West Hatch Parish Council (WHPC) Comments on A358 dual carriageway proposals.

**Executive Summary**

1. The Consultation Process is flawed. The required consultation with affected Parish Councils has not been performed.

2. The three Objectives of easing congestion, of supporting economic growth along the corridor and of improving safety will not be achieved.

3. Our villages, hamlets and houses neighbouring the dualled A358 will suffer from increased local traffic, accidents, noise and pollution.

4. Agriculture, the major business along the A358 will be adversely affected.

5. The proposed Option 8A/B + NFS gives poor benefit-to-cost ratio,

6. The proposal will damage both agricultural economy and, without a north-going spur to Jct25 behind Henlade, the development of Taunton.

7. The proposal is a very expensive interim measure, the main beneficiaries being holiday makers travelling to and from the South West Peninsula.

**1. Consultation Process**.

 Despite the fact that the A358 cuts West Hatch Parish in half, WHPC has NOT been consulted earlier on the present proposal, as stated in the Technical Appraisal and as demanded by Section 43 of the Act. Only a high level meeting in November 2016 has been held with representatives from several parishes and other bodies. Parish Council opinions on the preferred Option and others in the Technical Appraisal were not sought. Furthermore the coincidence of the consultation period with local and general elections means that politicians are unavailable for discussion and hence the consultation process is flawed. From the number of errors in the Technical Appraisal (see Appendix 1), it appears the Report has been rushed to publication.

While WHPC appreciates that the proposals are at an early stage, the effect on the local community cannot be ascertained until we know more about the detail of the intersections and the number and location of the proposed local traffic crossing, joining and leaving points. Without such detail, the effect on local vehicular, cycle, equestrian and pedestrian traffic cannot be known. Of particular concern is the potential loss of access across the dual carriageway for personal, agricultural, academic, ecclesiastical, business, etc, purposes and the resulting increases in journey times, costs, use of natural resources, pollution and congestion on the local roads through our villages. West Hatch Parish is already divided by the present A358 and we welcome the statement that *“Furthermore, the protection and enhancement of public rights of way and access is encouraged, for instance where national road network severs communities and community facilities and acts as a barrier for walking and cycling, developers are expected to correct historic problems and ensure easier and safer access for NMUs.”* WHPC believes that this should also apply to all NMUs including equestrian and to vehicular traffic.

 Although the details of such corrections have not been provided by Highways England, WHPC will make its own proposals concerning intersections and crossings later in this response document.

**2. General comments on the three scheme Objectives.**

WHPC believes the three main objectives (easing congestion, supporting economic growth and improving safety) of this multi-million pound development are not met to any significant extent by the present Option 8A/B + NFS proposal, as is explained below:-

i) **Traffic congestion** along the A303-A358-M5 corridor will remain a problem.

**a)** The 10-13% overall cut in traffic through Henlade is not likely to improve congestion at the M25 junction during peak hours of the working week, on weekend market days and during holiday periods. Any ecological benefit (noise and pollution) to Henlade environment will be offset by the devastation to the countryside caused by this massive development, particularly the large interchanges proposed at Junctions A, B, C & D.

**b)** The proposal will result in increased traffic on the M5 causing further congestion on this already overloaded route. This will further justify its name as the “M5 Car Park”, particularly apt throughout the summer holiday periods.

**c)** The Southfields roundabout is a major source of congestion. Without plans to deal with this, the present proposal can only make this pinch-point worse, producing more, not less, congestion. South-west bound A303-A358 traffic blocks three other access points onto this roundabout; increasing this traffic will further increase congestion on all the other entries.

**d)** Why has traffic data from mid-week values in October been used for traffic modeling, whereas the report itself states that that the congestion is worst in the mornings and evenings and exacerbated by summer holiday and weekend traffic (6.2.1). Table 3.2 shows an almost 50% greater traffic flow on a Saturday in August than the modeling day in October ! Clearly wrong data have been used to deal with the congestion objective and hence the objective will not be achieved.

ii) It is not conceivable that the new dual carriageway by-passing Taunton will **support economic growth** “along the corridor” in this part of the South-West. In fact the local businesses along the route will be by-passed by through traffic and local agricultural industry will be disadvantaged by loss and division of, and by reduced access to, agricultural land. In particular, it is not clear why a north-going spur to link with Junction 25 and the planned Nexus 25 employment site has not been favoured.

 The report provides no evidence of joined-up thinking between HE, SCC and TDBC and hence these proposals cannot deliver on this objective.

iii) It is questionable whether the scheme will **improve safety**. Local knowledge and the Technical Appraisal suggests that the A303 Ilminster by-pass, the Southfields roundabout and the A358-Junction 25, most of which will

presumably see increases in traffic, are the major sources of traffic accidents in the local area. Increasing speed by dualling the A358 is likely to result in more serious accidents than occur on this stretch at present as -indicated in the Technical Appraisal for Option 8+NFS showing a negative benefit in the accident domain (Table 7.2).

