The Planning Inspectorate
(A358 Taunton to Southfields Scheme)
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Copy to: National Highways
Somerset County Council
South Somerset District Council
Somerset West and Taunton Council

Your Ref. TR010061
Contact: Community of Parishes
Convenor: Mr Peter Gregory
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Date: 15 December 2021

A358 Taunton to Southfields Scheme
Suppression of the Concerns of Community of Parishes

Reason for this Submission

1. Thirteen Parish Councils and Ilminster Town Council (the Community of Parishes), all representing communities impacted by the development have worked together to provide mitigation proposals to make the scheme acceptable to all users, both those that travel along the route and those that live and work adjacent to it.

2. This submission is in response to clear misrepresentation of our efforts and a consultation process that consistently employed misinformation to obscure important issues in the development and management of the scheme. Our Community of Parishes covers the latter issue in our response to the Statutory Consultation, attachment 1, under the leading section Principal Issues. We are seeking your immediate intervention as the Business Case for the scheme is driven by an aspiration to build an Expressway, rather than to design and build a simpler 9-mile link to join the traffic-limiting roundabouts at Taunton and Southfields. The decision path that flows from mandatory governance requirements has not been followed and consequently the scheme is greatly damaging to the communities we represent.

3. National Highways obscures the fact that it intends to build an Expressway, a sub-category of a Motorway and therefore a controversial build standard, by not using the word Expressway in any consultation material. Rather it uses the term 'high quality dual carriageway', a term that has no definition within its Design Manual for Road and Bridges (DMRB). Indeed, even on your website under 'About this Project' the term is used, a clear example of National Highways' success in purveying misinformation in a concerted effort to minimise scrutiny.

Misrepresentation

4. Of the 23 communities that National Highways considers to be interested parties, 14 community councils support our response to the Statutory Consultation. We are therefore concerned that National Highways suppresses a majority opinion by referring to us as 'some'. This is evident in the Minutes of the meeting you held with National Highways on the 29th September 2021. It is also concerning that our efforts were described as *'whereas discussions with some Parish Councils had begun heated in nature, discussions were now more constructive,*

and a willingness existed to discuss specifics such as design details, etc.'. This misrepresents the discussions entered into in good faith by our Community of Parishes as difficult and unconstructive; this must be corrected. We therefore provide a summary of our interaction with National Highways during 2021:

April: Collaboration between Parish Councils commenced to prepare response to the Environmental Impact Assessment (EIA) Scoping Report and the upcoming May Forum, convened by Highways England. Several Parish Councils responded to the EIA expressing concern that the scheme did not address the inadequacies of the terminal roundabouts and the disruption of connectivity with the local rural network caused by the scheme. Community-developed proposals to improve local connectivity were included in responses. As neither Somerset County Council (SCC) nor South Somerset District Council responded to the EIA, local Parish Councils were the main source of scrutiny on behalf of the affected communities.

June: Following the May Forum, during which it became clear that the majority of connecting lanes and road would be closed, Parishes submitted the attached Mitigation Proposals, dated 14th June. Some of these proposals were discussed during the 23rd June Forum.

July: Highways England formally responded in part to our 14th June submission on 8th July. However, it did not cover points raised via a number of emails. Parishes submitted the attached Follow-up, dated 20th July, to consolidate growing concerns on governance and other DMRB issues. The Follow-up also included updated mitigation proposals to accommodate ongoing changes to the scheme design.

September: National Highways held briefings on 22nd and 23rd September at which the majority of the time was spent covering the Parish Mitigation Proposals. As new disclosures were made by National Highways, but no satisfactory explanation of DMRB governance and safety issues was forthcoming, a further submission was made on 30th September, again with updated mitigation proposals to accommodate further changes in design. This is also attached.

October: National Highways sent a second formal response to our 14th June submission, undated but received on 29th October, and promised to provide a full reply to our 30th September submission following closure of the statutory consultation. This has yet to be received.

5. We do not believe our engagement with National Highways fits the description that appears to have been conveyed at your 29th September meeting and recorded in the minutes. Our proposals have been an honest effort to improve the scheme for the benefit of our communities and we have been transparent in detailing our concerns. On the other hand, Parishes have never had answers to the fundamental questions that are now detailed in the Principal Issues section of the consultation response of the Community of Parishes.

6. The local politics of Somerset moving to a unitary authority probably was a great distraction, but Parishes have been, and remain, deeply disappointed and frustrated at the complete lack of engagement by Somerset County Council. Parishes started briefing SCC councillors and officials in late May and further emails were sent in June, July, and August all providing information on the concerted effort of local parishes to improve the scheme and all seeking the help of our County Council. In all that time SCC did not hold a single meeting to hear and discuss the concerns of affected communities and means of mitigation. On the contrary, SCC has stated its overriding aim is for the scheme to go ahead and therefore it will not challenge the expensive Expressway design standard, nor it seems engage with the local communities most affected by the scheme. We believe this is an abdication of its responsibility to scrutinise the spending of public money and a gross disregard of its democratic duty to consult with parish councils on a major development that will impact on the safety and well-being of local communities.

7. Neither have the two local authorities, Somerset West and Taunton (SWT), and South Somerset District (SSDC), engaged with their parishes. Both local authorities attended the National Highways Forums so were fully aware of the concerns of their local Parish Councils. It is therefore disappointing that neither followed up these Forums with local consultation and neither reflected in their responses to the Statutory Consultation the consolidated concerns of a large grouping of Parish Councils.

8. Consequently, the Community of Parishes find themselves as the sole representatives of communities most affected by the adverse impacts of the scheme, and it is for this reason we vigorously object to attempts to dismiss our actions as heated and unconstructive.

Inadequacies of Consultation

9. We understand from paragraphs 7,8 and 9 of your Advice Note 8.1 that upon submission of the A358 scheme application you will write to local authorities and ask for their views on whether or not the consultation has been adequate. The Community of Parishes is very concerned that our local authorities are not carrying out their responsibilities to present the concerns of a large section of their local communities and this lack of representation will extend into the DCO process. We hope this letter prompts local authorities to engage with us. However, we ask the Planning Inspectorate to be aware of our situation and, when the National Highways' application is received, to seek the full views of the Community of Parishes via the email addresses provided.

10. As we were given very little notice of the Statutory Consultation, which we suspect will also be the case with the DCO application, we are preparing a full report detailing the inadequacies of the Statutory Consultation. This will be sent to National Highways and copied to you, SCC, SWT and SSDC. We trust this advance notice will ensure our local authorities fully engage with the Community of Parishes within the DCO process.

11. It is no surprise, therefore, that the Community of Parishes concludes that the consultation process conducted by National Highways was inadequate, breaching many of the principles of consultation posted on the GOV.UK website. Controversial issues like the Expressway design standard versus lower cost alternatives, the ongoing congestion at the roundabouts, the limited access to, off and across the Expressway and the impact of the scheme on the local rural network and villages were either omitted, obscured by misinformation or absent because of uncompleted analysis. The consultation was an exercise in avoiding scrutiny rather than an opportunity for people to respond in an informed way on the true nature of the scheme.

This document is on behalf of:

Stoke St Mary Parish Council	West Hatch Parish Council
Hatch Beauchamp Parish Council	Beercrocombe Parish Council
Ashill Parish Council	Broadway Parish Council
Ilton Parish Council	Donyatt Parish Council
Horton Parish Council	Curry Mallet Parish Council
Pitminster Parish Council	Combe St. Nicholas Parish Council
Corfe Parish Council	Ilminster Town Council

Attachments:

1. A358 Consultation Response from Community of Parishes, 19th November 2021.
2. Parish Councils' Proposals for Satisfactory Connectivity, 14th June 2021.
3. Follow-up to Highways England's Response to Parish Mitigation Proposals, 20th July 2021.
4. Response to National Highway's A358 Parish Council Briefings, 30th September 2021.

national highways

A358

Taunton to Southfields Dualling Scheme

Public consultation feedback questionnaire
12 October – 22 November 2021

Response from the Community of Parishes

About you

Providing this information is optional but will allow us to update you on the outcome of the consultation and the next stages for this scheme. If you don't want to share these details please just tell us your postcode for the purpose of analysis.

Name:	Community of Parishes: - Convenor: Mr Peter Gregory - Co-ordinator: Mr Robert Burrough
Postcodes:	TA3 6AG, TA3 5BY, TA3 5RJ, TA3 6SG, TA19 9PB, TA19 9RX, TA19 9HB, TA19 0RG, TA19 9QR, TA3 6SY, TA3 7BA, TA20 3NQ, TA3 7AN, TA19 0AN
Email:	Convenor: [redacted]@gmail.com Co-ordinator: [redacted]@holmansfarm.co.uk

Would like to be kept up to date about the project by email?	Yes

Are you an affected landholder?	Representing community views, including landholders

Is this a response to the consultation on behalf of an organisation? If yes, which organisation?	Beercrocombe Parish Council Stoke St Mary Parish Council West Hatch Parish Council Hatch Beauchamp Parish Council Ashill Parish Council Broadway Parish Council Ilton Parish Council Donyatt Parish Council Horton Parish Council Curry Mallet Parish Council Pitminster Parish Council Combe St. Nicholas Parish Council Corfe Parish Council Ilminster Town Council will base their Response on this document.

How did we find out about the consultation?	Participated in Forums

Principal Issues

Business Case

1. The one element of the business case that has complete support of all local parishes is the need for a Henlade bypass.

2. Faced with the closure of the majority of local connections to our A358 a Community of Parishes has worked together to develop mitigation proposals to make the scheme acceptable to communities that lie close to the A358 and are most adversely affected by the scheme. Parishes require similar accessibility to the new A358 as is currently existing and as provided along much of the A303, and as being provided at the recently authorised Sparkford to Ilchester scheme. The Parish Community provided detailed submissions to National Highways in June, July and September 2021 and some proposals have been incorporated into the scheme. However, accessibility to the A358, severance, the roundabouts, particularly Southfields, and the Expressway standard remain outstanding issues. This response to the Consultation presents the consensus of opinion of the named Parish Councils.

3. It has become evident that pursuance of the 'Expressway Corridor' vision has distorted the thinking behind the current A358 improvement project. Our view is supported by an executive level Independent Assurance Review (IAR)[1] of the scheme during Stage 2, Preferred Route selection, that reported serious concerns regarding the influence a high level aspiration to deliver an Expressway to the Southwest had on the scheme design. Originating in 2014, along with Smart Motorways, the concept of building a sub-category of a Motorway called an Expressway emerged. An Expressway is therefore built to an entirely different scale to an all-purpose trunk road commonly used to link sections of the Strategic Road Network. The Review rated the scheme AMBER/RED, noting that the scheme capital provision was arguably incapable of funding a dualling scheme to Expressway standard, that the deliberate focus on the aspiration prevented comparison with alternative, more affordable options and that the design prioritised the aspiration above all other stakeholder requirements. Of particular note to our locality the IAR concluded that '*the proposed Expressway standard, for which no justification has been presented, may have a major impact on severance on the southern section of the route*'.

4. An Expressway promises high performance, achieving a mile-a-minute travel experience. This is not possible in this scheme as both the eastern and western ends of the link terminate in roundabouts, the latter a double roundabout with traffic lights. The congestion that exists on this link emanates from the roundabouts and on the western end is exacerbated by the adjoining village of Henlade. As the scheme does not, and will not, bypass these roundabouts with free-flowing grade separated junctions the objectives set in the 2014 Road Investment Strategy (RIS) 1[2] will not be achieved. Money spent on the Expressway aspiration is money wasted, requiring more resources like prime agricultural land and construction material for the excessively complex junctions, central barrier and boundaries. Rather than accept this conclusion Highways' England Executive embarked on a cost cutting exercise[3] that decided the scheme would proceed with the expensive Expressway, but without any 'extras' like the requirement for a Hatch Beauchamp junction. Consequently, local communities are denied the historical connectivity that is their right because of a misplaced high level aspiration.

5. The business case for the scheme needs to be rewritten with emphasis on a Henlade bypass and resolving the sources of congestion at the roundabouts. The link itself is not the major priority but any new road should be cheaper, simpler and environmentally less damaging.

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[1] Obtained through FOI/2578. IAR , formerly known as Office of Government Commerce (OGC) Gateway Review 2: Delivery Strategy.
[2] The 2020 RIS 2 describes the A358 scheme as a dual carriageway link. The sole Expressway scheme in RIS 2 was the Oxford to Cambridge Expressway, recently cancelled due to the low benefit to cost.
[3] Obtained through FOI/2578. Full SGAR 2_Redacted - End of Stage Report - 2019.05.24.

