



M5 J9 & A46 Transport Scheme – Public Engagement event 7th October – 2nd December 2024

Teddington & Alstone A46 Advisory Group (TAAG) Submission of feedback on the route options

1. Summary

While TAAG recognises the need to address the congestion on the A46 through Ashchurch, neither Options A or B are without issues as they will both have negative impacts on Teddington & Alstone and the surrounding villages and communities.

Not surprisingly, Route B is our preferred option but this isn't just because it will have less impact on our villages and residents. Option A would cause considerable harm to *all* communities adjacent to the current A435 including increased air, noise and light pollution and worrying safety issues with access onto it. Beyond this, we believe there are also significant legitimate reasons why Option A is not viable and should be unacceptable as a solution. These are explained in further detail later in this submission and are also highlighted in the report commissioned from Gerald Kells by TAAG but include;

- Safety issues at the junction of A435 with Teddington village for *all* road users
- Cotswold National Landscape encroachment by a widened A435
- Safety issues and congestion caused by mixing local and strategic traffic
- No contingency for diverting traffic in the event of an incident on the A435
- Not future-proofed to deal with increasing levels of traffic

Initially TAAG's focus was primarily on Options A and B as these we felt had the most impact on our villages and residents. We have subsequently come to understand the differing impacts Options 1, 2 and 3 would have on traffic numbers and therefore now feel we should have a view on the Western section route options too. This is explained further later in this submission.

2. Introduction and Background

In April 2018, TAAG was formed to represent residents' concerns with the implications of a proposed upgrade and redirecting 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 its work to lobby key decision makers to ensure they understand the legitimate concerns that we raise.

TAAG has produced two reports since 2018 which set-out these concerns and the reasons why we believe that the A435 should not be considered a suitable route for the redirected A46 going forward. These reports were shared with the Project Team, key Borough & County Councillors, our MP and other stakeholders.

So, we were hugely disappointed when, on 7th October, the route options were published with 3 of the 6 options utilising the A435.

We wanted to ensure that our residents fully understood the route options proposed and the impact these would have, as well as encouraging as many of them as possible to complete the public engagement survey and show a preference for Option B over A.

3. TAAG Questionnaire & Drop-in Event

To this end, TAAG organised a questionnaire to collate residents' concerns and questions and to inform TAAG's submission. We received 111 responses, with 77 from Teddington and Alstone villages, 19 from Oxenton & Woolstone and the remainder from Gotherington, Pamington and Woodmancote. These respondents consisted predominantly of car users, but also cyclists, pedestrians, horsebox and tractor drivers. The issues that were of most concern, should Option A be implemented, were;

- safety at the junction to Teddington village
- isolation of the village from the facilities at the Teddington Hands roundabout
- disruption during the construction phase
- increased traffic noise once the road is built
- wider concerns about future road and pedestrian safety.

The majority were very concerned about pulling out into heavy traffic as well as driving alongside HGVs. A majority also stated that, if the junction to Teddington village becomes difficult to use due to congestion, they would find an alternative route out of the villages. This would of course lead to heavier traffic on the quiet lanes around and between our villages. A sample of Quotes from the questionnaires has been included in Appendix A.

While the project team were holding their own public engagement events, TAAG felt it was important for local residents to have their own drop-in event locally in the village hall. As well as giving residents the chance to meet and question the project team, TAAG wanted to share our Pros and Cons for Options A and B, including what we believe had been missed in the table in the engagement brochure. We had an excellent turnout from the community, as well as county councillors, Parish councillors and residents from our neighbouring villages such as Oxenton and Gotherington. Everyone felt it had been useful to see the enlarged maps of the routes and talk to the project team about their concerns. We also captured more residents' questions. These, along with those raised from the questionnaire, were submitted to the project team for a response. It had previously been agreed that they would endeavour to answer as many questions as possible, so that these could be shared on our website. The project team also offered to update their FAQ document on the Have Your Say website. It was noted that members of the project team stated that a number of questions were 'details to be addressed later', an unsatisfactory response in the context of a meaningful engagement, given the significant impact on the community.

TAAG has also, during the public engagement period, been making leaflet drops to every house in Teddington and Alstone, producing newsletters and posters to ensure every resident is aware of the route options proposed, the impact we believe the new road would have and to encourage as many residents as possible to engage with and complete the Public Engagement survey.

4. Gerald Kells Options Review

To add further weight to our case and also provide an objective, professional view, TAAG commissioned Gerald Kells, a Campaign and Policy Advisor with a particular interest in Transport, Housing and Strategic Development. We asked him to review the Route Options to inform this submission and he has produced the report included with this submission.

5. Western Section Options 1,2 and 3

Initially TAAG were agnostic about route Options 1, 2 and 3 as on face value they didn't appear to have any adverse effects on Teddington & Alstone. Also, we are acutely aware that these 3 routes have differing detrimental effects on our neighbouring villages.

