

Summary

This document highlights those factors we believe should be taken into account during the detailed scheme road design and before route options are selected for public consultation. Specifically, we have highlighted those issues that would result from the A46 being rerouted onto the A435. This is an updated report (see "Background" section below) of a previous 2020 version, made to reflect changes in the local landscape together with new information. Document adopted by Teddington and Alstone Parish Council 15th November 2022.

There are five major issues to consider:

- **Environment.** In addition to a new development needing to comply with Borough and national criteria, any development adjacent to or along the A435 poses significant risk of severe negative impacts to local residents from increased air, noise, light and visual pollution. Flooding risk, which has previously caused major problems, could also increase.
- **Safety.** Road safety is already sub-optimal under current road configuration and signage. Expansion of the A435, increased traffic volumes, dualling and mixing through with local traffic will all lead to a more dangerous junction for entering and exiting Teddington village.
- **Severance.** The local amenities at The Teddington Hands Roundabout are very important for villagers, many of whom are elderly. The loss of or reduction in local services would be keenly felt, as would any interruption in existing road or pedestrian access.
- Cotswold National Landscape (CNL), a designated Area of Outstanding Natural Beauty. This borders the A435 & Teddington and encompasses Alstone. The closer any new development approaches the CNL, the graver any negative impacts will be on its current standing. Similarly, the Special Landscape Area to the north of Teddington currently enjoys protection from development in preference to land to the West of the A435 and this priority should be maintained.
- **Proportionality.** Traffic volumes using the A46 in 2021 were lower than in 2012. Future growth will come from medium term development of the new retail parks and, longer term, from housing volumes and perhaps a Garden Town. This suggests a new scheme must also address an online solution for a detrunked (but busier) A46 as well as adding a bypass. Also, a single rather than dualled bypass should be sufficient for through traffic, especially given it will join with an eleven mile stretch of single carriageway as the A46 runs into Worcestershire.

In our view, these issues will only be addressed if a new road development takes place to the west of both the A435 and the existing A46 Teddington Hands roundabout. An alternative route proposal put forward by Gloucestershire County Councillor Vernon Smith in 2021 proposed just this and was widely supported by villagers. We would like to see this route option properly assessed.

Our detailed supporting comments are attached, grouped under the headings of 'Strategic' and 'Local'. We believe these make a number of compelling arguments for choosing a bypass route which does not align with the A435.

Background

In April 2018, the Teddington & Alstone A46 Advisory Group (TAAG) was formed to represent residents' concerns with the implications of a proposed upgrade of the A46. TAAG's objective is "to prevent any expansion or redirection of the A46 which would have a negative impact on our villages". In pursuit of this,



TAAG has kept up to date with public announcements, established a number of key relationships with relevant organisations and continues in our work to ensure key decision makers understand the legitimate concerns that we raise.

Our primary goal is to avoid any deterioration in our rural environment and disruption of our local community. Villagers have chosen to forego the richer amenities and relative convenience of town living to enjoy life in a peaceful rural community, something which would be unfairly eroded by injudicious routing of a new road.

Over the last year it has become increasingly evident that using the A435 appears to be the only route option being considered by National Highways and Gloucestershire County Council (GCC). This is confirmed by their 2018 Road Investment Strategy (RIS) submission (not taken forward), a confidential e-mail from Atkins copied to us inadvertently and the rejection of an alternative route proposal (west of the A435) put forward by Councillor Vernon Smith and supported by villagers. Choosing the A435 would represent the worst case scenario for our villages leading to lengthy disruption during the build phase, followed by a permanent loss in our current quality of life. While resident numbers here are small in relation to Ashchurch, improvements sought there should not be at our expense.

In August 2020 we were invited by Councillor Vernon Smith to produce a report which summarised the collective views of village residents regarding the design and nature of a proposed scheme to build a new bypass of Ashchurch. This report, signed off with Teddington and Alstone Parish Council, has been subsequently shared with numerous organisations including National Highways, Western Gateway, the A46 Partnership Group, Laurence Robertson MP and a number of elected Tewkesbury Borough and Gloucestershire County councillors.

When our report was produced it was in anticipation of a public consultation taking place in early 2021. This was subsequently delayed to late 2021 and then again to September 2022. It has now been further delayed to late 2023 at the earliest.



