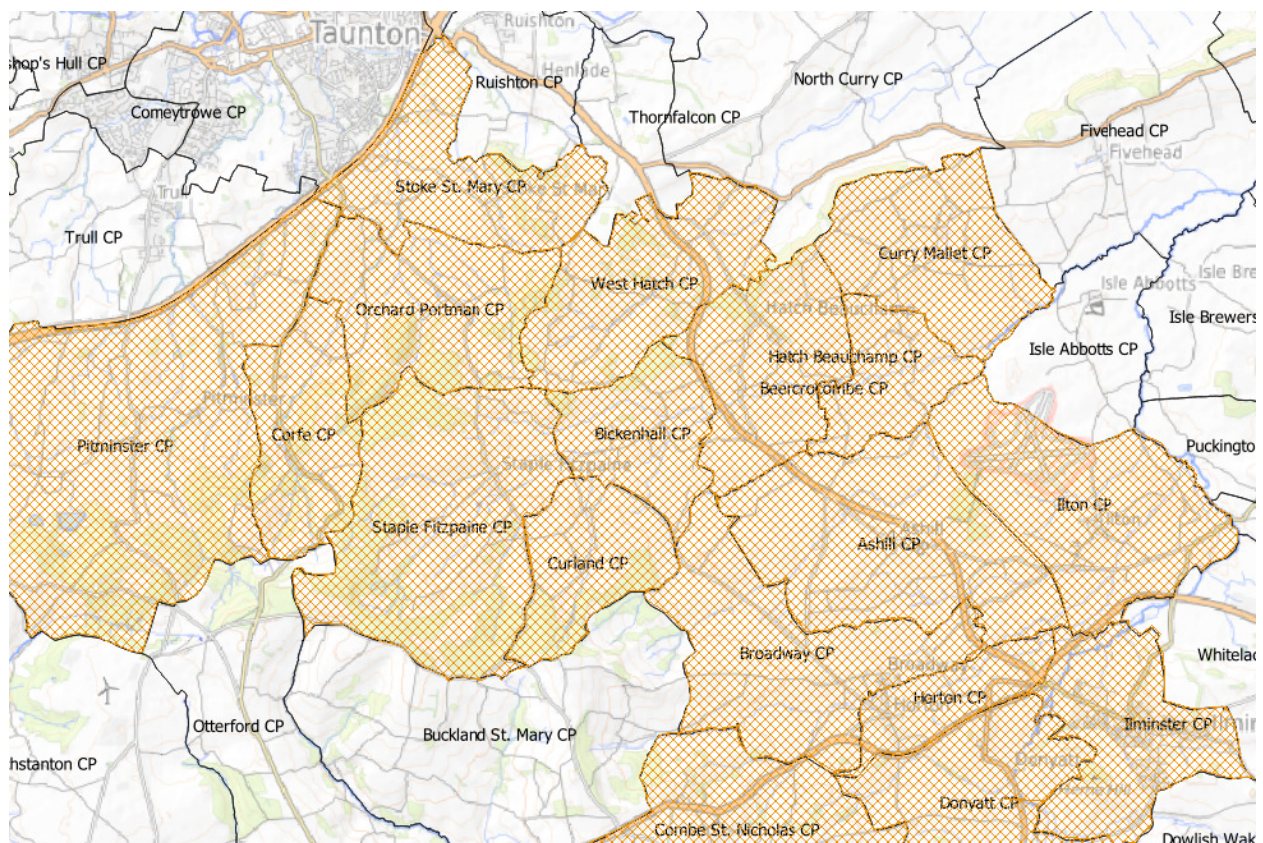


# Taunton to Southfields Dualling Scheme

Supplementary Consultation  
24 May to 26 June 2022

## Response from the Community of Parishes (CoP)



## About you

Providing this information is optional but will allow us to update you on the outcome of the consultation and the next stages for this scheme. If you don't want to share these details please just tell us your postcode for the purpose of analysis.

