

A358 Taunton to Southfields Improvement.

Non-Statutory Public Consultation Response on Route Option

Response by Somerset County Council. 22 June 2017.

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1. Introduction

- 1.1. Somerset County Council understands that Highways England is undertaking a non-statutory consultation on a single route option for the A358 Taunton to Southfields dual carriageway improvement in order to assist the Secretary of State in selecting a preferred route for the scheme prior to entering the formal process of seeking consent to construct the scheme.
- 1.2. As a nationally significant infrastructure project, this scheme will be dealt with under the Development Consent Order (DCO) process. The role of the Council within this process is therefore as a statutory consultee.
- 1.3. The Council notes the information that has been provided in the material published for consultation including the Technical Appraisal Report (TAR), and notes that the appraisal of the scheme impacts and design proposals are still at a very early stage in the development process including early stage indicative proposals for junctions and side roads.
- 1.4. The Council notes that only a single option has been put forward for consultation and would have preferred Highways England to have consulted on all the feasible options at this stage in the process. The single option has posed unhelpful constraints on communities wishing to express views about the scheme. We note that the TAR contains details of four alternative options that have been appraised and request that further consideration is given to some of the design features of the alternative options which have gained strong community support during this consultation rather than discounting them at this stage.
- 1.5. It will be necessary for further information to be made available to the Council in due course in order for us to fully assess the local impacts and design of the preferred route proposal once chosen. The Council understands that further consultation will take place prior to the DCO process and expects to prepare a report on adequacy of consultation, a local impact report and a statement of common ground, as well as agreeing a process for agreement to detailed changes to the highway network.
- 1.6. The Council notes that the TAR refers to a number of other technical reports that have been used to inform Highways England's proposals (e.g. Local Model Validation Report, Traffic Forecasting Report and Land Use & Economic Development Report). These documents have not been published as part of the consultation process. Highways England has however undertaken to provide The Council with specific additional traffic data which we have requested in order to assist us in undertaking our statutory role as local highway authority in understanding the rationale for the proposals and likely impacts. Whilst this has not been provided in time to inform this initial response, the additional data once received will enable us to start to form a view on the robustness and adequacy of the assessments undertaken.
- 1.7. We wish to have access to the full suite of technical documentation at the earliest opportunity in order to validate that the approach being taken by Highways England in assessing the impacts is robust, particularly in how it identifies and mitigates any local impacts and models the effects of

weekend and seasonal traffic. We wish to avoid an adversarial approach to the DCO process and would therefore appreciate as much transparency as possible in the earlier stages of scheme development.

- 1.8. The Council is working closely with Taunton Deane Borough Council (TDBC) as the respective host highways and planning authorities for the scheme. The County Council notes that at this stage in the process TDBC has submitted a separate response to the consultation and this refers to a number of detailed planning matters. The County Council's response at this stage is therefore confined primarily to matters related to highways and transport, traffic, safety, flood risk, engineering design, interfaces with the local road network and rights of way. As the two authorities have worked together on their responses, the County Council's response includes relevant extracts from TDBC's response on matters of landscape and visual impact, air quality and emissions, archaeology and cultural heritage, biodiversity and ecology, noise and vibration.
- 1.9. The Council has for a number of years promoted the upgrading of the A358 as part of an end-to-end improvement of the A303/A358/A30 corridor and wish to make clear to Highways England that it is fully committed to the DCO process, and supports the principle of a dual carriageway improvement between the M5 and Southfields. This support relies upon Highways England making objective balanced judgements in relation to further more detailed information that will be provided as the preferred route is finalised and progressed through the DCO and design stages and as detailed impact assessments are made available.
- 1.10. The Council would welcome further dialogue to agree the scope of the technical work being undertaken by Highways England in respect of the identification and validation of local impacts, and arrangements for engagement in the process going forward, including the DCO process and subsequent agreement/ sign-off of detailed designs for changes to the highway network. We envisage setting out a schedule of the information that we feel will be necessary to enable us to meet our obligations as statutory consultee and as the authority responsible for the local highway network. Any commentary set out in this initial response should therefore not be considered exhaustive and is made without prejudice to further information that we may request or further observations we may have during the process going forward.
- 1.11. The DCO process places a significant additional burden upon the Council if we are to undertake our statutory role in the process effectively. Highways England have confirmed that there is no opportunity for the DCO project to provide financial resource to the Council to enable us to undertake our statutory functions in respect of the scheme. Somerset and Wiltshire Councils have therefore written jointly to Government to highlight the potential impact of this approach on delivery of the overall A303/ A358 improvement programme and are seeking a dialogue about effective resourcing going forward.

2. The need for a dual carriageway improvement

- 2.1. The Council strongly supports the need for the A358 between Taunton and Southfields to be upgraded to dual carriageway as part of an end-end whole route improvement of the A303/A358 between the M3 and the M5 at Taunton. If designed appropriately, the improvement 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.

