised as to what design measures could be undertaken to mitigate any perceived impacts on the escarpment, caused by Option 12.

Issue 4 – I do not believe that Highways have responded to this issue

The Technical Appraisal Report states on page 54 that the Crickley Hill Country Park is located adjacent to Option 12 and within 1km of Option 30¹⁰. Can the ExA be appraised as to where Option 30 is assessed to be not adjacent to the Crickley Hill Country Park, as we believe both Options are adjacent.

Question: Considering this, can the ExA be assured that many of the environmental impacts for Option 30 have not been overstated when compared with Option 12, which in turn could have had a biased impact on the consultations.

Issue 5 – I do not believe that Highways have responded to this issue

⁵ TR010056-000602-7.9 Technical Appraisal Report (February 2018), Page 146, Table 9.2

⁶ TR010056-000602-7.9 Technical Appraisal Report (February 2018), Page 197, Table 15.1

⁷ TR010056-000602-7.9 Technical Appraisal Report (February 2018), Page 147, Para 9.3.6

⁸ TR010056 - Summary of Applicant's Oral Submissions at Issue Specific Hearing 2 (ISH2) (February 2022), Page 1, Para 3

⁹ TR010056-000608-7.4 Scheme Assessment Report (March 2019), Page 12

¹⁰ TR010056-000602-7.9 Technical Appraisal Report (February 2018), Page 54, Para 3.14.20

I attended a virtual A417 Missing Link - project update by Highways England on Thursday 9th November at which a member of Highways England made a point about the “volatile microclimate” that exists where the scheme will be built. I think this was also witnessed by the ExA in September when they visited the site, and there was thick fog! The Technical Appraisal Report has a section on Climate, but this is limited to the Midlands climatic region of England, in which the proposed scheme lies¹¹. There is no mention of the “volatile microclimate”.

Question: Highways stated at ISH2 that they were satisfied that they had taken climatic conditions into account. Can the ExA be assured that this microclimate has been accurately modelled, or has the data been based on design meteorological data for the Midlands climatic region of England, which does not represent the “volatile microclimate” that exists in the vicinity of the scheme. Maybe Highways can show the ExA exactly how they have taken these climatic conditions into account.

Question: The issue was meant to be addressed further as part of Agenda Item 8 by the Traffic expert, but it was not – can the ExA be assured that sufficient detailed traffic modelling (based on a known volatile microclimate that exists in the geographical location) has been carried out to examine the impact on journey times and safety when this condition exists.

Question: Can the ExA be advised as to whether this “volatile microclimate” could reduce journey times on Option 30 to journey times like those achieved on Option 12.

¹¹ TR010056-000602-7.9 Technical Appraisal Report (February 2018), Page 44, Para 3.8