

From: Robert Burrough <b.burrough@holmansfarm.co.uk>

Sent: 09 July 2022 17:42

To: Cllr Mike Rigby <msrigby@somerset.gov.uk>; Cllr Federica Smith-Roberts <federica.smithroberts@somerset.gov.uk>; Cllr Ross Henley <Ross.Henley@somerset.gov.uk>; Cllr Val Keitch <val.keitch@somerset.gov.uk>; Cllr Mike Stanton <mike.stanton@somerset.gov.uk>; Andy Coupe <ajcoupe@somerset.gov.uk>

Cc: Subject: Response by SCC to A358 Supplementary Consultation

Good Afternoon SCC

It is apparent from SCC's Response to the A358 Supplementary Consultation, available at <https://democracy.somerset.gov.uk/ieDecisionDetails.aspx?Id=2327>, that SCC is still downplaying the unnecessary scale of the proposed design. Paragraph 1.1.5 contains misrepresentation regarding the design standard GD 300, the title of which is Requirements for new and upgraded all-purpose trunk roads (expressways). Under the government's Road Investment Strategy 2 (RIS 2) the A358 Expressway aspiration introduced in RIS 1 was downgraded "to creating a dual carriageway link from the M5 at Taunton to the A303". This remains the requirement. CD 109, Highway link design, is the design standard for a dual carriageway link, not GD 300. Governance requirements detailed within GD 300 also states this. The change in requirement from RIS 1 to RIS 2 was not implemented when the current design team took over the A358 Scheme in late 2020.

It is a great disappointment that the new SCC is going to taint its environmental credentials by not challenging the design standard, which will unnecessarily have a higher carbon footprint and will incur higher costs of construction, besides unnecessarily damaging more of our local landscape and ecology. The CEO of National Highways, Nick Harris, recently confirmed (New Civil Engineer, 4 July 2022) that DfT scrutiny of environmental matters and in particular a scheme's carbon emission was causing long delays in getting a scheme signed off by the Secretary of State. Scrutiny of costs led the Oxford to Cambridge Expressway to be cancelled in March 2021 as the benefit to cost was a lowly 1.3. In the Statutory Consultation the benefit to cost of the A358 Scheme was even lower at 1.2.

The Community of Parishes (CoP) appreciates SCC's continued pressure on NH regarding the displacement of traffic within the local road network. However, SCC has yet again ignored the core issue of providing additional access to the A358 between Ashill and Hatch Beauchamp. A Freedom of Information request (FOI/3537) confirms that NH has not yet carried out the statutory requirement prescribed in the Health and Safety at Work etc. Act 1974, Section 3(1), which requires NH to eliminate to as low as reasonably practical (ALARP) the risks to the health and safety of communities adversely affected by the Scheme. SCC has under the same Act statutory responsibilities for the enforcement of Section 3(1). From the FOI it appears that NH is working with SCC to develop and agree the methodology for assessing the impact of the scheme on the local road network and determining any mitigation measures, if appropriate. NH's manual for carrying out the safety risk assessments is GG 104 and the process is required to be fully documented with supporting evidence. CoP believes that the Planning Inspector would refuse any application that has not fulfilled statutory

requirements. CoP's understanding of the statutory requirements and the GG 104 process is attached.

Since the first consultations in 2017 local communities located along and near the scheme have consistently argued for the need of access to the A358 between Ashill and Hatch Beauchamp. The proposal was included in the 2019 Scheme Assessment Report but was deleted from the scheme deliverables following a high-level cost cutting exercise to accrue money to pay for the Expressway build standard. Cost cutting to save the scheme is one thing, but cost cutting to provide money for an unnecessary, expensive GD 300 build standard is not acceptable. The CoP response to the Supplementary Consultation, copies of which were sent to you, includes a proposal for a low cost composite junction that would effectively reinstates the historical local road network in this sector of the A358 Scheme. Traffic would be fed in an efficient and safe manner to and from the dualled A358 without the need to travel through Hatch Beauchamp or Ashill, or extended travel through local lanes and roads. CoP wishes this proposed composite junction, which would provide ALARP mitigation, to be included in the GG 104 assessment.