Name:	Community of Parishes: - Convenor: Mr Peter Gregory - Co-ordinator: Mr Robert Burrough
Postcodes:	TA3 6AG, TA3 5BY, TA3 5RJ, TA3 6SG, TA19 9PB, TA19 9RX, TA19 9HB, TA19 0RG, TA19 9QR, TA3 6SY, TA3 7BA, TA20 3NQ, TA3 7AN, TA3 6TY, TA19 0AN
Email:	Convenor: petergregory999@gmail.com Co-ordinator: b.burrough@holmansfarm.co.uk

Would like to be kept up to date about the project by email?	Yes
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Are you an affected landholder?	Representing community views, including landholders
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<p><i>Is this a response to the consultation on behalf of an organisation?</i></p> <p><i>If yes, which organisation?</i></p>	<p>The Community of Parishes (CoP) comprise the following:</p> <ul style="list-style-type: none"> <li>Beercrocombe Parish Council</li> <li>Stoke St Mary Parish Council</li> <li>West Hatch Parish Council</li> <li>Hatch Beauchamp Parish Council</li> <li>Ashill Parish Council</li> <li>Broadway Parish Council</li> <li>Ilton Parish Council</li> <li>Donyatt Parish Council</li> <li>Horton Parish Council</li> <li>Curry Mallet Parish Council</li> <li>Pitminster Parish Council</li> <li>Combe St. Nicholas Parish Council</li> <li>Corfe Parish Council</li> <li>Neroche Parish Council</li> </ul> <p>Ilminster Town Council will base their Response on this document.</p>
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How did we find out about the consultation?	Participated in Forums
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## Remaining Issues

In the consultation booklet Responding to the 2021 Feedback National Highways (NH) lays out its principle of development stating the aim of the A358 scheme is to improve road safety, reduce traffic congestion and keep road users and local communities connected, while unlocking economic growth in Somerset and the South West. CoP fully supports this objective.

To achieve this objective NH is proposing to build a dual carriageway with only 2 access points along the 8-mile link. NH declares that it is not building an expressway or a motorway, but a high-quality, high-performing dual carriageway. This has no formal DMRB standard but the scale, limited access and junction design of the A358 Scheme all points to a continuation of the expressway ideology, based on GD300: *Requirements for new and upgraded all-purpose trunk roads (Expressways)*. CoP disagrees with this ideology that is distorting the design of the A358 link road.

Notwithstanding NH's inadequate responses to CoP's attempts to mitigate the scheme design in order to take account of the local community, the following needs to be addressed. The design is unnecessarily over-engineered; it is effectively an urban motorway, cutting a swathe through pristine countryside, Mattocks Tree Green roundabouts being a classic example of design ideology without reference to the location. The damage to the environment, wildlife, communities etc is totally unacceptable, the mitigation proposals are risible and the cost outweighs any conceivable benefit, particularly in the country's present parlous financial state. NH traffic modelling is subjective and in many instances is contested as erroneous. To save 5/7 minutes journey time (NH figures) makes a mockery of the scheme's objectives and costs and there has never been any explanation of the business case for the scheme. NH and Local Authorities have, to a large extent, ignored the local communities.

### Scale of Ashill Junction

NH insists the Ashill junction is to be a full grade separated junction designed with free flowing merges and diverges in accordance with the requirements of GD300 and CD122<sup>1</sup>. However, the current design of the Scheme has the following inconsistencies:

Although parking lay-bys are not permitted on a GD300 standard road, parking lay-bys that do not have free flowing merges and diverges are provided within the Scheme.

As there is no alternative provision for slow-moving vehicles a GG104<sup>2</sup> risk assessment concludes that they will be permitted to use the dualled A358.

Both the Sparkford to Ilchester Scheme and the A358 Scheme are within the original RIS A303 expressway corridor improvement programme. Both are now described as high-quality, high-performance dual carriageways. Indeed, the Sparkford to Ilchester Scheme has free-flowing connections to the existing A303, whilst the A358 Scheme is terminated at both ends by roundabouts, the M5 Nexus/Junction 25 being signalised. At-grade roundabouts and signalised crossings are not in accordance with the GD300 standard.

The Sparkford to Ilchester Scheme employs compact graded separated junctions to provide local connections to Downhead and West Camel. The slip roads are merging and diverging tapers with auxiliary lanes for acceleration and deceleration. The A358 Scheme Assessment Report (SAR) concluded that compact grade separated junctions were suitable at several

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<sup>1</sup> CD 122 Geometric design of grade separated junctions.