**Our conclusion** is that the main aim of Highways England was not to achieve the three stated objectives but rather to simply facilitate traffic flow from London and the SouthEast to the SouthWest Peninsula using the new dual carriageway to link to the M5,

This is an expensive and disruptive interim measure, which does not meet the stated Objectives. Because in 5-10 years the M5 will have become a complete nightmare, an alternative route parallel to and separate from the M5 is **now** needed to link the M3/A303/A30 to the South West Peninsula. To further load the M5 at this time is complete nonsense. Lorry drivers have stated that they are likely to continue to use the shorter (Table 3.3) and more fuel economic A303/A30 route from the Southfields roundabout to the M5 near Exeter rather than the proposed dual carriageway and the problematic M5!

Until Highways England ***grasp this nettle***, improvements of the intersections at each end of the A358, namely the Southfields and the M25 junctions, could provide better a cheaper and ecologically friendlier interim solution than the present proposal. A 50 mph limit fully monitored and policed would reduce the number and severity of accidents and smooth traffic flow as proved to be the case elsewhere, e.g. M25.

**3. Comments on the decision re- Option 8/NFS.**

Although there are many questions unanswered and some errors (see Appendix) in the Technical Appraisal, the comparison of the Options (Table 0.1) does not give 8/NFS the best score on any of the criteria. This ‘preferred’ option provides a negative benefit on accidents (-£314K) and on noise (-£837K) and the least benefit on total Economic Efficiency for Users and Providers (<£396m) whereas Option 2A/2B provides >£560m. On construction cost, 8/NFS is the cheapest at £244m but only 7% lower than the average of £263m and probably within the margin of error for such estimates. But most importantly, overall **on benefit-to-cost ratio**, **8/NFS is the worst**, being 20% lower than the best BCR value (Table 0.1),

There is no satisfactory explanation of the illogical decision to recommend Option 8/NFS, over for example Option2A/B Rather a number of platitudes are cited, many of which according to the other parts of the Technical Appraisal could be delivered by all the options.

 **4. Comments on specifics of the proposal**

a)The West Hatch Parish is split by the A358 but presently has 3 potential vehicular crossing places within or nearby the parish, none of which are suitable for NMUs. These are in regular use for the normal social and

business interactions of parishioners including schooling, scouting, religious and agricultural journeys. Although detail has not yet been provided, it would appear only the narrow and difficult Griffin Lane crossing may remain. This will interfere with the normal activities of this rural community and drive the traffic onto fewer narrow country lanes through our villages and hamlets. More crossing points are needed for vehicular and NMUs. We ask that, at least, the crossing point at Bickenhall Lane be retained in the form of a bridge or underpass. Limiting the crossing by failing to do this will increase traffic through our villages and hamlets. This increase in traffic will likely affect Frost Street and Higher West Hatch Lane, lanes which are close to the ancient woodland of Thurlbear Woods and the nearby SSI.

 b) The narrow country lanes are already subject to high use. We are very concerned that, if connections with West Hatch Lane are made at Junction B, there will be increased traffic on these very narrow lanes used extensively by NMUs. In particular, we are worried that users of the dual carriageway may be directed with ‘sat navs’ from Junction B via the West Hatch Lanes through potential short cuts (rat runs) specifically in the case of problems on the new route. We ask that there be no local exits from the dual carriageway at Junction B (see alternative proposal below). It is particularly important that West Hatch Lane is closed off from the dual carriageway on both sides so that no highway traffic can access this minor, narrow, winding lane with its clusters of houses close to the road. But we would hope for a correction of an historic problem by a re-connection of the two parts of West Hatch Lane separate from Junction B. Also of serious concern, in the present proposal, is that the narrow lane through Meare Green could become a ‘rat-run’ between the A378 and the remnant of the A358 in order to give a shorter route to and from Junction B, i.e. avoiding the Thornfalcon intersection.

 c) The increased local traffic, kept off the A358, will increase accidents on country lanes and through narrow villages adding to the ‘accident dis-benefit’ of Option 8/NFS and creating new places of increased noise and pollution in rural communities not benefitting from the proposal.

 d) The large 3 dimensional structure with night lighting planned for Junction B, is particularly contentious. Firstly, being low lying and close to Huish Woods, it is subject to flooding and is an important area for wildlife. Secondly it will seriously affect the Somerset Progressive Special School and the Scout Camp, two important assets for the local and wider community. The Scouts have had this beautiful quiet rural site for local, national and international camps and jamborees for XX years. To have it spoiled by a large, illuminated junction would be discriminatory versus the Scouts in favour of SWP travellers.

**5. Alternative proposal: Minimise Junction B:-**

WHPC proposes that at Junction B there is only a slip road off the NW-going carriageway which crosses the dual carriageway to join the now blind A358 and

a slip road onto the SE-going carriageway from the old A358 (i.e. 3 Way Free Flow 'Y' Layout).

