

NORTH CURRY PARISH COUNCIL

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Dear Sirs,

A.358 Public Consultation

North Curry Parish Council is the local government representative of approximately 1,700 residents, all of whom visit Taunton for a variety of purposes. The great majority of residents are constrained to travel along that section of the A.358 from the traffic light junction with the A.378 at Mattocks Tree Green to Junction 25 (J.25) of the M.5 motorway and beyond. In so doing, they endure the seemingly inevitable traffic delays which occur every day because of the inadequacies of the highway network serving this part of the South West and which affect national, regional and local traffic alike.

This is readily acknowledged by Highways England (H.E.) in its recently published public consultation document: “The northern section of the A.358 in particular, on the approach to M5 junction 25, experiences regular severe congestion and delay, making it difficult to get into Taunton or onto the motorway. This in turn adversely affects the quality of life in local communities ...” (p.6)

In response to the consultation conducted by H.E. last year, the Parish Council submitted a statement of its views by letter dated 13 July 2017. In essence, we objected to the fact that only one option – Option 8/8B + NFS, to which we referred as the “Consultation option” – was promoted through the readily available literature, although the accompanying Technical Appraisal Report (T.A.R.) provided additional information on other route studies which had been undertaken. We concluded that “From the evidence presently available to the Parish Council, we do not support the Consultation option. We favour a route for Section 1 of a re-aligned A.358 which connects to the existing A.378 and which includes a link to J.25 and to the proposed Nexus 25 employment site.” (para. 24)

We are pleased that H.E. has taken notice of our concerns and of the concerns of others, as is recorded in the “Report on Public Consultation (28 March – 16 July 2017)”, published in January 2018. The Report notes that 53% of respondents disagreed or strongly disagreed with the statement that “the scheme proposal has achieved the objectives” (Fig. 5.1 & para. 5.2.3).

We applaud H.E.’s decision to conduct a new consultation exercise. We are grateful that H.E. provided us with copies of the revised T.A.R document and gave a briefing to the Council on its updated (January 2018) proposals. This has enabled us to review what is now put forward for public scrutiny. Individual Council members have also taken advantage of the public consultation events at which they were able to clarify certain matters of detail.

At its meeting on 14 February, the Council approved the statement set out below as its own formal response. The Consultation questionnaire, whilst allowing for supporting comments, is essentially a tick-box exercise, with the nature of the questions restricting the opportunity to respond to it comprehensively. The Council does not consider this format to be particularly helpful, and has therefore resolved to examine H.E.’s proposals in a narrative form.

The Parish Council's response to the Consultation

1. We are invited to comment on three proposals. They are described in the documentation as the Pink, Blue and Orange options. We note in passing that the Pink option is what was Option 2A/2B in the previous consultation exercise, that the Blue option was Option 8/8B + J25 and that the Orange option was 8/8B + NFS. We will comment on each of the options in turn.

2. **The Pink option** begins at a new motorway junction, Junction A, which is to the north of what was proposed in the Consultation option. We appreciate the reasons why it provides no direct access into Taunton from here; it would perforce be through a residential area, bringing with it the prospect of environmental harm to those living there.

3. We would however note that, as a principle, any increase in access to the motorway network would be of advantage to businesses with a regional bias based at the newly established Nexus 25 or elsewhere in the town. Junction A is proposed to be a limited movements junction. If it were an all movements junction – and in that case, we acknowledge that it would of necessity be located further to the south because of slip road constraints - it would provide additional relief to J.25, and in particular, would offer traffic to and from Nexus 25 an alternative means of access to the site. We explore the issue further in para. 15 below.

4. The Pink option provides, at Junction B, a link to the proposed major employment site at Nexus 25 and to J.25 itself. Nexus 25 is widely acknowledged as being a site of strategic importance and it is critical that access to it is as good as it can be. The current proposal is not; it is a limited movements junction, providing access to and egress from the site in an east-facing direction only. The proposal offers Nexus 25 no connection with the proposed motorway Junction A. We believe this to be a missed opportunity, which we will explore in more detail later in relation to capacity issues at J.25 (see paras. 22 - 24 below), and we would therefore ask that H.E. considers a revised proposal to this effect.

5. From Junction B, the route passes in a retained cutting below Stoke Road, Henlade before running close to the existing A.358 to a new junction, Junction C. This new junction will be all movements, and designed to replace the existing traffic light junction at Mattock's Tree Green, linking with the existing A.378 and the communities served by it. This will create a much improved free flow for through traffic and some improvement for local traffic. We very much welcome and support this particular proposal.

