

**Highways Agency
Draft Route-based strategy: Evidence Report
Midlands to Wales and Gloucestershire**

Response of the Cotswolds Conservation Board

The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes¹:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) to increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

It is disappointing that the Board was not invited to send a representative to the Gloucestershire Workshop given the extent of discussion which appears to have taken place there regarding the A417 which is predominantly within the Cotswolds Area of Outstanding Natural Beauty.

The Board has been involved in discussions with the Highways Agency regarding journey reliability issues on this route on a number of occasions since 2005. However, it has also reminded the Agency of its duty under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of the designation of the AONB when undertaking its functions.

The Board has made clear that whilst some improvements to reliability may require route engineering solutions, these should be combined with modern traffic management measures in order to smooth traffic flows along the A417/419 route as a whole.

With regard to the draft RBS report the Board would wish to make the following points:

1. It is noted in a number of places in the report that the assertion that peak time congestion on the A417 is responsible for poorer economic performance in Gloucestershire is not supported by any evidence.

The draft Gloucestershire LEP Strategic Economic Plan for Growing Gloucestershire² states under 'Opportunity' (page 11)

'The economic heartbeat of Gloucestershire is the M5, flanked on either side by predominantly rural areas, with the Forest of Dean to the west and the Cotswolds to the east. Most of the employment and housing within the county is clustered around the M5 which runs from north east to south west close to Tewkesbury, Cheltenham, Gloucester and Stroud.'

i.e. the key economic driver for the future of Gloucestershire is the M5 corridor.

¹ Section 87, Countryside and Rights of Way Act 2000, as amended by the NERC Act 2006.

² <http://www.gfirstlep.com/home.aspx?LevelxID=39>

'Gloucestershire also plays an important role because of its connectivity to the Thames Valley and London via the A417/419 the Missing link which connects the M5 and M4.

i.e. the 'missing link' is a connectivity issue through Gloucestershire to places beyond, not necessarily a key economic development issue for Gloucestershire itself.

2. It is also clear from the RBS evidence report that congestion on the A419/417 route is worse around Swindon than at the 'missing link'. In paragraph 4.4.11 it is stated that despite the A419 around Swindon being one of the *'poorer performing sections'*, *'there are no current plans to improve the A419'*. Thus improvements at the 'missing link' alone will not significantly improve the performance of the route as a whole.
3. The LEP document itself states (Page 8) that *'the landscape is undoubtedly one of the county's major assets, with three AONBs, the largest of which is the Cotswolds... These natural assets are also more than just pictures on a postcard. They are an important component of the rural economy...'* The importance of the Cotswolds AONB to the rural economy is set out in the Report *'Assessment of the economic value of the Cotswolds AONB'* published by the Board in April 2013. (Copy attached to this response). Key points from that report are:
 - The Cotswolds AONB is worth £337m/year to the local economy;
 - 9720 jobs are critically dependent upon the quality of the Cotswolds landscape; and
 - 74% of business said that any deterioration in landscape quality would affect the performance of their business.

It should be noted that AONBs are a national asset, not just at county level.

4. The lack of any representation of environmental agencies (except the Environment Agency) and organisations at the workshop may have led to environmental impact concerns, many of which relate to statutory protections, being played down in the prioritisation process. However, it is noted that in paragraph 4.4.9 in the report that the issue of the 'missing link' was not given a high priority by the workshop participants. Suggestions as to why this is the case may be found in the RBS report itself:

Safety: '2.2.10. The A417/A419 DPFO falls mainly within the lowest two categories of casualty rate, i.e. generally good performance'

Capacity: '2.1.21. Whilst the A417 at Crickley Hill performs better than would be expected regarding average peak hour speeds...'

Reliability: Table 2.2 The A417 between the A429 and A436 ranks only 237 in the national list of least reliable journey times.

This evidence tends to suggest that it is not the case that 'if all the concerns across these measures were collected it is expected that this location [the A417] would be given higher priority' as it stated in paragraph 4.7.22. The lower priority for investment given at the workshops for the A417 probably truly represents the position across the whole route based network area rather than Gloucestershire alone.

It is also unfortunate that the 'number of discussions with key stakeholders since the workshops [regarding the A417] did not include the Conservation Board given its statutory role with respect to the Cotswolds AONB.

5. The Board agrees with the statement in paragraph 4.4.12 that (on the A417/419) *'interventions are likely to be required during the route based strategy period.'* The Board's concern is that the impact of a very significant engineering 'solution' at the 'missing link' alone to improve journey reliability times on the route will cause significant harm to the landscape, biodiversity and cultural heritage of the Cotswolds AONB (and thereby the rural economy) whilst not significantly improving the performance of the route as a whole.
6. It should be noted that in Table 3.1 'Key housing and economic growth proposals' the 'Eastern Villages' location is at Swindon, not Cirencester. The impact on the A419 is likely to be most felt around Swindon, rather than at the 'missing link' on the A417.