However, Gerald Kells' report highlighted that, under Option 1, the new Junction 9A on the M5 would operate as a two-way connection. This configuration would result in reduced traffic on the new route, offering advantages such as improved safety and decreased air, light, and noise pollution due to prevailing winds.

In addition, Option 2, and particularly 3, could create a wider development boundary resulting in increased traffic on the new route with a particularly noticeable rise in HGV traffic. This is because, unlike cars, the additional HGVs using the route would almost all be travelling all the way from the M5 to Teddington Hands.

As a result, we note that the difference in impact between Options A and B would be more significant under Options 2 and 3 and this would weigh against those options if Option A (which we disfavour) were chosen.

6. Eastern Section Options A & B

Having given a lot of thought over the years as to why bringing the A46 down the A435 was an inherently bad idea, TAAG naturally favoured Option B from the start. We wanted to ensure, however, that we had considered both options as fairly and objectively as possible. Accordingly, TAAG produced our own version of the Pros and Cons table (Appendix B) in the Public Engagement brochure as we felt that several significant issues had been missed or not given sufficient emphasis. This helped us and the residents get a clearer picture of why Route B was preferred and why Option A should be discounted. These issues are expanded on below.

We are aware that choosing Option B over Option A means that the new road would be closer to our neighbours in Pamington. Nonetheless, Option B would still be further away than the current A46. Admittedly, the road may be visible from those houses that sit adjacent to the B4079 but this could be easily mitigated with tree/hedge planting. Also, we feel that due to the prevailing winds being from the west, any increased traffic noise and associated pollution would be minimal.

a) Safety issues at the junction of A435 with Teddington village for *all* road users

Option A would result in the volume of traffic using the A435 South of Teddington Hands roundabout, increasing by over 15,000 vehicles per day; from 8,500 to c.24,000.¹ On average (as we don't have the peak time data, nor the split north/south), this equates to an extra 10 vehicles per minute in each direction (or 16 in total), resulting in a vehicle every 4 seconds on average; it would be even worse at peak times. This would effectively prevent access to and from

¹ Analysis of shortlisted options Figure 9-3 – 2031 2 way 12-hour traffic flows for shortlisted options versus no scheme

Teddington village, or at the very least make it extremely dangerous particularly if you factor in the farm traffic and horseboxes that use this junction regularly.

It has also been pointed out that with Option A there would be reduced visibility north on the A435 from the Teddington village junction because it would be close to the curve which starts the approach to the new roundabout on the B4077 Stow Road. Likely necessary mitigations for both safety issues would be a 40 mile per hour speed limit and no-overtaking restrictions on the A46 for some distance on either side of the Teddington junction (as has been recently introduced on the A46 north of Sedgeberrow due to safety concerns and a number of serious accidents).

This could foreseeably also lead to drivers looking for alternative ways out of the villages, to avoid the busy A435 and new junction. This would result in increased traffic on the quiet lanes surrounding and joining the 2 villages. These quiet lanes are used by farmers, walkers, cyclists and horse riders and are not suitable for additional traffic.

b) Cotswold National Landscape (CNL) encroachment by a widened A435 (Option A)

The CNL is designated an Area of Outstanding Natural Beauty (AONB). As such it benefits from protection under the National Planning Policy Framework (NPPF)². The CNL borders the A435 and Teddington village and encompasses Alstone.

Paragraph 183 of the revised NPPF 2024 reads “When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than *in exceptional circumstances*, and where it can be demonstrated that the development is in the public interest.”

As there is an alternative route option that does not encroach on the CNL, we don’t believe it will be possible to demonstrate these are exceptional circumstances nor that the encroachment is in the public interest.

c) Special Landscape Area (SLA) encroachment by new road (Option A)

The Tewkesbury Borough Plan Policy LAN1 Special Landscape Areas³ states

“Proposals for new development within Special Landscape Areas, as identified on the Policies Map, will be permitted providing:

- *The proposal would not cause harm to those features of the landscape character which are of significance;*
- *The proposal maintains the quality of the natural and built environment and its visual attractiveness;*
- *All reasonable opportunities for the enhancement of landscape character and the local environment are sought.*

Where a proposal would result in harm to the Special Landscape Area having regard to the above criteria, this harm should be weighed against the need for, and benefits from, the proposed

² National Planning Policy Framework 2024

https://assets.publishing.service.gov.uk/media/66acffddce1fd0da7b593274/NPPF_with_footnotes.pdf

³ Tewkesbury Borough Plan 2011-2031

<https://tewkesbury.gov.uk/wp-content/uploads/2023/11/Tewkesbury-Borough-Plan-Final-Version-with-front-cover.pdf>

development. Proposals causing harm to the Special Landscape Area will only be permitted where the benefits from the development would clearly and demonstrably outweigh the identified harm.”