<sup>2</sup> GG 104 Requirements for safety risk assessment.

junctions on the scheme. However, as Highways England was at that time designing an Expressway this option was not adopted<sup>3</sup>.

NH forecasts the large Ashill Junction will only be utilised by 4,200 vehicles a day in 2028, less than 12% of its capacity. There is no requirement for the scale of the current design as CD122 parallel merge and single lane auxiliary diverge slip roads could be accommodated within a compact grade separated junction layout.

For the benefit of our local environment, our landscape, our commitment to net zero highways CoP urges for a fundamental review of the Ashill Junction. The possible simplification is illustrated in Figure 1.

### **Access to dualled A358 between Ashill and Hatch Beauchamp**

Since 2017 communities situated between Thornfalcon and Ashill have pressed to have a junction between Ashill and Hatch Beauchamp. The fundamental benefit of such a junction is that local traffic would not have to travel through either Hatch Beauchamp or Ashill and neighbouring lanes to access the dualled A358.

The A358 scheme falls within the requirements of the Health and Safety at Work etc. Act 1974 (HASAWA)<sup>4</sup>. How NH fulfils its legal responsibilities is detailed in GG104 the DMRB Safety manual. CoP's understanding of NH's responsibilities is at Annex A. Regarding safety risk mitigation measures GG104 instructs NH design teams to follow the ERIC hierarchy - Eliminate, Reduce, Isolate and Control for each safety risk. The A358 SAR recorded that a junction south of Hatch Beauchamp could mitigate the adverse impact of the dualling scheme. However, it was omitted from the Preferred Route following a high-level cost cutting exercise<sup>5</sup> that decided the scheme would proceed with the expensive Expressway, but without any 'extras' like the requirement for a Hatch Beauchamp junction.

CoP's proposals for a junction were submitted to NH throughout 2021 and are well documented<sup>6</sup>. NH dismissed the proposals<sup>7</sup> on grounds that they were unconventional or could be considered to form a compact grade separated junction, which is not permitted on an Expressway. Inconsistencies abound in the current design so we again urge the incorporation of our proposal.

As the latest design limits Bickenhall Bridge to WCH and farm vehicles there is a strong case for extending the service road to Bickenhall Lane. The only alternative route is via Staple Fitzpaine Road, which would require considerable improvement along the section adjacent to the bridge over the Fivehead River; this concern was noted in the A358 SAR. Routing via Staple Fitzpaine Road would, however, have an adverse impact on WCH users that regularly use this road. The suggestion that traffic would use an alternative route via Cold Road and West Hatch Lane is nonsensical. Diverting traffic to narrow, hilly lanes, which are popular WCH routes is creating a safety hazard. A further affect of closing Bickenhall Bridge to vehicle traffic is that Griffin Lane is forecasted to become busier by some 250 vehicles a day. NH had agreed with CoP that Griffin Lane is totally unsuitable for vehicle traffic as it is narrow, windy, hilly and in parts with a deep gully running alongside. Furthermore, Griffin Lane is well used by walkers and horse riders.

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<sup>3</sup> A358 Scheme Assessment Report, paragraph 7.1.8.

<sup>4</sup> HASAWA, Section 3(1): It shall be the duty of every employer to conduct his undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment who may be affected thereby are not thereby exposed to risks to their health or safety.

<sup>5</sup> Obtained through FOI/2578. Full SGAR 2\_Redacted - End of Stage Report - 2019.05.24.

<sup>6</sup> A358 Taunton to Southfields Scheme - Suppression of the Concerns of Community of Parishes - 2021.12.15.

<sup>7</sup> Response to Parish Council Alternative Proposals, HE551508-ARP-HGN-ZZ-TN-CH-000005.

An illustration of CoP's proposal is repeated in Figure 2. Regarding the unconventional layout CoP has noted a similar layout is proposed for the Rokeby Junction within the A66 Northern Trans-Pennine project, a contemporary SRN scheme. Additionally, CoP has referenced the existing junction arrangement at the A356/Ringwell Hill/A303 connection at Bower Hinton as being comparable to our proposal at Figure 2.

