

# Valley Parishes Alliance

Protecting & enhancing the communities in the Avon & Limpley Stoke Valley, East of Bath

**Bathampton   Bathford   Claverton   Freshford**  
**Limpley Stoke   Monkton Combe   Winsley**

The Valley Parishes Alliance was formed in April 2010. It is a cross-county border alliance of seven rural parishes (five B&NES and two Wiltshire). Taken together, the seven parish councils which form the VPA represent over 7,000 residents (and over 5,500 electors).

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(via hard copy and eMail)  
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26<sup>th</sup> January, 2018

Dear Sirs,

## **STRATEGIC ROUTE NETWORK (SRN) INITIAL REPORT CONSULTATION**

I write to set out our views on the future of England's Strategic Roads, with the focus being on the question of whether there should be any change in the roads included in the SRN.

The representation sets out our views on -

- (a) The aspiration of Bath and North East Somerset Council (B&NES) - part of the West of England Combined Authority (WECA) - that an A36/A46 link road, east of the City of Bath, be included in the next Road Investment Strategy (RIS2).
- (b) The compelling case for the A350, north of Warminster, being made part of the SRN.

Linking the A36 and A46, which are part of the SRN, is highlighted in the South of England North-South Connectivity Prospectus (October 2017). This document sets out an outline economic case for inclusion of improvements to north-south transport links, between the Channel Ports of Poole and Southampton and the M4 corridor, in RIS2.

Two preferred link road scheme options are identified in the West of England Joint Transport Study (October 2017) with an associated cost estimate of £100m.

WECA recently approved funding to develop and promote the South of England North-South Prospectus, with a view to encouraging the Secretary of State for Transport to mandate Highways England to carry out a Strategic Study, including determination of whether an A36/A46 link road should be included in RIS2.

In considering an A36/A46 link road it should be highlighted that any option, including both of those identified in the West of England Joint Transport Study, would fall within the Avon & Limpley Stoke Valley, which lies entirely within the Green Belt and forms part of the Cotswolds Area of Outstanding Natural Beauty (AONB) and setting of The City of Bath World Heritage Site (WHS).

Against the above background, and in anticipation of the Secretary of State mandating the requested Strategic Study, we will present key considerations which demonstrate why any link road scheme, whether intended as a Bath relief road or an SRN improvement, can already be shown to be unjustifiable and that furthermore, there is a sustainable and effective solution to Bath and regional traffic issues which involves the A350 as part of the SRN.

## **1. A36/A46 Unsuitability**

The A36 within the topographically challenging Limpley Stoke Valley is geologically unstable and has required enhanced maintenance regimes, and consequent extended road closures, in order to retain the integrity of the route, e.g. to maintain the steep embankments of Limpley Stoke Hill.

The instability of the A36 was cited at the 1990 Batheaston Public Inquiry as pivotal evidence for the long-term unsuitability of a proposed link road between a new Batheaston Bypass and the A36 at Dry Arch - subsequently rejected by the then Secretary of State for Transport. The unsuitability of the A36 through the Limpley Stoke Valley was again highlighted in the DfT's justification for the 1994 'East of Bath to Beckington' scheme (subsequently withdrawn in 1996).

The A36 is also subject to problems of village severance and incident clusters. These problems are common with the topographically constrained A46, which is also the location of local subsidence, "noise important areas" and severe congestion. All the above A36/A46 issues are highlighted in the 2014 and 2017 South West Peninsula Route Strategy Reports and West of England Joint Transport Study.

Both the A36 and A46 are intrinsically unsuitable for the significant additional traffic, particularly HGV movements, which would result from a link road. This significant increase in traffic, both predicted and induced, would exacerbate all the route problems described above, and have incremental cost implications for both roads, over and above the high capital cost associated with a link road scheme.

## 2. Bath Traffic & Air Quality

**Bath traffic** is predominantly 'local', i.e. not dominated by through-traffic, and levels have, if anything, been declining.

A link road might *initially* alleviate congestion on London Road (the principal eastern artery within Bath) but any released capacity would soon be taken up by suppressed demand and the Bath area, as a whole, would see little or no improvement.

Through-HGV movements constitute a very small percentage of total traffic. These and other HGV movements could be reduced by measures other than a link road. These measures are summarised in sections 4 & 5 below, and detailed in Appendix A.

