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Response to National Highway's A358 Parish Council Briefings

National Highways (NH) briefed Parish Councils on 22nd and 23rd September on its appraisal of the Parish Mitigation Proposals and gave more details about its own development of the preliminary design. A meeting of parishes on 24th September acknowledged that the current scheme plan is an improvement over that proposed in May and consequently accepted several NH proposals as well as modifying our own.

For the first time NH admitted that cost was the true limitation on any further development as the scheme Benefit to Cost Ratio was only 1.2, representing a very low return on capital. RIS 1 objectives were to build an 'Expressway Corridor' from the M3 to Exeter and beyond, by providing a free flowing trunk road able to sustain an average speed of a mile a minute, 60mph. The A358 link road contribution to that objective is minimal, as it terminates at its eastern and western end at roundabouts, which are and will remain the sources of congestion. Inexplicably NH will not accept this fact and persists with the Expressway ideology and, as noted in paragraph 7.1.8 of the 2019 SAR, is causing the scheme to be more complex, more expensive, and more detrimental to the landscape and ecology. The scheme will provide a much needed bypass for Henlade, but currently this is at the expense of the well-being and safety of residents and businesses to the east of Thornfalcon. This 9-mile link scheme properly designed can accommodate both, providing the Expressway ideology is replaced with pragmatic common sense.

Scheme Governance

GD 300. General Principles & Scheme Governance, Requirements for new and upgraded all-purpose trunk roads (Expressways), and under its licence NH must follow the governance detailed within. The verb 'shall' is an explicit requirement placed on NH by DMRB governance.

The scheme encompasses three at-grade roundabouts. This means it fails the definition of an Expressway as detailed in E/5.2 and must be categorised as required by E/5.1.

E/5.2 Expressways shall be designed in accordance with the requirements of Table E/5.2.

Table E/5.2 Additional types of road

Additional types of road added to Table A.2 of CD 109 [Ref 12.N]						
Type of road	Sub category	Edge treatment	Direct access treatment (see CD 123 [Ref 6.N] for a definition of direct access)	Junction treatment at minor road intersection (see CD 123 [Ref 6.N] and CD 116 [Ref 8.N])	Junction treatment at major road intersection (see CD 123 [Ref 6.N], CD 122 [Ref 7.N] and CD 116 [Ref 8.N])	Previous category reference used in GD 300
Dual 2 lane expressway (D2E) – 7.3 metre carriageway	a	Nearside- 1 metre hard strip. Offside- 1 metre hard strip	Not permitted - motorway regulations	Not permitted - motorway regulations.	Full grade separation	7d

E/5.1 Highway links shall be designed in accordance with CD 109 (i.e. Table A.2)

Table A.2 Dual carriageway roads

Type of road (see CD 127 [Ref 1.N])	Sub-category	Edge treatment	Direct access treatment (see CD 123 [Ref 2.N] for a definition of direct access)	Junction treatment at minor road intersection (see CD 123 [Ref 2.N] and CD 116 [Ref 4.N])	Junction treatment at major road intersection (see CD 123 [Ref 2.N], CD 122 [Ref 3.N] and CD 116 [Ref 4.N])	Previous category reference used in TD 9 Table 4 (see note 1)
Dual 2 lane All-purpose roads (D 2AP) - 7.3 metre carriageway	b	No pedestrian footways or cycle tracks. Nearside - hard strip. Offside - hard strip.	Minimise number of direct accesses to avoid standing vehicles and concentrate turning movements. Clearway (see TSM Chapter 3 [Ref 7.N])	No minor junctions at-grade. No gaps in the central reserve.	At-grade roundabouts. Full grade separation.	6

GD 300 did not exist when the decision on the Preferred Route was taken. If it had, Highways England (HE) would have been required under Clause E/1.4 to categorise the scheme as an all-purpose trunk road and re-evaluate all other design requirements. The 2019 SAR categorised the Preferred Route as a Dual 2 Lane All Purpose Road (D2AP(b) as detailed in CD 109 Table A.2.). Even at this categorisation a departure from CD 109 standards is necessary for the substandard horizontal and vertical alignment and visibility on the Hatch Beauchamp bypass section.