Governance

6. Following the Stage 2 decision to abandon the free-flowing grade separated junction with the M5 the scheme lost its ability to achieve Expressway status. However, the high level aspiration to build the first section of the 'A303 Expressway Corridor' materially weakened governance that should have directed National Highways towards an efficient, value for money design based on trunk road specification. The Preliminary Environmental Information Report (PEIR) and associated documents describes the scheme in its totality. Unfortunately the design does not address the real issue of the roundabouts at both ends of the link, which cause congestion and significantly reduces the average speed across the scheme. National Highways attempts to obscure this failure by not including the congestion at the roundabouts in the issues needed to be resolved nor within the road typology (PEIR, 1.2.9). Rather National Highways transfers blame for congestion onto the link between the roundabouts. Contrary to what National Highways implies about safety along the route the current A358 and surrounding area has an accident rate lower than the national averages (PEIR, 12.6.69/70), and east of Thornfalcon there is no evidence of traffic joining the A358 being the cause of congestion.

7. National Highways avoids use of the word Expressway because of sensitivity of the costs associated with building a sub-category of a Motorway for an 9-mile link. Rather it describes the road as a high quality dual carriageway. As National Highways does not build low quality dual carriageways the description is meaningless and is used to obscure scrutiny. Because of their cost Expressways are rigorously governed by GD 300 standards, the title of which is General Principles & Scheme Governance, Requirements for new and upgraded trunk roads (Expressways). GD 300 is within a library named Design Manual for Road and Bridges (DMRB) and as the title suggests provides governance over National Highways design. GD 300 stipulates that the whole standard must be applied within an Expressway scheme. A key component of an Expressway is that all junctions are required to be at full-grade separation (GD 300, Table E/5.2), but the scheme fails this requirement as the link terminates at at-grade roundabouts, one even with traffic lights. In this situation GD 300 governance directs National Highways to categorise the scheme as an All-Purpose Trunk Road (GD 300, E/5.1) built according to CD 109 standards (Highway link design) with all other design requirements re-evaluated (GD 300, E/1.4). This governance related directive does not permit a departure from standards (GD 300, Table E/F.31) and is in place to ensure that schemes are efficient, provide value for money, and minimise the environmental impact, mandates placed upon National Highways by its Licence (Paragraphs 4.2d and g). If governance had been followed the scheme would have followed a simpler, cheaper design, evidenced within the 2019 Scheme Assessment Report (SAR) conclusion that the route could be simplified if Expressway standards were not applied (SAR, 7.1.8).

8. As National Highways will evade this issue it needs to be stressed that GG 101, General Principles & Scheme Governance, states the verb 'shall' is an explicit requirement placed on National Highways by DMRB governance and its Licence. The scheme encompasses three at-grade roundabouts, which means it fails the junction requirements of an Expressway as detailed in GD 300, E/5.2 and E/6.9, and therefore must be categorised as required by E/5.1.

> E/5.1 Highway links shall be designed in accordance with CD 109 (i.e. Table A.2).
>
> E/5.2 Expressways shall be designed in accordance with 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

An evaluation of the Preferred Route compatibility with GD 300 requirements, which came into effect in May 2019 just after the end of Stage 2, 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 as described in Table A.2 and designed in accordance with CD 109.

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

9. A recent response to a consultation query[4] demonstrates the ambiguities within National Highways' compliance with design principles and governance, a requirement placed on National Highways' Licence (5.28) and by GG 103, Sustainable Development and Design, (5.1 and Note). E/5.2 and Table E/5.2 are explicit that a junction at a major road intersection, i.e. the A358 Expressway and the M5, is to be a FULL grade separated junction, requiring free flowing merges and diverges. As this is not provided in the scheme National Highways defends the A358 Expressway standard by insisting Junction 25 is a grade separated terminal junction, ignoring the at-grade conflicts with other connections at the roundabout. Its own traffic analysis concludes that the roundabout and its traffic management introduce delays that totally undermine the high-performance promise of an Expressway standard. National Highways admits that both Nexus 25 and Southfields do not comply with Expressway standards but chooses to ignore E/5.1 and E/5.2 governance stating the standards that it is working to - Appendix E/F of GD 300 - are only advisory, quoting Clause E/F1.1. This is not the case as the Clause also directs the level of applicability to be followed in any design, and Table E/F.31 states that Table E/5.2 is applicable to Level 1 and 2 Expressways. The footnote to Table E/F.31 reinforces this point stating *'DG/E/5.2/1 [Level 1 & 2] The requirements in Table E/5.2 apply. If requirements in Table E/5.2 are not applied in accordance with this it prevents future compatibility with level 3 and 4 without further major interventions*'. It is symptomatic of National Highways to cherry-pick what it does and does not observe within the DMRB manuals. With regard to the Community of Parishes proposals we have been repeatedly told that several are not permitted due to non-compliance with Appendix E/F, which National Highways is now stating is only advisory. Within its response National Highways also describes the Expressway scheme as being future-proofed and compliant with anticipated future changes. With climate change measures already effecting national infrastructure projects across the UK, this claim is very questionable.

10. It is extraordinary that National Highways is proposing to build an Expressway, yet does not use the name itself in any documentation presented at the Statutory Consultation. National Highways only refers to GD 300 standards once, in Table 3.1 to record that the imposition of GD 300 standards is the reason all current at-grade junctions along the A358 are to be closed. The fly-through video of the scheme has shocked local people by the extraordinary complexity of the carriageway and junctions, the excessive scale of the central reserve, the extravagance of the boundary and drainage system and the overall urbanisation of what is a country road. The build specification of an Expressway has clearly led to a large inflation of the cost of the scheme and its environmental impact. Compounded by the Stage 2 decision to abandon the free-flowing grade separated junction with the M5 the Benefit-to-Cost Ratio is now at the very low level of 1.2 (A358 Technical Traffic Note, 7.1.3). National Highways' insistence on building a high cost Expressway jeopardises the viability of the scheme.

[4] Email response from National Highways to Mr Martin Hills dated 15 November 2021.

11. As detailed in paragraph 4 above the decision to remove the Hatch Beauchamp junction and other slip road accesses from the scheme was to save money that was needed to finance the Expressway itself. This, National Highways has consistently refused to acknowledge. Rather it blames the imposition of Expressway/Motorway standards that do not permit connections to minor roads as detailed in GD 300 Table E/5.2 to obscure the real reason. However, such connections may be permitted (GD 300, E/6.7). Indeed, the approved Ashill junction is connected to three C-class roads so it is equally possible to approve a Hatch Beauchamp junction connecting Staple Fitzpaine Road, Village Road, and Wood Road via service road, all C-Class roads, to the A358. Although local parishes disagree with the Expressway standard, all of their proposals for access has followed CD 122 grade separated taper merge/diverge slip road standards and hence are compatible to both an Expressway and an All-Purpose Trunk Road.

Design Failings

12. Much of thinking behind the scheme design has been remote, desk-top analysis and modelling by a design process that showed little empathy with the locality and the views of local residents and businesses. Moreover, Expressway ideology has gone against the underlying safety principle that a road network feeds traffic from minor roads onto major roads as quickly and efficiently as possible. The scheme ignores this principle and rather than provide safe taper merge/diverge slip access to the A358 diverts traffic 2-3 miles along unclassified and C Class lanes and roads, and even through villages, to reach the two junctions providing access to the A358. Rural lanes and roads are not well maintained by Somerset Highways and with the increase traffic load placed on them by the scheme the situation will worsen. Furthermore, in winter the rural network is often slippery with leaves, mud and surface water, and the narrow lanes can be very dark, with overlying shadows. During seasonal work the network is busy with farm vehicles, which often follow a one way system for long distance haulage of crops. The scheme as designed will prevent this occurring exacerbating conflict between farm traffic and between other vehicles.

13. The A358 Technical Traffic Note provides some limited data on the performance of the scheme and within the local rural network. Although journey times are modelled to the second no similar precision is provided regarding the locations at which modelled journeys commence and finish. However, with the data available it is possible to assess that the average speed along the scheme is a modest 50mph in 2028 and 47mph in 2043. This is some way below the design speed of an Expressway and is caused by delays at and across the Taunton and Southfield roundabouts of 3 and 4 minutes in 2028 and 2043 respectively. As National Highways traffic models are constructed to reflect typical conditions on an average weekday the performance during the holiday season will be considerably worse.

14. For this very modest performance that is far below RIS objectives local residents and businesses have been denied normal A303 type of access. The Sparkford to Ilchester scheme, that was recently approved by the Secretary of State for Transport, and part of the same RIS 1 programme, was designed to replicate A303 standards whilst following CD 109 requirements and does provide good access to the rural network. This is not the case for the A358. Moreover, the modelling of the local road network shows this lack of access increases traffic through Hatch Beauchamp by nearly 1,000 vehicles a day and through Ashill by 2,000+ vehicles a day. This traffic is funnelled in through local lanes and roads meaning residents, businesses, walkers, cyclist and horse riders will all be adversely impacted not only from the increased traffic but also from an increase in noise and vibration, often above NPSNN (National Policy Statement for National Networks) tolerance levels.

15. Highways England shows no empathy regarding the effect of the proposed design on the social fabric of the communities through which the road passes. Access to shops, fuel, surgeries, churches, village halls, recreation, leisure and social venues, is vital to the wellbeing of the local parish communities. Except for the clear benefits of a Henlade bypass, conclusions reporting the scheme benefits on local communities are weak and subjective (PEIR, 12.9.20, 12.9.83, Table 16-1), using phrases ‘likely slight beneficial’, ‘considered to lead to slight

beneficial effect', 'improving the perception of connectivity'. There is no detailed assessment of the problems the scheme will bring to local society as required by GG 104. GG 104 defines Other Parties as people living or working adjacent to the road or using the local rural network affected by the scheme. GG 104 governance requirements arise from statutory legislation (Section 3(1), Health and Safety at Work etc. Act 1974) that mandates National Highways 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. In spite of this statutory requirement National Highways has not mitigated the risks to Other Parties to an ALARP level. Neither has National Highways embedded design measures to avoid or reduce the adverse impact of noise and vibration as required by the NPSNN (NPSNN 5.195 and PEIR, Table 11.25). Overall, the scheme imposes adverse noise effects on 813 residential properties with only 324 benefiting. Disturbingly, National Highways can only anticipate that the scheme will lead to a slight beneficial effect on local human health. Illustrating the total lack of understanding of the locality, National Highways highlights the positive health outcome in North Curry and Stoke St Gregory, two villages well connected to the A378 some 3-5 miles distant, while ignoring the adverse impact on Hatch Beauchamp, Ashill, Broadway, Ilton and Horton, which adjoin the scheme.

16. National Highways has provided no response to the question of why an Expressway design was chosen for the route, a decision that goes against its own route categorisation governance. No comparison analysis between a GD 300 Expressway and a CD 109 link trunk road has been undertaken. Consultation webinar questions elicited the admission that speed along the link would not be adversely impacted by a non-Expressway design. More profoundly was the admission that the Expressway ideology of a mile a minute travel could not be attained across the scheme because of the speed limitation of the Southfields, Nexus 25, and Junction 25 roundabouts.

17. The Statutory Consultation exposes serious failings within this National Highways scheme. Unequivocally, governance does not permit the building of a 9-mile Expressway to link roundabouts. The proposed design is extravagant in land usage, unnecessarily cutting a great, environmentally damaging, swathe through a rural landscape at an unacceptable cost to the tax-payer. Except for the Henlade bypass the scheme gives very little back to the local community, adversely impacting their safety and wellbeing so that commuters and seasonal holiday travellers can speed to, and queue at, a roundabout before joining an already overloaded M5 or Ilminster bypass. The Henlade bypass and redesign of the two roundabouts should be completed before any consideration is given to dualling east of Thornfalcon. In that event, mitigation proposals given by local parishes, as an honest attempt to reconcile the adverse impact of the scheme, should be incorporated. It goes against all principles of governance that Community Mitigation Proposals are dismissed by exploiting compliance criteria within DMRB GD 300, whilst ignoring the non-compliance of National Highways' own scheme proposals. Governance requires National Highways to redesign the scheme as an All-purpose Trunk Road following CD109 Highways Link design criteria. Incorporating the proposed mitigation, this perfectly adequate specification, will provide a route usable to all travellers, local and distant.

Value for Money

18. In the value for money assessment the benefits of the scheme are compared to the costs of constructing it. Time saved by users of the A358 form a significant part of benefits, but the value for money assessment also covers other aspects such as road safety and environmental impacts (A358 Technical Traffic Note, 7).

19. Table 6-1 of the Technical Traffic Note reports time saved with the scheme is of 5 to 6 minutes for a typical average weekday journey (2.1.1). During seasonal holiday periods when traffic is considerably greater than average the time saved would be less because of the increased queue time at the terminal roundabouts. According to the executive level Independent Assurance Review a journey time savings of 6 minutes is unlikely to be of benefit to longer distance travellers, which places a damming assessment on the time saving benefits of the scheme. Regarding safety, National Highways own statistics proves the current A358

and surrounding area has an accident rate lower than the national averages (PEIR, 12.6.69), and with the exception of the Henlade bypass the environmental impact of the scheme is wholly negative.