CoP's proposal for a junction south of Hatch Beauchamp comprises a CD122 single lane auxiliary diverge and parallel merge from and to the eastbound carriageway at the current Hatch Beauchamp Village Road south junction with the A358; grade separation being provided by the overbridge. For the westbound carriageway CoP proposes a single lane auxiliary diverge on the eastern end of the service road and a parallel merge on the western end. The slip roads can be designed to CD122 parameters to accommodate the AADT level of traffic expected on the A358.

CoP is committed to the safety of all users of the dualled A358. Currently, road safety between Thornfalcon signals and Southfields roundabout is 16% lower than the national average. NH notes 3 fatal accidents along this section of the A358 citing the speed, volume of traffic, dangerous overtaking and poor junctions. CoP agrees that safety will be improved as the dual carriageway will provide safe overtaking opportunities and graded separated junctions will eliminate the need for right turning traffic to cross the opposing mainline A358 traffic. Safety and innovation can be combined to provide safe passage for through-traffic whilst safely maintaining the historic access for local communities to their local A road.

### **Southfields Roundabout**

a. Lengthening of the parallel merge/diverge layouts of the segregated left-turn lane connecting the A358 (west) to the A303 (east) to facilitate safer merging onto the A303 (east) and reduce congestion on the segregated lane.

This proposal first suggested by CoP in its response to NH's first consultation has been accepted. However, CoP believes that the segregated lane should be extended further back on the A358 (west) to incorporate an auxiliary lane so that there would be an earlier opportunity to leave the A358, reducing the risk of congestion on the segregated lane spilling back onto the A358 (west). At peak times, traffic approaching the roundabout can currently tailback to Rapps or even further west. NH has not given any explanation of why this proposal has been rejected.

b. Widening the approach of the A358 (south) to Southfields roundabout from 1 to 2 lanes at the point it passes Ilminster Services and installing traffic lights to improve traffic access to and from the Services and provide a WCH crossing the A358 (south).

This is not supported. The A358 at this point is used by traffic travelling from Chard and the south coast, traffic diverted off the A303 (south) via Horton, as well as locals from Chard, Donyatt, Horton and Broadway seeking to reach the roundabout. At peak times this stretch of the A358 (south) is heavily used and often congested. The creation of a second lane as the A358 (south) passes in front of the entrance to the Ilminster Services would complicate safe entry and exits. That and the installation of traffic lights would mean that traffic to and from the Services had more lanes to traverse and, particularly, those exiting right would have to wait for both entry traffic off the A358 (south) and WCH crossing, whether or not both were present. This would introduce significant additional delay to traffic approaching the roundabout and risk traffic heading towards Chard backing up to the roundabout, impeding traffic wishing to leave it for the same route. Instead, only one lane should be retained at this point and the entry/exit to the Services should be assisted by a yellow box junction, with the proposed traffic light crossing being sited further west on the A358 (south), closer to the link between Horton Cross and Broadway Street, to which it would be more relevant for walkers and cyclists.

c. A segregated left turn lane should be provided to allow access to the A358 (west) towards Taunton without using the roundabout, as previously proposed by CoP.

There is significant concern that the traffic modelling for Southfields Roundabout and the Ilminster Services signalised junction predict theoretical delays for traffic on the A358 (south) approaching the roundabout that are completely unrealistic and are regularly exceeded now.

CoP continues to urge National Highways to consider more thoroughly its proposals for the redesign of Southfields roundabout. It believes that the current proposals for the roundabout will lead to even greater congestion on all the approach routes, except potentially the A303 (west) and will increase safety risks. This, in turn, will encourage rat running through Sea, Donyatt, Horton and Broadway by vehicles wishing to avoid the congestion at the roundabout.

Further information on this issue is available in Broadway Parish Council's response to this Supplementary Consultation.



