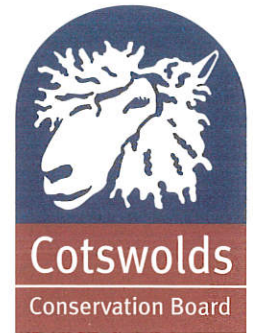


Nick Aldworth,
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24th March 2018

Dear Nick

A417 Missing Link Route Options Consultation

Thank-you for the opportunity to submit comments on the options consultation. As you know the Board has worked with Highways England (HE) and its predecessor since 2014 to identify and review suitable options for addressing the Missing Link.

The Board still believes that a solution to the Missing Link is necessary. We also firmly believe that all partners should strive to secure the right solution for this nationally and internationally important landscape. It has to be an exemplary solution that delivers the agreed Vision and Design Principles, a solution that everyone can be proud of since it would not be cost effective to revisit and rectify any shortcomings in the future.

We were pleased to jointly agree the Vision, Design Principles, Objectives and Sub Objectives for any scheme. We were also pleased with the progress through to autumn last year and the identification of 5 possible solutions.

We are concerned with the two options that have been taken forward to consultation and do not believe they meet the agreed Vision and its cascade to Sub Objectives or fully reflect the evidence gathered and then applied to the identification of options for taking forward to public consultation. Similarly we are concerned that tunnel options were not included within the consultation since HE clearly identified them as outperforming the surface route options on economy, environmental and social measures.

However, the consultation only offers one real option, since within the material HE clearly dismisses option 12 in preference for option 30. HE has not used its full set of evidence to genuinely consult the public on one or more of the far better environmental and landscape performing tunnel options. HEs assessment of options does not clearly relate them back to the agreed Vision, Design Principles, Objectives and Sub Objectives.

We believe that further consideration should be given to the tunnel options. Given HEs own evidence the tunnels should not be so readily dismissed at this stage and the general public should be consulted accordingly in future.

HE has a clear duty to have regard to conserving and enhancing the natural beauty of the Cotswolds AONB (Section 85 of the Countryside & rights of Way Act 2000).

Policy context is also provided by the National Planning Policy Framework (NPPF), paragraph 115 states "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."

Paragraph 116 states "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

Consideration of Option 12

HE identified this as joint 17 out of 20 options in February 2017 and discounted it as an option via engineering assessment. It was reintroduced following a meeting between HE & the Department for Transport (DfT) in November 2017 and given the evidence base its late reintroduction as an option in the consultation process was a surprise. It appears to be little more than an “aunt sally”.

If option 12 was dismissed in February 2017 it is difficult to see how it can meaningfully achieve the agreed scheme Vision and design principles.

Consideration of Option 30

Option 30 is the only surface route option from the October 2017 shortlist. It was the worst performing shortlisted option when compared against the assessment criteria. It had the best Benefits Cost Ratio (BCR) of the shortlisted options, but the BCR score was only 1 ie poor.

Option 30 was ranked 15 out of 20 in the assessment process. It has major junction implications, additionally damaging the landscape. It was the worst scoring shortlisted option in terms of the:

- Early Assessment & Sifting Tool (EAST and EAST Plus) processes
- Landscape Monetisation process
- Safety Assessment

In effect it was the cheapest but worst shortlisted option in autumn 2017.

Concern about the lack of tunnel options being advanced for consultation

A summary table depicting the relative merits of the 5 shortlisted corridor options compiled by HE and their consultants in October 2017, (as attached) clearly denotes that the tunnel options (3, 21, 24 & 29) more successfully deliver against the agreed Vision and design principles than any surface route. HEs consultation reports recognise that the tunnel options outperform the surface route options on economy, environmental and social measures, yet the tunnels have not been advanced to consultation.

HEs summary document doesn't compare the total lengths or gradients of options with each other to give like for like comparisons. However the tunnel options offer the lower gradients and in the majority of instances the shortest route length.

Similarly the summary booklet does not denote that due to their gentler gradient the tunnel options only require two lanes in each direction, whilst the surface routes need to retain three lanes, to include a crawler lane up Crickley Hill.

The tunnel options are clearly more successful at separating through traffic from local traffic, leading to less congestion and reduced surface traffic impacting on the AONB. The tunnel

options also offer less disruption to current road users during any scheme construction phase.

Consideration of A436 users

The identification of options has focussed on the A417 and HE and their consultants have admitted in meetings that the solutions put forward for consultation disadvantage the A436 user.

Option 30 requires an additional new link road to be constructed opposite the current Birdlip junction to provide access onto / off the new road. Traffic coming along the A436 from the A40 will need to travel across a bridge over the new A417 and then up towards Birdlip to a new link road onto the A417 to then travel back down the escarpment towards Gloucester. Traffic from Gloucester will have to travel up the new A417 to the new link road and Birdlip junction and then travel back down from Birdlip to access the A436 to Seven Springs and the A40. Option 30 is not a good solution for the A436 user.

Tunnel options would offer a much better solution for A436 users, with approximately a third of traffic travelling from Gloucester / M5 turning left at the Air Balloon.

The lack of consideration of Government's 25 Year Environment Plan

HE has not taken full account of the Government's 25 Year Environment Plan, launched in January by the Prime Minister, which aspires for the country to be recognised as a champion of a greener, healthier and more sustainable future for the next generation:

- Government wishes to embed a "net environmental gain" principle for development to deliver environmental improvements locally and nationally, but this cannot be meaningfully delivered for the A417 Missing Link with a surface route option;
- The Government wishes to apply a Natural Capital approach to decision making, but this has not been applied in the development of corridor options for the A417;
- The Government wishes to conserve and enhance AONBs, but the surface route options would damage the Cotswolds AONB;
- The Government is proposing to review National Parks and AONBs and consider the option for new National Parks, but the surface route options potentially compromise any consideration of the Cotswolds as a candidate National Park.