**Air quality** data from a London Road automatic monitoring site show that levels of particular matter (PM<sub>10</sub> and PM<sub>2.5</sub>) do not exceed government air quality objectives. Annual average nitrogen dioxide (NO<sub>2</sub>) concentrations have exceeded the objective level at a number of locations and an Air Quality Management Area (AQMA) was declared in 2002.

NO<sub>2</sub> concentrations in the London Road - A36 Warminster Road corridor of the AQMA have been falling in recent years with sites now approaching or below the annual average objective. This trend is encouraging. Furthermore, B&NES predicts that the annual average objective level will be met at nearly all London Road - A36 Warminster Road corridor sites by 2020. This prediction does not allow for any B&NES air quality improvement actions and reductions in vehicle emissions are due solely to an improvement in engine and fuel technology.

In this regard it is important to note that, from a source apportionment study presented in the B&NES Air Quality Action Plan, diesel cars contribute approximately the same oxides of nitrogen (NO<sub>x</sub>) as HGVs in the London Road area.

Given the foregoing and against a backdrop of continued decline in diesel car sales and implementation of B&NES short/medium term air quality improvement actions it is entirely reasonable to expect that air quality objectives will be met at virtually all London Road - A36 Warminster Road corridor locations, without any link road scheme.

## 3. Environmental Impact

Any link road option would have (undisputed) severe adverse impacts on the Green Belt, AONB and WHS landscape setting and recreation amenity (for Bath and wider community), irreversibly blighting the exceptional beauty of the Avon & Limpley Stoke Valley.

It is of grave concern, therefore, that the two preferred link road options are a scheme rejected at the 1990 Batheaston Public Inquiry and a scheme "connecting A36 (south of Bathampton) to A363 (near Bathford, south of A4 roundabout)" which is equivalent to the option rejected by the 2004 Government commissioned Bristol/Bath to South Coast Study.

Irrespective of budget it would be impossible to build a structure - particularly one associated with the latter option which would straddle the Limpley Stoke Valley - which could mitigate, by design, the severe adverse impacts of large junctions, gantry signs, lighting and noise associated with thousands of vehicle movements daily.

The 1990 Public Inquiry conclusion of the link road as - *“having intolerable impacts on landscape and being devastating to recreational amenity”* - is unambiguous and remains wholly relevant.

A photograph showing the area of the Limpley Stoke Valley AONB and WHS landscape setting which would be blighted, if either of the link road options were built, is provided in Appendix B: Figure 10.

#### **4. Regional Road Network**

The nearby A350 is the principal north-south route through Wiltshire. Sections of the Chippenham Bypass have been significantly improved in recent years and further works to improve roundabout junctions and make other sections dual carriageway are underway. In addition, improvement works will be carried out at Junction 17 on the M4 to address safety and congestion issues.

These improvements, and further upgrades north of Warminster, e.g. a Westbury Bypass (western route), would greatly enhance the strategic function of the A350, enable economic growth across Wiltshire, and importantly, attract through-traffic, particularly HGVs, away from Bath. The A350 is more level, more easily navigable and does not suffer terrain instability problems when compared with the A36/A46 trunk route.

A scheme for a new M4 Junction 18A and an associated link to the A4174 Ring Road is in the early stages of development. It is expected that this could deliver significant traffic relief to the A46 corridor and eastern Bath.

#### **5. Conclusions**

The VPA concludes that -

- (a) An A36/A46 link road, irrespective of route and whether intended as a Bath relief road or a SRN improvement, is not viable. Moreover, it would cause (undisputed) severe environmental damage which could not be mitigated.
- (b) There is a compelling case for further improvements to the A350, north of Warminster, and making it part of the SRN.

The upgraded A350 would improve regional north-south connectivity through Wiltshire while alleviating problems of through-traffic, particularly HGVs, in Bath.

This, together with public transport improvements (bus and rail) in Bath and implementation of other measures to reduce the impact of local and through-traffic (Refer Appendix A) would provide a sustainable, effective solution to eastern Bath traffic congestion and air pollution, and make the idea of any link road redundant.

- (c) This solution, potentially complemented by Bath traffic congestion relief arising from the proposed new M4 Junction 18A and link road to the A4174 Ring Road, would achieve the overriding objective of protecting the unique status of *both* The City of Bath World Heritage Site and its landscape setting, whilst also affording wider regional benefits.

I hope that you will find our representation constructive and that you give great weight to the key considerations set out above and discussed/illustrated in more detail in Appendices A & B.

Yours faithfully,

Hugh Baker  
Chairman

CC (Via eMail)

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