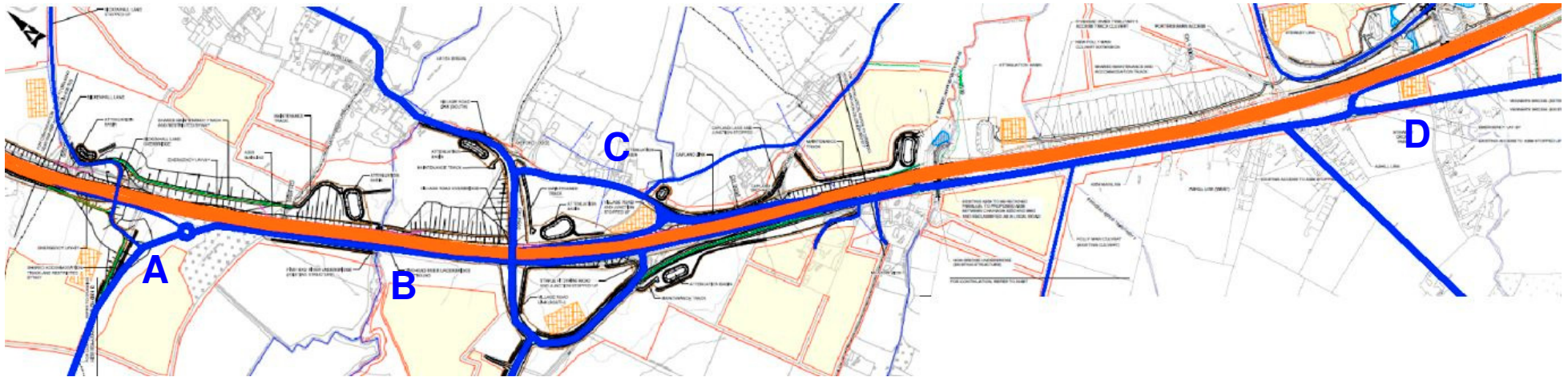


Figure 2 CoP proposal for composite junction between Hatch Beauchamp and Ashill.

Components:

- A. A parallel merge from roundabout to westbound carriageway, joining A358 before Bickenhall Wood.
- B. Service road extended to roundabout. Staple Fitzpaine Road joins service road at existing junction.
- C. A single lane auxiliary diverge and parallel merge at southern end of Village Road from and to eastbound carriageway. Capland Lane link moved to original alignment to provide ground for eastern parallel merge.
- D. A single lane auxiliary diverge from westbound carriageway to existing Stewley Cross junction with old A358. With simplified Ashill Junction weaving distance is greater than 1km. Even with existing Ashill Junction design the weaving distance is 980m.

Benefits:

The composite junction effectively reinstates the historical local road network in this sector of the A358 Scheme. Traffic is fed in an efficient manner to and from the dualed A358 without the need to travel through Hatch Beauchamp or Ashill, or extended travel through local lanes and roads. In accordance with Section 3(1) of Health and Safety at Work Act etc. 1974 the health and safety of nearby communities adversely affected by the Scheme is mitigated to as low as is reasonably practical.



# Response to Supplementary Consultation Questionnaire

## Transport, traffic flows and access

1a) Nexus 25 signalised junction.

No comment

1b) Mattock's Tree Green junction:

- New connection at MTG eastern roundabout and new signalised crossing on the A378.

Support

- Realignment of Ash Road to MTG junction connection.

Support

- West Hatch Lane extension to MTG junction.

Supported. However, the design shown in NH's fly through is excessive in scale. West Hatch Lane is a narrow single track lane so any link should be of similar scale, supplemented by traffic restrictions to only allow local access for agricultural and residential use.

1c) Bridge at Bickenhall Lane moved further south and restricted to walkers, cyclists and horse-riders, including disabled users and local landholder access.

This proposal limits access to the A358 by the Neroche district to solely Staple Fitzpaine Road via the service road or West Hatch Lane via MTG junction, routes that are difficult for normal traffic and unsuitable for HGVs and large farm vehicles, as explained in the Remaining Issues section. To mitigate this loss of access NH must provide access to the dualled A358 via Bickenhall Lane as illustrated in Figure 2.

1d) New Capland link road connecting Capland Lane and Village Road.

A CoP proposal, so supported. However, the design shown in NH's fly through is excessive in scale. Capland Lane is a narrow single track lane so any link should be of similar scale, supplemented by traffic restrictions to only allow local access for agricultural and residential use.

1e) Works to some local roads:

- localised widening / passing bays on Haydon Lane and Stoke Road.

Localised widening/passing bays do not address the serious bottleneck in Lower Henlade. Much of the traffic through Lower Henlade, Haydon and Stoke St Mary is destined for the south of Taunton to the schools and colleges there. The solution to the overuse of Haydon Lane and Stoke Road is to reopen the Old Ilminster Road so that access to south Taunton can be via Junction 25. Old Ilminster Road is currently restricted to Park and Ride buses and cyclists and, with only 14 bus movements an hour, is underused.