- 2.2. An economic impact study commissioned by the Council, published in February 2013¹ noted the following key benefits of an end-end route improvement based on comprehensive business & tourism surveys and transport economic assessment.
- 21,400 jobs
 - £41.6bn boost to the economy (GVA)
 - £1.9bn in transport benefits from reduced journey times
 - Improve transport resilience to cope with incidents and during flooding
 - Save over 1800 fatal or serious casualties over 60 years
 - Reduce carbon emissions by 9%
- 2.3. The Council considers that complimentary improvements to the A303/A30 route between Ilminster and Honiton play a vital role in delivering those wider economic benefits as part of the whole route improvement.
- 2.4. A sectional economic analysis² demonstrated that the Taunton to Southfields dualling provided high value for money in its own right due to estimated journey time and safety improvements, with the scheme reducing congestion and delay on this section including a reduction in incidents.
- 2.5. The Council appreciates that the technical appraisal of the route has further developed since 2013, through feasibility studies undertaken by Department for Transport³ and through subsequent work by Highways England set out in the Technical Appraisal Report (TAR) issued as part of this consultation. The feasibility study and TAR demonstrate that in principle the proposed scheme if designed appropriately has the potential to meet its stated objectives and will present medium to high value for money as an investment with significant wider economic benefits providing further justification for the scheme.
- 2.6. It is the Council's belief that it will be possible for an appropriately designed scheme to meet the objectives of providing enhanced local connectivity to Taunton (with associated economic growth benefits) as well as providing improved strategic connectivity between London and the South West. One of our key objectives for the scheme is also to ensure traffic travelling through Henlade is reduced to the greatest degree possible. We urge Highways England to develop a preferred route which delivers on all these objectives.
- 2.7. The Council continues to strongly support the proposal to provide a dual carriageway improvement between the M5 at Taunton and Southfields and urges the Government to ensure sufficient funds are allocated to deliver the most effective scheme possible alongside the further schemes required to improve the remaining sections of single carriageway to dual carriageway as part of a whole-route improvement.

3. Route options

- 3.1. The Council has considered the four routes discussed in the TAR and the single option put forward for consultation.
- 3.2. The Council notes Highways England's broad conclusions at this stage that:

¹ A303 A358 A30 Corridor Improvement Programme Economic Impact Study, Parsons Brinkerhoff, Feb 2013

² A303 A358 A30 Corridor Sectional Economic Analysis, Parsons Brinkerhoff, Jan 2013.

³ A303, A358 and A30 Corridor Feasibility Summary Report, DfT, March 2015.

- Each of the four routes would improve access times along the A358 corridor between the A303 at Ilminster and the M5 at Taunton, and that none of the options would be more complex to build or maintain than any of the others.
- Option 2A/2B attracts the most traffic to the new A358 (54,600 AADT), with most of this traffic (73%) accessing the M5 and Taunton via the new link to junction 25. The other options attract less traffic to the new A358 with little difference between the options.
- Overall, the environmental and social assessment concluded variable results across the different route options, but with Option 1 NFS performing substantially worse in its effect on the landscape and biodiversity.

3.3. We note Highways England's overall conclusions in selecting Option 8/8B + NFS as the single option for consultation. Highways England considers that:

- The proposed route provides improved opportunities for future growth in housing and employment leading to increased prosperity;
- The provision of an additional junction on the south side of Taunton would help relieve pressure on Junction 25, reduce journey times and queue lengths.
- Route resilience would be improved by providing alternative route opportunities between the A378 and the M5.
- Reduced traffic through Henlade will improve air quality.

4. Highways and Transport Issues

4.1. The Council has engaged with Highways England at a strategic level in developing the proposals but anticipates a number of matters in relation to finalisation of the preferred route will have to be resolved in detail with Highways England if adversarial representation to the Planning Inspectorate Examination is to be avoided following submission of the DCO application. Such matters are likely to include:

- Performance of the proposed route and in particular, measures to encourage traffic to use the new route rather than the current A358 through Henlade.
- Impact of the scheme on the local road network and agreement in relation to the technical appraisal and validation of local impacts as well as matters of construction access and construction vehicle routing.
- Design of local road elements of the scheme, including location of key junctions, alterations of junctions and side roads as appropriate, provision of local access roads or an easily identifiable east-west route made up of existing links and suitable for local and prohibited traffic; and any required local impact mitigation.
- Flood risk and surface water drainage.
- Rights of way and access, including segregated crossings.
- Transfer of assets between the Council and Highways England if necessary.
- Requirements for local Traffic Regulation Orders.

Performance of the proposed route.

4.2. The Technical Appraisal Report (TAR) compares the benefits of the four scheme options considered by Highways England prior to choosing a single option for consultation. Table 0.1 (TAR page 10) is particularly important in appraising the relative performance of the route options through a quantification of the transport benefits and dis-benefits of the options.

