

A358 Taunton to Southfields Improvement.

DRAFT Response to Second Non-Statutory Public Consultation on Route Options

Draft Response by Somerset County Council. 02 February 2018.

Author: Mike O'Dowd-Jones. Strategic Commissioning Manager Highways and Transport.

1. Introduction

- 1.1. Somerset County Council understands that Highways England is undertaking a second non-statutory consultation on route options for the A358 Taunton to Southfields dual carriageway improvement 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 an early stage in the development process including early stage indicative proposals for junctions and side roads.
- 1.4. Having raised concerns about the approach to the previous consultation in 2017, The Council considers that this second consultation is a much-improved process in that it sets out three potential options, provides details of other options that have been considered and discounted and provides a reasoned justification for the choice of options. Further traffic information and analysis has been provided to assist in comparing the relative performance of the three options; and respondents have been invited to suggest any 'hybrid' options that might be considered in formulating a preferred option.
- 1.5. Although more traffic information has been provided the material presented for consultation generally remains very limited and is not of sufficient detail for the Council to form a definitive view on the proposals. The TAR offers very limited analysis of the 3 options and in most subject matters simply describes the method of assessment without providing any data to substantiate the conclusion on the particular subject.
- 1.6. It will be necessary for further information to be made available to the Council in due course 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.
- 1.7. 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's response at this stage is 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. The County Council's response includes input from TDBC on matters of landscape and visual impact, air quality and emissions, archaeology and cultural heritage, biodiversity and ecology, noise and vibration; and includes input from South West Heritage Trust (SWHT) on archaeology.

- 1.8. 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.
- 1.9. 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 for 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.
- 1.10. 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 complementary 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.

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

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 also 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. Our key local objectives for the scheme include reducing the environmental (air quality and congestion) impacts of traffic flow through Henlade which is an Air Quality Management Area; enabling sufficient capacity for development of a new strategic employment site next to M5 Junction 25 (J25); and reducing congestion and delay at J25. 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 three options that are open to consultation and the supporting evidence that is set out in the TAR. Our broad conclusions based upon the available evidence are as follows:

- All options appear to provide significant benefits over doing nothing in terms of meeting the scheme objectives.
- All options appear to improve journey times on the network for traffic travelling around the Region and accessing Taunton. Journey time reductions appear considerable.
- All options reduce traffic travelling through the Henlade Air Quality Management Area, but with varying degrees of success. The pink and blue routes provide significantly greater traffic relief to Henlade than the orange route.
- The operational appraisal for J25 shows the pink and blue options potentially creating large delays on the A358 approach to J25 in the AM peak hour due to capacity constraints, as well as congestion problems on some other arms of J25 in the AM peak hour. These constraints would exist from the year of opening.
- The orange route and associated all-movement Junction 'F' on the M5 appear to take sufficient traffic away from J25 to enable it to operate effectively under all scenarios tested to 2038. Junction F is assessed as operating at about 55% of its capacity in 2038 peak period and would therefore appear to have capacity to accommodate further traffic growth whilst continuing to operate effectively well beyond 2038.

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

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

- Provision of a direct link between the Expressway and the A378 (i.e. Junction 'C') would appear to reduce traffic travelling through Henlade but also increase traffic using the A378.
- The orange and blue routes run through open countryside and are assessed as having a large adverse impact on landscape, whereas the pink route runs closer to the existing major roads and built up areas and is assessed as having medium adverse impact on the landscape.
- The orange route is assessed as having an overall disbenefit in noise impacts leaving the most traffic on the old A358, and with the associated Junction F affecting a greater number of properties than the alternative Junction A. The blue route is assessed as having greatest overall noise reduction benefits as it takes the most traffic further away from residential properties (although the location of Junction D would appear to the Council to have a greater potential noise impact than the pink route equivalent Junction B due to their relative locations in the landscape).
- The pink route, whilst the most expensive has been assessed as offering high value for money whereas the blue and orange routes have been assessed as offering medium value for money.
- There would not appear to be a significant difference between the routes in respect of the simplistic assessments of impact on Air Quality (although orange is assessed as marginally less beneficial in this respect), Historic Environment, Biodiversity, Water Environment or social impacts.

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 include:

- Performance of the preferred route.
- Impact of the scheme on the local road network and local communities; 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. Having considered the evidence provided it is apparent that each of the options has strengths and weaknesses but there is no clear 'best-performing' option in achieving the Council's objectives for the scheme. Each of the options appears capable of achieving the important wider objectives of enabling economic growth (through reduced journey times and business productivity), improving the resilience of the strategic transport network and improving access to Taunton and other growth centres, although there are issues that need to be further addressed with each option.