APPENDIX - STRATEGIC & LOCAL CONSIDERATIONS

STRATEGIC: The road classification in the context of local and national objectives

There are a number of relevant considerations:

- a) <u>Funding.</u> The submission and approval process being followed for the new bypass proposal is outside of the national strategic Road Investment Strategy (RIS) program. As a large local major (LLM) funded scheme, the business case should prioritise local requirements over wider national interests, particularly as this choice of funding option will require 15% of build costs to be funded by GCC.
- b) Environment. Local Authority policies to deliver carbon neutral targets and the widespread declaration of climate emergencies, reflect the continuing growth in public demand to take action on environmental issues. The business case for many new road schemes relies heavily on an assumption of a massive switch to electric vehicles. While short term progress has been good, there remain a number of technical and practical challenges that question whether the extent of such change will be sufficient to deliver longer term on published targets. The 'net zero' requirement is exacerbated locally by an additional need to counter the negative effects of the associated development of a new Garden Town.

The use of lower speed limits on any new road, would help improve road safety and reduce pollution.

For wider context on mode of transport, the environmental section of Western Gateway's strategic transport plan references the need for a modal shift away from the private car and supporting a greater use of rail, cycling and walking. These outcomes require a reduction rather than growth in future road traffic volumes.

- c) <u>Covid-19.</u> With the pandemic lockdowns hopefully well behind us, it is clear that road and rail commuting patterns have not returned to normal. There is evidence (2021 Census) of a permanent shift to more flexible working with an increase in home working. This calls into doubt relying on traditional business case assumptions on the growth in future traffic volumes.
- d) Local traffic volumes. We have looked at data provided for two Department for Transport (DfT) count points along the path of the A46; one on the A46 in Ashchurch and one just to the north-east of the Teddington Hands roundabout. In both positions, 'all motor vehicle' traffic volumes in 2021 were down c20% from 2019 (i.e. pre Covid) and c10% down on 2010. Therefore, over a 12 year period the baseline position is actually a reduction in volume. The current commercial and residential development adjacent to the M5 combined with the proposed long-term development of a new Garden Town will clearly lead to future increases; therefore, a solution needs to consider online interventions as well as looking at bypass options. In any case, a single carriageway bypass that will double combined capacity appears more proportionate than an all-purpose dual carriageway which will triple current capacity.
- e) <u>Ashchurch Garden Town masterplan.</u> Since Ashchurch was awarded Garden Town status in 2019 the concept plan has evolved to reflect changes such as the loss of targeted MoD land. The most recent concept plan published in 2021 extends development further south and east with an indication that access points to enter and exit a new bypass are key requirements. The associated additional roundabout interventions question the suitability of a dualled through road.
- f) The A46/M69 strategic corridor. This has been promoted as a 70 mile economic corridor, although seemingly based on industries located along rather than reliant on it (e.g. we are advised 95% of the traffic going north from the M5 on the A46 is not going further than the M40). While reference continues to be made to a long term strategic route, the priorities of Midlands Connect have seen



changes with older proposals to add new bypasses at Beckford and Evesham either removed or deferred. This challenges the logic of building a new dualled Ashchurch bypass which then joins with an 11 mile single carriageway road running to and beyond Evesham. It is inconsistent, unnecessarily expensive and will simply add congestion from merging traffic where these meet.

- g) <u>Induced traffic.</u> Historical analysis by the CPRE suggests many business case growth benefits cannot be evidenced, particularly where these relate to reduced journey times which are then negated by induced traffic*. Furthermore, a significant proportion of induced traffic will be HGV's (which won't be electric or hydrogen anytime soon) which will continue to elevate rather than reduce carbon emissions.
 - *Independent research commissioned by CPRE published in 2017 concluded that new road schemes increase traffic beyond normal growth due to encouraging longer commutes and adding route choice.
- h) Mixing local and through traffic. Separating local from through traffic supports the longer-term ambition of the Garden Town, it would also optimise traffic flow and improve road safety. However, reducing local traffic volumes is likely to be very difficult to achieve by simply de-trunking the A46 given a sizeable proportion of traffic, including HGV's, will continue to need to access retail and industrial units in Ashchurch and Tewkesbury. Similarly, the addition of thousands of new houses and the opening of an outlet village will further add to traffic volumes passing through Ashchurch rather than using a new bypass. This further questions the required capacity for a new bypass and the need for it to be dualled.

Conversely, avoiding the use of the A435 within a bypass route, would enable local and through traffic to be separated and deliver traffic flow and road safety benefits.