20. It is therefore not surprising that the Benefit-to-Cost ratio of the scheme is at the very low value of 1.2. Knowing the cost of meeting the Expressway aspiration is very large, it appears irrational not to have developed a cheaper, simpler non-Expressway alternative design.

Consultation

21. During the 2021 consultations ten parishes that lie directly within the scheme developed proposals that would mitigate the adverse impact of the scheme to an ALARP level. These proposals were at the centre of the consultation Forums held by National Highways. It is unfortunate that National Highways excluded the proposals from all statutory consultation material, including DCO preparatory documents like the PEIR. The latest revision of the community proposals has been incorporated into this consultation response.

22. The Consultation presented 7 key documents of which one, the PEIR, is 792 pages long with 36 Appendices and over 150 Figures. The scheme is extremely complicated and the 6-week consultation period is too short to enable the information to be assimilated with any rigour. National Highways was slow in responding to email questions and the web centric format is unfamiliar to many within a rural population. The face-to-face events were very limited in number and open times, and the complexity of the paper and online Questionnaires discouraged responses from individuals.

23. On issues of this scale most parishioner leave it to the Parish Council to represent their views. Besides the task of appraising the scheme Parish Councils have to draft a response, circulate and brief parishioners, and redraft until consensus is achieved. This takes time and the 6-week consultancy period is an unnecessary tight schedule. Furthermore, nowadays, most drafting is done in a Word editor. National Highways made this expected task difficult by not providing a Word based template. This response uses a manually produced copy of the Questionnaire format.

24. The Statutory Consultation was a public relations exercise to elicit support for a scheme centred on delivering an Expressway. No evidence has been provided that an Expressway is the most appropriate standard to be applied. No comparison to a trunk road design standard has been published. Traffic analysis provided did not present the worse case scenario of peak holiday traffic thereby obscuring the inability of the scheme to resolve one of its major objectives. The public has not been provided with the information needed to make an informed opinion.

Section 1 – M5 junction 25 to Mattock's Tree Green junction

1a) To what extent do you agree or disagree with our proposals to upgrade M5 junction 25 and the Nexus roundabout?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
				✓	

Reasons for response to 1a.

(1) The proposed upgrades to M5 junction 25 and the Nexus roundabouts do not remove the congestion and delays experienced at these junctions, which will remain at-grade priority/traffic light controlled.

(2) Modelling of the performance of the roundabouts presented at the Consultation uses average daily traffic flows, not the high traffic flows experienced during holiday periods. Modelling predicts queuing will occur at the roundabouts even at these average traffic flows and consequently longer queues than reported in the Consultation documents will remain on the new A358 during holiday periods (Webinar, 4/11/21).

1b) To what extent do you agree or disagree with our proposals for a new bridge over the A358 at Stoke Road?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
		✓			

Reasons for response to 1b. No comment.

1c) Further comments about the plans for Section 1: M5 junction 25 to Mattock's Tree Green junction.

(1) The Community of Parishes emphasises their full support for a Henlade bypass to be built.

(2) There is no evidence for building the dual carriageway to an Expressway build standard. GD 300 E/5.1 directs the highway link between Southfields roundabout and M5 Junction 25/Nexus roundabouts to be designed in accordance with CD 109.

Section 2 - Mattock's Tree Green junction to Griffin Lane

2a) To what extent do you agree or disagree with our proposals for Mattock's Tree Green junction, including the connections to local roads such as to Henlade via the existing A358, the A378 Langport Road and Ash Road?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
			✓		

Reasons for response to 2a.

The spur off the northern roundabout to Henlade is considered unwarranted and local traffic to and from Henlade should flow via the existing Thornfalcon junction modified as required to provide the necessary connections to the A358. 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. Although National Highways has recently concluded the proposal to retain the existing Thornfalcon junction would result in a junction that performs less well in both highway safety and traffic management terms we believe there is a strong case for reviewing the Mattock's Tree Green junction as a whole. In its conclusion National Highways did note that potential refinements were possible following the outcome of the statutory consultation.

2b) To what extent do you agree or disagree with our proposals for a new connection to provide access for the Somerset Progressive School, the Huish Woods Scout Campsite and local businesses at Nightingale Farm Units.

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
✓					

Reasons for response to 2b.

As the community of local parishes recommended this connection it is strongly supported.

2c) To what extent do you agree or disagree with our proposals for a new connection linking Village Road to the Mattock's Tree Green junction to provide access to Hatch Beauchamp for residents and local businesses?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
✓					

Reasons for response to 2c.

As the community of local parishes recommended this connection it is strongly supported.

2d) Do you have any other comments about our plans for Section 2: Mattock's Tree Green junction to Griffin Lane?

(1) There is no evidence for building the dual carriageway to an Expressway build standard. GD 300 E/5.1 directs the highway link between Southfields roundabout and M5 Junction 25/Nexus roundabouts be designed as a trunk link road in accordance with CD 109.

(2) The 2019 SAR reported the requirement for departures from standards within this section relating to sight distances, and horizontal and vertical geometry around the Hatch Beauchamp bypass. No information on the consequences of these departures from standard has been published within the Consultation documentation.

Section 3 – Griffin Lane to Ashill junction

3a) To what extent do you agree or disagree with our proposals for a new bridge at Bickenhall Lane to provide access for vehicles, walkers, cyclists, horse riders and disabled users?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
				✓	

Reasons for response to 3a.

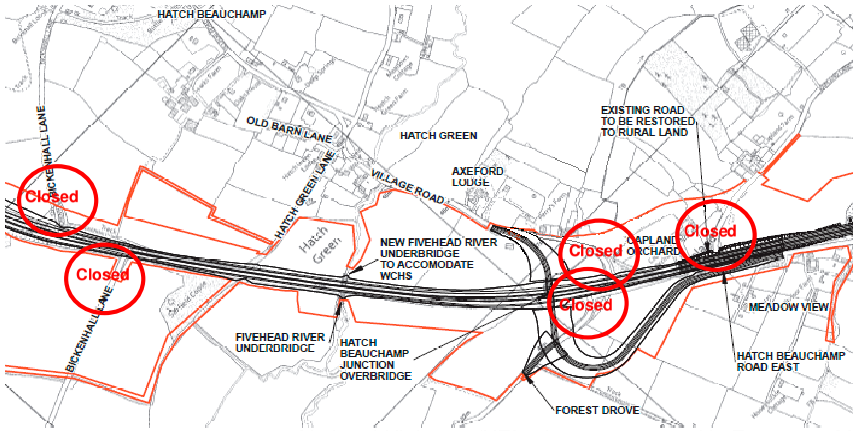
(1) As explained in Figure 10-1, A358 Technical Traffic Note, traffic from Staple Fitzpaine, Curland, New Town and Bickenhall areas wanting to go towards Taunton will have to use this new Bickenhall Lane bridge enroute to and from Mattock's Tree Green junction. Without the scheme most of this traffic would enter or leave the A358 south of Hatch Beauchamp, bypassing the village. With the scheme this traffic will be diverted into Hatch Beauchamp through Bickenhall Lane East, shown in the Google Streetscene below, a narrow single-track lane. At the junction with Village Road this

traffic would turn left and drive through the centre of the village, passing the village green, a children's play park and a large residential and nursing care home. Similarly, Hatch Beauchamp residents who live on the southern side of the village and who would, without the scheme, use Bickenhall Lane East and Village Road South to access the A358 will, with the scheme, be diverted north through the village centre to access the A358 at Mattock's Tree Green junction. The reverse would occur in traffic travelling from Mattock's Tree Green junction. There would be no compensating reduction in traffic through Hatch Beauchamp from the Curry Mallet and Beercrocombe area as their routing remains the same without and with the scheme. The overall impact of not providing access to the A358 south of the village, estimated from SAR traffic data, will be 800-900 more vehicles a day passing through the centre of Hatch Beauchamp.

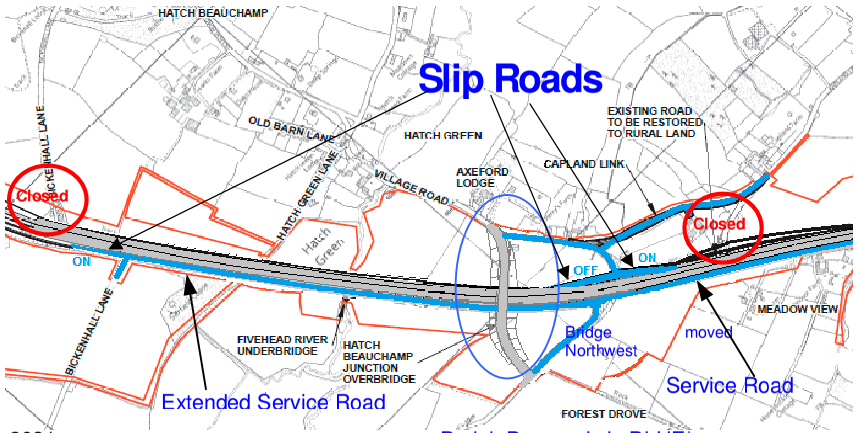
(2) National Highways uses prescribed modelling to forecast the impact of the scheme on local traffic. From consultation discussions it is clear that the large number of variables that include traffic flow rates, traffic types (ranging from HGV, large and often very dirty farm machinery through to residential cars and WCH), destinations, road/lane capacity, seasonal farm traffic, driver preferences and behaviour, road/lane maintenance standards, impact of weather and seasons, etc. makes predicting the impact of the scheme particularly challenging. However, in spite of the logic presented in (1) above, National Highways insists the impact of the scheme on Hatch Beauchamp village will be negligible.

(3) Local parishes voiced their concerns at the lack of access to the scheme south of Hatch Beauchamp throughout the consultations that took place in 2019 and during 2021. Indeed the 2019 SAR included the requirement for a junction south of Hatch Beauchamp (Section 3e)(1) refers) but it was removed without any published analysis following a Highways' England Executive cost cutting exercise[5] that decided the scheme would proceed without any 'extras' like the Hatch Beauchamp junction. The Community of Parishes has continued to present proposals to mitigate the adverse impact of the scheme within this section.

(4) The first assumed the Bickenhall overbridge was not present. As Bickenhall Lane is a busy local route favoured by farm traffic and lorries, the lane needs to be kept open by extending the planned service road from Ashill to Hatch Beauchamp overbridge to Bickenhall Lane. A CD 122 Layout A Option 1 taper merge slip road access should be provided onto the westbound carriageway at the western end of this extended service road. Offset savings will be made by not requiring suitability assessments of the diversionary routes proposed and the improvements that would be required on these routes to make them acceptable. An example of this type of junction is at the A356/Ringwell Hill/A303 connection at Bower Hinton. National Highways objects to this proposal on cost grounds, the interest of other stakeholders and the impact on Bickenhall Wood. The latter experiences an adverse impact from the Expressway itself (PEIR, Table 16-1), so moving the carriageway slightly to accommodate a slip road could bring overall benefit to the wood.



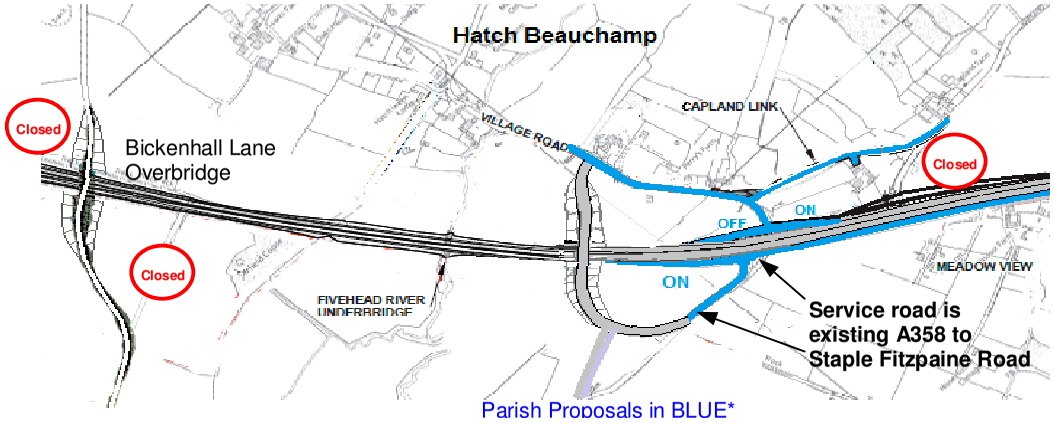
National Highways/HE's plan as presented in Forum 2 – May 2021



Parish Proposals in BLUE*

[5] Obtained through FOI/2578. Full SGAR 2_Redacted - End of Stage Report - 2019.05.24.

(5) The second proposal assumed the bridge is built. In this case 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. Highways England'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 A358 rather than the scheme route via Hatch Beauchamp to Mattock's Tree Green junction and Ashill to Ashill junction.



