

Submission ID: 8151

Submission to ExA Feb.2022-2 Deadline 4

I would like to draw the ExA's attention to some passages from previous Submissions and comment on them

From The Joint Councils D3 Submission " Appendix A Detailed Design in DCOs

1.2 Recent DCOs for NSIPs sought by National Highways (or Highways England)

1.2.1

All of the recent National Highways (or Highways England) DCO applications we reviewed are supported by scaled engineering section drawings and/or elevation drawings which illustrate preliminary design information in relation to proposed over bridges:

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A428 Black Cat to Caxton Gibbet Improvements (Examination)

"

M25 Junction 10 / A3 Wisley Interchange (Decision stage)

"

M25 Junction 28 (Decision stage)

"

A63 Castle Street Improvement-Hull Order 2020

"

M42 Junction 6 Improvement Order 2020

1.2.2

In the case of each of these schemes, the DCO Requirement which secures the detailed design (as set out in the following section) makes specific reference to engineering drawings and sections. This ensures that the preliminary design information shown on those drawings is secured and provides assurances that the future assessment of the compatibility of detailed design with the preliminary design is achievable.

1.2.3

The Joint Councils note that none of these schemes are located in nationally designated areas but do provide greater level of certainty around design than the draft DCO for the A417 Missing Link.

From Joint Councils D3 -Written Summaries

3.4.13. Having reviewed the evidence presented at the hearing the Joint Councils would wish to make additional points on this matter:

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The case studies set out in

Appendix A Detailed Design in DCOs Case Studies demonstrate

that there is not a standard amount of preliminary design detail submitted in the A417 Missing Link DCO application or secured within the proposed Requirement 11.

"

There is a clear lack of preliminary design detail compared with National Highways recent DCOs " none of which are located in an Area of Outstanding Natural Beauty (AONB).

"

There is a clear lack of preliminary design detail and securing mechanism for approval of detailed design within the application compared to other DCOs for Nationally Significant Infrastructure Projects in AONBs " as made by other Applicants.

It would appear that the Applicant feels that Rules which apply countrywide are not relevant here. It is a further worrying factor that the Applicant seeks to defer detailed design of the Gloucestershire Way Crossing until after the Examination has been completed. Can the ExA

confirm that a design code will be developed, in collaboration with GWT, CCB and the National Trust, during the Examination process

From CEPP D2 "Written Representation Part 2  
CHANGES IN LOCAL AND NATIONAL POLICY

12 The section provides more detail on the TDP, the NZS and also a report from Chatham House.

2.1 Transport Decarbonisation Plan

13 On the 14th July 2021, the Government released its Transport Decarbonisation Plan

14 The Rt Hon Grant Shapps MP, Secretary of State for Transport states in the foreword:

"But we cannot, of course, simply rely on the electrification of road transport, or believe that zero emission cars and lorries will solve all our problems, particularly for meeting our medium-term carbon reduction targets to 2035. Road traffic, even on pre-pandemic trends, was predicted to grow by 22 percent from 2015 to 2035 much of it in cities, where new road building is physically difficult and disadvantages communities. We cannot pile ever more cars, delivery vans and taxis on to the same congested urban roads. That would be difficult for the roads, let alone the planet, to tolerate.

As we build back better from the pandemic, it will be essential to avoid a car-led recovery."

Whilst this is mainly aimed at urban locations the same principal applies to major roads, not all delivery vans and cars, and certainly most lorries, emanate from the area in which they are driving. A car-led recovery would encompass the entire road network and history has shown that more roads just encourage more vehicles, the building of this type of highway will simply increase traffic flow and, therefore, emissions and safety issues.

D2 CEPP Written Representation & Response to ExQ1 " Rev 1

105 States that the Applicant is in contravention of the Aarhus Convention in regard to traffic modelling

This is more than born out by the figures the Applicant quoted for Cowley Lane which have been demonstrated to be ludicrous, they show modelled figures as far lower than observed and indeed on one graph they estimate that, by 2041, there will be no traffic at all, despite there being c140 vehicles belonging to current residents plus our visitors and deliveries, is a ban to be imposed !!

Andrew Boswell of CEPP further states

The Applicant says that it has followed the Transport Appraisal Guidance (TAG). It is more accurate to say that the Applicant has followed its own particular interpretation of TAG, which is appropriate for operational/performance evaluation of the network, but which is not fit for purpose for cumulative carbon assessment,

This has been, and continues to be, the case throughout. The Applicant appears to be cutting corners wherever possible, paying scant regard to the Rules governing such applications and avoiding all proper consultation in its desire to rush the project through and the obvious question is WHY ? What is so special about Option 30 compared to the many other projects around the country where proper consultation has sometimes ended in refusal, as should be the case here. Who is behind the desire for approval and what do they hope to gain ?

It is not just Cowley Village that has suffered poor involvement and lack of engagement, other Submissions show multiple cases of issues raised not being dealt with, updates requested but not provided, Meetings missed, key points introduced at Meetings not being recorded, factual errors, the list goes on!

D2 - CEPP Submission Part 2 Appendix D

Food Security - states that, by the year 2050, agriculture will need to produce 50% more food but

that yields could decline by 30% in the absence of dramatic emissions reductions. Their map shows the UK to be in one of the worst predicted areas.

Many of us may not be alive in 2050 but our children and grandchildren certainly will be and yet Option 30 delivers a double blow in that firstly, it destroys first class farmland which could be changed from grazing to crop production if necessary and secondly, the Applicant's desire for additional speed i.e.70mph instead of 50mph with Option 12 (or better still a tunnel) will increase emissions as the higher the speed, the greater the emissions. Whatever the limit is, vehicles will exceed it so surely better for the environment, as well as road safety, to set it as low as possible.

### D3 Submission to ISH2 by Cowley (& Birdlip) Parish Council

Firstly, this was once again prepared and submitted purely by the Councillors from Birdlip without any reference to, or consultation with, Councillors representing Cowley. They quote ExQ1 1.11.26 "the impact of traffic in the Parish in the event of an incident such as the fatal accident that occurred on Crickley Hill just before Christmas" I must point out here that Crickley Hill is NOT in the Parish of Cowley which ends at the Air Balloon roundabout, a fact of which I am sure they are very well aware. The top of Crickley Hill is in Ullenwood Parish but the vast majority is not even within Cotswold District Council. However sad and regrettable any death is they are, once again, manipulating figures and exploiting somebody's loss for their own advantage. In fact the last death recorded in the area was October 23rd at 4am between Brockworth and Shurdington, so some miles away and nothing to do with congestion or the "Missing Link".

To turn to the B4070, they managed to persuade the Applicant to move this road in order to keep traffic out of Birdlip village and are now concerned that speed will increase and want a 30mph speed limit, what did they expect ? As a B road it will, no doubt, be full width, probably with a centre white line and may well have at least one pavement. Whilst finally acknowledging that Cowley has far too much traffic on very narrow, ill kept lanes they do not suggest that a 30mph limit might be advisable here also. At present it is 60mph so speeding vehicles cannot even be reported as they are not illegal.