**Interim Comments on A358 dual carriageway proposals**

**from West Hatch Parish Council (WHPC), June 8th 2017.**

Executive Summary

1. The Consultation Process is flawed. The required consultation with affected Parish Councils has not been performed and there is no evidence that the proposed single option is integrated with SCC and TDBC plans for the development of Taunton and its environs.
2. The three Objectives of easing congestion, of supporting economic growth along the corridor and of improving safety will not be achieved.
3. The proposal is a very expensive interim measure, essentially creating a Taunton By-pass for the benefit of holiday makers travelling to and from the South West Peninsula.

In particular

* No consideration has been given to resolving the congestion problems of the Ilminster by-pass and the pinch-point roundabouts at the ends of the A358.
* Our villages, hamlets and houses neighbouring a dualled A358 will suffer from increased local traffic, accidents, noise and pollution.
* Agriculture, the major business along the A358 will be adversely affected.
* The proposed Option 8A/B + NFS gives poor benefit-to-cost ratio,
* The proposal will damage both agricultural economy and, without a north-going spur to Jct25 behind Henlade, the development of Taunton.

**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, until then WHPC offers interim comments concerning intersections and crossings (see 4 below).

**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**.

**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.

Traffic congestion along the A303-A358-M5 corridor will remain a problem

ii) **Economic growth.**

**a)** Local businesses along the route will be by-passed by through traffic and local agricultural industry will be disadvantaged by loss, division of, and reduced access to, agricultural land.

**b)** It is not clear why a north-going spur to link with Junction 25 and the planned Nexus 25 employment site has been rejected.

**c)** The report provides no evidence of joined-up thinking between HE, SCC and TDBC.

It is not conceivable that a new dual carriageway by-passing Taunton will support economic growth “along the corridor” in this part of the South-West. These proposals cannot deliver on this objective.

iii) **Improving Safety.**

a) 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.

b) 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).

It is questionable whether the scheme will **improve safety**.

**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 a new dual carriageway to link to the M5,

This is an expensive and disruptive interim measure, which does not meet the stated Objectives. 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*** and work with Somerset and Devon County Councils, improvements of the intersections at each end of the A358, namely the Southfields and the M25 junctions, could provide a better, cheaper and ecologically friendlier interim solution than the present proposal. It is questionable whether the A358 needs to be dualled for the entire length between Southfields roundabout and the M5. A 50 mph limit fully monitored and policed would reduce the number and severity of accidents and smooth traffic flow as has 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).
* The least benefit on total Economic Efficiency for Users and Providers (<£396m) whereas Option 2A/2B provides >£560m.
* On construction cost, 8/NFS, although the cheapest at £244m, is only 7% lower than the average of £263m and within the margin of error for such estimates.
* Most importantly, overall **on benefit-to-cost ratio**, **8/NFS is the worst option**, 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. A number of platitudes are cited to justify the decision, many of which according to the other parts of the Technical Appraisal could be delivered by all the options.

**4. Interim comments on the local specifics of the proposal.**

Without detail it is impossible to know exactly what HE are planning but, following the surprise appearance of the single Option 8/NFS, we have some specific comments:-

1. Because the West Hatch Lanes are totally unsuitable as access points on and off the dualled A358, there is no reason to have a massive, illuminated structure for Jct B. A simple 3-way high flow Y junction would be adequate. Indeed, because of this and the proximity to the Scouts Camp and to the ancient Huish Woods, the siting seems ill-considered. An on-line position closer to the Thornfalcon junction with the A378 would seem to be more satisfactory all round. This would have the added advantage of reducing the risk of Meare Green becoming a rat-run and, with strong signage and some traffic calming/restriction measures could reduce the flow of A303 traffic through Henlade.
2. In order to allow access across the new A358 for vehicles and all NMUs (West Hatch Parish was split by the Hatch Beauchamp by-pass), crossing points, e.g. at West Hatch Lane and at Bickenhall Lane, as bridges or underpasses are needed for the communities on either side of the new road. Otherwise there will be an increase in local traffic through the very narrow, winding lanes of our villages and hamlets and nearby SSIs with the consequent increases in accidents, pollution and noise and in the risk to NMUs. These factors seem not have been considered in the economic analysis of the proposed options.

**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.

West Hatch Parish Council,

June 8th 2017

**Appendix 1: Errors and questionable 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 that North Curry and M(e)are Green are brought in for this option alone Section 9.4), BUT North Curry is similarly miles away from all of the Option routes ?

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.

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 avoiding Henlade has got 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.