

A358 Taunton to Southfields Dualling Scheme

Environmental Impact Assessment Scoping Report Beercrocombe Parish Council's Opinion

1. The EIA does not reference two NPSNN road safety policies nor fulfils the requirements of these policies. The applicable NPSNN policies are:

4.64

The applicant should be able to demonstrate that their scheme is consistent with the Highways Agency's Safety Framework for the Strategic Road Network and with the national Strategic Framework for Road Safety. Applicants will wish to show that they have taken all steps that are reasonably required to:

- . minimise the risk of death and injury arising from their development;*
- . contribute to an overall reduction in road casualties;*
- . contribute to an overall reduction in the number of unplanned incidents; and*
- . contribute to improvements in road safety for walkers and cyclists.*

5.202

Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks. Impacts may include economic, social and environmental effects. The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.

2. As part of the local community we are extremely concerned by the scheme's proposal to close all direct access to the dualled A358 for the 5 mile section between the Ashill and Mattock's Tree Green junctions. The EIA records at paragraph 3.2.6 that HE took the decision to close all 11 local road links primarily as a cost cutting measure, without complete analysis of the suitability of the local network to handle the volume and types of traffic and the impact this traffic would have on the road safety of walkers, cyclists and horse riders (WCH). This extreme decision will have a serious negative impact on road safety, general well being and health of the local area and discourage the activities of walkers, cyclists and horse riders. The Applicant has not fulfilled the NPSNN 5.206 requirement to include within the EIA a full description of the impact of their decisions with mitigating commitments.

3. The scheme proposes local traffic divert through rural roads to access the A358 at either the Ashill or Mattock's Tree Green junctions necessitating long journeys through narrow and often windy country lanes. Moreover, to reach either of these access points most local traffic will be funnelled through the villages of Hatch Beauchamp and Ashill and each will experience a large increase in traffic, which will inevitably have a negative impact on road safety within the villages. Both villages had bypasses built in the 1980s and 90s, which the scheme incorporates into the dualled A358, yet the implication of closing all local links will be to return the villages to traffic volumes that precipitated the need for a bypass.

4. The EIA notes at paragraph 13.3.20 that although walkers, cyclists and horse riders are not prohibited from using the A358, the current road is not suitable for this type of use due to traffic volumes and speed. Fortunately, the local rural roads are ideal for WCH users, which have increased following COVID restrictions. Local traffic currently

joins the A358 at the numerous connections and consequently motorised traffic on the rural network is minimised. Forcing local traffic to remain within the local network for long distances will undoubtedly cause conflict with WCH users. Traffic volume and incompatibility will lead to a rise in accidents and incidents within the local rural road network and discourage WCH from using a valuable local resource. This outcome directly opposes the Government's wider policy objectives for sustainable development.

5. HE's analysis of the current deficiencies of the A358 at paragraph 2.1.1 avoids the primary reason for delays, which are the inadequacies of the roundabouts at the west and east ends of the A358. Junction 25 to the M5 and the approach through Henlade is the primary cause for delays heading west, as is Southfields roundabout and Ilminster bypass for easterly traffic. These two bottlenecks are the cause of traffic congestion along the A358. East of Thornfalcon traffic flow is never compromised by local traffic joining and HE's own data recorded at paragraph 13.3.55 proves that the current A358 with all the current links has a considerably lower accident rate than the national average (110 versus 171 accidents per billion vehicle kilometres).

6. As the scheme has insufficient funding for incorporating free flowing junctions at both ends of the A358, HE's analysis concentrates on the second order deficiencies along the A358. The scheme's proposals for improvement appear to follow motorway design specifications for maximum speed of through traffic from one roundabout to the other, with a consequential disproportionate negative impact to the local rural communities. The loss of historic accessibility to the A358 necessitating long diversion through windy and narrow lanes, 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.

7. With government approval of the Sparkford to Ilchester dualling scheme local communities now have a template to compare to the proposal for the A358. Both schemes originated from the government's Road Investment Strategy 2015-2020 published in 2014 and both are part of the long-term commitment to creating a new Expressway to the Southwest. However, the designs of the two schemes are different in several ways. Whereas the Sparkford to Ilchester scheme has free flowing connections to the existing A303, the A358 scheme terminates at existing roundabouts that will undergo only marginal improvements. The Sparkford to Ilchester scheme has also maintained connectivity for local traffic by including standard trunk road at-grade junctions at Downhead and Camel Cross approximately halfway along the 3-mile long scheme. The EIA states at paragraph 2.4.2 that the A358 scheme is to be built to the same trunk road standards. However, the overwhelming priority given to through traffic and seasonal holiday traffic has produced decisions on local access to follow motorway specifications, with the consequential easy dismissal of the need for local connectivity between the Ashill and Mattock's Tree Green junctions.