4.3. The chosen scheme (Option 8 + NFS) would appear, according to Table 0.1, to offer the lowest transport benefits of the options considered including a safety dis-benefit. Further information

has been requested in order to fully understand the performance of the proposed scheme compared to other options considered in terms of network congestion, delay and safety.

- 4.4. Table 0.1 appears to conclude that Option 2A/2B has the greatest quantified transport benefits particularly in terms of journey time and safety benefits. Whilst it is costed as being significantly more expensive than the other options it is assessed as having the greatest value for money at this early appraisal stage. This appears to indicate that option 2A/2B performs much better than Option 8 + NFS in traffic and transport terms.
- 4.5. An operational assessment of Junction 25 in the year 2038 (using Somerset County Council's proposed Junction 25 improvement layout) has been carried out by Highways England for the options both with and without a link between the proposed new road and Junction 25. This showed that with the junction improvement the junction would operate at around 85% saturation in both the AM and PM peak periods either with or without a link between the new road and Junction 25. (85% saturation in this type of model is the point at which the junction still operates effectively but any further traffic load will start to cause congestion and delay). This analysis would not appear to present a clear technical rationale for the choice of the proposed route option in that it simply calculates that Junction 25 operates in a similar fashion whatever the route choice.
- 4.6. The Council understands that this is a relatively early stage in the appraisal of the scheme and that a more detailed assessment will be undertaken in due course, however a clear understanding by all parties, of the technical rationale for the choice of route option will be vital as the DCO progresses.
- 4.7. Whilst The Council's view is that further clarification and justification for choice of route is required, and that there are a number of important issues which will require resolution as the preferred route alignment and design is further developed, including the precise location of the new M5 junction; it is clear from the TAR that the proposed option if designed appropriately does have the potential to deliver the economic, transport and safety benefits that the Council is seeking in promoting the need for the improvement.
- 4.8. Data provided by Highways England from the initial transport modelling concludes that the proposed scheme is predicted to reduce annual average daily traffic on the existing A358 at Henlade by 4,000 vehicles in 2038 when compared to current (2015) flows, and that taking account of predicted traffic growth, the scheme results in 12,900 fewer vehicles travelling through Henlade in 2038 than there would otherwise have been. There are predicted to be a similar number of vehicles using the new road and the 'old road' through Henlade (about 26,000 on each road) in 2038.
- 4.9. Although not specifically referenced in the TAR, Highways England have confirmed that the 'Nexus 25' strategic employment site trip generation has been included in the traffic analysis and therefore the scheme does appear to accommodate predicted traffic growth to 2038 and enable the development of the Nexus 25 site whilst still delivering a reduction in traffic through Henlade compared to current traffic volumes.
- 4.10. One of the Council's key objectives as part of the wider ambition to create an improved strategic route to Taunton and the South West is to reduce traffic travelling through Henlade to the greatest degree possible. The Council's view is that the current forecast traffic reductions through Henlade can be improved upon and therefore requests Highways England to consider including measures in the DCO which encourage traffic to use the new route rather than the

current A358 through Henlade; including consideration of physical works on the existing A358 to further reduce traffic using that route, and alterations to the A358 junction with the A378 to encourage A378 traffic to use the new road.

- 4.11. The Council is particularly keen to understand why Option 2A/2B and its key feature of a link into the existing M5 junction 25 has not been recommended as an option for consideration when the high-level transport economic assessment presented would appear to favour this option. The Council expects this to be a matter for further consideration prior to selection of the preferred route and if necessary during the DCO process. The Council urges Highways England to further assess and consult upon the potential benefits and implications of a link between the proposed expressway and Junction 25 prior to selecting the preferred route and to consider including it as part of the preferred route if the more detailed assessment demonstrates that this would be beneficial in terms of economic growth, reducing congestion and improving safety, accessibility, and value for money; rather than discounting it at this stage in the process.
- 4.12. Journey time data supplied by Highways England from initial traffic modelling calculates that the new route will deliver the following changes to journey times in 2038 when compared to the 'do-minimum' scenario:
- South Petherton to North of Taunton (Bishop's Lydeard): Reductions of 4 min (12%) and 6 min (15%) in the AM and PM Peaks respectively.
 - South Petherton to North of Bridgwater: Reductions of 8 min (17%) and 7 min (19%) in the AM and PM Peaks respectively.
 - Wincanton to Exeter: Increase of 2 min (3%) and 1 min (1%) in the AM and PM Peaks respectively along the A303 and A30 due to congestion at Southfields junction.
- 4.13. The data provided appears to demonstrate that the proposed route provides enhanced journey times to Taunton compared to the do-minimum scenario. The Council is extremely keen to ensure that the proposed scheme provides strong connectivity between the new road and Taunton as an economic growth hub. Particularly if a link into Junction 25 is not provided, the precise location of the new M5 junction will be key to ensuring that the new route provides improved journey times to Taunton and supports the economic growth of the area. In confirming a precise location for the new junction, the scheme development process and DCO process will need to consider an appropriate balance between achieving an attractive journey time into Taunton and any impact of the new junction on local communities. In simple terms moving the junction further south is likely to reduce any potential impacts on local communities but also reduce the effectiveness of the route in providing attractive journey times into Taunton, so getting this balance right will be an important matter for the DCO process.
- 4.14. The Council is concerned that the proposal appears to increase journey times to Exeter via the A303/A30 due to forecast congestion at Southfields junction. The wider economic benefits of the investment in the corridor rely on improved journey times on both the A358 and the A303/A30, and whilst this apparent negative effect of the proposed A358 scheme should be removed once the South Petherton to Southfields section of the whole-route improvement is in place, the DCO for the A358 scheme should include interim measures to ensure there is no detriment to journey times to Exeter via the A303/A30.

