

I would like to raise the following points, some of which may perhaps have been mentioned previously but which have become more relevant in the light of current events:

1. 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. This situation will be greatly worsened by the war in Ukraine reducing imports and we will need to put more land into food production, especially grain, not reduce it for outdated road schemes

2. The embargoes being introduced on oil and gas imports from Russia, whilst impacting less heavily on the UK than Europe, are already having a massive effect on fuel prices, for both vehicles and heating, and on all consumer products, including food, as suppliers struggle with ever increasing costs. The Government will not be able to bail everybody out so it is perhaps inevitable that, in the medium term, there will be an increased need for coal whilst renewable and nuclear energy sources are developed. This will lead to an increase in the level of emissions the world is trying to reduce so other means of reduction will be urgently required, perhaps the easiest and most likely being a nationwide reduction in speed limits to lower vehicle emissions. This, added to far fewer miles being driven as people have to cut down to save money, makes this expensive, environmentally and ecologically destructive project totally redundant.

3. There have, to date, been no questions raised relating to the additional lanes on Crickley Hill and it is therefore still unclear whether the change in gradient is proposed only for the new lanes or if the existing lanes are also to be reduced. If the former how would a two gradient road work and if the latter the cost of such an undertaking would be massive and blow the budget out of the water also, how would traffic be re-routed whilst such work was carried out. Whatever the gradient changes made it is unlikely to be less than that of the Heads of the Valley road in Wales as the ultimate height at Birdlip cannot be reduced yet, whilst the Heads of the Valley has a speed limit of 50mph to reduce NO2 emissions, NH still propose 70mph on Crickley Hill, this despite their own statement in 2018 that "the 70mph proposed for Option 30 will need to be considered further as part of the next stage in the project's development". Highways are not even convinced by their own principle argument and *raison d'etre* and, without the higher limit, they have no case whatsoever for Option 30

4. NH's own Preliminary construction assessment shows

- Likely permanent adverse significant effect on best and most versatile agricultural land.
- Likely permanent adverse significant effect on water as a result of identified soil and groundwater contamination. Mitigation is to be developed to reduce the impact.

Construction

The proposed scheme would result in greenhouse gas emissions during construction from the raw materials required, transport and construction processes. The provisional estimate of emissions from the construction phase

total 47,000 tCO<sub>2</sub>e (metric tonnes of carbon dioxide equivalents).

Mitigation measures would be implemented to reduce emissions during construction of the proposed scheme, for example through specification of ultra-low sulphur diesel, management and

minimisation of energy use,  
sourcing recycled or secondary materials from the local area and exploring the use of lower carbon materials.

The proposed scheme would be designed to be resilient to impacts arising from projected future weather events and climatic conditions and designed in accordance with current planning, design and engineering practice and codes.

They admitted that agricultural land will be significantly affected, whilst pretending that the scheme is landscape led, and their proposed construction mitigations will add significantly to the ever growing overall cost of the project. Surely putting it well beyond the budget of Â£500m

5. There has been much written about plans for the creation of habitat on all the proposed crossings but nowhere has it been explained by NH how funding for long term maintenance will be secured, or who will be responsible for same. Similarly the cost of re-instatement of trees, hedgerows and drystone walls damaged in the construction process. Have all these costs been factored into the Budget and, if not, where is the money coming from ?

The Joint Councils D5 Submission, paras 3.4.7 & 8 are devoted almost entirely to the provision of Calcareous grassland on various sites, including the need to ship limestone and substrate from other sites. Firstly, this is simply robbing Peter to pay Paul in that other areas will be depleted but, has the cost of this been factored into the budget and, when the plan almost certainly doesn't work, what financial provision has been made for replacement with other types of grassland ? If the ongoing cost is actually to be born by the Joint Councils it will be passed on to Rate Payers in their Council Tax, a hidden cost nobody signed up for and which would doubtless have put a very different slant on public opinion during the Consultations.

6. In the 2019 Consultation the cost of Option 30 was estimated at Â£485m, by 2020 it had been changed to Â£250/500m a possible saving of up to 51%.which, with post-pandemic price rises, had already become unattainable due to massive increases in the cost of steel, concrete, fuel and wages. The war in Ukraine, with its long term financial implications for the whole of Europe, and the wider world, has made a ceiling of Â£500m quite obviously pie in the sky and construction is not due to start until 2023 when we cannot predict how the situation will have developed. There is a new Road Strategy planned for 2023 and any consideration of this project should be postponed until new Government Transport and Environmental plans have been determined and updated needs can be assessed.