3b) To what extent do you agree or disagree with our proposals for Village Road to be diverted via a bridge across the A358?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
			✓		

Reasons for response to 3b

(1) Local residents welcome the adoption of the community proposal to site the Hatch Beauchamp overbridge about 250m Northwest.

(2) 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, Scheme Governance, Requirements for Safety Risk Assessment. Figure A.4, CD 122, Design of Grade Separated Junctions, gives a generic layout of a grade separated half-cloverleaf junction, which the community proposal follows. The proposal also minimises land usage and with the slip roads located close to existing junctions their impact on local residents would be minimal.

Understandably, without a fully developed design some residents have expressed concern about the impact of the slip roads, combined with the overbridge and possible Capland link. Good design and extended village speed limit would remove those concerns.

(3) National Highways dismisses these proposals for very weak, ideological reasons. Irrationally it uses GD 300 as the governing document to dismiss a community proposal that is in accordance with CD 122 standards, whilst ignoring the fact GD 300 prohibits the at-grade priority junctions at Southfields, Nexus 25 and Junction 25 roundabouts.

3c) At Capland, which option would you prefer to provide a connection between local villages in this area?

Please tick one choice

✓ Option 1 Provide a connecting link road between Capland Lane and Village Road
Option 2 Retain the existing route via Stewley Lane and Stock's Lane and provide localised flood improvements
Option 3 Retain the existing route via Stewley Lane and Stock's Lane without providing localised flood improvements

Reasons for response to 3c.

The 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

3d) To what extent do you agree or disagree with our proposals between Capland and Ashill on the western side of the A358? To summarise, they would allow the existing road to be converted to a local route, connecting to the new Village Road bridge and providing connectivity between Ashill and Hatch Beauchamp, keeping access to properties along this route.

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
			✓		

Reasons for response to 3d.

(1) The Community of Parishes 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 bypass Ashill village. This proposal provides a very important part of an ALARP solution to this section of the scheme.

(2) Without the slip road access at Hatch Beauchamp Village Road South and on the western and eastern ends of an extended service road it is estimated that some 2000+ vehicles a day will be diverted through Ashill village to reach the junction on its eastern boundary. National Highways must acknowledge that this traffic increase poses a severe safety risk on residents. Although ALARP level mitigation is a mandatory requirement, no

mitigation at all has been incorporated. The proposed Stewley Link is inconsequential in reducing this traffic. With numerous residential developments within Ashill already approved the risks to safety and general well-being will grow from National Highways' under estimated baseline. All the advantages provided to the village by the building of the Ashill bypass will be taken away, negatively changing the whole character of the village.

3e) Do you have any other comments about our plans for Section 3: Griffin Lane to Ashill junction?

(1) It is within this section that cost–cutting has had a severe negative impact on local communities. The 2019 SAR published a popular proposal to provide an additional junction south of Hatch Beauchamp (SAR, Figure 6.15 and Table 6.13) to specifically improve connectivity and reduce the flow of traffic through Hatch Beauchamp and Ashill, contradicting the current National Highways analysis of traffic flows. The removal of this junction by the then Highways England Executive leads to the conclusion, further evidenced by the high-level IAR report, that the dogmatic pursuance of an Expressway aspiration has bleed funding away from providing a usable A358 to local communities. There remains no evidence for building the dual carriageway to an Expressway build standard. GD 300 E/5.1 directs the highway link between Southfields roundabout and M5 Junction 25/Nexus roundabouts be designed as a trunk link road in accordance with CD 109.

(2) 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 National Highways 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 National Highways to reduce the risk to Other Parties to as low as is reasonably practical, a higher level of safety than required for actual road users. National Highways 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. Parishes further believe a benefit cost ratio (BCR) analysis as detailed in GG 104 would support the adoption of our proposals. Besides significantly improving safety within the villages the connections to the dual carriageway provide emergency access and egress as recommended by GD 368

(3) National Highways' conclusions on Human Health, Noise and Vibration highlights the mediocrity of the scheme as currently designed. North Curry and Stoke St Gregory, villages miles away from the direct impact of the scheme, are the sole identifiable beneficiaries. It is also damming that the Expressway will subject more residential properties to noise and vibration (813) than those benefiting from less (324). For the rest, National Highways can only point to a 'likely slight beneficial effect' on health across the local area, whilst ignoring the adverse impact on communities lying adjacent to the Expressway.

(4) The loss of historic accessibility to the A358 along Section 3 will necessitate long diversions along unclassified and C class rural lanes and roads. Experience to date is that these roads are poorly maintained by Somerset County Council, evidenced by pot holes, uncleared gullies, limited cutting of road hedges and verges. In autumn and winter the rural network is very dark, often muddy and slippery and in many places flooded or obstructed by pools of water. These issues already make the rural network precarious. The increased traffic volume, incompatibility of traffic types (cars, vans, lorries and agricultural vehicles) with each other and WCH uses will increase mental and physical stress on local communities. School runs will become more stressful. Businesses will be handicapped. Community severance will increase. The scheme does not consider in any depth these effects nor offers any mitigation of substance.

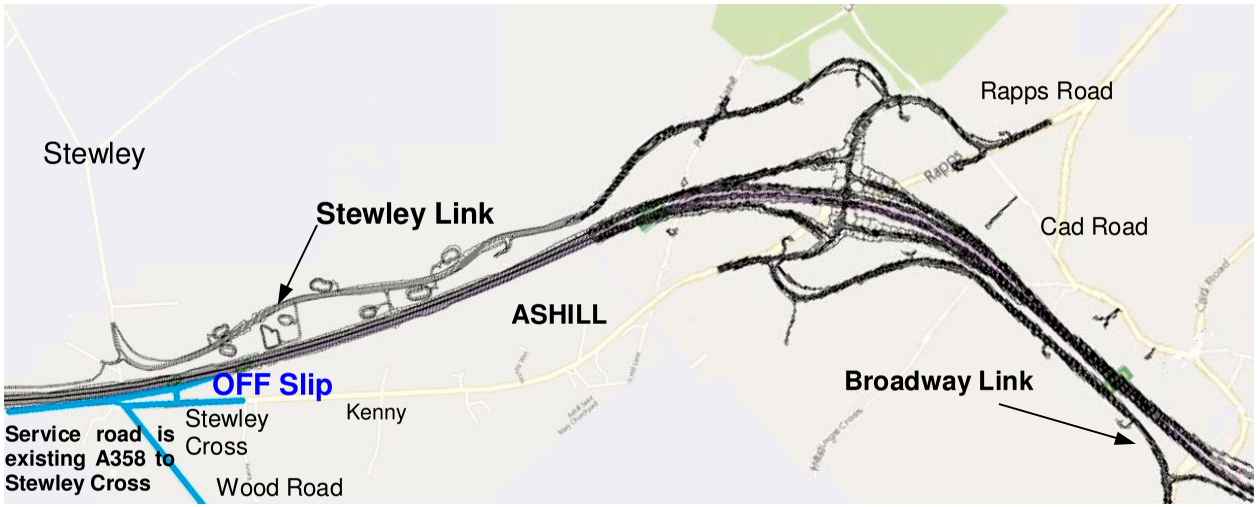
Section 4 - Ashill junction to Southfields roundabout

4a) To what extent do you agree or disagree with our proposals for the Ashill junction?

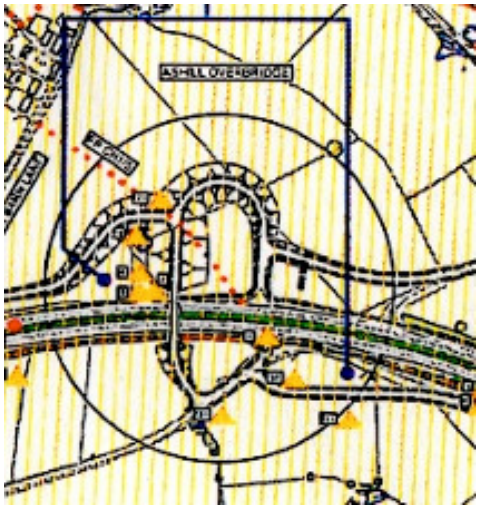
Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
			✓		

Reasons for response to 4a.

The junction is unnecessarily complicated taking up a large footprint and adversely impacting on the local environment. The route should be built as a trunk road link, with governing DMRB documents CD 109, CD 122, CD 123 and CD 116. Indeed, the 2019 SAR concluded that the route could be simplified if Expressway standards were not applied (SAR, 7.1.8). The 2007 Highways Agency design, shown below, indicates that if the Expressway ideology is dropped a simpler route and junction layout could be built.



Schematic Plan of Parish Proposal for Stewley Cross with off –slip



Highways Agency's 2007 design for Ashill Junction

4b) To what extent do you agree or disagree with our proposals for a parallel road on the eastern side of the A358 to connect Stewley with the Ashill junction and provide access to the A358?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
			✓		

Reasons for response to 4b.

The Stewley Link will have an inconsequential impact on the traffic through Ashill. Although the link would bring benefits to WCH users it will exacerbate severance of the Ashill parish and create difficulties for farmers working land both sides of the A358. Furthermore, the land required for the link is considerable, making at least one farmer's enterprise uncommercial. There is, therefore, a strong case for an overbridge at Kenny as proposed as part of the Preferred Route in the 2019 SAR.

4c) To what extent do you agree or disagree with our proposals for a parallel road on the western side of the A358 to connect Broadway Street and Thickthorn Lane with Ashill junction and provide access to the A358?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
	✓				

Reasons for response to 4c.

(1) Support for this proposal is qualified.

(2) Broadway's current direct connection to the A358 is important to the village, not just as a means for villagers to travel for work, leisure and health reasons to local or more distant destinations, but for residents in the wider area, notably in Ilminster and to the east, to reach the services Broadway provides. These include the over 2,000 people registered with Broadway's Church View Medical Centre who live outside the parish, mainly in or near Ilminster, or the families of children attending Neroche Primary School who travel to the village during term time. The community objective from the outset has been to ensure that these important flows in and out of the village via Broadway Street are neither discouraged nor diverted to local roads in the village or via other communities in the area, like Horton and Ashill.

(3) The proposed link connecting Broadway Street and Thickthorn Lane to the proposed Ashill junction achieves some of this objective. Accordingly, there is support for National Highways' proposals for Broadway Street in this respect. However, National Highways' plans fail to provide direct access to Broadway off the A358 for eastbound traffic. Such traffic would have to use the less convenient Ashill junction, involving an

unrealistic additional 3.2 miles for a round trip from Southfields roundabout, twice the distance compared to the Suggs Lane route. There is significant local concern that those wishing to reach Broadway for medical, educational, social or employment purposes may be discouraged from doing so or would use the shorter route via Suggs Lane, which is totally unsuitable for increased levels of traffic.

(4) The solution to this problem is to provide an off-slip road for westbound A358 traffic at Broadway Street. National Highways' refusal to agree to this access is justified through its adoption of the GD300, Expressway standard, for the whole route. To date, no explanation has been provided as to why adoption of this standard is more relevant to the circumstances of the route than the standard adopted, for instance, for the Sparkford to Ilchester section of the A303 currently under construction. That section of the A303 will have slip roads of the type needed at Broadway Street.

(5) The path for walkers, cyclists and horse riders proposed between Broadway Street and Horton Cross via the abandoned A358 is strongly supported.

4d) To what extent do you agree or disagree with our proposals for Southfields roundabout?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
				✓	

Reasons for response to 4d.

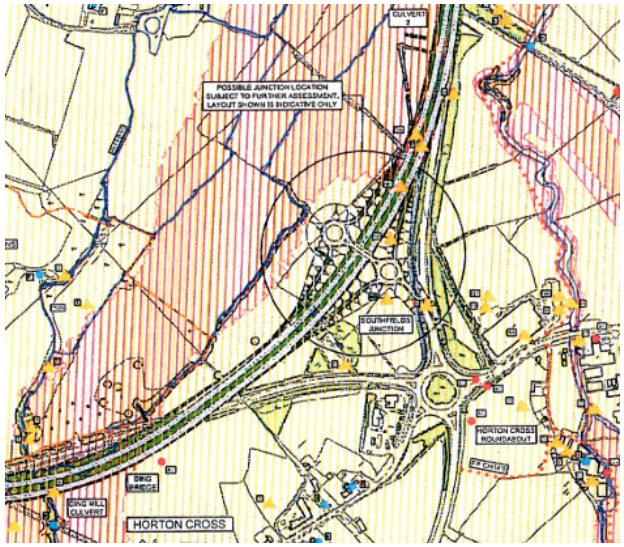
(1) The current route of the A358 (West) presents 2 significant problems for motorists. These are the congestion, pollution and safety issues at Henlade and the regular congestion experienced at Southfields roundabout. National Highways' proposals provide a solution to the first of these, but will make the second worse. In the process they also ignore at Southfields roundabout the engineering design standards they are imposing elsewhere along the route.

