



Transport Action Network

*Response to:*

**A358 Taunton to Southfields  
Consultation**

## Headline comments

- The consultation is fundamentally flawed, too short and badly presented. It should be rerun with a proper set of options for the scheme and with clearer signposting to documentation.
- The non-technical summary of the Preliminary Environmental Impact Report (PEIR) is not fit for purpose, contradicting evidence elsewhere and understating true impact of the scheme.
- The new road fails to deliver on the scheme objectives and National Highways have not worked with local people to reduce the scheme severance and its impact on their quality of life.
- The proposed scheme will increase carbon dioxide emissions (from traffic growth and due to its construction) by over two million additional tonnes at a time when we should be rapidly reducing our emissions to reach a 78% reduction by 2035 and net-zero by 2050.
- The new road will substantially increase noise pollution for many local residents, despite some people seeing noise levels drop.
- The impact of higher levels of pollution on local residents are not properly assessed.
- It will have a detrimental impact on several habitats including ancient woodland and national and local wildlife sites, and negatively impact on bats.
- There will be the loss of mature trees and a negative impact on the setting of the Blackdown Hills AONB.

## Introduction

The proposed scheme would consist of 8.5 miles (13.6km) of new dual carriageway and large junctions between J25 on the M5 and Southfields roundabout on the A303.

We formally object to the proposed new road on the grounds that it will not deliver sufficient benefits to justify the significant environmental and social costs. Increasing road capacity also undermines key policy goals on environmental protection, modal shift, carbon reduction, air pollution and public health. It will increase community severance, divert a considerable number of rights of way which will become less pleasant to use alongside, or close to, a 70mph dual carriageway. This will undermine people's enjoyment of the area and their recreational opportunities and hence their mental and physical well-being.

## Aims of the scheme

The scheme aims are set out as follows:

- improve the capacity of the road to reduce delays and queues that occur during peak hours and at key times of the year i.e. the height of summer.
- support economic growth, facilitating growth in jobs and housing by providing a free-flowing and reliable connection between the South East and the South West
- make the road safer, by providing additional capacity and reducing driver stress. We'll also improve routes for pedestrians, cyclists, horse riders in the area.
- protect the environment and look for opportunities to improve it, minimising any unnecessary impact of the scheme on the surrounding natural and historic environment and landscape
- work with local communities to reduce the impact of the road in terms of community severance, and look for ways to improve local peoples' quality of life

However, there is little evidence to support the claim it will lead to economic growth, even if it might lead to economic redistribution. While roads can always be made safer, the current road actually has a safer crash record than the average crash rate for rural trunk A-roads<sup>1,2</sup> so it's questionable whether National Highways' overengineered solution is necessary to address any safety issues.

Given that one bridleway and many roads and footpaths will be stopped up with significant diversions it is hard to see how an overall positive score on rights of way has been achieved.

Insisting on a dual carriageway for the whole length of the scheme is not looking for opportunities to improve the environment or minimising the scheme's impact. It's doing the opposite. At the same time National Highways is clearly not listening to local communities, especially at the eastern end who will be strongly impacted by the scheme. They will see community severance worsened along with their quality of life.

## Issues of concern

### *Flawed consultation*

For such a large road, 8.5 miles (13.6km) long, with a substantial number of accompanying documents, a six week consultation is completely inadequate. It is worth noting that the shorter 5 mile (8km) A27 Arundel Bypass will have an 8 week consultation when it starts in January next year. Even that is not that much time given the wealth of information people need to read to fully understand the impacts of the new road and come to an informed position on it.

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<sup>1</sup> Table 3.4, page 29, [Technical Appraisal Report \(January 2018\)](#) – Highways England

<sup>2</sup> Paragraph 12.6.69, page 32, Chapter 12 Population and Health

There are 272 documents accessible mostly through the list view on the Virtual Consultation portal which is a very clunky way of accessing the documents. Firstly, it is not very obvious that the documents are situated under a heading called 'list view' instead of a more obvious title such as 'documents' or 'further information'. Secondly, for much of the time when looking for information on the portal we were having to accept cookies for each document we accessed. This was another inconvenience and barrier to accessing the many documents, as well as wasting the public's time. Thirdly, given various documents are presented on the main consultation page with direct links, people could be left with the impression that these are the only documents they need to read. There are only 16 of these plus a link to the PEIR.

Even when you do find what you are looking for, the information is often presented in a confusing way or in a way designed to downplay the negative impacts and potentially mislead the public as to the true impact of the scheme. This is shown very clearly around the issues of Public Rights of Way (PROW) and noise pollution as outlined below.