- addition of passing bays on Broadway Street.

These are supported.

- traffic calming measures in Ashill village.

Alternative mitigation to eliminate health and safety proposed. See Remaining Issues

- changes to Cad Road / Rapps Road junction.

Local opinion is that the expected increase in traffic volumes and the disregard for the 40mph speed limit already apparent, will greatly add to the dangers for traffic emerging from residences on Rapps Road and from Butts Lane. They request traffic calming measures including the imposition of a 30mph speed limit.

## **Walking, cycling, horse-riding and disabled user access**

### **2a) Jordans bridge.**

This is supported. It will give land users access to fields either side of the A358 and a crossing point for walkers, cyclists and horse riders (WCH), reopening footpaths and creating safer cycleways and bridlepaths. Additionally, the proposed WCH path to be created between Broadway Street and the old A358 at Horton Cross should be upgraded to take vehicles, linking it to the service road between Broadway Street and the proposed Ashill junction. This would create a direct link between Horton Cross and Broadway Street for those wishing to access or travel from Broadway, thereby relieving the unsuitable Suggs Lane of traffic and providing an alternative route for vehicles from the A358 (south) to join the A358 at Ashill junction without using the Southfields roundabout. This new route would resolve the problem of NH's refusal to agree an off-slip road at Broadway Street. It would be necessary to have a weight restriction on the proposed Horton Cross to Broadway Street link and careful consideration would be needed to the design of the junctions at Horton Cross and Broadway Street. However, should NH decide not to include the link for vehicles from Horton Cross to Broadway Street, Jordan's Bridge should be relocated to permit an off-slip road at Broadway Street.

Further information on this issue is available in Broadway Parish Council's response to this Supplementary Consultation.

### **Parking lay-bys on both carriageways south of the proposed Jordan's Bridge:**

This is supported in principle. However, if the Horton Cross to Broadway Street link is not agreed, the lay-bys should be located so that an off-slip road can be provided at Broadway Street. However, since both these lay-bys require simple merge and diverge tapers for all vehicles up to and including HGVs, CoP fails to see why similar arrangements designed to appropriate standards are not possible to facilitate access to and from the dualled route as they have proposed. Indeed, the parking lay-bys provide more of a safety risk.

### **2b) new restricted byway at Oldbroach Lane.**

The new restricted byway ends on Haydon Lane, which NH forecasts will be carrying over 4,700 vehicles a day. Horse riders and cyclists would then have to travel along Haydon Lane to reach the quieter lanes to the south. This creates a serious safety issue. Extending the restricted byway south and east along T26/9 (rerouting it around the perimeter of the orchard) and T22/9 would enhance the WCH network in this area and solve a serious safety issue.

### **2c) new signalised junction including a pedestrian and cyclist crossing on the A358 (west) close to Southfields roundabout.**

This is not supported. The A358 at this point is used by traffic travelling from Chard and the south coast, traffic diverted off the A303 (south) via Horton, as well as locals from Chard, Donyatt, Horton and Broadway seeking to reach the roundabout. At peak times this stretch of the A358 (south) is heavily used and often congested. The creation of a second lane as the A358 (south) passes in front of the entrance to the Ilminster Services would complicate safe entry and exits. That and the installation of traffic lights would mean that traffic to and from the Services had more lanes to traverse and, particularly, those exiting right would have to wait for both entry traffic off the A358 (south) and WCH crossing, whether or not both were present. This would introduce significant additional delay to traffic approaching the roundabout and risk traffic heading towards Chard backing up to the roundabout, impeding traffic wishing to leave it for the same route. Instead, only one lane should be retained at this point and the entry/exit to the Services should be assisted by a yellow box junction, with the proposed traffic light crossing being sited further west on the A358 (south), closer to the link between Horton Cross and Broadway Street, to which it would be more relevant for walkers and cyclists.

## Environmental mitigation

3a) new areas of biodiversity and landscape mitigation away from the route.

If the scale of the dualling was less there would be less need to mitigate the adverse environmental impact of the Scheme. See Remaining Issues.

3b) hedgerow improvements proposed across the length of the scheme to connect up areas of existing suitable habitat.