An evaluation of the Preferred Route compatibility with GD 300 requirements should have been undertaken at the commencement of Stage 3, at which point DMRB governance should have directed a decision to categorise the route as a D2AP road. Governing DMRB documents would then be CD 109, CD 127, CD 122 and CD 116, which superseded the Volume 6 equivalents employed during Preferred Route selection.

GG 104. General Principles and Scheme Governance, Requirements for safety risk assessment.

GG 104 defines Other Parties as people living or working adjacent to the road or using the local rural network affected by the scheme. Clause 2.12 requires NH to conduct a safety risk assessment to clearly identify all sub-populations within Other Parties and record how each is or can be affected by the scheme. Furthermore, GG 104 mandates NH to reduce the risk to Other Parties to ‘as low as is reasonably practical’ (ALARP), a higher level of safety than required for actual road users. NH has not mitigated the risks to Other Parties to an ALARP level because of the cost involved, and is using the GD 300 restrictions on access to an Expressway to mask this fact. The Parish Mitigation Proposals provide Other Parties with an ALARP outcome at an affordable cost. We further believe a benefit cost ratio (BCR) analysis as detailed in GG 104 would support the adoption of our proposals.

To avoid the diversion of local traffic through Hatch Beauchamp and Ashill we propose grade separated taper merge/diverge slip roads located between the two villages and approximately 4km from Mattock’s Tree Green and Ashill junctions. Besides significantly improving safety within the villages the connections to the dual carriageway provide emergency access and egress as recommended by GD 368.

Stage 2 Gate Assessment Review. The major alterations to the scheme design that have occurred during the past 6 months suggests the design at the end of Stage 2 was not adequately mature to provide a realistic cost estimate. We therefore question the rigour of the mandatory Stage 2 Gate Assessment Review required under the Project Control Framework.

The Planning Inspectorate. The current preliminary design breaches governance principles and we are confident that the Planning Inspectorate will uphold our objections. We, therefore, strongly encourage NH to accept these facts and incorporate our remaining proposals detailed within the Appendix. Gaining the support from local parishes for the final design of a complex scheme must be worth very serious consideration by NH and DfT.

Stoke St Mary Parish Council
Hatch Beauchamp Parish Council
Ashill Parish Council
Ilton Parish Council
Horton Parish Council

West Hatch Parish Council
Beercrocombe Parish Council
Broadway Parish Council
Donyatt Parish Council
Curry Mallet Parish Council

Appendix **A358 Dualling: Taunton to Southfields** Mitigation Proposals Updated post NH's Briefings to Parish Councils

Proposal 1a. The view remains that the spur off the northern roundabout to Henlade is unwarranted and that traffic should flow via the existing Thornfalcon Junction modified to provide the necessary connections. This would discourage a rat-run developing through Henlade and Creech St Michael. It would also reduce costs and reduce the impact the junction will have on the local landscape, including light pollution, particularly from the west. Parishes have similar concerns about a rat-run developing through Stoke St Mary, so any final design must mitigate against this outcome by restricting traffic along Ash Road. A realistic visualisation of this junction is required before the public consultation.

Proposal 1b. Our proposed link connecting Hatch Beauchamp Village Road to Thornfalcon junction is incorporated into the scheme.

Proposal 2. Our proposal to provide a link from the Somerset Progressive School and adjacent Business Park direct to Mattock's Tree Green roundabout south is incorporated into the scheme. We recommend the incorporation of a farm track/Walker, Cyclist, Horse rider (WCH) path from this complex to West Hatch Lane.



NH's plan as presented on 22-23 September 2021

Parish Proposal for junction in BLUE*

Proposal 3. Following our advice Griffin Lane will no longer be considered a major local road.

Proposal 4. The scheme proposal to provide an additional east-west crossing via an overbridge connecting the Bickenhall Lanes has merit, particularly for WCH users and farm traffic, but does not meet the requirement for access to the dualled A358. Consequently, local parishes withdraw their objection to the overbridge providing the parish mitigation proposal as amended is incorporated into the scheme.

