



Transport Action Network

*Response to:*

**A417 Missing Link  
Supplementary Consultation**

## Headline comments

- The proposed scheme will increase carbon dioxide emissions (from traffic growth and due to its construction) by almost a million additional tonnes at a time when we should be rapidly reducing our emissions to reach net-zero by 2050.
- The new road runs entirely within the Cotswolds Area of Outstanding Natural Beauty (AONB), and would introduce a new dual-carriageway into a sensitive and protected landscape.
- There is a very strong presumption in planning policy against building in an AONB unless there are overwhelming benefits. This scheme does not meet this threshold.
- The scheme severs two Sites of Special Scientific Interest (SSSIs) and will have a significant and permanent impact on rare and protected wildlife, despite the proposed mitigation.
- The proposed scheme adversely impacts on several important and protected species including Barn Owls, bats, rare invertebrates, Red and Amber listed birds, and badgers.
- The proposed scheme impacts on the settings of Scheduled Ancient Monuments (SAMs), particularly Crickley Hill Fort, and Emma's Grove.
- There is no indication that Highways England have revised their plans in the light of decreased travel due to the COVID19 pandemic which may reduce or remove the time savings and economic justification for the scheme.

## Introduction

The proposed scheme would consist of 3.4 miles (5.5km) of new dual carriageway and large junctions, running entirely within the Cotswolds Area of Outstanding Natural Beauty (AONB).

We formally object to the proposed new road (and the new design), on the grounds that it will not deliver sufficient benefits to justify the significant environmental costs within a protected landscape setting. Increasing road capacity also undermines key policy goals on environmental protection, modal shift, carbon reduction, air pollution and public health.

The primary purpose of this scheme is not to improve the local environment but to address what is seen by Highways England as a 'missing link' between the M4 and M5, at great financial and environmental cost.

## Justification for the scheme

The scheme appears to be justified on the grounds that it will fill a missing link between the M4 and M5, yet the scheme will increase air pollution and carbon emissions because of the extra traffic that will result and the longer distance the traffic would then travel. As this would cause more traffic to pass more houses, than were the traffic to go on the A34 and M40, its impact will be greater. Therefore, rather than being a missing link, it appears to be more of a lengthy, destructive and polluting diversion.

Previous consultations have shown an extremely low benefit-cost ratio (BCR) for the scheme where the financial benefits of a scheme are weighed against the negative impacts and a monetary value attached to how much benefit is gained for every £1 spent.

Due to the COVID19 pandemic and dramatically changed travel behaviour (more people working from home, meetings conducted virtually etc), there is an urgent need to revise the traffic forecasts and the transport/economic appraisal for the scheme to demonstrate that the scheme represents good value for money, and justifies the unacceptable impact within a highly protected area. Lower traffic forecasts will reduce the forecasted economic benefits used to justify the scheme. It is now unclear whether this scheme is needed or justified.

## Planning framework

We are particularly concerned that new road construction and increased road capacity is proposed in an Area of Outstanding Natural Beauty (AONB). AONBs enjoy special protection under the National Planning Policy Framework (NPPF) and the National Policy Statement for National Networks (NNNPS).

The NPPF 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. The conservation of wildlife and cultural heritage are important considerations in all these areas... Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.”*

We do not believe the “exceptional circumstances” or “public interest” conditions have been met.

The NNNPS (section 5.151)<sup>1</sup> states:

*“The Secretary of State should refuse development consent in these areas except in exceptional circumstances and where it can be demonstrated that it is 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 consenting, or not consenting 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; and*
- \* any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

We do not believe that the “exceptional circumstances” condition has been met, nor has Highways England properly examined non-roadbuilding alternatives (“meeting the need for it in some other way”) as required by this section of the NNNPS.

The NNNPS (section 5.152) states:

*“There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty.”*

This protection is very significant in planning terms. The case for building this road is far from compelling given its poor cost benefit ratio and certainly does not meet the test for building in an Area of Outstanding Natural Beauty. It should therefore be withdrawn as a proposal as it is not supported by the current planning policies.

## **Climate change**

A freedom of information request we made for the most recent Appraisal Summary Table (AST) for the scheme showed that in 2019 Highways England estimated the additional carbon dioxide emissions due to increased traffic from the proposed option would total 847,108 tonnes over the 60-year lifetime of the scheme<sup>2</sup>.

Chapter 14 of the Preliminary Environmental Impact Report (PEIR) states that the construction of the scheme would cause an additional 47,000 tonnes of carbon dioxide.

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/387223/npsnn-web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387223/npsnn-web.pdf)

<sup>2</sup><https://www.whatdotheyknow.com/request/650523/response/1554553/attach/6/A417%20Missing%20Link%20Appraisal%20Summary%20Table.pdf>

In total the proposed A417 Missing Link would lead to almost a million tonnes of additional carbon dioxide. This is simply unacceptable at a time when the UK must do all it can to rapidly and dramatically reduce carbon emissions. The A417 Missing Link takes us backwards on tackling climate change, whilst damaging a nationally important historic landscape, wildlife and biodiversity.

Although the National Networks National Policy Statement (NNNPS) requires schemes to be compared against national carbon budgets, this is actually not a useful comparator. The carbon emissions from this scheme should be compared to local and regional road transport emissions, not national carbon budgets for all sectors.