Supported, but if the scale of the dualling was less there would be less need to mitigate the adverse environmental impact of the Scheme. See Remaining Issues.

## Location of the main construction compound

4. Main construction site compound near to Mattock's Tree Green junction. This would include the installation of a temporary bridge to the east of the existing A358 / A378 junction.

No comment.

## General Comment

5. The A358 Scheme provides one great improvement – the Henlade bypass that will improve the quality of life for communities in that immediate area. Beyond that area fourteen Parish Councils and Ilminster Town Council are very concerned that the Scheme has serious failings. These were voiced and documented throughout 2021. The Statutory Consultation was an exercise in selling NH's preliminary design. All differing views were severely muted. In spite of the deficiencies of the consultation<sup>8</sup> we understand from the limited information on the Consultation provided by NH that local communities do not agree with the fundamentals of the preliminary design.

It is symptomatic of this Tier 1 scheme that views of local communities are ignored. The Minutes of the update meeting that NH held with the Planning Inspectorate on 31 March 2022 contained the following statement: *'The Applicant is considering all the feedback in detail and looking at their preliminary design to decide whether any changes are needed, however following a high-level review of responses, the Applicant expects that the fundamentals of the preliminary design will not change.'*

This high-level review is not included in any material presented at the Supplementary Consultation. It is relevant and for transparency of decision making it is necessary to know the evidence and analysis. In the Highways England publication 'The Road to Good Design' the Chief Highways Engineer and Chair of Strategic Design Panel wrote: *We need to design in a way that is sensitive to the context of a road's surroundings and responsive to the needs of those who use it and the communities through which it passes; this will create a vital piece of infrastructure that is not only functional, but also makes a positive contribution.*

NH's behaviour is a contradiction of this principle of good design.

Annex A: Statutory Requirement for Mitigation.

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<sup>8</sup> Report into the deficiencies of consultation prepared by the Community of Parishes – 2021.12.20.

1. The A358 scheme falls within the requirements of the Health and Safety at Work etc. Act 1974 (HASAWA)<sup>9</sup>. How National Highways (NH) fulfils its legal responsibilities is detailed in GG104<sup>10</sup>, the DMRB Safety manual. HASAWA<sup>11</sup> also places guidance and enforcement responsibilities on local authorities.
2. GG104 defines 3 groups affected by the scheme: Workers, Users, and Other Parties<sup>12</sup>. HASAWA statutory safety requirement for Other Parties is as low as is reasonably practical (ALARP). ALARP requires risks to be assessed and compared to costs of mitigation.
3. All accidents have a monetized cost. Government data estimates the cost of one fatality to be slightly below £2.5m<sup>13</sup>. This monetized cost of a fatality is based on a willingness to pay to avoid pain, grief and suffering to the casualty, relatives and friends, as well as intrinsic loss of enjoyment of life. Based on costs of Creech Castle junction (£8m) and Dunball roundabout (£4m) we estimate the CoP ALARP mitigation proposals forwarded in this response to be less than £3m if our cost and environmental savings are taken into account.
4. Traffic accidents are caused by a myriad of events. NH data states that the current accident rate on the Thornfalcon to Southfields section of the A358 is some 16% lower than the national average. Data from Public Health England also indicates the local road network is safer than the national average<sup>14</sup>. Indeed, during the past 8 years no accidents at all have been recorded in Hatch Beauchamp or Ashill villages. This is our safety baseline, defined in GG104 as the level of safety against which the safety objectives are to be set and measured.
5. The current scheme design will increase traffic, increase the mixture of vehicles and increase the time traffic will spend in the rural network and our villages. All these changes increase the likelihood of accidents. In the language of GG104, the scheme introduces a safety risk dis-benefit from the safety baseline that must be mitigated to an ALARP level. GG104 describes in detail the safety risk assessment process, evaluation of safety risks, safety risk mitigation, required documentation and governance. NH has not carried out with any rigour a GG104 assessment of the risks associated with the displacement of traffic within the local road network.
6. NH uses modelling to forecast the impact of the scheme on local traffic. For local traffic modelling there are a large number of variables that include traffic flow rates, traffic types (ranging from HGV, large and often very dirty farm machinery through to residential cars and WCH), destinations, road/lane capacity, seasonal farm traffic, driver preferences and behaviour, road/lane maintenance standards, impact of weather and seasons, etc. This makes predicting the impact of the scheme particularly challenging. In these circumstances GG104 specifies that local expert knowledge should be included in the safety risk assessment. The CoP is composed of parish councillors with excellent knowledge of local conditions and local dangers. NH has not sought our advice.
7. GG104 Appendix D details how qualitative data is assessed. One accident without injury, one with slight injury, and one with serious injury occurring every 5 to 10 years together with one fatal accident occurring less than once every 10 years is a very probable outcome within our villages and rural network without mitigation. Compared to our current safety baseline GG104