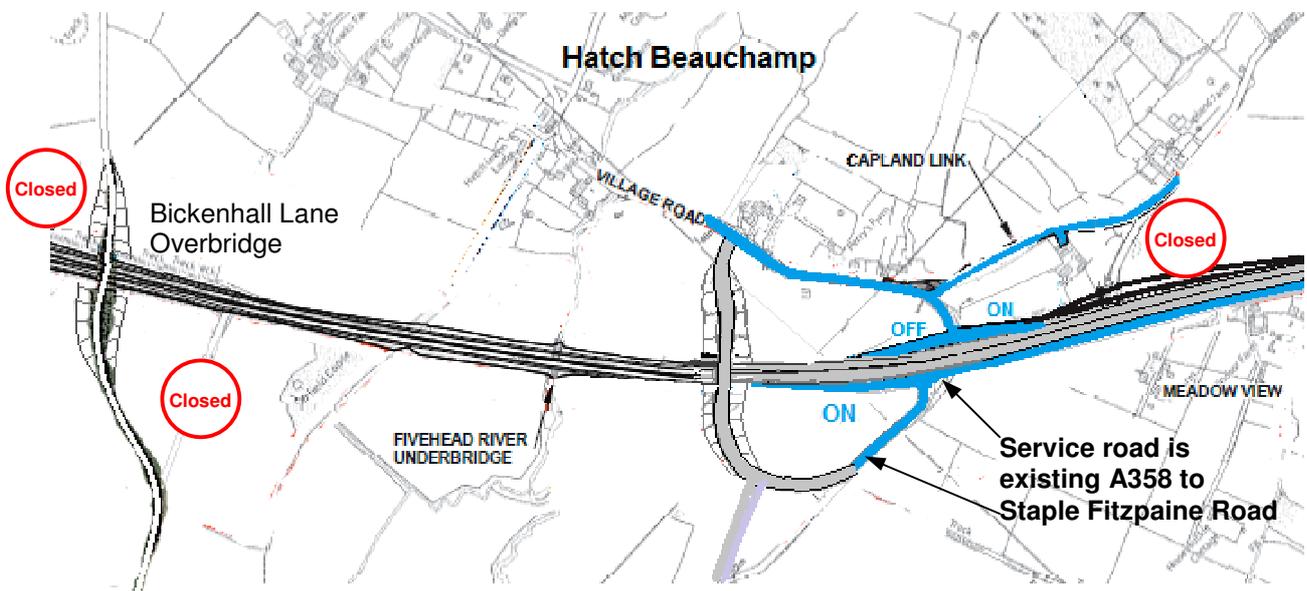
The western end of the service road should terminate at the existing Staple Fitzpaine junction, from which point a CD 122 Layout A Option 1 taper merge slip road should be provided onto the westbound carriageway. The service road with this on-slip enables traffic from Kenny, Wood Road, Folly Drove, Meadow View, Staple Fitzpaine Road and Hatch Beauchamp Village Road to efficiently access the westbound carriageway. HE's 2017 traffic data indicated some 2500 vehicles accessed the existing A358 from roads leading into the scheme's service road. This local traffic, which will continue to grow, must retain access to the new dualled A358 rather than the scheme route via the Hatch Beauchamp overbridge and through the village itself to Mattock's Tree Green junction.

The adverse engineering and environmental effects of extending the service road to Bickenhall Lane highlighted by NH are now removed. An advantage of the service road going straight to the existing Staple Fitzpaine priority junction is that there is less agricultural land take and the wood/pond on the south-east of the priority junction is not destroyed. Furthermore, there are BT green cabinets within the wood, which with their connections, would not need to be relocated.

Proposal 5. Our proposal to site the Hatch Beauchamp overbridge about 250m Northwest is incorporated into the scheme.