(2) Presently at Southfields roundabout, traffic on the A303 (East) Ilminster bypass travelling to Devon and Cornwall passes in front of the B3168 (Ilminster) before taking the A303 (West) towards Honiton. With this arrangement and with current levels of traffic, there is already congestion at peak and other times on all 5 approach legs of the roundabout. National Highways' proposal is to re-route the westbound A303 traffic around the roundabout towards Taunton and so across in front of 3 approach legs. In the process, and for the only time since the M3, this takes such traffic away from the geographically shortest route on the national highway network to Honiton and the South West. The result of this, combined with the major increases in traffic National Highways predict by the 2043 design year and the creation of 3 circulatory lanes rather than the present 2, will be to make traversing the roundabout more challenging for vehicles emerging from the B3168 (Ilminster), the A303 (West) and the A358 (South). That will result in increased congestion, particularly on the B3168 (Ilminster) and the A358 (South) approach legs. It also provides westbound A303 traffic with the opportunity to take the logical, shorter and presumably in future less busy A303 (West) route, defeating one of the purposes of the A358 improvement.

(3) Nor will the provision of a segregated left turn lane off the A358 (West) approach to the roundabout significantly improve matters. The diversion of traffic from the South West peninsular heading to the A303 (East) via junction 25 of the M5, coupled with the increases in traffic predicted

by National Highways, will substantially increase the number of vehicles approaching the roundabout. This, with the shortness of the segregated left-hand turn lane as it leaves the A358 (West) and joins the A303 (East) and the sharpness of the curve in the segregated lane, will cause congestion on that lane, potentially spilling back onto the A358 (West).

(4) The answer to these problems is to build a grade-separated junction at Southfields, separating long-distance from local traffic by providing a seamless connection between the A303 (East) and the A358 (West). Minimal changes would then be required to the roundabout and westbound traffic would be more easily encouraged to the M5 rather than the A303 (South). The Highways Agency has already proposed such an arrangement in 2007, as the graphic below shows:



(5) National Highways' refusal to agree to this not only condemns local communities in the area to even more congestion at the roundabout, but it also encourages rat-running along local roads for the foreseeable future. This has implications not considered by National Highways for communities like Donyatt and Sea. Significantly, as already explained in the answer to Question 1a, it also ignores the standards enshrined in GD300, which National Highways is imposing elsewhere on the route. National Highways' decision to build the route as a Level 2 Expressway requires junctions at either end to be grade-separated, as stated in E/6.9 of GD300. At Southfields, National Highways will not be meeting their own obligatory standards. In the absence of either justification or explanation, National Highways should revert to the grade-separated junction at Southfields for which plans already exist and for which local support is forthcoming.

(6) Instead of the limited changes proposed by National Highways at the roundabout, all the following design changes to the roundabout are essential were a grade-separated junction not to be provided.

A358 (West) traffic approaching the roundabout

As a strategic route in the national road network, it is anticipated that a high proportion of the traffic heading towards Southfields roundabout from the Taunton/M5 direction would use the proposed segregated left turn lane to head east onto the A303 (East) Ilminster bypass. Considering the speed reduction and consequent reduced traffic flow caused by the acuteness of the segregated lane curve at the roundabout, the following measures would help to alleviate the possibility of tailbacks on the dual carriageway:

- The addition of a significant length of auxiliary lane (similar to that shown in CD 122 Figure 3.30b Layout A option 2 - Single Lane auxiliary diverge) rather than the taper diverge currently proposed;
- The introduction of speed reduction measures for traffic approaching both the segregated left turn lane and the A358 approach to the roundabout;
- The introduction of real-time congestion warning signage.

A303 (East) Ilminster bypass traffic leaving the roundabout

For the same strategic reasons as mentioned above, a substantial length of parallel merge lane at the end of the segregated left turn lane should be introduced so that east-bound vehicles exiting Southfields roundabout itself can merge with the potentially dominant segregated left turn lane traffic up to and past the first right hand curve of the eastbound A303.

A303 (East) Ilminster bypass traffic approaching the roundabout

The proposed third approach lane at the roundabout would reintroduce the failed and subsequently amended original design of the roundabout. Additional speed reduction, improved signage and other safety measures should be implemented if this third approach lane were nonetheless to be implemented.

A358 (South) traffic approaching the roundabout

The proposed third approach lane should be converted into a segregated left turn lane so that all traffic joining the A358 (West) from Horton Cross can merge rather than giving way at the roundabout. National Highways should address the impact of a third lane on the safety of vehicles leaving and entering the services off the A358 (South) at this point.

Additional proposals at the roundabout

There is already significant congestion at peak times and other times on each of the approach legs to the roundabout. No significant physical change to the roundabout itself is proposed. However, the proposed creation of a third circulatory lane on parts of the roundabout would mean that traffic seeking to enter the roundabout from the B3168 (Ilminster) and A358 (South) approach legs would have to cross in front of 3 lanes of traffic rather than the current 2. This would create a significantly more challenging traverse of the roundabout for local vehicles than is currently

the case with a lower volume of traffic than National Highways project for the future. To cope with this, the following additional measures are needed at the roundabout.

- The permitted speed on the roundabout should be reduced from the current national speed limit to 40 mph, as is the case of the 40 mph limits at the South Petherton and Amesbury roundabouts on the A303.
- In order to give traffic from lower priority roads, namely the B3168 (Ilminster), the A303 (West) and the A358 (South), a safer and fairer opportunity to use the roundabout, traffic signals (either full-time or part-time) should be installed, as is already the case at Amesbury and Podimore roundabouts on the A303.
- Subject to the implementation of the first 2 proposals for the roundabout, the vertical profile of its central island comprising banks and foliage should be lowered so that traffic joining the roundabout has better visibility and consequently longer decision times, compensating to some extent for the increased volume of traffic from the A303 (East) joining the A358 (West) to Taunton/M5.

(7) To address a fundamental flaw in the scheme proposals, the opportunity should be taken to provide a grade-separated junction at Southfields, permitting A358 (West) and A303 (East) through-traffic to be separated from local traffic. Without this, the aim of reduced and consistent travel times will not be achieved, even if the design changes proposed above were to be implemented.

4e) Do you have any other comments about our plans for Section 4: Ashill junction to Southfields roundabout?

(1) There is no evidence for an Expressway build standard. The 2019 SAR indicates the route should be built as a dual all-purpose trunk road.

(2) 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.

(3) The width of the central reserve of the carriageway is excessive along the whole scheme but is particularly excessive on the approach to Southfields roundabout.

Improvements for walkers, cyclists and horse riders including disabled users

5) To what extent do you agree or disagree with our proposals for walkers, cyclists, horse riders and disabled users, including our plans to make use of the local road network and new off-road routes to create a cycle route from Henlade to Southfields roundabout?

Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know
	✓				

Reasons for response to 5.

(1) The objective to enhance the facilities for WCH is fully supported.

(2) Should the Capland link not be built, the alternative scheme proposal to provide a bridleway connecting Village Road South to Capland Lane should be expanded to include a cycle path. This would open up an alternative cycling option from Village Road to Ashill junction.

(3) National Highways reports that there is one large adverse impact to a bridleway where the route will be stopped up, with a further 15 routes experiencing moderate adverse effects as a result of longer journey times as a result of permanent diversions. This conclusion means the scheme fails the GD 300 requirement that WCH facilities should be at least as good as they were and that WCHs should not be disadvantaged by the building of an Expressway (GD 300, E/3.10.1 and E/3.10.3). It also means the scheme fails one of its primary objectives.

Planning ahead to construction

6) Please let us know if you have any comments on our proposals for construction, including the proposed phasing. No comment.

The Environment

7) Please let us know if you have any comments on the information presented in the Preliminary Environmental Information (PEI) Report.

(1) With the exception of Henlade air quality is generally good in the area. Because the area is rural the large footprint of the Expressway is likely to have a permanent significant adverse effect on the Vale of Taunton Deane and North Curry Sandstone Ridge landscapes and will adversely impact on views across these landscapes (Table 16.1). Minimising the environmental impact of the scheme points to minimising the scheme footprint, which in turn points to a non-Expressway standard dual carriageway.

(2) Since the scheme inception in 2014, the environmental issue of climate change has risen to prominence. The 2014 ideology of building big may now be out of step with current thinking of building small, the phasing out of petrol and diesel cars, and nudging seasonal travellers to alternatives like rail.

General

8) Do you have any other comments you would like to make about our proposals?

Refer to Principal Issues at front of questionnaire response.

* Illustrations are solely to assist explanation of requirements.

It is important that you submit your feedback by 23:59 on Monday 22 November 2021.

Questionnaires received after this time may not be considered.

Data protection

On 25 May 2018, the General Data Protection Regulations (GDPR) became law. The law requires National Highways to explain to you – consultees, stakeholders and customers – how your personal data will be used and stored. National Highways adheres to the government's consultation principles, the Planning Act 2008 as required, and may collect personal data to help shape development of highways schemes. Personal data collected by the project team will be processed and retained by National Highways and its appointed contractors until the scheme is complete.

Under the GDPR regulations you have the following rights:

- Right of access to the data (Subject Access Request)
- Right for the rectification of errors
- Right to erasure of personal data – this is not an absolute right under the legislation
- Right to restrict processing or to object to processing
- Right to data portability

If, at any point, National Highways plans to process the personal data we hold for a purpose other than that for which it was originally collected, we will tell you what that other purpose is. We will do this prior to any further processing taking place and we will include any relevant additional information, including your right to object to that further processing. You have the right to lodge a complaint with the supervisory authority, the Information Commissioners Office.

If you'd like more information about how we manage data, or a copy of our privacy notice, please contact:

DataProtectionAdvice@highwaysengland.co.uk

14 June 2021

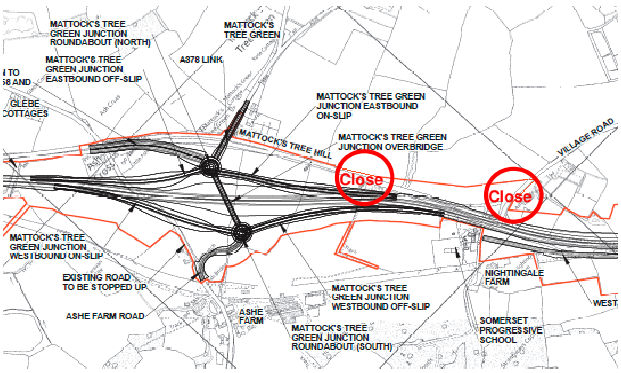
A358 Dualling: Taunton to Southfields
Parish Councils' Proposals for Satisfactory Connectivity
Mattock's Tree Green to Southfields

The following Parish Councils endorse these proposals:

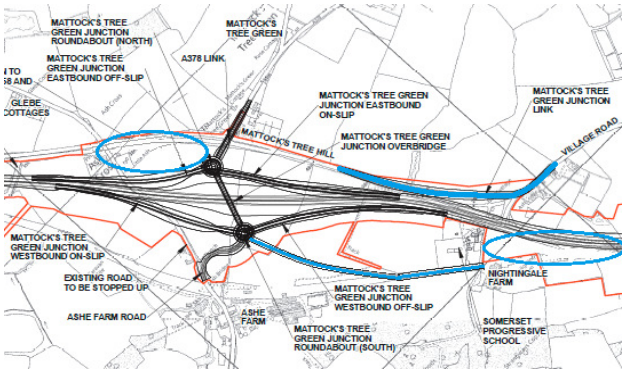
Stoke St. Mary	Ashill
West Hatch	Broadway
Hatch Beauchamp	Ilton
Beercrocombe	Donyatt

1. The new connection at Mattock's Tree Green Junction to the existing A358 and Henlade is unwarranted. The existing junction at Thornfalcon suffices with the additional spur to roundabout north. The busy Hatch Beauchamp Village Road needs to be connected to Thornfalcon junction via the existing A358. This cost neutral proposal would improve movement of local traffic, neighbourhood safety and reduce severance.

2. The West Hatch Lane link to Somerset Progressive School and adjacent Business Park is impractical, as the diversionary route proposed is some 3 miles distance along very narrow windy lanes. The link should be from the School/Business Park direct to Mattock's Tree Green roundabout south. Re-routing this link should be cost neutral.

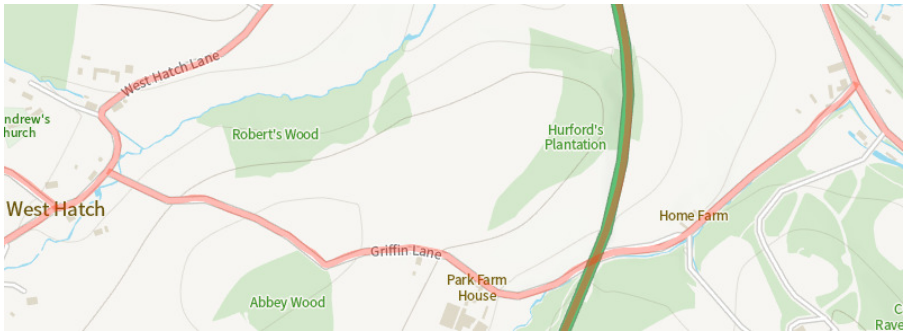


HE's plan as presented in Forum 2 – May 2021



Parish Proposals in BLUE*

3. Griffin Lane is too narrow, windy and hilly to be used as a major local road. Walkers, cyclists and horse riders use this lane extensively so the scheme's proposal for greater use of this lane by local motorised traffic is dangerous.