### ***Public Rights of Way (PROW)***

Document 9 called 'PROW improvements' is an example of a document produced to give the impression of PROW benefits but provides virtually no useful information to show how this might be claimed. It also fails to bring together information about PROW that will be closed or stopped up so that people can get a balanced understanding of the overall impact of the scheme on the PROW. It points people to "*Chapter 12 of our Preliminary Environmental Information (PEI) Report*" for further information but without any link so people have to go looking for it themselves. It is worth noting that there is no document titled PROW closures and diversions, so people are left with the impression, without a lot of digging, that this new road is only going to lead to improvements, which is clearly wrong and clearly misleading.

It is also worth noting that the PROW information within Chapter 12 is mixed up with other considerations and while new proposals are clearly set out in Table 12-21<sup>3</sup>, this is incorrectly labelled as "*Changes to PROW as a result of the proposed scheme*" as it doesn't include closures or other impacts. The left-hand column of this table makes these interventions all sound like positive changes when this might not be the case given some involve diversions and hence extra journey lengths, most likely in a less pleasant environment as they are close to a 70mph road. Consequently, this table is misleading the public.

Indeed, the total number of PROW affected by the scheme, and this doesn't include local roads, is 39<sup>4</sup> but no detail is given as to what this might mean. Nowhere in this document is the full impact of the road scheme revealed. Figure 12-7 is twice referenced within Chapter 12 as "*showing proposed stopping up, diversions and new routes for WCH and other users of highways and local routes with public access rights*". To work out the real impact of the scheme involves scrutinising two maps, which are not always the easiest to work out, to try and assess what is being closed or affected. This is far from satisfactory and as part of the PEIR is not fit for purpose. The PEIR should clearly set out what is being affected and how. It should then explain how the negative impacts are proposed to be mitigated. Instead, it misleadingly presents all the changes as being positive, even when they are diversions, while

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<sup>3</sup> Table 12-21, pages 45 & 46, Chapter 12 Population and Health

<sup>4</sup> Paragraph 12.9.79, page 49, Chapter 12 Population and Health

effectively ignoring the negative impacts. This makes it very hard for the public to come to any clear understanding of the overall impact of the road proposals and therefore an informed decision when responding to the consultation.

### **Noise pollution**

In the same chapter (12), noise is also similarly confusingly presented, not fully quantifying the direct and indirect impacts of noise pollution on residential dwellings. Even when it presents the direct impacts of the road scheme on noise, these are not totalled up for people to have a clear understanding of the overall impact. Excluding the mostly beneficial impact on village of Henlade, further demonstrates the negative impact the scheme has on communities along the route and further highlights a different approach should have been seriously considered east of Henlade.

While the direct noise impacts are set out in a series of tables for communities along the road, the indirect impacts experienced due to changes in traffic on neighbouring roads are less clearly presented in a more generalised form with no breakdown as to which areas are most affected. This further undermines the ability for people to make informed comment.

It's worth noting the number of churches and at least one school adversely affected by the proposals.

Despite the fact that the number of residential and other receptors negatively affected by noise from the road, both directly and indirectly, is clearly far greater in number than those that benefit (which the report acknowledges), the conclusion in Chapter 12 somewhat amazingly concludes that *"At a population level, the health outcome is likely to be neutral across all wards except for North Curry and Stoke St Gregory, which is positive."*<sup>5</sup> This is just not credible and highly misleading especially as the number of properties with direct permanent significant adverse effects are nearly four times those with direct permanent significant beneficial effects<sup>6</sup>.

Further muddling and confusion is created in Chapter 16, which is described as PEIR summary, which could cause it to be confused with the PEIR Non-technical summary. Here, there are further incredible claims about positive health outcomes due to noise when noise is worse for far more properties than it is beneficial. Another claim is that there will be *"improved accessibility from the overall reduction in the number of vehicles passing through communities"*<sup>7</sup> yet this does not tally with the increases in noise due to increases in traffic this scheme will generate.

Meanwhile the PEIR says *"There are over 20 public rights of way (PRoW) such as footpaths that cross or meet the A358 which have the potential to be affected by the proposed scheme."*<sup>8</sup> Yet in Chapter 12, it states that: *In total the proposed scheme has the potential to affect 39 PRoW which are shown on Figure 12.7 Public rights of way within the study area.*<sup>9</sup>

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<sup>5</sup> Paragraph 12.9.111, page 55, Chapter 12 Population and Health

<sup>6</sup> Pages 32 & 33, PEIR Non-technical summary

<sup>7</sup> Table 16-1, page 4, Chapter 16 Summary

<sup>8</sup> Page 35, Population and human health, PEIR

<sup>9</sup> Paragraph 12.9.79, page 49, Chapter 12 Population and Health

This is clearly inconsistent and while the latter is listed under construction, no detail is given and no more information is provided under operation.

## ***Air Pollution***

No mention is made within this section of the recent change in World Health Organisation WHO guidelines for particulates and nitrogen dioxide. The WHO have concluded that there are no safe levels of these pollutants and has cut its guideline levels significantly, which are now a quarter of the UK's legal limits for nitrogen dioxide and one fifth the UK's limit for PM2.5s.