8. We absolutely disagree with the assertion in paragraph 3.3.19 that the scheme will cause less disruption to existing patterns of movement for local communities. Local concerns regarding the loss of existing links to the A358 have been expressed at all opportunities including the Highways England sponsored Community Liaison Forums. We have proposed solutions to resolve these concerns but to date these concerns and our proposals have been ignored. The scheme development is now at Stage 3 – the last

stage - when the Preferred Route is developed to the Preliminary Design level to allow planning consent applications to be made. We are deeply concerned that reversing, or even amending, decisions made in Stage 2 that led to the Preferred Route Announcement will not be achieved through local appeals and we look to the Inspectorate to convey these concerns to Government and to Highways England.

9. Improvements can be made that would mitigate many of our concerns. We also believe savings can be made in the current proposal to pay for changes we want. These are:

a. The new connection at Mattock's Tree Green Junction to the existing A358 and Henlade is unwarranted. The current traffic light controlled junction at Thornfalcon would suffice with the additional link to roundabout north. The link from Hatch Beauchamp Village road should go to the Thornfalcon junction as EIA Figure 2.1 indicates. Maintaining this junction as existing would save money and improve movement of local traffic and avoid severance.

b. 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. Rerouting this link should be cost neutral.

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

d. Bickenhall Lane is a busy local route (over 500 AADT) favoured by farm traffic and lorries. We propose this lane is kept open by extending the planned service road from Ashill to Hatch Beauchamp overbridge to Bickenhall Lane. We also propose that a slip road access be provided onto the southern 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 remediation that would be required on these routes to make them acceptable.

e. The Hatch Beauchamp overbridge is considered to be unnecessarily complicated and sited at the most difficult and environmentally intrusive position. We believe the overbridge should be sited about 200 metres west, where the adjacent ground is higher, dryer and more stable, and aligned with 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 Hatch Beauchamp Road East.

f. HE traffic data for Village Road exceeds the criteria documented at Table 5.18a of CD123 Revision 2 for provision of slip road access. We therefore propose that the current Village Road from Hatch Beauchamp be modified to connect it to the northern carriageway via converging and diverging slip roads.

g. Although EIA Figure 2.1 shows Capland Lane connected to Village Road by a link, other briefs have not shown this connection. The link is a necessary

mitigation, as Capland Lane west is the only flood free access to properties along Capland Lane and the northern part of Stewley Lane.

h. The Kenny overbridge is too complicated and therefore expensive for the requirement. A simple straight connection from Stewley Lane to Wood Road should be possible in spite of recent development at Stewley Cross. The existing roads at Stewley Cross should remain, as again they are perfectly satisfactory. We propose that the junction with the existing A358 remains and becomes the eastern extent of the service road. We also propose a slip road access from the southern carriageway onto the service road at this point.

i. For clarity and emphasis, we propose slip roads off and on the southern dual carriageway at the eastern and western ends of the service road. We also propose slip road access off and on the northern carriageway at Village Road, Hatch Beauchamp. These additional access points are low cost solutions to provide satisfactory connectivity to the dual carriageway by the local network. If provided, traffic through Ashill and Hatch Beauchamp would be greatly reduced as would the distances driven by users of the local rural network. Confliction with WCH users would be reduced, damage to the environment would be reduced as would the mental and physical stress felt by local communities.

j. The link to Ashill sewage works should be replaced by a simple works entrance off and on the northern carriageway, as is done in many locations on the national trunk network.

k. The EIA gives little information about the upgrade to Copse Lane and we question whether the depicted route will be able to cope with the level of traffic heading to Ilton.

10. To respond to this EIA local parishes have combined knowledge in order to provide a useful critique to the current scheme proposal together with proposals for mitigation. We realise that we do not hold all the necessary technical information, but our opinions are based on local knowledge, local concerns, local practices and likely behavioural responses. In these areas our knowledge exceeds that of HE.

Beercrocombe Parish Council

22 April 2021