

Letter of agreement by the Parishes of West Hatch, Neroche, Trull, Hatch Beauchamp, Stoke St Mary and the unparished Killams & Mountfield.

Jim O'Sullivan
Chief Executive
Highways England Company Ltd.
Bridge House
1 Walnut Tree Close
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GU1 4LZ

cc Department for Transport, Secretary of State for Transport - The Rt. Hon. Chris Grayling MP

cc Department for Transport, Permanent Secretary – Bernadette Kelly

cc Member of Parliament for Taunton Deane - Rebecca Pow

cc Member of Parliament for Bridgwater and West Somerset - Ian Liddell-Grainger

cc Highways England – Andrew Page-Dove

cc Somerset County Council – Cllr David Hall

cc Somerset County Council – Cllr John Thorne

cc Taunton Deane Borough Council – John Williams

17th June 2017

Dear Mr. O'Sullivan,

A358 - TAUNTON TO SOUTHFIELDS DUALLING SCHEME

We the undersigned write directly to you as the Chief Executive of Highways England Ltd. to advise you of our objections regarding the manner in which the consultation for the above mentioned project has been handled by Highways England (HE).

Initially we were advised in February 2016 that we would be consulted and we quote from the literature produced by Highways England at that time: "These consultations will allow us to work towards identifying preferred routes for each scheme by mid-2017". Though further Parish consultations took place in November 2016, these provided no additional indications of the proposed options, just a shaded area to the west of the existing A358, which could hardly be considered as a consultation, as explained below. Imagine our total surprise when the public consultation revealed just one "preferred route". The other projects under your current A303 consultations, Sparkford to Ilchester and Amesbury to Berwick Down both included two options.

The government has published a revised set of consultation principles, last updated in January 2016, providing clear guidance to government departments on conducting consultations. Clause B* highlights the need for the consultations to have a purpose and be informative. It states "Take consultation responses into account when taking policy forward. Consult about policies or implementation plans when the development of the policies or plans is at a formative stage. Do not ask questions about issues on which you already have a final view". Additionally, government guidance* details state "making sure we [Highways England] consult only on issues that are genuinely undecided". Selecting to consult on a single option contravenes these criteria and the purpose of a consultation. Presenting only one option is of great concern as it leaves many local residents believing that they do not have a real opportunity to influence the decision making process, particularly as the vast majority are unaware that 3 other options existed, given these were not presented at the Highways England public

*Appendix A

events. Even the consultation questionnaire only allows responses relating to the single proposed route.

Furthermore, the consultation principles (Clause C*) state "include validated assessments of the costs and benefits of the options being considered". These figures are only available in the Technical Appraisal Report (TAR), however they clearly identify that all of the discarded options have far superior benefit to cost ratios. In fact only option 2A/2B achieves your own "high value for money category". This is also recognised in your paper "How Highways England plans major schemes" which states "We are responsible to you, the tax payer. So when we plan a project, we have to make sure that we meet the stated aims for the project and get the best value for money. Each scheme goes through a rigorous process to make sure this happens." Why then does the option with the lowest value for money become your single preferred option?

Following a Freedom of Information Request, we understand that the minutes of meetings from 3rd March 2017 conducted with Somerset County Council confirm that there were three shortlisted options (8+NFS, 8+J25 & 2A/2B) prepared for public consultation, developed in the 17 months since Mott MacDonald were appointed for this options stage. Despite this confirmation, within three and a half weeks the other options were discarded reducing the public consultation to just one preferred route, and leaving all key stakeholder members confounded by the lack of clarity. It is fundamental aspect of good decision making that the decision maker gives conscientious consideration to the outcome of the consultation process allowing consultees an opportunity for intelligent consideration of the proposals and to respond in a way which enables them to participate meaningfully in the decision making process.

We have already written to the HE Bristol office regarding Clause K* of these consultation principles as launching consultation exercises during local or national election periods (purdah), the guidance is quite explicit stating "If exceptional circumstances make a consultation absolutely essential (for example, for safeguarding public health), departments should seek advice from the Propriety and Ethics team in the Cabinet Office". Purdah commenced for the Somerset local elections 20th March 2017, whereas your consultation commenced 28th March 2017, within the period of purdah. We have requested confirmation that you sought advice and agreement from the Propriety and Ethics team in the Cabinet Office regarding this matter. We are awaiting a response to this question, though it appears to be another example of dismissive disregard for correct procedures and local concerns.

