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Dear Mike

A417 Missing Link

Following the Highways England (HE) Preferred Route Announcement and the recent Technical Working Group meeting the Board wishes to make the following observations and ask the following questions:

Suggestions made following the February / March 2018 consultation:

- The Board has not received a formal response from HE to its letter of 3 September 2018 outlining tunnel improvements for Option 30. We do not consider that the issues raised in the letter were addressed at the meeting on 22 October with the Highways England team. The suggestions made last September related to potential improvements to Option 30, they were not a repeat of earlier shortlisted tunnel options assessed by HE.
- HE appears to consider that any or all tunnel options were dismissed at the end of the shortlisting stage (November 2017), when HE decided not to advance any tunnels to the February / March 2018 consultation. This should not be the case. Tunnels specific to Option 30 should be considered afresh since they would be of different locations, lengths and gradients compared to earlier shortlisted options.

Preferred Route Announcement:

- The Board's input to the selection of shortlisted options in 2016/17, its response to the February / March 2018 consultation and correspondence since then has questioned the lack of up to date methodology for the evaluation of natural capital and the economic assessment of options, the lack of net environmental gain policy and the lack of consideration of the public's willingness to pay for solution options. None of these issues appear to have been fully recognised in the announcement and yet we are over 12 months on from the HE Consultation and 15 months on from the Government's publication of its 25 Year Environment Plan.
- HE say in the recent Preferred Route announcement booklet that tunnel options ".....did not represent value for money as the return on investment was very poor." As highlighted in our consultation response of March 2018 one tunnel option gave a better return on investment than one of the options advanced to consultation. The statement in your booklet thus implies that at least one tunnel option should have

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been advanced to consultation stage in 2018 or that one of the surface road options (i.e. option 12) should not have been taken to consultation. It certainly indicates that tunnel options for Option 30 should now be fully explored ahead of any formal consultation.

- HE says that Option 30 provides a downgraded road between the Air Balloon roundabout and a new junction at Cowley. Can you explain this route please?
- HE says that Option 30 will provide a junction at Shab Hill that links to Birdlip. The Board has questioned the need for this route given its impact on the AONB landscape since spring / summer 2018 and still awaits HEs justification for this route. The evidence provided at the recent technical working group certainly highlighted the wider benefits of not providing such a link.
- For design to progress in the section of the route in deep cutting through the scarp, the need for, type and scale of any retaining structures makes an enormous difference - not just to design but also environmental impact and cost. It is understood that this is currently highly uncertain, much depending on the results of geotechnical studies. The Board asks HE to keep it informed on a regular basis, indicating your current best case and worst case scenarios, and any current working assumption; and that as you become better informed and the assessment of need for and options to address any need narrow, you keep the Board apprised of how these assumptions change.

The Board is currently very concerned that in such a sensitive part of the AONB the serious harm to the landscape arising from the proposed cutting (on a scale not dissimilar to that for the M3 at Twyford Down, potentially with retaining structures added) is such that it would clearly outweigh the benefits that the scheme might deliver in other respects. The presentations at the recent workshop reinforce the view that the significant net harm due to the severe impact of the length and depth of the potentially retained cutting through the scarp and larger highway crossing a relatively unspoilt part of the High Wold is not offset by the positive but relatively modest net balance arising from the beneficial removal of the main road from the vicinity of the scarp. The proposed green bridge does not adequately address the major impact of the cutting through the scarp. No overall net gain is in prospect.

The Board would appreciate your response as quickly as possible given the amount of work to be undertaken by the Board and the level of engagement you are expecting in the coming weeks and months.

Yours sincerely



Martin Lane
Director