4.3. The Council's more localised objectives are to reduce the environmental (air quality and congestion) impacts of traffic flow through Henlade which is an Air Quality Management Area;

enable sufficient capacity for development of a new strategic employment site next to J25, and reduce congestion and delay at J25. The route options perform very differently in meeting these more localised objectives:

- The orange route leaves a considerable volume of traffic travelling through Henlade, but creates more capacity to enable the network to operate effectively further into the future.
- The pink and blue routes offer better journey times, more relief to Henlade, and better accessibility to Nexus 25; but experience capacity constraints at J25 which may create unacceptable congestion and delay in the AM peak hour due to the high volume of traffic using the spur to J25.

4.4. The Council urges Highways England to undertake appropriate further technical analysis on the options and develop amended proposals and appropriate mitigations prior to publishing a preferred route; and to ensure the Council is engaged in this process:

- With regard to the orange route; The Council urges Highways England to consider further measures 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 consideration of a hybrid option which connects more directly with the A378 and reduces the adverse impacts on the landscape.
- With regard to the pink and blue routes; The Council urges Highways England to undertake further detailed assessment to establish more firmly the operational capacity constraints at J25, the impact of those constraints on traffic movement, and potential mitigation; to better inform the choice of a preferred route. A scheme which results in significant queues and delays at J25 during peak hour traffic is unlikely to be supported by The Council.
- In the event that forecast congestion issues at Junction 25 cannot be mitigated to an acceptable level; a hybrid option which follows the pink route from West Hatch to join the orange route (just to the west of junction 'B'); then follows the orange route to a new all-movement junction on the M5, with or without a link to J25 might achieve a balance between the various objectives; enabling a strategic connection to the A378 which further reduces traffic in Henlade compared to the orange route; provides relief to J25 to avoid peak hour congestion and provides capacity for future traffic growth; whilst avoiding the large adverse landscape impacts of the orange and blue routes by running closer to the existing A358. The Council urges Highways England to consider and assess these a potential options in undertaking the further work necessary to identify a preferred route.

4.5. The Council is extremely keen to ensure that the scheme provides strong connectivity between the new road and Taunton as an economic growth hub. Particularly if a link into J25 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.

4.6. 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.

4.7. 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.

4.8. 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.

4.9. The route options propose several junctions:

- Pink Route:
 - Junction 'A': Limited movement junction on the M5 with south facing slip roads only;
 - Junction 'B': Free flow junction providing access between the Expressway and J25;
 - Junction 'C': Junction allowing free flow on the Expressway providing a direct connection with the A378, and serving local communities.
- Blue Route:
 - Junction 'A': As pink route above;
 - Junction 'D': Free flow junction providing access between the Expressway and J25;
 - Junction 'E': Grade separated junction near West Hatch further to the south of the A378.
- Orange Route:
 - Junction 'F': All movement junction on the M5;
 - Junction 'E': As blue route above.

4.10. 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.

4.11. The proposed Junction 'F' in particular has attracted local community concern largely due to its proximity to residential development and due to Highways England's consultation material previously referring to the junction supporting major development opportunities in the area south of Taunton. The Council remains concerned about potentially large adverse impacts (such as noise, visual impact or impact of lighting schemes) of either of the proposed connections to the M5 (at either Junction F or Junction A) and finds the lack of information provided on this matter a considerable constraint in the consultation process at this stage.

4.12. The Council understands that Highways England do not propose any connection between the new Junction 'F' 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 Junction 'F' 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.

- 4.13. 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.
- 4.14. It is disappointing that this further round of consultation has not provided any further information or visualisation of the proposed junctions which are likely to have an impact on local communities. Further information would be helpful to enable all parties to fully understand the implications and potential impacts (particularly visual impacts and noise impacts) of proposed junctions. It is anticipated that the precise location of the possible Junction F on the M5 has a degree of flexibility at this 'outline' stage and The Council urges Highways England to confirm that if this option is taken forward, the junction location would 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.
- 4.15. 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. The proposal for 'Section 2' may well result in sections of the new expressway running in close proximity to carriageway retained from the existing A358 (such as the section between Hatch Beauchamp and Ashill) and it will be important to address the potential adverse visual impact created by these adjacent roads within the detailed design.
- 4.16. 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.
- 4.17. 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.

4.18. 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

4.19. 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

4.20. There are several Non-Motorised User (NMU) amenities located within the study area for all the proposed options, consisting of cycle routes, footpaths, footways and 2 long distance trails, namely the East Deane Way and Staple Fitzpane Herepath. One signalised crossing is located within 250 metres of all 3 options.