Construction management.

- 4.15. The impact of scheme construction and movement of materials is not set out in the consultation documents at this stage and The Council anticipates that a detailed construction

traffic management plan will need to be agreed as part of the DCO process, explaining how construction impacts, in particular movement of materials will be minimised and mitigated. Construction traffic should not be routed along inappropriate narrow or residential roads. There could be considerable impact on the local highway network and in such circumstances the Council will seek to protect its roads under the legal provisions available.

Junctions and side roads.

- 4.16. The Council notes in the TAR that all junctions (with the exception of the link to the A303 at the eastern end of the scheme) are currently designed to fully grade separated standards and that this approach will be reviewed as relevant design parameters become available.
- 4.17. The single consultation option 8/8B + NFS proposes four junction locations:
- Junction 'A': A new two-bridge roundabout which forms a new all-movements M5 junction with the new A358 'expressway' located approximately 3.5km south of M5 Junction 25. Highways England have verbally confirmed that the proposed junction does not link with the local road network at this location.
 - Junction 'B': An all movements grade separated junction at West Hatch Lane to enable interchange with the existing A358 and A378. This junction could also serve adjacent communities such as West Hatch and Hatch Beauchamp.
 - Junction 'C': A grade separated junction at Ashill to provide access to communities near Ashill and Ilton.
 - Junction 'D': An at-grade connection to the Southfields Roundabout with the A303, with possible local improvements required at that junction. We understand the intention is to provide a grade separated junction or other free-flow connection to the A303 as part of a future South Petherton to Southfields improvement.
- 4.18. The TAR notes the proposed size and layout of these junctions will be determined during further design development and will be based upon predicted traffic volumes and relevant design standards.
- 4.19. The proposed 'Junction A' has attracted local community concern largely due to its proximity to residential development and due to Highways England's consultation material referring to the junction supporting major development opportunities in the area south of Taunton.
- 4.20. The Council supports the principle of a new junction on the M5 close to Taunton with both north and south facing slip roads, rather than a junction which only provides south facing slips; subject to a more thorough assessment to identify an optimum location balancing effective performance and local impacts.
- 4.21. The Council understands that Highways England do not propose any connection between the new 'Junction A' and the local road network as part of the scheme. It is The Council's view that it would not be appropriate for a connection to be created between the new 'Junction A' and the existing local highway network without provision of appropriate road infrastructure running between the new junction and destinations in the town. This view is on the grounds of the adverse highway safety, congestion and local environmental impacts that would be likely to arise due to the existing local network not being of suitable standard to carry additional strategic traffic.

- 4.22. Further dialogue with The Council will be required as part of the process of finalising the preferred route in order to ensure that the impact of the proposed scheme and associated junction strategy on local traffic movement, safety and accessibility are fully quantified by Highways England, and understood by all parties, including local communities, with any necessary mitigations agreed.
- 4.23. Early sight of the proposed layout of Junction A would be helpful to enable all parties to fully understand the implications and potential impacts (particularly visual impacts and noise impacts) of a new junction at this location; and to clarify how existing local network connectivity over the M5 (currently via a bridge at Killams Lane) will be maintained. It is anticipated that the precise location of this junction on the M5 has a degree of flexibility at this 'outline' stage and urges Highways England to confirm that the location will be established through further dialogue prior to (and if necessary as part of) the DCO process taking into account further technical design work, further appraisal of potential impacts and community views.
- 4.24. The proposed junction strategy for 'Section 2' significantly reduces opportunities for local traffic to access the A358 compared to the current provision, and this will inevitably increase the volume of local traffic travelling along less-suitable local roads to reach an access point onto the new road; which may have significant environmental impact on communities along those routes. Careful consideration will be needed to avoid the scheme leading to additional traffic using unsuitable minor roads such as West Hatch Lane where particular community concerns have been raised.
- 4.25. The TAR identifies that the proposal for 'Section 2' to upgrade the existing A358 alignment to 'expressway' with no parallel local access road provision limits opportunities for east-west movements by local traffic; and that this may encourage 'junction hopping' by local traffic between any proposed junctions. The TAR notes this could have adverse safety implications due to excessive merging/weaving on the mainline, or else use of inappropriate local roads, many of which are of relatively low standard. The TAR notes that HE should consider providing a Local Access Road or an easily identifiable east-west route made up of existing links and suitable for local and prohibited traffic. The Council supports this suggestion should the proposal for 'Section 2' be taken forward, and also requests that the need for further connections between the new road and the local network along 'Section 2' are considered in the light of a more detailed assessment of the impacts on the local road network and appropriate mitigation.
- 4.26. The proposals appear ambiguous about requirements for Non-Motorised User (NMU) provision at this stage, as NMU's may be banned from expressways and an objective for the scheme is to be expressway compatible. The scheme will need to ensure appropriate long-term provision for NMU movement is made particularly as the proposed 'Section 2' of the improvements does not leave a local road in place for east-west movement.
- 4.27. The TAR notes that structures (primarily overbridges), will be required to carry side roads across the proposed new road and maintain local road connectivity. The exact location of any junctions connecting the scheme with the local road network and of any overbridges/underbridges connecting local roads to be provided along the scheme length are unknown at this stage. Engagement with The Council will be essential in order that safe and appropriate layouts and designs are agreed for any elements of the scheme interfacing with or impacting on the local road network. This includes junctions, overbridges and underpasses, changes to alignment of side roads or any other elements of the scheme. The TAR includes an initial safety review of the outline proposals and The Council notes that initial safety concerns