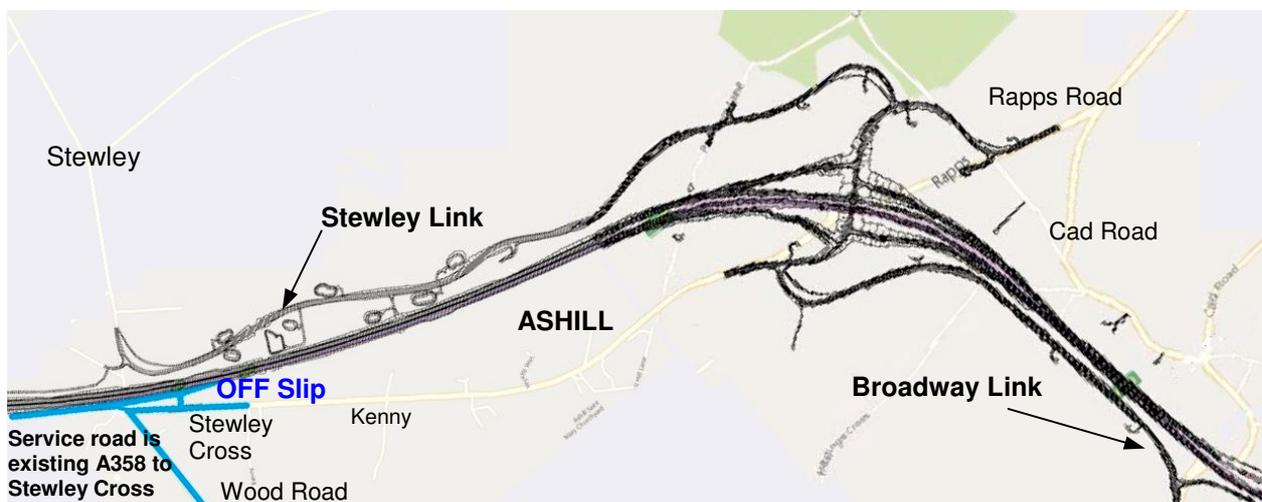
Proposal 6. The existing Village Road from Hatch Beauchamp needs to be connected to the eastbound carriageway via on-off slip roads. These slip accesses are required to significantly reduce the need for local traffic to drive through Hatch Beauchamp and Ashill villages, so providing an acceptable ALARP solution as mandated by GG 104. CD 122 Figure A.4 gives a generic layout of a grade separated half-cloverleaf junction, which our proposal follows. Our proposal also minimises land usage and with the slip roads located close to existing junctions their impact on local residents will be minimal.

Proposal 7. Capland Lane link should be no more than a single lane in keeping with the existing lane. It would prevent severance of Capland Lane residents from the village of Hatch Beauchamp and provide a flood free route to Village Road. The link is also needed to provide access to Capland Orchard Farm and as an alternative path for bridleway T14/25 that is the current WCH link. The proposal to carry out works to attenuate the flood risk on Stock's Lane and Stewley Lane would have none of these benefits and would involve costs akin to the provision of a link.



Schematic Plan of Parish Proposals 4, 5, 6 and 7, incorporating NH's proposal for a Bickenhall Lane Overbridge*

Proposal 8. The parishes, and in particular Ashill, accept the Stewley link. However, it will exacerbate severance of the Ashill parish and create difficulties for farmers working land both sides of the A358, but the parishes acknowledge the benefits to WCH users.



Schematic Plan of Parish Proposal 8 and 11, incorporating NH's proposal for Stewley Link and Broadway Link*

Parishes still propose that the existing roads and junction at Stewley Cross remain, and become the eastern extent of the service road. Slip road access from the westbound carriageway onto the service road should be provided at this point. This would enable local traffic from Ilminster heading for Kenny, Wood Road, Folly Drove, Meadow View, Staple Fitzpaine Road, Bickenhall Lane and Hatch Beauchamp to by-pass Ashill village.

Proposal 9. The Stewley link road makes the proposal redundant.

Proposal 10. HE SAR 2019 traffic data indicates that the closure of Cad Road/T junction would greatly increase traffic along Rapps Road. Much of this traffic is HGV to the two Ilton Business Parks and daily military convoys to and from Merryfield Airfield. The scheme proposal is inadequate to safely cope with this increased traffic load on a narrow country road. The current near balance in traffic along Rapps Road and Cad Road needs to be maintained by providing a single slip road from Cad Road/T junction on to the eastbound carriageway.

Proposal 11. Broadway Parish Council accepts the proposed link connecting Broadway Street and Thickthorn Lane to the Ashill junction, but considers this link would be improved by providing an off-slip onto Broadway Street. The path for WCH users between Broadway Street and Horton Cross via the abandoned A358 is strongly supported.

Proposal 12. Parish councils continue to believe that the opportunity should be taken to provide a grade-separated junction at Southfields, to permit A358 and A303 (Taunton/M5 – Ilminster Bypass) traffic to be separated from local traffic. Broadway Parish Council intends to submit a detailed appraisal of the improvements to Southfields roundabout currently proposed by NH.

* Illustrations are solely to assist explanation of requirements.