



**A417 MISSING LINK - RELEVANT REPRESENTATION**  
**(REFERENCE NO. TR010056)**

Date: 1 September 2021

**BACKGROUND**

The A417 Missing Link road scheme is located entirely within the Cotswolds Area of Outstanding Natural Beauty (AONB).

The Cotswolds Conservation Board ('the Board') is an independent, statutory body that was established by Parliamentary Order in 2004.

The Board has two statutory purposes:

1. To conserve and enhance the natural beauty of the Cotswolds Area of Outstanding Natural Beauty (AONB);
2. To increase the understanding and enjoyment by the public of the special qualities of the Cotswolds AONB.

In furthering these two purposes, the Board also has a statutory duty to seek to foster the economic and social well-being of local communities within the Cotswolds AONB.

The Board has long accepted that there is a need to solve the significant concerns of public safety (including users of the Cotswold Way National Trail), traffic congestion and vehicle emissions on the existing A417 – and we fully understand the need for a scheme that mitigates these concerns. The Board also accepts that the scheme can, realistically, only be accommodated within the Cotswolds AONB, so therefore the A417 Missing Link should be in support of our statutory purposes.

The Board also acknowledges that Highway England's consultation and engagement has been good, especially over the past 12-18 months where a series of collaborative sessions with other key environmental stakeholders has led to scheme adaptations and improvements. We have commitment from Highways England to continue these collaborative sessions to refine the detail design on key aspects of the scheme.

**LANDSCAPE-LED**

A vitally important aspect of the scheme is the landscape-led vision, design principles, objectives and sub-objectives developed and agreed between Highways England and key stakeholders, including the Board. The challenge is to understand whether or not the scheme delivers against these. In their supporting documents Highways England state that landscape-led means that '*landscape is a primary consideration in every design decision that is taken*' and that '*the proposals have been designed to meet the character of the surrounding area, rather than changing the landscape to fit the proposals*'. Whilst we fully endorse these measures as components of a landscape-led approach, we consider that a fully landscape-led

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The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

[cotswoldsaonb.org.uk](http://cotswoldsaonb.org.uk)

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approach is one in which a proposed development would, on balance, be compatible with, and positively contribute to, the purpose of AONB designation. It is our belief that if the proposed scheme does not have substantially more benefits than negative impacts for the Cotswolds AONB then it is at risk of not fulfilling the schemes own design principles.

Furthermore, in the Board's opinion, past decisions about the scheme - when considering various options - would appear to have been budget-led rather than landscape-led. As examples, the following are extracts from '7.1-Case for the Scheme':

- 'A tunnel option was discounted due to the estimated cost (£1 billion)' - section 2.1.2.
- 'The tunnel options offered poor value for money' - section 2.2.12

It is, however, clear that landscape has been taken into account when taking forward and designing Option 30 and that some amendments, e.g. changing the gradient on Crickley Hill has had benefits for landscape in reducing both the cutting width and the volume of spoil to be transported off site.

## KEY QUESTIONS

When writing the Relevant Representation, the Board has considered four key questions:

### 1. WOULD THE SCHEME CONSERVE AND ENHANCE THE NATURAL BEAUTY OF THE AONB?

We consider the balance of adverse and beneficial effects on the factors that contribute to the natural beauty of the Cotswolds AONB (when compared to the current baseline) to be as follows:

- **Landscape quality/character:** net adverse effect, with some of these adverse effects potentially being significant.
- **Scenic quality/beauty:** net adverse effect, with these adverse effects potentially being significant in some locations.
- **Relative tranquillity:** net beneficial effect for both residents and users of public rights of way, particularly the Cotswold Way National Trail.
- **Dark skies:** net neutral or minor beneficial effect.
- **Natural heritage:** net beneficial effect, albeit with some significant adverse effects on a nationally important SSSI and on irreplaceable ancient woodland habitat.
- **Cultural heritage:** net adverse effect, with some of these effects potentially being significant.

Taking into account the great weight that should be given to landscape and scenic beauty, we believe it is important that we continue a positive dialogue with Highways England to find ways of mitigating these adverse effects.

### 2. WOULD THE SCHEME HELP TO PROMOTE THE UNDERSTANDING AND ENJOYMENT OF THE SPECIAL QUALITIES OF THE AONB?

We consider that the scheme would provide a net beneficial effect on opportunities for open-air recreation and on the recreational experience. This is primarily due to the recreational use of the re-purposed A417 and the reductions in noise levels on the Cotswold Way National Trail.

### 3. ARE THERE BETTER ALTERNATIVE OPTIONS?

Since the announcement of the preferred route in 2019, we have asked Highways England to consider a number of variations to this route. Highways England has recently provided two detailed reports on these suggested alternatives and we are in the process of reviewing these as part of the ongoing collaborative sessions, including updating the Statement of Common Ground document. We aim to provide a fuller response in the Written Representation.

**4. DOES THE SCHEME MODERATE DETRIMENTAL EFFECTS ON THE ENVIRONMENT, LANDSCAPE AND RECREATIONAL OPPORTUNITIES TO THE EXTENT POSSIBLE/ PRACTICABLE?**

Through the collaborative workshops with Highways England and their consultants during 2020, it was clear that there was a willingness to find solutions to moderate detrimental effects of the current scheme. However, there is more work required to further mitigate adverse impacts and fully maximise the beneficial impacts – especially with regard to landscape and scenic beauty.

In addition, the Board would expect Highways England to demonstrate that the road scheme is compatible with the government's commitments to combat climate change, adhering to all relevant legislation and guidance for climate change and nature's recovery.

The Board will make further Written Representation/s during the Examination to expand on matters included within this Relevant Representation.

**ENDS**