As is SCC, CoP is unconvinced of NH's operational and strategic traffic modelling. With pressures on transport from climate change, conventional fuel costs and availability of future renewable energy it is time to revalidate NH's traffic modelling. We echo SCC's call for NH to conduct an analysis of the original dataset to check that traffic growth in the area is as previously forecasted. The process and results of this analysis must be recorded in the Combined Modelling and Appraisal (ComMA) report and be put in the public domain.

Apart from these issues CoP acknowledges that SCC's response to the Supplementary Consultation is comprehensive and retains conditionality in requiring the Scheme to be further improved. The support to CoP's proposal to upgrade the proposed WCH route between Broadway Street and the A358 at Horton Cross to enable vehicular traffic is welcomed.

The 15 communities that make up CoP have consistently asked to have regular meetings with the local authorities so that we can work together to achieve an improved A358 fit for purpose for commuting traffic and for local communities whilst also providing a strategic regional improvement connecting London and the South-East with the South-West. We trust the new administration believes in a more democratic version of local government and takes more account of the local communities significantly affected by NH proposals.

Yours sincerely

Robert Burrough and Peter Gregory

On behalf of:

Stoke St Mary Parish Council

West Hatch Parish Council

Hatch Beauchamp Parish Council

Beercrocombe Parish Council

Curry Mallet Parish Council

Ashill Parish Council

Broadway Parish Council

Ilton Parish Council

Horton Parish Council
Donyatt Parish Council
Pitminster Parish Council
Combe St. Nicholas Parish Council
Corfe Parish Council
Neroche Parish Council
Ilminster Town Council

From: [Cllr Mike Rigby](#)

Sent: Thursday, July 28, 2022 11:06 AM

To: b.burrough@holmansfarm.co.uk ; petergregory999@gmail.com

Subject: RE: Response by SCC to A358 Supplementary Consultation

Dear Mr Burrough and Mr Gregory,

Thank you for your email on behalf of the Community of Parishes.

I am grateful to you for taking the time to write and for your interest in the project. Although I am the new Lead Member for Transport and Digital at Somerset County Council, I am also the Portfolio Holder for Economic Development, Planning and Transportation at Somerset West and Taunton Council. The County Council's position continues to be that we strongly support and have promoted the need for the A358 between Taunton and Southfields to be upgraded to dual carriageway as part of an end to end whole route improvement of the A303/A358, between the M3 and the M5 at Taunton. If designed appropriately, the scheme will improve connectivity and access to the South West Region, improve the resilience of the strategic road network and help to promote economic growth in the region. A principal objective and essential component of the scheme involves addressing the environmental (air quality and congestion) impacts of traffic flow through Henlade which is an Air Quality Management Area.

As the Portfolio Holder for Economic Development, Planning and Transportation at Somerset West and Taunton Council, I can also confirm that Council's position in that it continues to support improvements to the A358 between Taunton and Southfields - the Council's existing statutory planning policy within the Taunton Deane Core Strategy and its supporting adopted documents are supportive of the current proposal. Upgrading of the A358 should provide important improvements to the accessibility of Taunton as a high quality multifunctional sub-regional service centre and thereby further enhance its attractiveness and success.

You will be aware that Somerset County Council sought clarity at the Statutory Consultation stage about the design standard that National Highways was applying for the main line, and that the County Council does not challenge this. This continues to be the case. Instead, our support for the scheme is balanced against ensuring that measures are taken to address the principal impacts. I am aware that National Highways has explained its position in relation to design standards to the Community of Parishes and I appreciate that the Community of Parishes takes an alternative view that will undoubtedly be presented to the Planning Inspectorate during the Examination next year.

I realise and appreciate this puts the County Council, and ultimately Somerset Council, in a position which is at variance on some core matters to the majority of Parish Councils directly affected by the project.

The County Council continues to work with South Somerset District Council and Somerset West and Taunton Council to review the proposals being developed by National Highways. We are working positively with National Highways and the various stakeholders in developing this scheme for the benefit of Somerset and the wider South West. In doing so, we will be exploring opportunities for the scheme to contribute to the transport measures described in Somerset's Climate Emergency Strategy.