LOCAL. The positioning of the new road as this approaches the Teddington Hands roundabout These are the key local factors to highlight:

- a) Cotswold National Landscape (CNL), designated as an Area of Outstanding Natural Beauty. The CNL borders the road running through Teddington (Alstone is wholly within it) and extends to the line of the A435. We would not expect routing to cross into this area. However, as set out in Section 85 of the Countryside & Rights of Way Act 2000, it is equally important that any new road does not lead to any visual or other impairment being experienced from within the CNL (e.g. from Oxenton Hill or housing in Teddington). We understand the CNL has provided feedback that significantly increasing traffic volumes along this stretch of the A435 would be a major concern.
- b) <u>Special Landscape Area (SLA).</u> The land to the north of Teddington as this meets with the A435 and B4077 roads respectively, is designated by Tewkesbury Borough Council (TBC) as a" Special Landscape Area". Originally introduced in 1982, an extract from the 2019 TBC Joint Strategy Document states that "While SLA's are of a quality worthy of protection in their own right, they also play a role in protecting the foreground setting for the adjacent AONB.". We highlight that this designation exists in contrast to land to the west of the A435 and north of the A46, which carries no special status. We would expect the valued landscape of the SLA to be wholly protected in priority to other lower designated land in design decisions.
- c) Environment. The potential adverse environmental impacts for our villages are a great concern whether this be from 1) a deterioration in air quality due to higher emissions (including tyres and brake-pads) from more traffic and more proximate traffic combined with prevailing westerly winds, 2) an increase in road noise due to proximity, road type, tyre noise at high speeds and prevailing westerly winds, 3) visual impairment caused by any elevation or bridging works or 4) additional light pollution from new road lighting, more roundabouts, possible elevations and volumes of traffic at night.



While we know that the new road proposal must satisfy all required environmental legislation, including recently adopted policies on tackling climate change, we do not want to experience a localised deterioration from any of these factors even if those legal requirements were met overall. The A46 Partnership Group has stated that "reducing noise and pollution levels for our communities" will be a significant benefit from any development.

- d) <u>Severance.</u> The garage, local stores and public house at the Teddington Hands roundabout provide important local amenities for villagers, many of whom are elderly. This was particularly highlighted during the covid-19 pandemic and these services continue to see growth in their use. It is essential for the quality of village life that safe walking and driving to these facilities continue without interruption from new road development.
- e) <u>Road safety.</u> Exiting from Teddington onto the A435 is already a challenge at certain times of the day with existing traffic volumes. In particular, turning right carries some risk if traffic travelling south from the Teddington Hands roundabout attempts to overtake traffic ahead at the same time. Signage here could be improved *now*. If the A435 were to become the bypass this would magnify safety concerns.
 - This stretch of the A435 is regularly used by farm vehicles to access land on both sides of the A435. Combining this with an increase in fast moving through traffic, will add to safety concerns along with hold-ups and congestion.
- f) Recent new developments. The William Gilder truck-stop and associated services has been further extended in recent years and now occupies a sizeable area abutting both the A435 and A46 to the south west of the Teddington Hands roundabout. This would be adversely impacted by any dualling of the A435, whereas a new road running further to the west would leave it untouched and still able to access the new road.
- g) Cost and undeveloped land. Possible arguments for using the A435 in a bypass scheme such as reduced cost or not building a new road on existing undeveloped land are flawed. Firstly, the contested stretch of the A435 from the junction of the A435/B4079 to the Teddington Hands roundabout is only just over a mile long and any additional cost for building a parallel road is dwarfed by M5 junction considerations together with offsetting savings from reducing/eliminating compulsory purchase orders and from not reconfiguring the A435. Secondly, the most recent Garden Town concept plan already sets a precedent to re-purpose existing undeveloped land to the East of Pamington for commercial development.
- h) <u>Flooding.</u> The heavy rainfall in July 2007 identified a significant problem with run-off water arriving from the higher ground to the south and east of Teddington being unable to adequately drain to the north of the village resulting in flooding within the village itself, along the A435 and at the Teddington Hands roundabout. Storm drain works were enacted to resolve future problems and the integrity of these needs to be preserved as well as ensuring new development does not lead to additional local flooding risks.
- i) Historic Monuments. There are two Grade II listed historic monuments located on either side of the A435 just before this joins the Teddington Hands roundabout The Teddington Hands Sign Post and The Tibblestone. If the integrity of access to local services is retained, then so is the access to both of these.
- j) <u>Existing A46 route.</u> The location of the existing section of the A46 between Aston Cross and the Teddington Hands roundabout is capable of allowing a new road to join with it, together with associated new roundabouts, while avoiding existing commercial developments. This would also support Garden Town proposals to join with new developments to the north of Aston on Carrant.



k) Network Resilience. In the event of accidents etc. (on either the M5, old A46 or A435) additional road network resilience would be provided by keeping the A435 and a new bypass separate. Wider congestion and disruption would result from the A435 being used as the bypass.

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