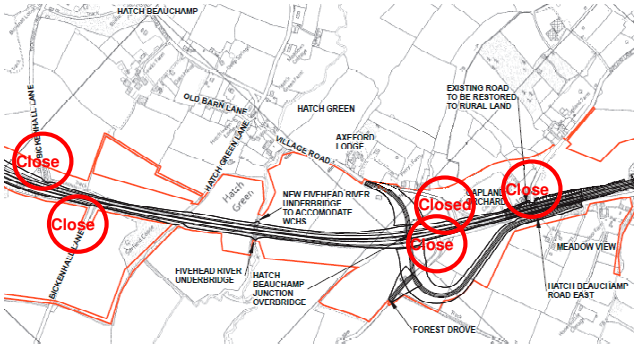
4. Bickenhall Lane is a busy local route favoured by farm traffic and lorries. This lane needs to be kept open by extending the planned service road from Ashill to Hatch Beauchamp overbridge to Bickenhall Lane. Slip road access should be provided onto the westbound carriageway at the western end of this extended service road. Offset savings will be made by not requiring suitability assessments of the diversionary routes proposed and the improvements that would be required on these routes to make them acceptable.

Bob Burrough [redacted]@holmansfarm.co.uk

5. The Hatch Beauchamp overbridge is considered to be unnecessarily complicated and sited at the most difficult and environmentally intrusive position. The overbridge should be sited about 200 metres northwest, where the adjacent ground is higher, dryer and more stable, and connected to Staple Fitzpaine Road (locally called Batten's Green Road). The overbridge should span the dual carriageway and the extended service road. The existing Batten's Green Road junction with the A358, which has been perfectly acceptable to date, should remain connected to the service road, dispensing with the scheme's expensive link to Hatch Beauchamp Road East.

6. The existing Village Road from Hatch Beauchamp needs to be connected to the eastbound carriageway via on-off slip roads. This access would significantly reduce local traffic through Hatch Beauchamp and Ashill villages, improving overall neighbourhood road safety.

7. Capland Lane needs to be connected to Village Road as Capland Lane west is the only flood free access to properties along Capland Lane and the northern part of Stewley Lane. The link also prevents severance of Hatch Beauchamp parish.



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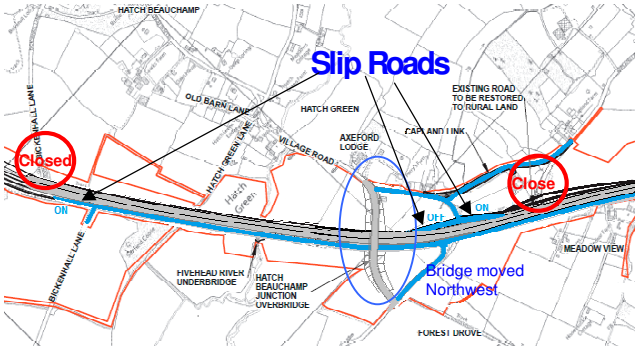
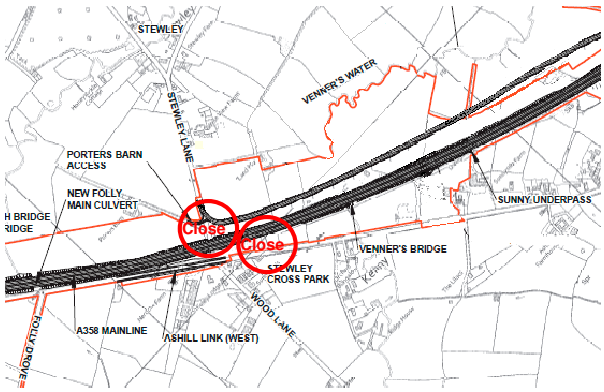


Parish Proposals in BLUE*

8. The recent HE proposal to build a road from Stewley Lane to Park Barn Lane and removing the Kenny overbridge, which was provided as part of the Pink Modified Route, is not supported. It would exacerbate severance of the Ashill parish and create difficulties for local traffic and other road users, particularly for farmers working land both sides of the A358. The Kenny overbridge needs to be retained as detailed in HE's Environmental Impact Assessment. Furthermore, existing roads at Stewley Cross should remain, as again they are perfectly satisfactory. The junction with the existing A358 should 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.

9. A simple works entrance off and on the eastbound carriageway should replace the link to Ashill sewage works, as is done in many locations on the national trunk network.



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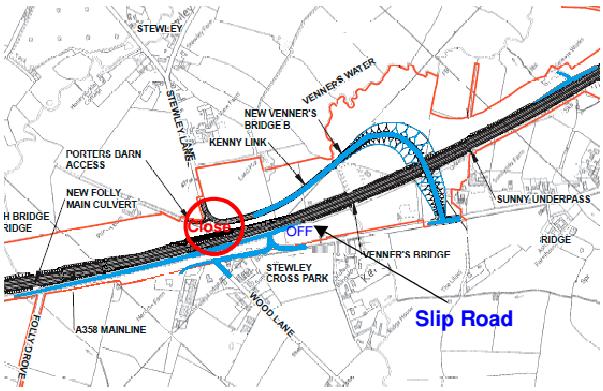
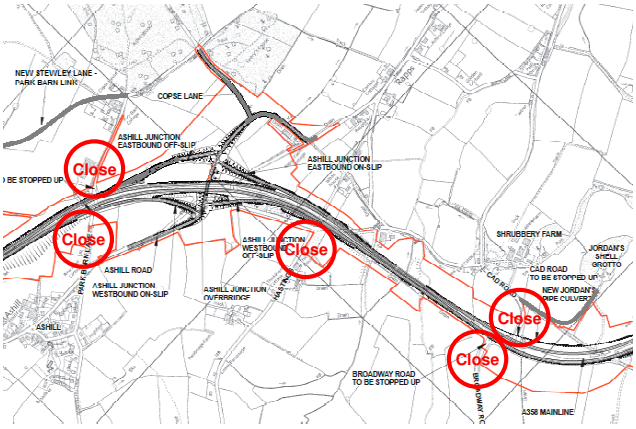


Parish Proposals in BLUE*

Bob Burrough [redacted]@holmansfarm.co.uk

10. HE SAR 2019 traffic data indicates that the closure of Cad Road 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 on to the eastbound carriageway.

11. At Broadway Street the dual carriageway should be moved Northeast to enable the existing A358 to be used for local two-way traffic and non-motorised vehicle users to and from the proposed Ashill junction. This would also enable Thickthorn Lane to remain open. A slip road off at Broadway Street would enable westbound traffic to leave to reach Broadway, Ashill and Ilton and remove the need for the proposed slip road further west. A path for non-motorised vehicle users should be provided from Broadway Street alongside the dual carriageway south to the abandoned section of the old A358 to Horton Cross.



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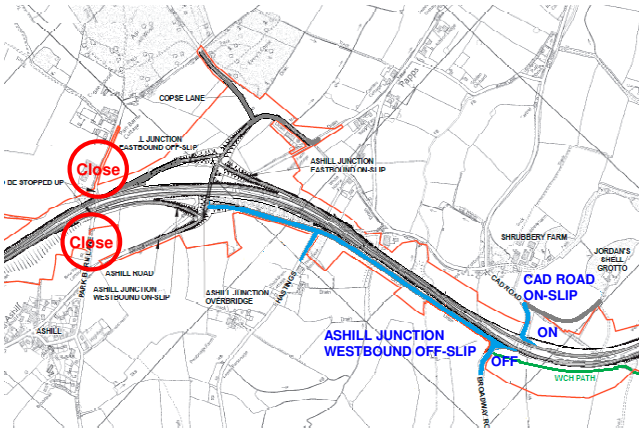


Parish Proposals in BLUE/GREEN*

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. Some of the improvements currently proposed to Southfields Roundabout would repeat the original, failed design at that location which had to be changed to the current layout in view of the roundabout's significant accident history, including HGVs overturning. In the absence of the parish councils' preferred option, the layout of the roundabout should be re-thought to reduce the already significant congestion regularly occurring on all 5 legs of the junction, including consideration of options such as traffic signals, either full-time or part-time.

* Illustrations are solely to assist explanation of requirements.

Bob Burrough [redacted]@holmansfarm.co.uk

20 July 2021

Kat Liddington
Senior Project Manager
Highways England

Follow-up to Highways England's Response to Parish Mitigation Proposals.

Following the 23 June Forum several Parish Councils raised DMRB issues and specific comment on individual proposals. These were not covered in your 8 July response. As they are very relevant to your continued appraisal of the Parish Mitigation Proposals we have consolidated them in this letter and Annex.

GD 300

The Technical Note emphasised the importance of GD 300 Table E/F.31 as determining junction standards along the scheme, noting that the proposals for slip roads is not permitted. However, the very same Table precludes roundabouts at the eastern and western ends of the link. The actual definition of Expressway components is given in Table E/C.1 and E/C.2 and this confirms that your proposed design does not meet the Expressway Level 2 requirements.

GD 300 did not exist when the decision on the Preferred Route was taken. If it had, HE would have been required under Clause E/1.4 to categorise the scheme as an all-purpose trunk road and, on cost grounds, 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 Phase 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. It should also be noted that the contract was awarded at the end of Phase 2 with an estimated budget calculated on a D2AP road standard.

We note your commitment to review the applicability of GD 300 to this scheme and to report the outcome of the review. We trust all the above points are fully considered in this review.

Other DMRB Issues

The Parish Mitigation Proposals were developed using local knowledge and life-time experience of the nations roads, prior to the recent discussion on DMRB applicability. However, it is now important to stress the compatibility of our Proposals to DMRB requirements.

Your letter stated '*Safety is our number one priority and therefore we must design the road to these GD 300 standards*'. Your focus on the road is our principal concern, as your preliminary design will not reduce risks for Other Parties (people living or working adjacent to the road or using the local rural network affected by the scheme) to as low as reasonably practical (ALARP) level. GG 104 requires 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. We contend our 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 left in/left out 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. Moreover, our proposal accords with CD 109 generic layout

constraints, which stipulates the distance between road access points should not exceed 5km. HE's preliminary design does not address either of these DMRB requirements.

Contrary to the Technical Note the Mitigation Proposals do conform to CD 122. We used the common term *slip road* to describe the transition between the mainline and the connecting road. For this CD 122 uses *taper merge/diverge*, defined as a merge or diverge layout where merging or diverging traffic joins or leaves the mainline carriageway through an area forming a funnel to or flare from the mainline carriageway. This is precisely what we propose for all our connections. For most people a slip road is a taper merge/diverge, so we do ask HE to have some consideration for common language when evaluating proposals from non-specialist stakeholders.

The slip roads that are proposed comply with GD 300 E/6.3, E/6.4 and E/6.6, and therefore are also well within the lower CD 109 criteria. Published AADT rates on the mainline and the connecting minor roads point to CD 122 Layouts A option 1 for all slip roads in the Mitigation Proposals, and their positioning ensures that they all comply with the GD 300/CD 122 grade separation requirement. Their necessity is on the following basis. The surrounding community affected by the scheme has consistently and continually stated a need for them on the grounds of safety, health and wellbeing of local parishioners and businesses. GG 103 mandates HE to respond to any adverse effects on these issues and GD 300 E/6.7 permits the inclusion of junctions required to support localised interaction. We trust the need of surrounding communities to be a higher priority than the examples given (retail outlets, tourist attractions, etc). E/D4.5 also makes the point that mitigation may mean the provision of new access roads, crossing points and enhancements to the local network. The proposed slip roads solve these issues and are, in comparison to the scheme cost, inexpensive. Moreover, the proposals provide offset cost saving opportunities. You should note that provision of the slip roads would relieve the scheme of requirements of E/6.8 and to some extent assist with the E/8.1 requirement for emergency areas along the route.

We welcome HE's commitment to reviewing the traffic on local roads with new updated data. Current forecasts see significant increases in traffic due to the scheme's design for which HE has provided very little mitigation. This burden on the local community will have to be carried summer, autumn, winter and spring. This is particularly vexing, as the outcome is opposite to HE's promotional in the Overview on the scheme webpage. A358 traffic diverting onto the local network only occurs because of the congestion at the very roundabouts still retained within the scheme. During the May Forums Philip Thiele implied that congestion during the holiday season at both ends of the scheme would be similar to that experienced today. This rather weak assessment of the capacity of the 3 roundabouts, Nexus 25, Junction 25, and Southfields is deeply concerning as it highlights the failure of the scheme to fulfil the RIS 1 objective. A robust and transparent analysis of these bottlenecks is needed. As safety is everyone's priority HE must also provide clear evidence that the scheme will improve safety of a road, and local network, that is currently safer than the national average.