have been recorded for a number of in principle design issues. Engagement with The Council will be necessary to ensure that safe and appropriate design solutions are agreed.

Flood Risk and Drainage

4.28. Detailed proposals for drainage and flood risk management are not set out in the consultation documents and the Council will require further information on those matters in order to agree that any temporary proposals and permanent solutions have adequately considered all flood risk and drainage considerations, including how the drainage system will function once it is constructed. It will be imperative to ensure that this scheme does not increase the flood risk in other areas.

Public Rights of Way

4.29. The TAR identifies that many Public Rights of Ways (PRoWs), undesignated paths and cycle routes are situated within the vicinity of all scheme options, a number of which have been severed by the construction of the existing A358, A303 and M5 roads. The TAR notes that crossings suitable for non- motorised users (NMU) are not common features in the area.

4.30. The TAR notes that there are 77 footpaths, 2 Sustrans cycle routes, 10 bridleways; and 2 long distance paths within 200m of the proposed option. Reference to the Neroche Herepath and the East-Deane Way appears to have been omitted and as these are important promoted routes regionally (particularly with the Herepath being a multi-user path), potential impacts on these routes should be given specific consideration.

4.31. The TAR notes that Non-Motorised User (NMU) surveys were undertaken in September 2016 but these have not been made available to The Council, and the TAR also contains narrative which indicates that outcomes from NMU surveys have yet to influence the design proposals.

4.32. Several footpaths and bridleways intersect the new highway alignment. All the proposed options would require the severance of several of these PRoWs. The TAR notes that these severed PRoWs would likely be replaced in the form of footbridges or underpasses, if deemed necessary following the completion of NMU surveys. It is unclear from the option design how these will be catered for in the new dual-carriageway design, and it should be noted that equestrian needs should be catered for in any new bridges or underpasses.

4.33. It is noted that the Council's adopted 'Rights of way improvement plan 2' is missing from the policy summary within the technical appraisal report and this contains several action and policy statements which are relevant to the scheme, particularly Action 1.4 and policy statements 3.1, 3.2 and 3.10.

4.34. Mitigation for severed ProWs will be necessary and this will either be in the form of diversion to the closest over/underbridge or the provision of a purpose built crossing for NMUs. Engagement with the Council will be essential in order that appropriate off-road space for NMUs is provided, appropriate parapet heights are provided particularly for equestrians, and appropriate diversion alignments are agreed. Where the mitigation is provision of a dedicated NMU over/underbridge then every consideration should be given to providing access for all NMUs, and looking at what local improvements could be made either in physical or legal status to improve the situation for NMUs.

- 4.35. Any NMU studies should not be taken as a reflection of lack of demand. The current flows on the A358 are likely to be a deterrent for many NMUs in using the current path network.
- 4.36. The TAR notes that with a new offline highway proposed the existing A358 will become an important route for local access – including for NMUs - particularly if certain vehicle types are banned from using the new highway. Reduced traffic levels on the existing A358 may encourage increased vehicle speeds. NMUs will not be adequately catered for as there is currently very limited infrastructure specifically for pedestrians, cyclists and equestrians. The Council expects this issue and associated mitigation to be given further consideration prior to and if necessary as part of the DCO.
- 4.37. It is highly recommended that detailed discussion takes place with local user group representatives to ensure that any routes believed to carry public rights, or higher rights than are already recorded, are captured and considered as part of proposal development. We understand that Somerset Local Access Forum has not had a specific consultation letter for either of the A303 schemes currently being promoted in Somerset and please note that this is an important forum to engage with going forward.