Option A cuts across a designated SLA, the fields between Teddington and the Teddington Hands Public House. As such, we don't believe that the above criteria are met, not least in the presence of an alternative proposal.

d) Safety issues and congestion caused by mixing local and strategic traffic

Separating local traffic from strategic through traffic, as delivered by (Option B) supports the longer-term ambition of the Garden Communities project, it would also optimise traffic flow and improve road safety. This is particularly true for the A435 which is used by farm traffic, cycles, pedestrians and by horseboxes. These slow-moving vehicles would not only slow the strategic traffic, but could cause congestion at junctions along this section of the A435. This would foreseeably lead to more accidents as impatient drivers take unnecessary risks to try to overtake the slow-moving vehicles.

e) No contingency for diverting traffic in the event of an incident on the A435

With Option A, there is no suitable contingency should an incident cause the upgraded A435 (expected to be renumbered the A46) to be blocked. From the north, traffic could be diverted onto the old de-trunked A46 to J9. However, the only roads available if coming from the new J9A, are the Seven Bends Road B4079 (which has a weight restriction on it currently) up to the Aston Cross lights and then back on the existing A46 to Teddington Hands roundabout.

f) Not future-proofed to deal with increasing levels of traffic

It seems inevitable, from the limited traffic modelling that we have access to, that the levels of traffic will only increase over time, particularly with the development of the Garden Communities and associated employment areas (and wider plans to meet the Government's new housing targets). Option B would provide a more robust and future-proof approach as the 2 roads (the new A46 and the existing A435) would share the increased traffic and, more importantly, would have greater potential to link-in with strategic improvements to the A46 trade corridor (the aspiration of Midlands Connect).

g) Huge disruption, diversions and delays during construction

Although both route options are likely to cause significant disruption during the build phase, upgrading the A435 and building the roundabout on the B4077, would cause complete traffic chaos as there are no suitable alternative roads for safe diversions.

The construction would also result in high levels of noise and pollution which would need to be mitigated against. Teddington village and the properties adjacent to the A435, would be particularly affected in view of the westerly prevailing winds; Option B less so as it is further west.

h) Severance of Teddington Hands facilities and public footpath

A lot is made in the Public Engagement literature about reducing severance and improving the experience for walking and cycling; indeed, it is one of the Scheme Objectives. Option A would fundamentally sever village residents from their only facilities; the local pub, shop and garage at Teddington Hands roundabout. The new road behind the pub actually cuts through a public

footpath from the village to the Teddington Hands roundabout and no clear proposal for an alternative has been forthcoming.

The increase in traffic, particularly HGVs, would make crossing the new road hazardous and would inevitably discourage residents from making the journey.

It isn't clear from the literature how the scheme could improve the experience and address the severance for Teddington & Alstone or if this issue has been considered at all. Also, details of how this will be addressed were not provided in the project engagement sessions, suggesting that the issue has not been recognised as significant and the cost implications have not been taken into account.

i) Increased traffic noise, light pollution and air pollution affecting Teddington residents

Both route options would cause an increase in traffic noise, light pollution and air pollution but, Option A would be worse by far for Teddington and Alstone residents, particularly those properties adjacent to the A435. This isn't recognised in the Public Engagement literature which states that there would be little difference between the 2 options. Also, there are very few suggestions for how these could be addressed by clever design and/or mitigating interventions other than a mention of 'noise barriers' which of course wouldn't address the increased pollution levels. In conversation at the village hall session, a project consultant suggested that high wooden fences (of the type used on motorways to shield urban housing) might be used. Given the landscape context, these seem an entirely inappropriate solution.

Of particular concern is the new section of road to be built to the east of the existing Teddington Hands roundabout. We've been told that this new section of road will be only 460m from our village playing fields. As these are to the east of the road, the prevailing westerly winds will carry the air pollution in the playing fields direction.

j) Risk of increased collisions

The Safety section 2.6 of the Analysis of shortlisted options, makes no mention of the potential for an increase in collisions on the A435. Indeed, it states "Paragraph 4.61 of the NN NPS relates to minimising road casualties arising from development and ensuring that development contributes to an overall improvement in the safety of the strategic road network."

Option A radically increases the traffic volumes using the A435, including at the junction to Teddington which is likely to increase collisions.

Furthermore, on the existing A46 the existing Teddington Hands Roundabout is much closer to the new roundabout than would be the case in Option B which may lead to congestion and consequently, more collisions.

Although an enhanced junction at the A435/Alstone Road Junction and a new roundabout at the junction of the A435 and the B4079 have been proposed, we have seen no evidence of how these would address the safety issues highlighted above and no projected collision data for Option A has been provided in this latest consultation.