We note that our Mitigation Proposals have not yet been fully appraised in terms of their environmental impact and cost and you propose that the project team undertake a full option appraisal against the current baseline scheme. This is appreciated. With the amount of major design work you are currently undertaking it appears that your predecessors did not fully complete Stage 2 design before costing and contract award. HE must face up to these earlier shortcomings and if necessary use your Designated Funds to make up any shortfall in funding.

Appendix A: Mitigation Proposals Updated post HE's Response.

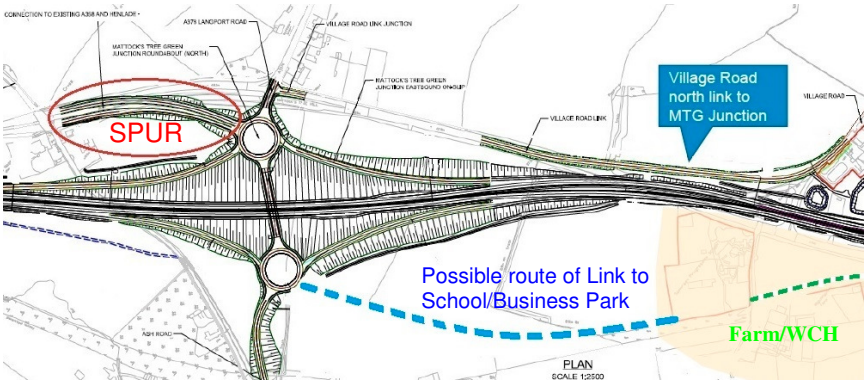
Stoke St Mary Parish Council
Hatch Beauchamp Parish Council
Ashill Parish Council
Ilton Parish Council
Horton Parish Council
West Hatch Parish Council
Beercrocombe Parish Council
Broadway Parish Council
Donyatt Parish Council

Appendix A **A358 Dualling: Taunton to Southfields**
Mitigation Proposals Updated post HE's Response

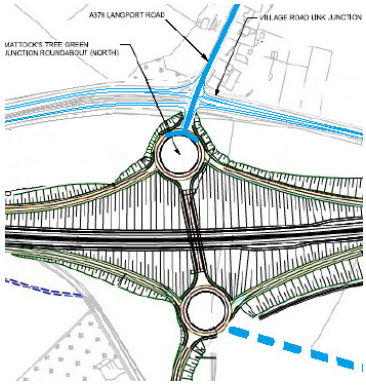
Proposal 1a. The new connection at Mattock's Tree Green Junction to the existing A358 and Henlade is unwarranted. The existing junction at Thornfalcon suffices with the additional spur to roundabout north. If the spur remains the Henlade side of Thornfalcon Junction will be closed and all local and through traffic will be funnelled onto roundabout north. This will encourage a rat-run from the M5 through Henlade and from the A38 through Creech St Michael via the spur to roundabout north, across the roundabout (at which they will have priority over Langport Road traffic) and down the slip road to the eastbound dual carriageway. The ease of this route that emphasises its connection to the dual carriageway will be apparent on all sat-navs. We note that HE is continuing to review this alternative junction proposal.

Proposal 1b. Our proposed link connecting Hatch Beauchamp Village Road to Thornfalcon junction is to be 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 has been adopted. Highways England is also considering a farm track/WCH path from this complex to West Hatch Lane.



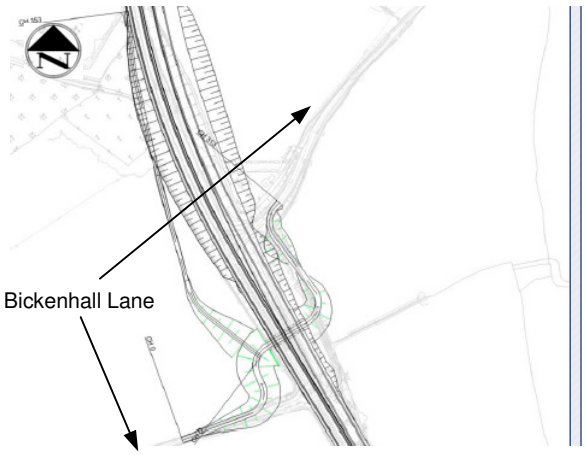
HE's plan as presented in Forum 3 – 23 June 2021



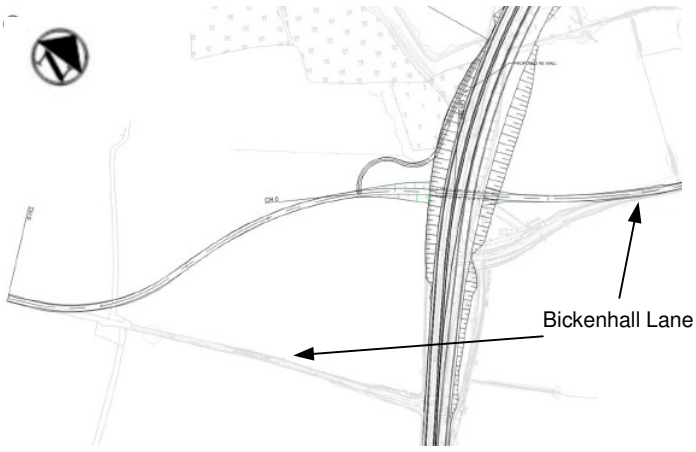
Parish Proposal for junction in BLUE

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

Proposal 4. Both alternative proposals to bridge Bickenhall Lane presented by HE will funnel traffic via a single track lane into the centre of Hatch Beauchamp, increasing the risk of accidents within the village. Following the recent confirmation that slow moving traffic will be allowed onto the dual carriageway the requirement for special crossings is removed.



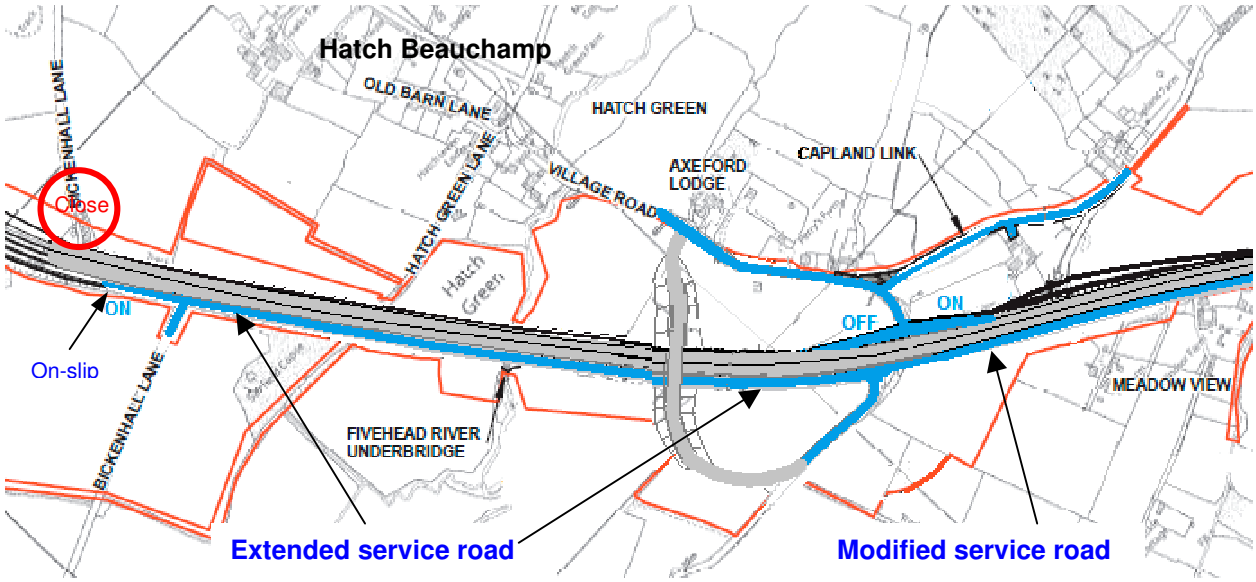
Bridge for farm traffic and WCHs



Bridge for all traffic and WCHs

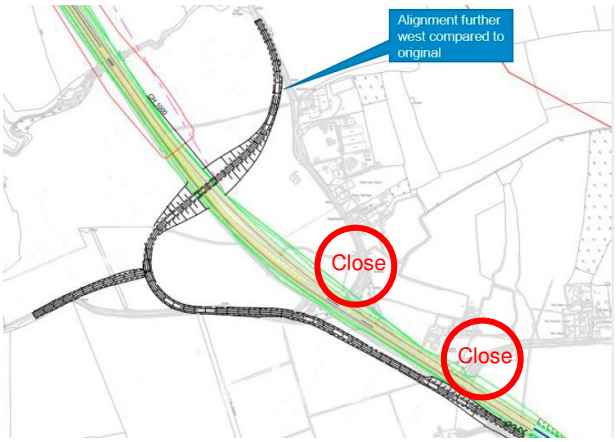
HE's plan as presented in Forum 3 – 23 June 2021

The Mitigation Proposal is to extend the service road to Bickenhall Lane and provide an on-slip road. Contrary to the Technical Note a Layout A Option 1 merging taper would occupy 235m, which is within the distance to the Bickenhall Ancient Woodland. Neither does CD 122 contain any reference prohibiting this type of taper merge junction. This proposal would enable all traffic, including farm vehicles, to use the dual carriageway to travel westward or the service road to travel eastwards. The service road with this on-slip also enables Taunton bound traffic from Kenny, Wood Road, Folly Drove, Meadow View, Staple Fitzpaine Road and Bickenhall Lane to access the A358 rather than the scheme route via the Hatch Beauchamp overbridge and through the village itself to Mattock's Tree Green junction. Offset savings will be made by not requiring suitability assessments of the diversionary routes proposed and the improvements that would be required on these routes to make them acceptable.



Parish Proposal in BLUE

Proposal 5. Our proposal to site the Hatch Beauchamp overbridge about 250m Northwest has been adopted. The recent HE proposal brings the link between the service road and Staple Fitzpaine Road very close to the existing junction, but this line takes the link over a pond with a spring. We recommend that the service road goes straight to the existing priority junction and onwards to Bickenhall Lane. The overbridge should span the dual carriageway and the extended service road. Should the extended service road not be adopted, the on-slip should be provided from the existing Staple Fitzpaine Road junction with the service road.



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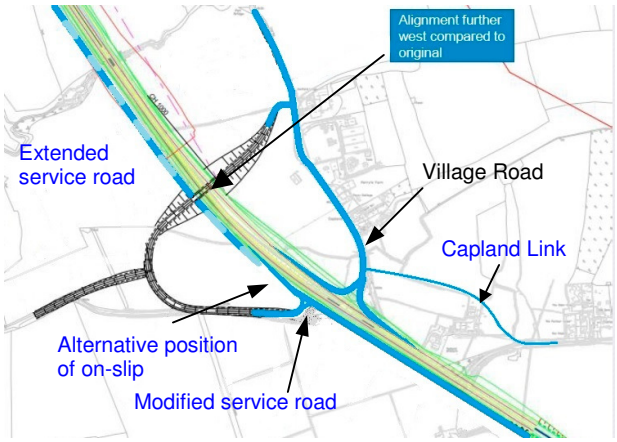
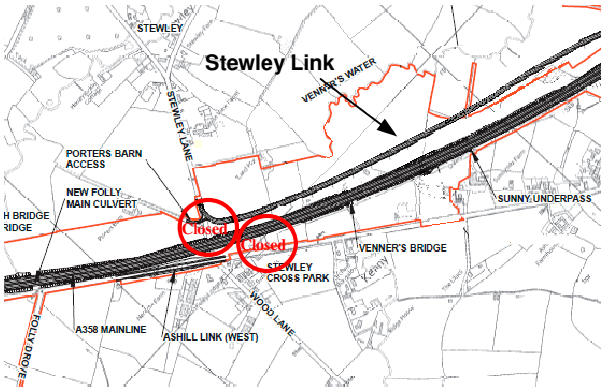


Parish Proposals in BLUE*.

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. CD 122 Figure A.3 gives a generic layout of a grade separated half-cloverleaf junction, which our proposal follows. We therefore question the objection at 8.2.2 of the Technical Note. 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.