While these are not legal limits, they are important and should be mentioned and the impact of the road assessed against them as they are a better measure of impact on human health.

It is also of concern that virtually no monitoring has been done, or is proposed, along most of the A358 or the local road network nearby. Most of the air pollution monitoring points are along the M5 or in Taunton. There are only 5 monitoring points along the existing A358 and these all lie within not much more than 1km from the M5, with point 62 being the furthest east.

Given the large increase in noise pollution for people along the route east of Henlade, and also off the route, particularly at North Curry, Broadway and Horton, it's highly likely these communities will see an increase in air pollution. This does not appear to have been properly addressed within the PEIR.

The PEIR non-technical summary states that there is *“Likely significant adverse effect on Bickenhall Wood ancient woodland due to air quality related nitrogen deposition from vehicle emissions causing potential for habitat degradation.”*<sup>10</sup> In Chapter 5 (air quality) a much longer list of designated wildlife sites and ancient woodland are listed as being adversely affected, although most are then dismissed in Chapter 8 (biodiversity) as the impact is not considered to be significant. However, it should be noted that this is before cumulative impacts have been assessed. It also highlights the need that if the A303 is completely dualled, there will need to be an assessment of the whole corridor for the wider impacts that will arise from the increase traffic that will result.

## ***Climate change***

This new road proposal will lead to an unacceptable increase in carbon emissions. Despite the fact that the scheme is expected to increase carbon emissions over its lifetime by over 2 million tonnes, the PEIR says there will be no significant impacts due to these emissions. This is simply not credible.

This is repeated in Chapter 16 and the fact that emissions arising from the road are not significant compared to the UK's 5 year carbon budgets is used as the excuse for dismissing carbon emissions as insignificant. However, that ignores the impact of increasing emissions

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<sup>10</sup> Page 26, PEIR Non-technical summary

within the local and regional area (as EIR guidance recommends<sup>11</sup>) and Somerset County Council's aim to be carbon neutral by 2030. In this context this increase will be significant and should be addressed within the PEIR.

It is worth noting that carbon losses due to land clearance, soil disturbance or loss, and land use change have not been assessed.

### ***Landscape and wildlife impacts***

The road proposals would have significant negative impact on the landscape, including the setting of the Blackdown Hills AONB, and would involve the significant loss of ancient and other woodland, veteran trees, hedgerows and other habitats.

The scheme would impact directly on wildlife both during construction and operation with the most severe impact likely to be on bats. Habitat severance could disrupt the bats' foraging and this might not return to what it was previously even with mitigation measures. Temporary screening to direct low-flying bats and birds over the road to avoid colliding with traffic, could actually be in place for at least a decade as it won't be able to be removed until planting has substantially matured. This could also have an impact on the landscape that extends beyond the construction period.

The increased noise from the road will also impact on breeding of birds and other creatures that rely on communication to find a mate.

### ***Cumulative effects***

Given that the PEIR admits that it has not assessed the cumulative effects of other developments in the vicinity, how can the true impact of the new road be properly assessed?<sup>12</sup>

### ***Other options***

We don't believe that other approaches or options have been properly considered for this road. National Highways has settled on a dual carriageway and refused to seriously consider anything else, either in part or in full. Given the need for more urgent action on climate change, which is likely to include the need for traffic reduction as the electrification of the vehicle fleet is unlikely to happen quickly enough, the justification for a dual carriageway, end to end, falls away.

Given the severe impact of the road scheme on the local community and the surrounding environment and the huge increase in carbon emissions, National Highways needs to go back to the drawing board and come back with something that delivers far more benefits and has far less adverse impacts.

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<sup>11</sup> Paragraph 4.4.2, page 40, [Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment](#) – European Union, 2013

<sup>12</sup> Page 42, PEIR Non-technical summary

## Conclusion

We strongly believe that the consultation is far from adequate and should be re-run. It does not meet acceptable standards of information provision in terms of the way that it is presented to the public, often to hide the true impact of the road, a lack of face to face consultation events and the poor quality of the online consultation tool. It also needs to give people enough time to properly digest and assess the information they are given. Just throwing nearly 300 documents at people which are badly presented and without proper links between them does not tick the box of providing adequate information. Equally, only providing 6 weeks for people to read all the documentation, if they can find them all, is not nearly long enough for people who may well be working full-time. A 12 week consultation should be standard for a road of this magnitude and at the very least an 8 week consultation period as proposed for the much smaller A27 Arundel Bypass should have been the minimum considered.

Overall, we do not believe that the severe impacts that this road will bring are outweighed by its marginal benefits. It should therefore not proceed and National Highways should go back to the drawing board and come back with a far better and less impactful solution.

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Chris Todd

Director

Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus services, damaging road schemes and large unsustainable developments

254 Upper Shoreham Road, Shoreham-by-Sea, West Sussex, BN43 6BF

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