Also, the NNNPS and the national carbon budgets are extremely out of date and urgently in need of review. The NNNPS predates the Paris Agreement and the amendment to the Climate Change 2008 which commits the UK to achieve net zero emissions by 2050. The Committee on Climate Change has since advised that the fourth and fifth carbon budgets are likely not to be stringent enough.

As transport is the single largest carbon emitting sector in the UK it is a most critical sector to see reductions in emissions. In its 2020 Progress Report to Parliament<sup>3</sup>, the Committee on Climate Change said:

*“Surface transport emissions have been broadly flat over the past decade, falling only 3% between 2008 and 2018. Surface transport has emerged as the single highest emitting sector in the UK since 2015, and the current trend is off track to contribute as required to meeting the fourth and fifth carbon budgets and Net Zero.”*

In its recent The path to net zero report<sup>4</sup>, the UK Climate Assembly called for traffic reduction with a moratorium on road building until the mid 2040s.

Put simply, roadbuilding which leads to increased traffic and carbon emissions is completely incompatible with the major task of rapidly and dramatically decarbonising transport and achieving net zero emissions by 2050. It takes us in the opposite direction of travel needed.

## **Environmental impact**

The environmental impact is significant as the scheme runs in its entirety within the Cotswolds AONB. It would introduce a new, dual-carriageway with embankments, cuttings and large junctions in a sensitive and protected landscape, where previously there had been only a relatively low-impact single-carriageway road.

The images produced for this consultation are misleading. The view from Barrow Wake shows this major new dual-carriageway almost entirely screened by proposed planting. Yet it will be some time before these new trees reach maturity and provide the screening

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<sup>3</sup> <https://www.theccc.org.uk/publication/reducing-uk-emissions-2020-progress-report-to-parliament/>

<sup>4</sup> <https://www.climateassembly.uk/report/read/final-report.pdf>

illustrated<sup>5</sup>. In the meantime, this important landscape and views will be scarred by a major dual-carriageway.

The scheme would lead to the loss of seven bat roosts. It is concerning that there have been no tree surveys (for bats) in the Emma's Grove Scheduled Ancient Monument site, as there are mature trees there and this site is likely to be significantly impacted being immediately adjacent to the proposed scheme. We do not understand why access would be a problem. We are concerned that the proposed scheme would have a significant adverse impact on populations of bats that the PEIR considers of national importance.

We are also concerned about the significant impact on Barn Owl nesting sites in close proximity to the proposed route. We do not believe the proposed mitigation and very low estimated economic benefits of the scheme justify the harm to this Schedule 1 species.

The area is incredibly rich in biodiversity, with two SSSIs either side of the proposed scheme. The scheme would have a negative impact on Red and Amber listed birds, rare butterflies, snails, slow worms and other invertebrates. We do not believe that the limited benefits of the scheme outweigh this impact on biodiversity.

We object to the loss of any ancient woodland and veteran trees. No planting of new trees can ever make up for their permanent loss. The scheme does not have significant enough benefits to warrant the loss of these irreplaceable trees.

The scheme would also lead to a loss of over 11 hectares of semi-natural broadleaved woodland of national importance. This is unacceptable given the scheme's limited benefits.

Although we welcome the moving of the green bridge to reduce the impact on National Trust and Gloucestershire Wildlife Trust owned land at Crickley Hill, this is still not enough to reduce the impact of this scheme for it to be acceptable.

## **Historic and cultural impact**

The scheme will also impact on the setting of two Scheduled Ancient Monuments, Crickley Hill Camp and Emma's Grove which contains three round barrows.

## **Roadbuilding is only a temporary solution**

Providing new road capacity can only be a temporary solution to congestion. The phenomenon of induced traffic is well-established. This has been seen for example at the Dartford Crossing in Kent, where repeated increases in capacity have been overwhelmed by growing demand.

In the longer term, we advocate a more strategic multi modal approach to long distance travel including a shift to rail freight as envisaged in the Government's recent Rail Freight Strategy.

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<sup>5</sup> A Live Chat with Highways England staff at the online exhibition said it would take at least 15 years for this proposed screening to reach maturity

Investing to improve the capacity for rail freight has multiple economic benefits as well as being significantly less environmentally damaging. There are cross-cutting benefits from the inward investment for passenger rail, creating a virtuous circle of improved alternatives and reduced demand for road space.

For local traffic, we are already seeing reduced demand due to changes in working practice due to the COVID19 pandemic, with more home working, and virtual meetings. Rates of cycling and walking, as a form of transport, have increased dramatically since the pandemic too leading to less car journeys. Highways England must urgently review the need for the scheme in the light of reduced travel demand.

## **Conclusion**

We object to the scheme as it clearly fails to meet the major development test for construction within the AONB, and goes against national planning policies. We do not believe that the already slim forecasted traffic and economic benefits outweigh the significant impacts, and that the purported benefits could be further reduced due to changed travel behaviour as a result of the COVID pandemic.

We do not accept that the proposed mitigation will sufficiently ameliorate the very large adverse impact of the scheme, nor will any mitigation happen fast enough.

We believe that the impact on the protected landscape, combined with permanent loss of habitats, increased air and noise pollution and increased carbon emissions, provide clear grounds to reject these current proposals.

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Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

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