Proposal 8. The recent HE proposal to build a road from Stewley Lane to Park Barn Lane and removing the Kenny overbridge, which was provided within the Preferred Route, is not supported. It would exacerbate severance of the Ashill parish and create difficulties for local traffic and other road users, particularly for farmers working land both sides of the A358. It would also require considerable land take, cutting through and isolating large segments of good agricultural land. The Kenny overbridge needs to be retained as detailed in HE's Environmental Impact Assessment. Furthermore, the existing roads at Stewley Cross should remain, as they are perfectly satisfactory. The junction with the existing A358 should 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 Beercrocombe, Stewley, Capland, Kenny, Wood Road, Folly Drove, Meadow View, Staple Fitzpaine Road, Bickenhall Lane and Hatch Beauchamp to by-pass Ashill village. This mitigation proposal is strongly supported by Ashill Parish Council.



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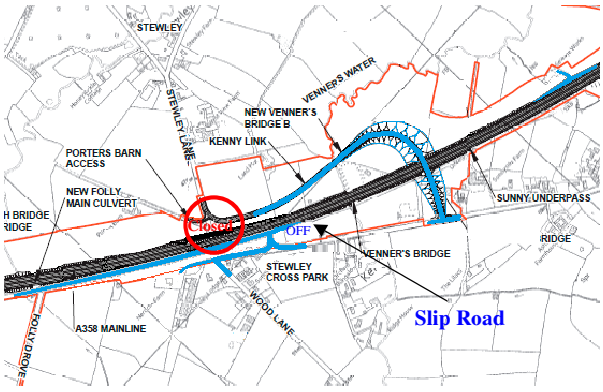


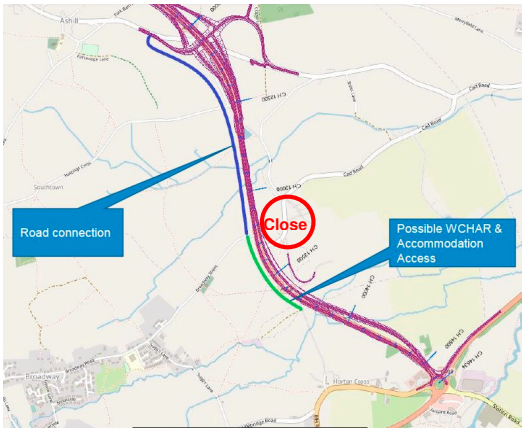
Parish Proposals in BLUE*

Proposal 9. A simple works entrance off and on the eastbound carriageway should replace the link to Ashill sewage works, as is done in many locations on the national trunk network. The requirements of GD 300 strongly point to the sewerage works having direct access from the A358 and integrated with an emergency refuge area. Without the Stewley Link an off-line link, if deemed absolutely necessary, to Park Barn Lane would be the most economical route.

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 believes that the critical importance of Broadway Street for communication between Broadway's health and educational services and its hinterland, and for commuting to work in the wider area justifies moving the proposed A358 carriageway

northeast to enable the existing A358 to be retained for access to and from the proposed Ashill junction, supplemented by a slip road off for west-bound traffic. Alternatively, HE's suggested service road between Broadway Street and the proposed Ashill junction should be improved by one or other of the slip road options set out in the Parish Council's detailed note sent to HE on 30 June. Failure to adopt one or other of these options will put an unacceptable strain on local roads, especially Suggs Lane in Broadway, undermine local services, extend journey times for work and leisure and lengthen emergency vehicle response times. The path for walkers, cyclists and horse riders between Broadway Street and Horton Cross via the abandoned A358 is supported.



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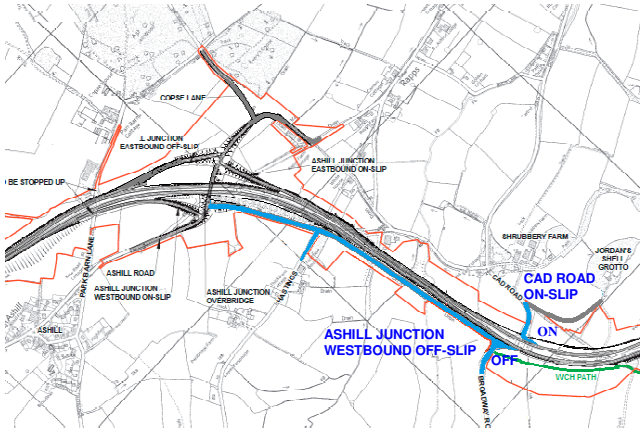


Parish Proposals in BLUE/GREEN*

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. Some of the improvements currently proposed to Southfields Roundabout would repeat the original, failed design at that location which had to be changed to the current layout in view of the roundabout's significant accident history, including HGVs overturning. In the absence of the parish councils' preferred option, the layout of the roundabout should be re-thought to reduce the already significant congestion regularly occurring on all 5 legs of the junction, including consideration of options such as traffic signals, either full-time or part-time.

Postscript. Although raised from the start of the consultation process many local people contend that congestion on the A358 would be solved by the creation of a Henlade By-pass (modified Pink route) and proper resolution of the design of the Southfield and Nexus/Junction 25 roundabouts, and specifically that there is no need to dual the entire length of the A358. This issue has never been properly addressed or explained. The savings and benefits to cost, the environment, rural community wellbeing and safety by not dualling would be considerable and also enable proper account to be taken of rapidly changing Government policies and Climate Change mitigation. RIS 2, signed off by the Secretary of State, describes the A358 Taunton to Southfields scheme as creating a dual carriageway link. Is HE's development of this link to an Expressway out of step with a change in Government priorities?

* Illustrations are solely to assist explanation of requirements.

Kat Liddington
Senior Project Manager
Highways England

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.

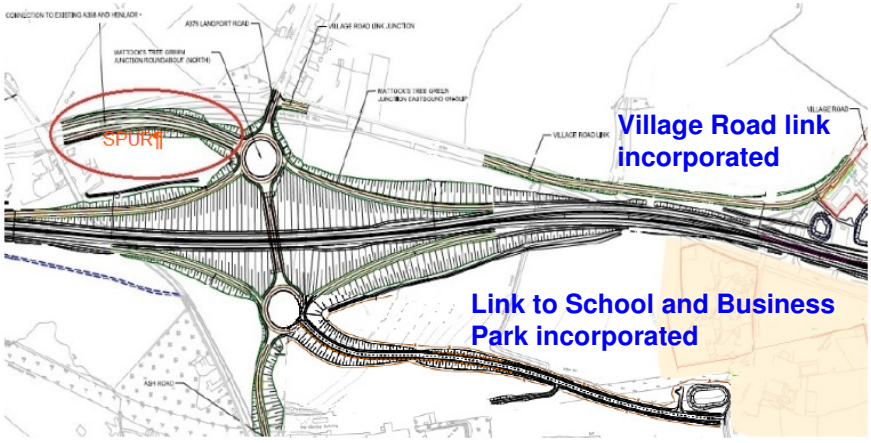
Stoke St Mary Parish Council
Hatch Beauchamp Parish Council
Ashill Parish Council
Ilton Parish Council
Horton Parish Council
West Hatch Parish Council
Beercrocombe Parish Council
Broadway Parish Council
Donyatt Parish Council
Curry Mallet Parish Council

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

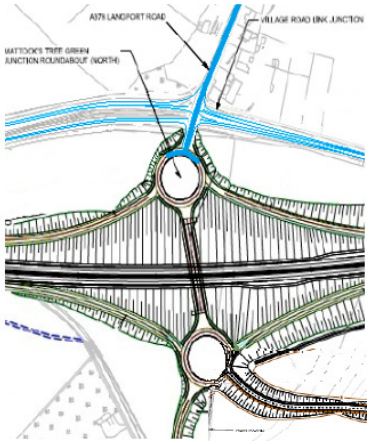
Proposal 1a. The view remains that the spur off the northern roundabout to Henlade is unwarranted and that traffic should flow via the existing Thornfalcon Junction modified to provide the necessary connections. This would discourage a rat-run developing through Henlade and Creech St Michael. It would 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.

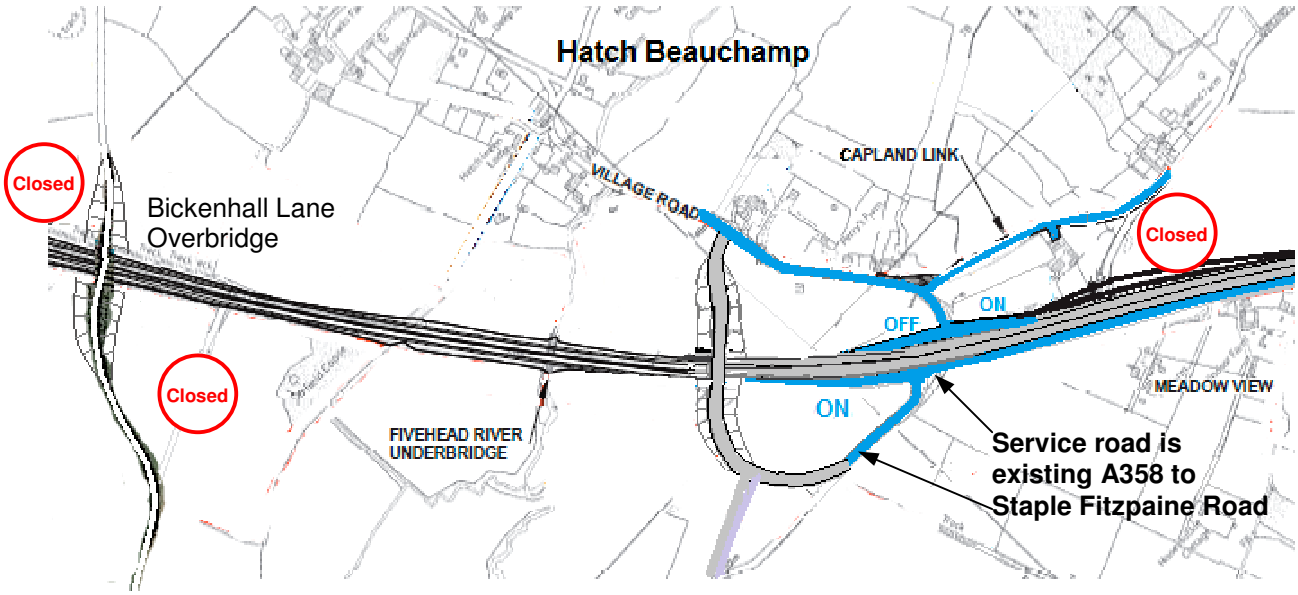
The western end of the service road should terminate at the existing Staple Fitzpaine junction, from which point a CD 122 Layout A Option 1 taper merge slip road should be provided onto the westbound carriageway. The service road with this on-slip enables traffic from Kenny, Wood Road, Folly Drove, Meadow 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.

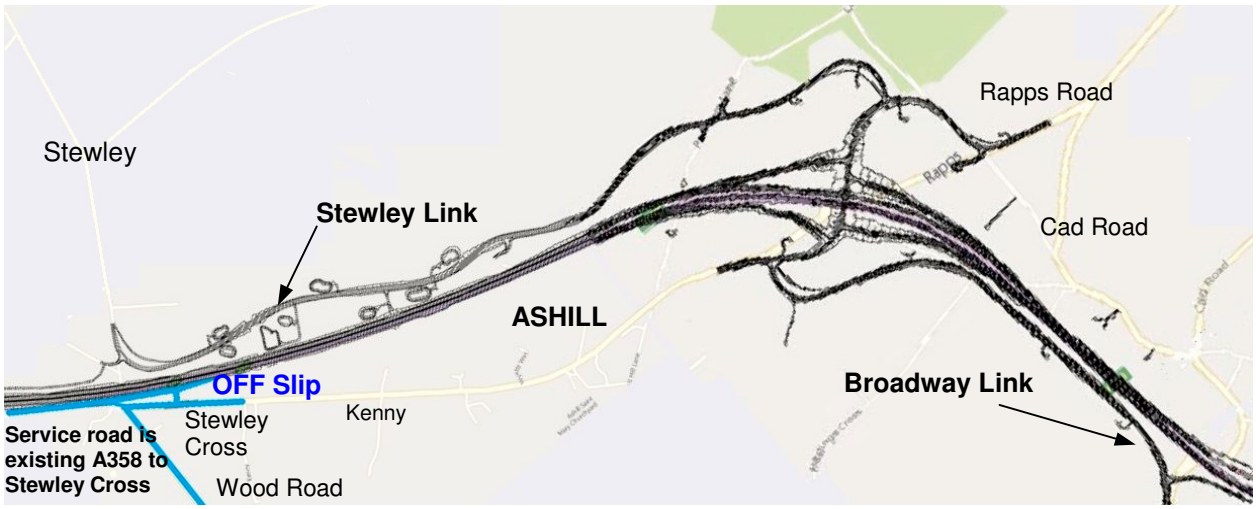
Proposal 6. The existing Village Road from Hatch Beauchamp needs to be connected to the eastbound carriageway via on-off slip roads. These slip accesses are required to significantly reduce the need for local traffic to drive through Hatch Beauchamp and Ashill villages, so providing an acceptable ALARP 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.