An incomplete Benefit Cost (BCR) assessment

The BCR scores are low for one option and poor for the other options. They are all below the normal 1.5 expected by DfT. At the same time they all fail to capture:

- Health and Wellbeing benefits for local populations, offering a reduction to the national prescription budget;
- The wider economic benefits and national and international economic tourism gains from a significantly improved landscape if the road is placed in a tunnel;
- Natural Capital benefits along the Cotswold escarpment;
- The public's willingness to pay for a tunnel option.

The Board understands that an extended BCR capturing this wider set of data and including the public's willingness to pay for a tunnel option was undertaken for the Stonehenge options assessment and cannot understand why this work was not undertaken for the A417.

The current proposal for Stonehenge is for a 2.9km tunnel, estimated to cost £1.6bn, which is the same estimated cost for option 21, of similar length. The tunnel options for the A417 appear to offer similar or better value for a more challenging gradient and landform.

The shortest tunnel, option 3, actually gives a better return on investment than option 12, reinforcing concerns that a tunnel option wasn't advanced to the consultation stage.

HE indicate that some of the wider economic analysis could not be undertaken due to the lack of computer memory and that improved computer memory will be available for the next stage of the process. Unfortunately good options will have been rejected by the time the larger computer memory is available.

The approach and methodology signalled in the Government's 25 Year Environment Plan has not been applied. The current BCR approach is in danger of being obsolete in the immediate future, yet the resulting road scheme will impact on the AONB for generations.

The scheme budget is the wrong budget

HE commenced the identification of corridor options with the wrong budget. The brown route (now Option 12) informed the original budget of £250m. It was obvious in February / March 2017 that this was an inadequate budget for any solutions that sought to meet the agreed Vision and design principles and the Board wrote expressing its concerns to HE on several occasions in Spring 2017.

The budget was only revised to a £250 – 500m envelope in Autumn 2017. At the same time the costings for Option 12 have risen to £465m, an 86% increase. Both options 12 and 30 are within the top 10% of the new budget envelope, reinforcing the point that the original budget was the wrong budget.

If the budget shortcomings had been addressed at an earlier stage the relative merits of tunnel costs compared to £500m guide figure would be quite different from being compared to a £250m figure.

Value for Money

Whilst value for money is not mentioned in the agreed Vision, design principles, objectives etc the Board fully recognises the need for value for money considerations.

It is clear from DfT advice from July 2017 that VFM is more than just BCR. The DfT advice identifies value for money as using public resources in a way that creates and maximises public value. Public value is defined as the total well-being of the UK public as a whole. This wider context reinforces the Board's concerns that the current BCR assessment was too limiting and did not capture the range of extended environmental, tourism and health and well-being benefits of the options. Similarly it did not reflect the Government's policies and thinking within the 25 Year Environment Plan and in particular the Natural Capital approach.

In that context the scheme's financial considerations, assessment and associated budgets need to consider value for money as a whole, taking account of the wider impact and benefits of any scheme and the national and international importance of the Cotswolds AONB.

Yours sincerely

E Eyre
Chairman

Sifting Methodology

- Step 1 – Engineering assessment
- Step 2 – Early Assessment and Sifting Tool (EAST Plus)
 - additional assessment of 5 corridor options through EAST Plus*
- Step 3 – Safety assessment
- Step 4 – Landscape:
 - opportunity mapping
 - landscape study
 - landscape monetisation
- Step 5 – Sustainability assessment
- Step 6 – National planning policy accordance*
- Step 7 – Cost and benefit cost ratio (BCR)*
- Step 8 – Sifting matrix*

* Update since VM3

Revised Sifting Matrix – following feedback

Sifting Criteria	Corridor Option	Corridor Option 3	Corridor Option 21	Corridor Option 24	Corridor Option 29	Corridor Option 30
Landscape Vision	Landscape Study	A	G	R	A	A
	Opportunity Mapping	✓	✓	✓	✓	✓
	Landscape Monetisation (£m)	£152.49	£52.76	£108.88	£113.88	£200.47
EAST Plus	Scheme Objectives CSR	2	1	4	3	5
	Environmental Objectives	3	1	4	2	5
	Landscape Objectives	3	1	4	2	5
	Strategic Objectives	2	1	4	3	5
	Economic Objectives	2	1	4	3	5
	Overall (excluding cost)	2	1	4	3	5
Safety Assessment		G	G	G	G	A
SDM (Sustainable Decision Model)		2	1	5	4	3

Revised Sifting Matrix – following feedback

Sifting Criteria	Corridor Option	Corridor Option 3	Corridor Option 21	Corridor Option 24	Corridor Option 29	Corridor Option 30
NPS	Air Quality	G	G	G	G	G
	Historic Environment	R	A	R	R	R
	Landscape & Visual Effects	R	A	R	R	R
	Geology, Soils	R	R	R	R	R
	Biodiversity	R	A	R	R	R
	Materials	R	R	R	R	R
	Noise and Vibration	G	G	G	G	G
	People and Communities	A	G	A	A	A
	Road Drainage and Water Environment	R	R	R	R	R
	Climate	A	A	A	A	A
	Cost (£m)	£876.57	£1,625.90	£1,210.31	£1,238.40	£501.79
BCR (ADJ)	0.67 (0.79)	0.4 (0.47)	0.46 (0.54)	0.48 (0.56)	0.82 (0.98)	



5 Route Corridors