6. We note that the Pink option requires the closure of Greenway Lane, which provides an alternative route into Taunton when the A.358 is heavily congested, as well as the closure of minor routes to Hatch Beauchamp and West Hatch. We are concerned that local people may be prevented from using these minor routes, which do provide a measure of relief for both local and through traffic.

7. The Pink option merges with the existing highway at West Hatch Lane, but the details are not clear, being described in terms of "The proposed road would then meet up with the existing A.358 at West Hatch Lane ..." (T.A.R., para 7.1.4). In particular, it is not clear whether the existing highway to the north-west will still provide a connection to the A.378 junction at Mattock's Tree Green.

8. We still have reservations about the published traffic flow data, particularly in relation to the Orange option – which we outline in paras. 18 - 20 below - but accept for this purpose that the figures provided are the ones we must work with. The Pink option shows that comparative AADT flows through Henlade without and with the Scheme are 35,100 and 4,700 respectively at Scheme opening in 2023, and 39,700 and 5,300 in 2038 (T.A.R., Fig. 8.9). These "with Scheme" figures represent an 87% reduction in traffic passing through Henlade compared with the "Do Minimum" option – which is acknowledged as being essentially a "do nothing" option (T.A.R., note to para. 8.4.17).

9. The respective traffic flows on the new link to Nexus 25 and on to J.25 at Scheme opening and in 2038 are 35,200 and 40,100. These figures are a clear indication of a very substantial demand for the new link to be built, and reflect the contribution which the employment site can be expected to make to the local and regional economy. On the new A.358 west of Junction B, the respective traffic flows are 11,800 at Scheme opening and 14,500 in 2038.

10. The modelling data suggests that traffic currently using the A.303 but which is expected to divert to the A.358 because of the proposed improvements to it is relatively modest at Scheme opening (T.A.R., Fig. 8.8). However, H.E. did confirm to us at our briefing that the effect of the improvements at Stonehenge and elsewhere on the A.303 has not been factored into the data. Nonetheless, its provisional estimate of additional vehicles on the A.358 arising from those latter improvements could be accommodated within the new motorway junction, whether at A or F. Either would be substantially under capacity.

11. If the measure of success in this context is a change in drivers' route selection, Junction C achieves exactly that. According to the traffic modelling data, the respective AADT volumes on the A.378 to the east of Junction C without and with the Scheme are 10,100 and 13,100 at Scheme opening and 11,600 and 15,400 in 2038 (T.A.R., Fig. 8.9). This 30% - 33% increase in traffic flows indicates that there would be a significant demand from those living in the towns and villages served by the A.378, Langport, Curry Rivel and North Curry being just three such examples, and at the same time would provide relief elsewhere on the highway network.

12. **The Blue option** has similar proposals as the Pink option for Junction A at the motorway. Its route thereafter from the M.5 is to the south of that shown for the Pink option, but still provides a junction (Junction D) to Nexus 25 and thence to J.25. Junction D is a limited movements junction, and as in the case of Junction B, to which we refer in para. 4 above, we recommend that, for the reasons stated there, H.E. should re-consider the issue.

13. The route continues on a more southerly line than that in the Pink option and re-joins the existing A.358 to the south-east of that proposed in the Pink option. There is no equivalent to Junction C to the A.378 and it is therefore unlikely to be of any benefit to those using that road. The documentation does not suggest that the closure of the minor roads to Hatch Beauchamp and West Hatch is necessary. Junction E may be further to the south-east than its equivalent in the Pink option but the reason why there is this distinction in local road closure between the Pink and Blue options is not explained. Such an explanation would have been helpful.

14. In respect of traffic volumes through Henlade, the Blue option suggests that the AADT flow at Scheme opening will be 8,400 and in 2038 will be 10,000 (T.A.R., Fig 8.11). This represents a 75% - 76% reduction in traffic compared with the "Do Minimum" option. The respective traffic flows on the new link to Nexus 25 at Scheme opening and in 2038 are 30,300 and 33,400, and on the new A.358 west of Junction D are 8,700 and 12,500. The AADT figures on this route are substantially lower than those for the Pink option, doubtless because of the connection to the A.378 at Junction C in the latter case. If for no other reason, this makes the Blue option less beneficial to local and through traffic alike.

15. **The Orange option** starts further south on the M.5 than do the other options. The proposed motorway Junction F is, unlike Junction A, an all movements junction, allowing access to and egress from the M.5 both northbound and southbound. An all movements junction would in our view increase the attraction of Nexus 25 to regional and national business interests, particularly if Junction B (in the Pink option) is also converted to an all movements junction. It should for that reason be welcomed. Whichever scheme is agreed for development – and as will be noted, we do not support the Orange option - this all movements junction should be considered for inclusion as part of it.