In the opinion of those of our community that have been able to attend the public events held in various parts of the greater Taunton area, your staff attending the events have been under prepared, unwilling or unable to answer even the most basic of questions, and it became apparent to many that the junior staff in particular had absolutely no knowledge of the area concerned. Additionally, not one parish event was planned, and though we submitted a complaint via our local Member of Parliament, a date for the Stoke St Mary Parish event has only just been agreed with less than a week's notice. Many parishes in this part of Somerset have a high number of elderly, there are limited or no bus connections and the people classed as "hard to reach" have not had the opportunities to voice their concerns that one would wish. It is incumbent upon you to "consider how to tailor consultation to the needs and preferences of particular groups, such as older people" (Clause F*).

We acknowledge that there is no doubt that the A358 needs to be upgraded. There is no doubt that the long suffering residents of Henlade desperately need a by-pass. There is absolutely no doubt that Taunton needs to grow economically and we

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understand that there is a Government need to move traffic from the south east to the south west, but we strongly advise you that your single preferred route achieves none of these aims.

As you have set out your scheme objectives for this scheme in section 2.2. of the TAR** as part of the *Road Investment Strategy*, you should therefore be judged against these criteria:

- Support economic growth - Given the proposed route has no link to J25 and there is no local access at J25A, there will be no local benefit. The road acts purely to connect traffic between the south east and south west. You state a key requirement is to facilitate growth in employment and housing in key locations and hotspots along the corridor, but without connections to local roads as part of this scheme these objectives will not come to fruition.
- Capacity - The TAR openly admits that the majority of traffic to Taunton and M5 North (73%) will still pass through J25 via the old A358, and hence congestion will not be relieved through Henlade, so “delay and queues” will remain on this section during peak hours. The proposed option is under-utilised, as traffic flow predictions suggest that it would only attract 48%** of the flows on the most utilised option 2A/2B, and hence fail to maximise the capacity of the new road, which is further reflected in the lowest benefit to cost ratio**.
- Safety - The TAR states that this option is actually the only one to increase the cost of accidents, which clearly does not match with your mandate to provide safer roads.
- Connectivity. There is no link to the proposed employment park near J25 or the Gateway Park and Ride Facility, so no connectivity to improve business and growth prospects. Furthermore there are questionable connectivity benefits for the 73% of traffic heading through Taunton and the M5 North, in other words “the rest of the UK”, whereas the options with a J25 link would meet this objective.
- Environmental - The new road cuts a great swathe across Stoke St Mary Parish (much of which is likely to be on embankment) through Grade 3 classification agricultural land, onto the closed Junction 25A located within the Vivary Green Wedge and the urban boundary of Killams, part of our recently declared Garden Town. Your objectives state you should “avoid unacceptable impacts on the surrounding natural and historic environment and landscape and optimise the environmental opportunities and mitigations that the intervention could bring”. Surely option 2A/2B meets these criteria, as it is declared in the TAR that it “can reduce the impacts upon landscape character and visual receptors since it would be contained within the existing road corridor”. Furthermore, your preferred route “has the potential to increase noise in local residential areas”, as it is only option to show a noise dis-benefit.
- Value for Money (from “How Highways England plans major schemes”). - The Benefit to Cost ratio figures** provide the only numerical objective assessment of the various options within the TAR, which identifies your preferred route has the lowest ratio of 1.54 vs 2.08 for option 2A/2B.

The preferred route appears to have been selected based purely upon subjective criteria chosen by Highways England.

We assure you that this letter is written after much local discussion, endless meetings and hours of searching for details which under “normal” conditions would have been available through your Bristol office, sadly due to purdah this has not been possible.

Please do not dismiss these requests suggesting that they will be merely considered as part of the consultation process. The TAR clearly states that “this assessment should also look at issues through customers’ eyes”. We request in the strongest possible terms that all of the identified issues are taken on board as they do not align with the

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government's principles of consultation and Highways England own stated objectives and aims. We would make ourselves available to meet you and appropriate members of staff to discuss a meaningful and logical direction forward for the parishes of East Taunton and Highways England.

Ultimately the current A358 Taunton to Southfields Dualling Scheme Public Consultation is flawed. As such it should be recommenced after the current general election purdah period with three options (8+NFS, 8+J25 & 2A/2B) available for a purposeful and informative public consultation.

Yours sincerely

Keith Read MBE - Chair of West Hatch Parish Council
Ripland House, West Hatch, Taunton, TA3 5RN

Jon Bell - Chair of Neroche Parish Council
The Old School, Staple Fitzpaine, Taunton, TA3 5SW

Mark Hughes - Chair of Trull Parish Council
Kibbear Cottages, Trull, Taunton, TA3 7LN

Cllr Catherine Herbert, Borough Councillor - The unparished Killams and Mountfields Ward.
49 Shoreditch Road, Taunton, TA1 3DF

Michael Baddeley – Chair of Stoke St Mary Parish Council
Hi-Ho Farm, Stoke Hill, Stoke St Mary, Taunton, TA3 5BU