We are still at the stage of reviewing the traffic model outputs and assessing the impact of the project on the local road network. I am therefore unable at the current time to comment upon the adequacy and appropriateness of the mitigation measures proposed by National Highways in the Supplementary Consultation, but I would suggest that the time for further engagement with the Community of Parishes is when this exercise has been completed.

Yours sincerely,

Mike Rigby
County Councillor, Lydeard Division
Lead Member, Transport & Digital
Somerset County Council, County Hall, Taunton, TA1 4DY

From: Peter Gregory <petergregory999@gmail.com>
Date: Mon, 15 Aug 2022 at 13:01
Subject: Response by SCC to A358 Supplementary Consultation
To: <MSRigby@somerset.gov.uk>

Dear Mr Rigby.

Thank you for your email of 28 July setting out your response to the views of the Community of Parishes (CoP) on the National Highways' (NH) proposals for the dualling of the A358 between Southfields and the M5 at junction 25.

This project is reaching a critical stage. NH clearly believes that it has done enough to consult local opinion on its plans and that it can now finalise the design and the traffic modelling to inform it without further community engagement. This makes it doubly important that the current and future Somerset councils understand local views and press for the changes which are so important to the lives and livelihoods of people living either side of the proposed route. CoP members are concerned that, in its contact with CoP, Somerset County Council (SCC) has not recognised that community views are of the same importance as the wider strategic considerations. Nor has the County Council been prepared to challenge NH on behalf of the local people they represent.

Specifically, in response to your email, CoP wishes SCC and its successor to understand that:

1. In CoP's view, NH and SCC have not completed the statutory safety risk assessment for the communities neighbouring the eastern section of the route as detailed in GG 104. SCC must consult communities as part of that assessment.

2. CoP argues that the GD 300 design standard is unnecessary for an 8-mile link between roundabouts. The CD 109 standard is perfectly adequate to meet all NH's and SCC's objectives and would reduce the construction carbon footprint, the damage to the landscape and ecology and the financial cost, improve the benefit-to-cost ratio, facilitate local connectivity and reduce the threat to residents' safety from increases of diverted traffic through villages adjacent to the route.
3. Contrary to your assertion, National Highways has not adequately explained to CoP the rationale for the adoption of GD 300 for the new road nor why the standard adopted for the A303 Sparkford to Ilchester scheme currently under construction is not also appropriate for the A358.
4. SCC's emphasis on the importance of the new road to the economic development of Taunton and its hinterland is at the expense of the economic interests of people and businesses in the villages affected by it. The balance between the 2 should be redressed, particularly by challenging the standard to which the new road is proposed to be built.
5. While you claim that the new road will improve access to Taunton for long-distance traffic from the South East Region, it will have the reverse impact for local people affected by NH's proposals.
6. SCC needs to join CoP in pressing NH for the improvements to Southfields roundabout detailed in CoP's response to the Supplementary Consultations. Failure to change NH's mind on this issue will undermine the realisation of the strategic objectives of the scheme while hampering local residents' access to and from Ilminster and other legs of this vitally important junction.
7. CoP welcomes your suggestion of discussions with SCC once your review of NH's traffic modelling has been completed and CoP looks forward to that. It would be helpful, however, for CoP to be consulted on the methodology and to be kept in touch with progress. The outcome otherwise will be to take this process close to the commencement of the Examination in Public, with little time to discuss the outcome and the realities of traffic diversion which are at the heart of local communities' concerns. CoP awaits your approach on this subject.

CoP understands that SCC has had to balance the interests of local communities with those of the wider area, including the county town. However, CoP continues to believe that the balance which SCC has struck so far heavily favours those wider interests, when supporting CoP's advocacy of the adoption of CD 109 would achieve the right mix of local and wider considerations, would reduce costs and cause less environmental damage. That would also have the advantage of putting the Somerset Council on the same side as its electorate when the Examination in Public takes evidence.

Best regards

Peter Gregory
Convenor, Community of Parishes