16. The T.A.R. offers no supporting evidence as to why this option does not provide a direct access from the newly aligned A.358 to the south into Nexus 25 and to J.25 itself. The traffic modelling data, referred to in paras. 9 & 14 above, demonstrates that such an access would be beneficial to

both business and other traffic. Instead, access to Nexus 25 would of necessity be from the old A.358 at J.25, in contradiction of both the Background and need (p.5) and the Scheme objectives (p.7) set out in the public consultation document. If there are existing capacity issues at J.25, which undoubtedly there are, this will reduce the attractiveness of the Nexus 25 site to business.

17. Furthermore, the Orange option provides no link to the park and ride site; those wishing to use it would be constrained to continue to pass through Henlade. It makes no sense, in terms of a coherent transport strategy, to build an option which fails to encourage the private motorist to leave the vehicle outside the town centre and travel the remainder of the journey by public transport.

18. Other than that length from the new M.5 junction as far east as a point north of Stoke Hill, the route of the Orange option is the same as that of the Blue option. Junction E at the eastern end of this section is the same as that proposed in the Blue option, and it is unlikely, therefore, to be of any benefit to those using the A.378.

19. In respect of traffic volumes through Henlade, the Orange option anticipates an AADT flow at Scheme opening of 25,300 and in 2038 of 26,800 (T.A.R., Fig 8.13). This represents a significant yet significantly smaller 28% - 32% reduction compared with the no Scheme option. Regardless of the apparent illogicality of what follows, the T.A.R. suggests that, at J.25, "the Orange option results in the largest traffic reduction compared with the Do Minimum" (para. 8.4.18).

20. The personal experience of Council members, together with other anecdotal evidence, suggests to us that of the A.358 traffic which currently travels towards Taunton, it is only a small proportion which takes the slip road at J.25 to travel further south-west on the M.5. We understand that H.E. has historic data of traffic volumes passing through J.25, which shows that approx. 50% of that traffic heads into Taunton. We have not seen the details, but in our view, that is an under-assessment. If our experience and the other anecdotal evidence is correct, it appears that the M.5 southbound traffic to which we refer will make a relatively small contribution to that referred to at para. 8.4.18 of the T.A.R. Instead, the traffic reduction claimed in that paragraph is based on traffic modelling data, which shows that some traffic having business in Taunton would take the new road from Junction E as far as the new motorway Junction F, take the new slip road north to J.25 and then take the old A.358 into Taunton as before.

21. Frankly, we are highly sceptical of this notion. It seems very unlikely that traffic will travel twice the distance of the alternative over this stretch of the route to reach its destination. The information set out in the T.A.R. indicates that the saving in travel time during the AM and PM peak periods from J.25, i.e. for that 50% (or more) of the total traffic volume referred to in para. 20 above, to Southfields via the M.5 and the new A.358 rather than through Henlade is less than one minute eastbound and less than two minutes westbound (Table 8.5). For the average user of this route, it will be counter-intuitive to drive the extra distance, with the attendant additional fuel costs, to make, hypothetically, such a minimal saving in time. We therefore take the view that the anticipated reductions in traffic passing through Henlade in the Orange option will be significantly less than those stated in Fig 8.13. Indeed, we believe that those reductions of traffic will prove to be negligible.

22. As is widely acknowledged, there are serious capacity issues at J.25. H.E.'s operational assessment states that "Junction 25 would operate satisfactorily with the improvement proposed by Somerset County Council in connection with the Nexus 25 Development ..." (T.A.R., para. 8.4.15). However, "there are some circulation capacity issues for all options which means that queuing traffic on the roundabout circulation links may exceed the available storage capacity and this would need to be addressed further ... The Pink option will have a degree of saturation of 138%. The Blue option will have a degree of saturation of 132% ..." (T.A.R., para. 8.4.20).

23. In addition to the proposal we make in para. 15, we have drawn attention in para. 4 above to the fact that the proposed Junction B is a limited movements junction. This will result in traffic

wishing to access Nexus 25 from the M.5 travelling from the south and traffic wishing to travel from Nexus 25 to the M.5 southbound being unable to take advantage of the link to the new A.358 and Junction A, as set out in the Pink and Blue options. Instead, it will be forced to use J.25, bringing additional traffic to a junction which has insufficient capacity, and which will remain insufficient even after the County Council improvement has been implemented.

24. If one of the Scheme objectives is to encourage economic growth in this part of the South West, everything should be done to make those sites available for business development as attractive as possible. That is not achieved by building a limited movements junction at Junction B. We would therefore urge H.E. to re-consider the type of junction to be provided at this point, creating instead an all movements junction. Such a junction would make Nexus 25 a more attractive site from which to do business in the region. We would hope that the additional expenditure would be justified by an equally additional benefit to the economy of the Taunton area.

