

## Part B

Name or Organisation: **Claverton Parish Council**

### 3. To which part of the Core Strategy does this representation relate?

Page number: 129, paragraph 6.94

Policy / Proposal: Policy 6f (Well connected)

### 4. Do you consider the Core Strategy is:

- |                         |     |                          |    |                                     |
|-------------------------|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound*            | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

### 5. Do you consider the Core Strategy is unsound because it is not:

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| (1) Justified                       | <input checked="" type="checkbox"/> |
| (2) Effective                       | <input checked="" type="checkbox"/> |
| (3) Consistent with national policy | <input checked="" type="checkbox"/> |

#### 6b Why you consider the Core Strategy is unsound:

We are concerned by the statement in Policy 6f, paragraph 6.95 that - "*The Council .....recognises the need for studies to assess .....an A46/A36 link*".

This, superficially, innocuous statement has significant implications which are in direct conflict with many other policies within the Core Strategy. Its inclusion is not based on a robust evidence base and does not reflect long standing and valid environmental concerns expressed by both the local Bath and wider community and at a previous public inquiry into such a scheme.

For many years an A36/A46 link road has been suggested as a possible above ground eastern bypass to the City of Bath. However, it is universally accepted that such a scheme would have a devastating impact on the Cotswolds Area of Outstanding Natural Beauty, City of Bath World Heritage Site landscape setting and recreational amenity of the area.

This highly controversial scheme is not the answer to traffic congestion and air pollution problems in the City of Bath. It is both unsustainable and undeliverable.

Further considerations are as follows:

**(a).** The Core Strategy Spatial Options Document - Consultation Report omits, e.g. on pages 61-63, any reference to the detailed concerns expressed in Claverton Parish Council's representation on an A36/A46 link road. Similar concerns are known to have been expressed in representations by other organisations and Parish Councils. For the convenience of the Inspector, the following comments summarise the key issues raised in the Claverton Parish Council representation on the A36/A46 link road. These comments further underpin why we consider the inclusion of the link road in the Core Strategy to be unsound.

**(b).** It has been firmly established that bypasses attract extra traffic. Rather than building an extremely expensive link road, thereby encouraging traffic to the Bath area, lower cost measures should be employed to discourage through-city traffic in the first place.

## 6b continued

The number of through-HGVs which would be removed by a link road is too small to justify the undisputed and permanent damage which would be done to the Avon & Limpley Stoke Valley and City of Bath World Heritage Site landscape setting.

The damaging impact of HGVs on the city can be tackled by other measures which would remove more HGVs (through N-S, E-W & local) than a link road. These measures, which are outlined in the B&NES draft Air Quality Action Plan, include the relatively low cost HGV ban on Cleveland Bridge or the A36 Warminster Road, as originally proposed by the Council in 2005. Such a ban is the only acceptable option to protect both the City of Bath WHS and its landscape setting. It is considered that an effective and enforceable ban can be formulated and it is understood that B&NES Cabinet strongly supports such a scheme.

It is also important to note that the recently approved development of the Deep Sea Marine Terminal at Avonmouth will significantly reduce the volume of HGV traffic between south coast ports, via the Bath A36/A46 corridor, and the M4/M5 interchange area.

**(c).** The wider harm and disbenefits which a link road would bring, outweigh any presumed benefits. A link road would not solve Bath's traffic congestion problems because traffic is predominantly local, as highlighted by B&NES:

*"In the Bath urban area, Government figures suggest that fewer than 1 in 20 cars represent through traffic during the morning rush hour, so a bypass would not tackle the thousands of cars whose destination is Bath"*

**(d).** The many statements made in the B&NES draft WHS Management Plan and West of England Partnership Joint Local Transport Plan (JLTP3) and other key policies within the Core Strategy make it clear that protection of both the WHS and its landscape setting constitutes, in planning parlance, "a very special circumstance".

This has been brought into sharp focus by the 2009 Government Circular on protection of WHSs, the 2009 B&NES "Bath WHS Setting Study" and the 2008 City of Bath UNESCO report and Seville Convention in 2009. In particular, the UNESCO report highlights the need for reinforced protection of both the surrounding landscape and the views to and from the City of Bath.

The concerns and considerations outlined in these key reports reinforce previously expressed concerns about the dramatic impact which an A36/A46 link road would have on the Cotswolds AONB and WHS landscape setting, in particular those expressed at the 1990 public inquiry which rejected comprehensively a proposal for an A36/A46 link road as being "*..intolerable in its landscape impact and devastating to recreational amenity*" - unambiguous words which remain wholly relevant.

**(e).** Against a background of the vision, objectives, strategies and policy statements in the draft Core Strategy, and these recent international, national and local reports on the WHS and its landscape setting, it is very clear that no case can be made to justify the continued presence of an A36/A46 link road in B&NES/West of England transport planning.

**(f).** An A36/A46 link road and the, now planned, 1400 space Park and Ride on Bathampton Meadows would combine to have a catastrophic impact on the landscape and amenity of the whole area east of Bath.

Set against the vision, objectives, strategies and policy statements in the draft Core Strategy, this must *never* be allowed to happen

**(g).** The absence of the A36/A46 link road from the West of England JLTP3 transport Vision to 2026 is welcomed. Looking towards 2026 and beyond, B&NES must relinquish, once and for all, any aspirations for an A36/A46 link road through the City of Bath WHS landscape setting and Cotswolds AONB.

To do otherwise would be to undermine the credibility of the Core Strategy and signal B&NES intention to abandon the WHS landscape setting rather than protect it.

**7b Change required to make the Core Strategy sound:**

The reference to the A36/A46 link road on page 129, paragraph 6.94 of Policy 6f should be removed and no other references to a link road should be inserted.

**8. If your representation is seeking a change, do you consider it necessary to participate at the public hearings part of the examination?**

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

**9. If you wish to participate at the public hearings, please outline why you consider this to be necessary:**

To reinforce the arguments for removal of any reference to an A36/A46 link road in the Core Strategy.