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<sup>9</sup> HASAWA, Section 3(1): It shall be the duty of every employer to conduct his undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment who may be affected thereby are not thereby exposed to risks to their health or safety.

<sup>10</sup> GG104 General Principles and Scheme Governance - Requirements for safety risk assessment

<sup>11</sup> HASAWA, Section 18 4B(a): It shall be the duty of the Executive and the local authorities to work together to establish best practice and consistency in the enforcement of the relevant statutory provisions.

<sup>12</sup> Other parties includes any person or persons who could be affected by the National Highways motorway and all-purpose trunk roads, but who are neither using it, nor working on it i.e. living or working adjacent to the motorway and all-purpose trunk roads, using other transport networks that intersect with the motorway and all-purpose trunk roads.

<sup>13</sup> COBA Manual Table 3/1 and 3/4: Cost per fatal casualty £1,652,729 (2010 value) multiplied by 1.50 (assumed compounded rate 2022 and beyond) yields £2,479,093.

<sup>14</sup> Paragraph 12.6.70 of PEIR and crashmap.co.uk.

Appendix D methodology concludes this is an unacceptable level of risk that must be avoided through changes in design.

8. The 2019 SAR included a junction south of Hatch Beauchamp to improve connectivity and reduce traffic flow through Hatch Beauchamp and Ashill. NH PICADY analysis showed the junction would operate well and within the scheme's capacity objectives<sup>15</sup>. This junction that would have provided ALARP level mitigation was removed from the scheme following a high-level cost cutting decision<sup>16</sup>. In contrast, recognising and accepting its statutory obligations NH has imposed no cap on the budget to fulfil its responsibilities regarding protection of the environment<sup>17</sup>. CoP asks why the same importance is NOT given to the health and safety of local communities.

9. The loss of historic accessibility to the A358 will necessitate long diversions along unclassified and C class rural lanes and roads. Experience to date is that these roads are poorly maintained by SCC, evidenced by pot holes, uncleared gullies, limited cutting of road hedges and verges. In autumn and winter the rural network is very dark, often muddy and slippery and in many places flooded or obstructed by pools of water. These issues already make the rural network precarious. The increased traffic volume, incompatibility of traffic types (cars, vans, lorries and agricultural vehicles) with each other and WCH uses will increase mental and physical stress on local communities. School runs will become more stressful. Businesses will be handicapped. Community severance will increase. The scheme does not consider in any depth these effects nor offers any mitigation of substance.

10. An up front expenditure of about £3m to provide the additional access to the A358 would restore most of our historical connectivity to our A358. It would preserve our current safety baseline. Additionally it would remove a large proportion of the future costs in maintaining an over-used rural network, and remove potential arguments for litigation.

11. There is no requirement for a GD300 build standard in the scheme's business case. An independent expert review concluded that the scheme prioritised the Expressway aspiration above all other stakeholder requirements<sup>18</sup>. Our previous Conservative county authority stated it would not challenge the GD300 design standard, believing criticism would jeopardise the scheme. This was extraordinary weak behaviour as local communities and the environment will suffer as a consequence. CoP hopes the newly elected Liberal Democrat county authority will take a more balanced view and work to provide a dualled A358 that works for commuting traffic and for local communities and businesses that live and work along the Scheme.

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<sup>15</sup> Paragraph 10.4.8 of 2019 SAR.

<sup>16</sup> Obtained through FOI/2578. Full SGAR 2\_Redacted - End of Stage Report - 2019.05.24.

<sup>17</sup> Response to FOI/3220.

<sup>18</sup> Obtained through FOI/2578. Gateway Review 2: Delivery Strategy.