25. The Council has no substantive comment to make on Section 2 of the consultation document, i.e. that section of the A.358 between West Hatch and Southfields. The dualling of the route should make this section of travel to the A.303 and to the South East less stressful. Careful consideration should be given to local traffic and to its needs to cross the new road; we note that many of the existing junctions will be closed. Nonetheless, we recognize that highway safety is paramount.

26. It is our view that improvements to that part of the route shown in Section 1 of the consultation documents are of substantially greater benefit and of greater urgency than those identified in Section 2. If there should prove to be financial constraints on the Road Investment Strategy, we would urge that the improvements to Section 1 be considered as a first priority.

27. We note that the Appraisal Summary Tables show the Pink option to be the most expensive, followed by the Blue option and the Orange option (T.A.R., para. 15.2.1). We trust that cost alone is not now to be the deciding factor. In any event, to counter those cost implications, the benefits of the Pink option are the highest of the three, i.e. an adjusted benefit to cost ratio (B.C.R.) of 2.08, followed by the Blue option at 1.87 and the Orange option at 1.64 (T.A.R., para. 15.2.2). The T.A.R. goes on to note "that the assessment of wider economic benefits ... shows that these benefits are likely to be significant providing further justification of the scheme" (para. 15.2.3). Finally, the appraisal records that "Overall, in terms of value for money, the best option is the Pink option followed by the Blue and the Orange options" (para. 15.2.4). We agree; it is clear that the Pink option, or an amended version of it, as we propose in para. 30 below, is the solution which H.E. should now promote.

Summary and Conclusions

28. The Parish Council is pleased that H.E. has engaged in a meaningful consultation exercise which allows local people, businesses and local authority representatives to express their views. Current traffic conditions along the A.358, particularly on the northern section as it approaches J.25, are close to impossible for road users. The proposed solution must resolve those conditions as its contribution to the national and regional economy, and at the same time provide relief for local people, be they car users, cyclists, pedestrians or residents.

29. Of the three options which form the subject of this consultation, the evidence is clear that the Pink option offers the most significant improvement from what is currently endured. The traffic modelling data shows that this option offers the greatest benefit to those living in Henlade. We particularly welcome the proposed Junction C at Mattock's Tree Green, which will be of the most advantage to those travelling to and from the A.378 corridor and beyond. It offers to a significant number of towns and villages, such as Langport, Curry Rivel, North Curry and others served by the A.378 the best solution to their needs to access Taunton and the wider highway network.

30. We do urge H.E. to revise the proposals for Junction B to make it an all movements junction serving Nexus 25. We are convinced that this would be of substantial benefit to the local and

regional economy, and would at the same time aid traffic movement at J.25. Added to that, further benefits would accrue if the motorway junction were an all movements Junction F rather than a limited movements Junction A. We recommend that such provision should be examined; if the Pink option + Junction F remained the option with the highest B.C.R., Junction F should be provided as part of it.

31. The Blue option does not provide the same benefits as the Pink option to those who use the A.378. There is no equivalent to Junction C at Mattock's Tree Green and projected traffic flow figures suggest that the reduction in traffic through Henlade will not, as a consequence, be so substantial. It is, however, a better solution than that offered by the Orange option.

32. The evidence clearly demonstrates that the Orange option achieves the least in terms of improving the local and wider highway network. It demonstrates in turn that H.E. was acting prudently in not proceeding further with it after last year's consultation. The information provided in the current consultation exercise has proved the validity of our and others' opposition to it. The traffic modelling data acknowledges that it provides comparatively little relief to Henlade – and we take the view that it would in practice provide less than it acknowledges - and offers nothing for the local economy by its failure to provide any link to Nexus 25.

33. Having selected a preferred route, further work will be needed on junction design. The junction arrangements are indicative and not worked up for consultation. We would welcome the opportunity to comment when the details are known. We urge H.E. to work with the County highway authority when proceeding with the later stages of Scheme preparation and before seeking statutory approval.

34. The improvements identified in Section 1 of the proposal will be of substantially greater benefit and are of a greater urgency than those identified in Section 2. If financial resources are constrained, the Section 1 improvements should be undertaken as the first priority.

35. The Pink option most closely matches the Scheme objectives and offers the best value for money. The Parish Council would support a decision to proceed with the development of this option, as potentially amended by the variations described in para. 30 above.

Yours faithfully,

C D Stodgell

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Chairman, North Curry Parish Council

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