The new slip road off the dual carriageway would be signed “Langport and local traffic only (not Taunton)”.

This would be ideally combined with a Jct25 split as one approaches the M5, as planned in Options 2A/B and 8/Jct25

The following advantages would accrue:-

 i) less loss of both agricultural land and natural habitat, less noise, less air and light pollution.

ii) reduced cost.

iii) directs dual carriageway traffic to Junction A and not through Henlade, providing real benefit to Henlade, especially likely if combined with a later Jct25 split as the dual carriageway approaches the M5.

iv) reduces accident risk from leaving and joining traffic at Junction B

v) with money saved more crossing-only points could be constructed, e.g. at Bickenhall Lane. Depending where the dual carriageway goes off-line from the present A358, this bridge could join to the remnants of the present A358, direcly or via other local roads on the northeast side, allowing local traffic from the south-east side (Bickenhall, Curland, Staple Fitzpaine, West Hatch RSPCA, etc,) to access the old A358 to and from Taunton as they do at present.

vi) The A378 and other local traffic from the north east side (Hatch Beauchamp, Beercrocombe, Curry Mallet, etc) will still be able to use the present A358/Henlade route to access Taunton and the M5 at the Thornfalcon intersection.

This alternative proposal of minimizing junction B has no obvious disadvantages compared with other options being discussed.

**Summary.**

1. The Consultation Process with West Hatch Parish Council to date, one of the worst affected parishes, has been very unsatisfactory.

2. The three Objectives related to congestion, economic growth and safety appear secondary to getting holiday traffic to the South-West peninsula.

3. Our villages, hamlets and houses neighbouring the dualled A358 will suffer from increased local traffic, accidents, noise and pollution.

4. The agricultural economy, for which Somerset is renowned, will be adversely affected.

5. The proposed Option 8A/B + NFS gives the worst benefit-to-cost ratio.

6. Without a north-going spur to Junction 25, Taunton’s development will be slowed and Henlade will remain polluted.

7. The proposal is an excessively expensive interim measure, mainly benefitting holiday traffic to the South West Peninsula.

**Appendix 1: Errors and equivocal or contentious statements.**

Pg 2. mid-week in October is likely to be low rather than ‘neutral’

 Pg2 ‘Aspirations of Road Investment Strategy are that A303/A30 corridor should be an expressway !!’ So why are HE doing the A358 as an expensive interim ??

Pg 3 Table 0.1; Option 8+NFS is not best on any of the criteria !!

 The reason why Option 2 comes out worst on Air Quality is it appears because North Curry and M(e)are Green are brought in for this option alone Section 9.4), BUT North Curry is miles away from any of the Options ?

Pg 5 “Early consultation with … parish councils..” This was very limited discussion with a few representatives from many parishes and other bodies at the same time: No discussion of this particular Option and how it would affect WHParish

Pg 8; 2.2. No evidence is provided for many of the objectives

Pg 11 – Bridgwater ! Bridgewater

Pg 11 – A303/A358/M5jct29 is several miles and minutes longer than the A303/A30/M5jct29. (AA information and see Table 3.4)

Pg 12. The preferred option does not help Taunton’s traffic congestion!

Pg 22. “Southlands” roundabout (This error is made several times !!) ??

Table 3.4 and Fig 3.8; see above; Only a few minutes will be saved by 8/NFS and probably not quicker than A303/A30 and at what cost !

Pg 23. Data were extracted

Pg 24 ‘stress’; This a difficult concept to measure: Queues at roundabouts at both ends of the A358 and the 3-lane Ilminster bypass are probably more stressful than some slowing along the A358 itself.

Fig 3.11 Colours muddled or incorrect.

3.12.6 Why does only Option 1 reflect on the ‘potsherd’ at Ashill ?

In 3.14, pg 41, it states that ‘developers are expected to correct historic and ensure easier and safer access for NUMs’ (non motorised users) - BUT no mention of this in the Technical Appraisal

5.1.8 Issues for Option 1 – fails to mention Thurlbear and SSI here

5.3.3 Option 8+J25 (and for 8+NFS) Jct B ‘would also serve adjacent communities of …’. If this implies, both parts of West Hatch Lane being connected to JctB. Highways England have not looked at these 2 very narrow, twisting lanes.

Pg 79; The statement that *‘Analysis of highway journey times demonstrates that each of the four scheme options would improve access times along the A358 corridor between the A303 at Ilminster and the M5 at Taunton’*. Is not true if one considers in Option 8 + NFS, Taunton-bound traffic has not to turn north from the new junction.

Table 6.2; Sudden appearance of Option 2/2D and of Option 13 plus jcts at Henlade & Forest Drove BUT no Option 8 = NFS ??

 Why does this Table use different names e.g. Jct25 called Blackbrook,

Table 8.1 ‘Southlands’ roundabout

Section 12; No satisfactory explanation of choice of Option 8/8B + NFS versus the other Options, since some other Options provide many, if not more, of the listed benefits.