Transfer of assets between the Council and Highways England

- 4.38. The single option being consulted upon appears to require incorporation of parts of the local highway network into Highways England's Strategic Road Network as part of the DCO process; particularly parts of the existing A358 which form 'Section 2' of the proposed scheme. The Parties must ensure that responsibility for each section of road is discussed within the DCO process so there is clarity over what transfers to Highways England and what remains the responsibility of the local highway authority.

Requirements for local Traffic Regulation Orders.

- 4.39. The Council will need to be assured, before the DCO application is made, that all identified necessary TROs are included in the process, in particular that it is not left for the Council to address TROs necessary to regulate traffic on the existing county road network before, during or after construction.

5. Environmental and Social Impacts

Overview

- 5.1. The Council notes that initial environmental and social impact assessments have been undertaken and that consultation has started with the statutory environmental bodies. The Council notes that the options have varying levels of impact on Noise, Air Quality and Greenhouse Gases, Landscape, Archaeology, Listed Buildings, Historic Environment, Biodiversity, Water Environment, Physical Activity, Journey Quality and Severance.
- 5.2. At this stage in the process The Council refers Highways England to Taunton Deane Borough Council's consultation response in respect of matters of landscape and visual impact, air quality and emissions, archaeology and cultural heritage, biodiversity and ecology, noise and vibration as follows:
- 5.3. Relevant extracts from TDBC's response on environmental matters supported by the Council:

Landscape and Visual (from TDBC)

- 5.4. The report acknowledges that there is a significant wealth of assets with designated environmental status near the four routes including landscape, ecological and historical features
- 5.5. It is assumed that a landscape and Visual impact assessment (LVIA) has been carried out to assess the landscape impact of the various routes but there is no reference to such an assessment. It would be useful to see a map showing the zone of theoretical visibility and a map showing the various viewpoints used for assessing each route. It is unclear how conclusions on landscape impact have been made
- 5.6. The preferred scheme area passes through four identified National landscape character regions within the districts of Taunton Deane and South Somerset (National Character Areas (NCA): 143 Mid Somerset Hills, 140 Yeovil Scarplands, 147 Blackdowns and 146 Vale of Taunton and Quantock Ridges
- 5.7. However no mention is made to local landscape character areas. In Taunton Deane these are 1a Farmed and Settled Low vale-Vale of taunton Deane 4a Farmed and Wooded Lias vale -Fivehead Vale and part of 5a Sandstone ridge –North Curry.
- 5.8. The route passes very close to the nationally protected landscape, the Blackdown hills Area of Outstanding Natural Beauty (AONB) the boundary of which is which usefully shown on the constraints map.
- 5.9. There is reference to the two long distance footpaths (East Deane way and Neroche Herepath) that will be affected by the preferred road route but these recreation routes are not shown on plan. The report acknowledges the importance of Stoke Hill as a prominent landscape feature in the area but fails to mention Thorn Clump SLF. (Special landscape Feature).
- 5.10. Although there is no specific landscape legislation, reference and consideration should be made and given to the European landscape Convention which the UK signed up to in 2006. It is considered that the National parks and Access to the Countryside Act 1949 should also be taken into account. When listing local relevant policies in Taunton Deane district, CP8 policy which states that the council will conserve and enhance the natural and historic environment should also be considered. There is no mention in the report of the councils' green wedge at Vivary and Cotlake Hill or the Special landscape feature (SLF) of Thorn clump at Henlade
- 5.11. All four proposed route options would traverse the agricultural landscape between Taunton in the west and Ilminster in the east.
- 5.12. One of the options (1/1B+NFS) within the TAR which is the furthest away from the existing A358 corridor being within an otherwise agricultural and tranquil environment would lead to a more notable change than those routes near the existing A358 corridor. This option would also be set at the base of the Blackdown Hills Area of Outstanding Natural Beauty (AONB) which rise to the south. Existing far reaching views of and from the AONB would be disrupted by the presence of the new route. This route has great landscape and biodiversity impact.
- 5.13. On the lowland plain, the visibility of the Options 8/8B + NFS (the preferred route) and Option 8/8B + Jct25 may be limited by intervening vegetation, but the schemes would still be visible from the adjacent Blackdown Hills AONB. The provision of junctions at West Hatch and Ashill would increase the level of disturbance, as would the upgrading of part of the existing A358 and the construction of the new link over the lowland plain connecting to the motorway.

This route also encroaches slightly on the lower slopes of Stoke Hill possibly resulting in cutting into the hillside, and would also result in the destruction of some woodland at Huish woods.

- 5.14. The preferred route 8-8B+NFS would also be visible from local visual receptors along the A358 and from the proposed housing extension in the Killams area of Taunton.
- 5.15. Option 2A/2B would have the less landscape impact being in the most part either passing in close proximity to the existing A358, however this option would be visible from local visual receptors such as residential properties close to the route.