7. Conclusion

There are many legitimate reasons why Option B is the preferred route option and why Option A should be taken off the table entirely. Should Option B be chosen, it will still have adverse impacts on our villages and mitigating interventions will be required which at this stage of the scheme development, have not been considered.

Conversely, Option B would reduce traffic on the existing A435 which would have safety benefits but would not in itself address all the existing safety issues or issues on the B4709. Option B, because of the reduced traffic on A435, provides the opportunity to introduce further safety measures to address these existing issues which are highlighted in Gerald Kells report paragraphs 8.12 – 8.16. We believe, that should option B be the chosen route, then the existing safety issues on the A435 and B4079 should be resolved at the same time as the road is built and residents should be consulted on the design of the respective solutions.

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A sample of quotes from TAAG's questionnaire

"It makes sense to keep the A435 as a local road and to separate HGV traffic that is heading for the M5 junction from local traffic, thus ensuring continued safe access to amenities at Teddington Hands for local people."

"Cycling as a sustainable means of travel from the villages will only be considered by people if there are suitable roads."

"Option B would be the better of the two options but still very close to Teddington and would create noise and light pollution. To keep the A435 as it is now is a far better proposal as it will keep the local traffic separate from long-distance vehicles. Option B is also further away from the children's play area and the CNL."

"Our children enjoy the independence of walking to our only local shops at the Teddington garage but with such a drastic increase in traffic that Plan A would create I would feel that this would no longer be safe."

"B" minimises impact on nearby AONB and reduces traffic along Poplar Row. The single carriageway link of option A promises to continue the traffic congestion already seen on the A46"

"Option A doesn't seem to have any thought or regard to homes located on the West side of the A435 outside of Teddington Village, plus the Traveller site further down the road. In the same vein, the proposed new roundabout on the B4077 will be directly on the boundary of an existing bungalow, and the exit road will run across a field directly in front of a large farmhouse. Are these properties to be the subject of compulsory purchase orders? Indeed, were these property owners involved in the creation of Option A?"

"In addition, it is not hard to see that the entrance to Teddington village will become unusable for extended periods. Given there is only one other option for leaving the village, this a single-track road shared with farming vehicles, how are residents expected to cope during these extended periods of the newly built A46 road construction?"

Furthermore, given roads will be closed, and access to villages will be limited, it should be understood that there are no easy alternative routes available that are not longwinded, narrow, pot-holed, dark, and lacking street lighting."

"Option B has the least impact in terms of CNL as the proposed route is further away from the boundaries, this option also has no SLA impact. Option A however has a higher CNL impact and an additional SLA breach. Option B is therefore the least impactful."

"As an Oxenton resident the only access into and out of the village is onto the A435. I am very concerned about increased congestion and safety."

"I understand that Option B will have challenges; notably crossing the Tirlle Brook flood plain. Instead of looking at this as a negative we could take the opportunity to increase biodiversity along the new road with native trees hedgerows and ponds. It could be something really positive to take away from the scheme."

A46 M5 Junction 9A Routes Options Engagement Eastern Section Options Comparison

Option A Pros	Option B Pros
<p>Meets all objectives Safety improvements around business accesses at Teddington Hands Avoids need for longer new road and crossing the Tirlle Brook flood plain zone west of A435 Lower forecasted cost but similar value for money.</p>	<p>Meets all objectives Avoids incursions into CNL(AONB) and cutting across Special Landscape Area Visual and noise impacts from CNL more easily mitigated with careful planting Fewer negative impacts on Teddington, Travellers community on A435 and Oxenton residents No safety concerns for drivers exiting and entering Teddington village junction on A435 No impacts on business accesses at Teddington Hands No mixing of through and local traffic, including equestrian and farming traffic Roundabout on A46 will potentially allow access for development south of Aston on Carrant Huge opportunity to increase biodiversity along new road; hedgerows, native trees, ponds etc. A435 will remain a contingency route in the event of issues on the new road.</p>
Option A Cons	Option B Cons
<p>Impact on hedgerows and trees along A435; leading to possible increased flooding on A435 and negatively impacting biodiversity Greater traffic noise affecting Teddington residents Worse air and light pollution for all bordering A435 Road will need to be elevated in places Crossing the SLA to the east of A435 (protected in Tewkesbury Borough Plan) Footpath across from Teddington to facilities at Teddington Hands severed Visual and noise impacts along the Cotswold National Landscape boundary Incursions into CNL; protected by planning law Safety issues accessing Teddington and Alstone villages Teddington Playing Field, located very close to new road option; increased pollution near children playing Increased traffic volumes in Alstone and Dixton villages as vehicles avoid busy A435 Huge diversions and delays during build period (less applicable with route B) Less impulse use of facilities at Teddington Hands.</p>	<p>Visual impacts from CNL; mitigated by careful planting Longer length of road More expensive than Option A (similar value for money) No safety improvements to businesses accesses at Teddington; could be improved at a later date.</p>