4.21. All the proposed options would cross several of these Public Rights of Way (PRoWs). The TAR notes that these intercepted PRoWs would be kept open via bridged crossings at various points along the option routes. As a result, all of the proposed options have the potential to result in some changes to journey distances for NMUs. It is unclear 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.

4.22. 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.

4.23. 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.

4.24. The TAR notes that with a new offline highway proposed certain section of 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 associate mitigation to be given further consideration prior to and if necessary as part of the DCO.

- 4.25. 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

- 4.26. The route options appear 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.

- 4.27. 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, 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 TAR provides a completely simplistic assessment of the three options and is not supported by a Landscape and Visual Assessment. The conclusion that the Blue and Orange routes would cause a large adverse effect versus a moderate adverse effect from the Pink route cannot be substantiated or verified.
- 5.5. The assessment makes no attempt to describe or assess the impact of either connect to the M5 from residential properties from either the Junction A slip roads or the more substantial all movements grade separated junction.

Air Quality and Emissions (from TDBC)

- 5.6. As with the previous consultation it is not possible to comment on the accuracy of the figures or assumptions made within the TAR in respect of air quality and emission 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.
- 5.7. The TAR highlights that regionally, the Pink option appears to have a worse Net Present Value (-£136k) versus Orange option (£71k) versus the best performing Blue option (£180k). The report explains that this is due to the greater number of roads with significant vehicle number changes, what is not clear is the relative benefits to the Air Quality Management Area (AQMA) on the A358 in Henlade which was declared due to high levels of nitrogen dioxide.
- 5.8. 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.
- 5.9. 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 disbenefit for air quality. The new road should have a quiet road surface and appropriate mitigation.

Cultural Heritage (from TDBC)

- 5.10. There is a Cross in St. Aldhelm and St. Eadburga churchyard Scheduled Monument within 1km of all three options and there are many listed buildings within the 1km of all three 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.
- 5.11. The heritage section of the consultation document is again 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.

Archaeology (from SW Heritage Trust)

- 5.12. There are a number of known archaeological sites close to the route options, and the landscape through which all options run is likely to contain further as of yet undiscovered archaeology. It is understood that the initial information gathering at the option stage is limited to the review of existing information and it is expected that more non-intrusive and intrusive studies will take place on the preferred options.
- 5.13. It is acknowledged in the TAR that there is likely to be impacts on buried archaeology and that the potential for impacts are similar across all preferred route options. Therefore further assessment of archaeological potential should take place on the preferred route options to gain

an understanding of the significance of any heritage assets likely to be affected. This assessment should include Desk-based assessment followed by geophysical survey and/or trial trenching (where appropriate).

- 5.14. The results of the surveys should provide sufficient information to design an archaeological statement that locates and identifies sites that will be impacted and details the mitigation strategies that will be employed.

Bio Diversity and Ecology (from TDBC)

- 5.15. 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.
- 5.16. 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.
- 5.17. 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.
- 5.18. 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.
- 5.19. The Orange route 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 Killams in Taunton. Species occurrence mapping indicates that dormice are likely to be a particular issue at Killams and on the lower slopes of Stoke hill near Arundells farm.
- 5.20. The TAR provides no definitive detail to enable assessment and all options are described as having an overall moderate adverse impact, this cannot be verified within the information which is available.

Bio Diversity and Ecology (additional issues raised by SCC)

- 5.21. 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.
- 5.22. 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)

- 5.23. As with air quality the assessment finds a benefit with three of the proposals, but a disbenefit with one of them, the Orange route (NPV -£837k). The Blue route is assessed as having a net present value of £2.2m and the Pink route £493k. Again, there is no supporting information to back up and substantiate these figures. It is presumed that the calculations would be based on changes in traffic flows and how noise levels will change at properties with the proposed roads.
- 5.24. 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.
- 5.25. 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.
- 5.26. 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.
- 5.27. 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 disbenefit for air quality. The new road should have a quiet road surface and appropriate mitigation.

Community Impacts (from TDBC)

- 5.28. Two of the three options (Pink and Blue) propose that land at Hawthorn Park is lost to create the on-off slip roads to the M5. Hawthorn Park is both a Recreation Space and Wildlife Site as categorised by Policy CP8 of the Core Strategy and so mitigation will be required.
- 5.29. Many of the issues which will directly impact on the communities along the existing and proposed A358 are dealt with within the paragraphs above clearly transport (ease of movement and access, severance and rights of way), air quality, noise and landscape impacts will affect residents and communities in a significant way.
- 5.30. It will be important for Highways England to properly consider the impacts on all of the affected communities and provide bespoke mitigation to an appropriate standard once a scheme is selected. This should not just take into account the individual impacts but the cumulative effects from all impacts on communities.

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