Air Quality and Emissions (from TDBC)

- 5.16. The TAR states that “The air quality appraisal has been undertaken in accordance with Transport Appraisal Guidance (TAG) unit A3 chapter 3. Net present values (NPV) have been calculated for both local and regional changes in air quality.”
- 5.17. The report states that “All options show local improvements in ambient air quality due to reduced congestion on the affected road network. This is balanced against predicted regional increases in emissions due to overall traffic growth. For Option 2A/2B, the regional increases outweigh the local improvements, resulting in a small dis-benefit for this option with small benefits for the other options. All options have the potential to decrease noise in local residential areas, apart from option 8 NFS which has the potential to increase noise in local residential areas. These are represented by benefits in the quantitative appraisal, except for option 8 NFS which shows a dis-benefit”.
- 5.18. It is not possible to comment on the accuracy of the figures or assumptions made during the assessments as there is no data provided with the report. There are no details of existing and potential air quality, noise levels or traffic levels.
- 5.19. The TAG document that is referred to in the Report outlines how the assessment compares the existing noise/air quality to the levels that could be expected with a proposed new road. It is based on predictions of traffic levels and a number of other assumptions. There is also no discussion or comment on the results, what factors may affect the air quality or noise levels or any mitigation that could be used.
- 5.20. There is an Air Quality Management Area (AQMA) on the A358 in Henlade which was declared due to high levels of nitrogen dioxide. This is due to the high levels of road traffic and the residential buildings being close to the road. It is likely that a road by-passing Henlade would reduce traffic and also the levels of pollutants on the existing A358. The Report does not include details of the changes in traffic levels on the existing A358 in Henlade due to each proposal, however, there is an estimate of the traffic levels on the new stretch of the A358 to the east of the existing A358.
- Option 1 + NFS (31,700 2 way flow in 2038),
 - Option 8/8B + Junction 25 (45,900 2 way flow in 2038)
 - Option 8/8B + NFS (26,000 2 way flow in 2038).
 - Option 2A/2B scheme attracts the most traffic to the new A358 (54,600 2 way flow in 2038), with the majority of this traffic (73%) accessing the M5 and Taunton via the new link to Junction 25, the remainder (27%) using the new free flow slip roads with the M5 to travel south on the M5.

- 5.21. Option 2A/2B has the highest flow of traffic on the new stretch of A358 and so this would

indicate that it would result in the lowest levels of traffic on the existing A358 through Henlade. This is backed up by the statement that 73% of the traffic would be using the link to Junction 25 to access Taunton and the M5 north, and so for the other options without the link to Junction 25 a lot of this traffic would be using the existing A358.

- 5.22. Without any calculation or explanation of the results it can only be assumed that any improvements due to reduction of traffic on the A358 in Henlade are outweighed by increases in air pollution at other properties. It may be that Option 2A/2B passes closer to houses than the other three options which pass through more rural areas. Even so, it would be surprising if the new road was closer to houses than the existing A358 in Henlade.
- 5.23. The Council has been producing Action Plans with the aim to improve air quality in the AQMAs, however, as the pollution is due to road traffic on a main road the Council is very limited in what it can do. It is likely that the only way to meet air quality standards at Henlade is to provide a by-pass to remove most of the traffic from the road.
- 5.24. Therefore, further detail should be provided on how a proposal that removes the most traffic from the built up area of the A358 at Henlade leads to a dis-benefit in overall air quality.
- 5.25. In summary, there is not enough information on air quality or noise in the Appraisal Report to allow a full comment or view on these issues. The report does not provide detail or an explanation of how each route may affect certain areas, there is no explanation as to why the options that result in dis-benefit to noise and to air quality are different, when both are based on traffic flows. There is no explanation as to how the option that removes the most traffic from the A358 through Henlade results in a dis-benefit for air quality. The new road should have a quiet road surface and appropriate mitigation.

Air Quality (Additional SCC comment)

- 5.26. The TAR notes that recent TDBC air quality reports (2011) do not report any exceedances of the annual mean nitrogen dioxide (NO₂) objective in 2010 at Henlade. Somerset County Council understands that more recent data does show exceedances in 2016 so we request that HE uses the latest data as a basis for decision making.

Archaeology and Cultural Heritage (from TDBC)

- 5.27. Poundisford Park Pale Scheduled Monument and Poundisford Park Grade II Registered Park and Garden are located within 300m of Option 1 + NFS. There is a Cross in St. Aldhelm and St. Eadburga churchyard Scheduled Monument within 1km of Options 2A/2B, 8 + NFS and 8 + Jct25.
- 5.28. There are many listed buildings within the 1km of all four scheme options, consisting of Grade I, Grade II and Grade II* listed buildings; and many records of archaeological events and finds within 1km of the proposed options, many of which run along the existing A358.
- 5.29. The heritage section of the consultation document is poor and while it mentions archaeology, the impact on historic buildings and heritage assets is not considered in any detail. Historic England has now produced its replacement for the PPS5 Practice Guidance. Historic Environment Good Practice Advice in Planning Note 3 'The Setting of Heritage Assets' needs to be specifically referred to as well as the considerations set out in the NPS and NPPF. Highways England need to produce a Statement of Historic Significance.

