

7. Do you have any comments on our PEI Report and other proposed mitigation measures?

It could be useful to quote

Legislative and Policy framework from Section 7.2.3 in Highways England A417 Missing Link | HE551505

Great weight should be given to conserving landscape and scenic beauty nationally designated areas (National Parks, the Broads and AONBs). These areas have the highest status of protection in relation to landscape and scenic beauty. In decisions, the Secretary of State has a statutory duty to have regard to the statutory purposes which help ensure their continued protection. The Secretary of State should refuse development consent except in exceptional circumstances and where it can be demonstrated that it is in the public interest.

For any significant road widening or the building of new roads in these areas, compelling reasons for the new or enhanced capacity are required, and with any benefits outweighing the costs very significantly. The applicant should ensure that the project will be carried out to high environmental standards and where possible include measures to enhance other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered (paragraphs 5.150 -5.153).

Ramblers have been campaigning here for around 20 years to remove through traffic from local roads (preferably with a tunnel) to make them walkable and crossable again. The rest of the landscape would stay the same.

This road scheme could be implemented with no modifications to any Public Rights of Way or unsurfaced highways. Bridges (or underpasses) can be used along the route and tunnelling options considered where necessary. Tunnels less than 150metres in length are considered to be bridges irrespective of method of construction. Short tunnelling methods could be considered for the Air Balloon site or for any of the crossing points or for the Green wildlife bridge.

If funding arrangements allowed, longer tunnel options could be used instead of the deep cutting either side of the Air Balloon site whilst remaining within the Preferred Option 30 route corridor.

Taking the new road under the Air Balloon site would resolve many issues at probably the most used crossing on the new A417 route, retain the landmark & historic Inn and maintain the long distance walking trails, the Cotswold Way & the Gloucestershire Way, on their authors' line.

As well as a 50 metre wildlife, flora and fauna green bridge to connect the Crickley Hill SSSI with the Barrow Wake SSSI, smaller green bridges along the route for footpaths, bridleways and tracks could go some way towards mitigating environmental concerns of the scheme.

Document GR-A417-HE-Proposals-Review-2019-10.pdf discusses implementation of some of the proposals

There should be a hierarchy of roads on completion of such a scheme. Although the new route is to satisfy demand for cross-country traffic, local traffic should still be able to make local journeys without using the busy new route.

The hierarchy of roads includes quiet country lanes and unsurfaced ancient highways (marked on OS maps as Other Route of Public Access or ORPA).

Types of Public Right of Way (PRoW) include Footpaths, Bridleways, Restricted Byways & Byways Open to All Traffic.

Walking routes can include all these types of PRoWs and roads. Other user groups can use a subset.

The Cotswold Way is a designated National Trail. It links places of interest, following the edge of the escarpment or dropping down into towns and villages. Its route uses footpaths, bridleways, tracks and roads - the variation in character is part of the enjoyment of the trail.

Shab Hill Junction

It has been said that this proposed junction could do with sinking and rethinking.

The junction is at almost the highest point in the landscape and takes the busy new A417 dual carriageway over the top of the A436 link, on a flyover. Prior to the junction the A417 is within a deep cutting. This cutting should be continued so as to keep the new road low in the landscape to travel below the A436 link, reduce visual impact and minimise spread of traffic noise. Keeping it low should also facilitate the use of bridges nearby for popular walking and riding routes.

Tunnels vs. Cuttings

Also see GR-A417-green-bridges-tunnels-2019-07.pdf and GR-A417-A27-tunnel.pdf

Highways England claims that the proposed Option 30 is a surface route from Brockworth Bypass to Cowley roundabout junction. However much of the route is within a deep cutting, some 20-30 metres below surface, at the depths of a tunnel but without a roof. In places the roof could be kept on the cutting to form a tunnel-like structure. Highways England has said that provided it is for a length of less than 150 metres it would be deemed a bridge and allowable within the scheme. However a longer tunnel would not currently be fundable within the scheme.

In places the route is challenging. The cutting has steep sides to avoid historic and other features. The landscape is built up of layers of underlying rock some easier to excavate and retain in place than others. Similar issues could apply to the construction of a deep cutting as to a tunnel.

The current projected cost of the scheme apparently including contingency is £435m well within the budget of £250m- £500m. Scaling from other schemes that use low cost tunnelling methods such as at Hindhead in the South Downs suggests tunnelling options could be within range.

Landscape

Ramblers' Charitable Aims enables us to defend footpaths and protect places we like to walk.

The current proposals

- Divert the Cotswold Way and Gloucestershire Way
- Extinguish footpath crossings
- Demolish the landmark Air Balloon Inn
- Impinge on the site of Emma's Grove Neolithic round barrows

The documents included as part of this response demonstrate that all of these can be protected.

Either Simplified (or greened up) Option 30 or Option 30 with Alternative 2 retaining the Air Balloon can

- Keep the Cotswold Way and Gloucestershire Way on their Authors' line
- Ensure safe footpath crossings
- Retain the landmark Air Balloon Inn – a meeting place for walkers

and in order to demonstrate environmental considerations of the scheme, include green flanked bridges across the new road to allow migration of wildlife, flora and fauna.

Highways England could create an exemplar scheme that is a good fit within the landscape of the Cotswolds AONB.

PEI Report and proposed mitigation measures

This scheme is located within a national character area – the Cotswolds AONB. The landscape viewed and enjoyed from along a PROW needs protecting and enhancing. The current proposal does not provide adequate detail of the landscape enhancements and mitigations that will occur.

Hedgerows alongside footpaths can enhance the walking experience, provide habitat for wildlife and provide some mitigation from noise and pollution created by the new road. Where hedgerows already exist they need to be conserved where possible and new hedgerows planted within the scheme.



Ramblers footpath teams have surveyed all the paths likely to be affected by the scheme and the design of crossing points can be reviewed. Green flanked bridges can be constructed by digging underneath from either side of a path. Alternatively a standard green bridge structure can be installed, the path surface reinstated & hedgerows replanted. There should be no need for standard concrete bridges with railings either side. Although a path might rise towards the centre of the bridge, the result can be a path that has the same character after construction as it did before.

The grounds of the Air Balloon Inn contain a registered veteran apple tree. Retaining the site keeps this tree and other trees around the site for future generations.

At Emma's Grove there should be a thorough assessment of the veteran and notable trees. If a deep cutting is used for the route of the new road a retaining wall is proposed at this location which would sever some of the woodland. This would not enhance the woodland experience here, of the Gloucestershire Way. Some thinning of the woods is proposed but beech woods alongside the path should be left undisturbed as the area is noted for its ancient beech.