Bio Diversity and Ecology (from TDBC)

- 5.30. The report acknowledges that there is a significant wealth of assets with designated environmental status near all four routes and shows these on the constraints map. A smaller scale map showing the location of the SACS (Hestercombe, Bracket's Coppice, Exmoor and Quantock Oakwoods and Beer Quarry and caves (all designated for bat populations) would be useful.
- 5.31. It appears that , Option 1/1B + NFS was ruled out as it was anticipated to have a Large Adverse effect on the protected site Thurlbear Wood and Quarrylands Site of Special Scientific Interest (SSSI) and designated ancient woodland located 100m east and downstream of the option centreline.
- 5.32. The proposed works for all options would impact on habitats potentially resulting in permanent loss of habitats of high to medium conservation value. The report states that the habitats have been surveyed but due to the large area covered by the route there is no plan showing all habitat types listed within the Somerset LBAP and Taunton Deane LBAP, including hedgerows and standing water.
- 5.33. It is not clear at this stage what the impacts may be. These impacts may include, but are not limited to habitat removal and fragmentation, disturbance, air pollution, noise and vibration, which will adversely reduce the integrity of the protected sites.
- 5.34. The report states that protected, including European protected species will be affected by the new road but does not discuss any detail. Full field surveys are required to assess the impact the preferred route would have on protected sites and protected species. It is understood that these surveys are currently taking place.
- 5.35. The report lists all legislation relevant to biodiversity on p45. However it is considered that the National parks and Access to the Countryside Act 1949 should also be listed. When listing local relevant policies in Taunton Deane district CP8 should also be listed.
- 5.36. The preferred route Option 8/8B + NFS mainly tries to avoid the protected sites but it is considered it comes too close to the mapped ancient woodland leaving no buffer. At Huish woods near Ashe farm it appears as though the woodland will be directly impacted upon. There will also be a moderate effect on South Taunton Streams Local Nature Reserve (LNR) near Killlams in Taunton. We know from our species occurrence mapping that dormice are likely to be a particular issue at Killlams and on the lower slopes of Stoke hill near Arundells farm.

Bio Diversity and Ecology (additional issues raised by SCC)

- 5.37. Dualling the A358 is likely to have the effect of an increase in habitat fragmentation. Individual species and species groups are mentioned and we request that this effect is fully assessed and mitigated in the design of the new road using proven techniques. This should be integral to the design process of the overall proposal and not considered as an afterthought as happens on many occasions.
- 5.38. No mention is made of Somerset's Ecological Network which has been modelled by Somerset Wildlife Trust with support from Somerset County Council and Forest Research (part of Defra). There is a page about it on the County's website. If not already aware the consultants dealing with this aspect should include an assessment and mitigation to maintain the network.

See <http://www.somerset.gov.uk/policies-and-plans/policies/ecological-networks/>

Noise and Vibration (from TDBC)

- 5.39. The TAR states that “The noise appraisal has been undertaken in accordance with TAG unit A3 chapter 2. Net present values (NPV) have been calculated for changes in noise, amenity and several specific health issues. To derive the NPVs, calculated values for each house within the respective option study areas required independent entries in the WebTAG Noise Worksheets for ‘with’ and ‘without’ scheme in both opening and design years”.
- 5.40. As with air quality the assessment finds a benefit with three of the proposals, but a dis-benefit with one of them, in this case Option 8+ NFS, Again, there is no supporting information or comment on these figures. The calculations would be based on changes in traffic flows and how noise levels will change at properties with the proposed roads.
- 5.41. For both noise and air quality there is no information on which areas will be adversely affected by noise and which will benefit. Also, as both are a result of changes in road traffic, there is no comment on why one option results in a disbenefit for noise whereas a different option gives a disbenefit for air quality.
- 5.42. All of the proposals will result in an increase in traffic on the A358 due to traffic diverting to the new road from the A303/A30 over the Blackdown Hills. However, there is no information in the report on the potential increase in road traffic levels.
- 5.43. Any new road should be built using a quiet road surface, as reducing noise at source is normally more effective than trying to deal with noise after it has been generated. Noise mitigation such as barriers should be used where needed.
- 5.44. In summary, there is not enough information on air quality or noise in the Appraisal Report to allow a full comment or view on these issues. The report does not provide detail or an explanation of how each route may affect certain areas, there is no explanation as to why the options that result in dis-benefit to noise and to air quality are different, when both are based on traffic flows. There is no explanation as to how the option that removes the most traffic from the A358 through Henlade results in a dis-benefit for air quality. The new road should have a quiet road surface and appropriate mitigation.

6. Consultation and Engagement

- 6.1. Continued engagement with the affected communities, landowners, the Councils, environmental bodies and the South West Heritage Trust will be essential as Highways England develop their plans up to DCO to ensure potential community and environmental impacts of the preferred route are identified and mitigated.

END