

BY POST AND EMAIL



Queen Camel Parish Council

A303 Sparkford to Ilchester Project Team
Highways England
2/07K Temple Quay House
2 The Square
Temple Quay
BRISTOL BS1 6HA

2nd March, 2018

Dear Project Team,

Statutory Public Consultation - Submission from Queen Camel Parish Council

Queen Camel Parish Council (“the Council”) is grateful for this opportunity to comment on the proposals in the Preliminary Environmental Information Report (“the proposals” and “the PEI Report”) for the A303 Sparkford to Ilchester Dualling Scheme (the “scheme”). It is encouraged by the assurance in the Highways England (“HE”) Statutory Public Consultation brochure that “All feedback received from this consultation exercise will be used to help shape our proposal”. However at this stage it is noted that the Highways England A303 Sparkford to Ilchester project team (“the team”) has not taken account of the Council’s previous feedback. This feedback included discussions at an informal meeting with team representatives on 12th December 2017 as well as the Council’s formal submission to The Planning Inspectorate (“PI”) Scoping Enquiry which was copied to the team on 28th December 2017 (see *Appendix*, below). At a Stakeholder Consultation event at Haynes Motor Museum on 25th January 2018 a Queen Camel representative was assured that the team would continue to consult the Council over revisions to the proposals. We trust that this commitment will be honoured, that the Council will be listened to and not just heard, and that where the team chooses to reject our suggestions they will give reasonable explanations as to why.

The matters of most concern to Queen Camel are explained below along with recommendations as to how they might be addressed in HE’s Development Consent Order Application (“DCO Application”). For the sake of clarity our recommendations are cast in the form, *HE should do this, that or the other*, but we are aware that HE has access to a wealth of detailed data and professional expertise is not available to us and that it must strike a balance between costs, benefits and competing interests. On the other hand the Council has the benefit of local knowledge and a better understanding of local concerns and we hope that HE values this sufficiently for our recommendations to be taken seriously.

- 1. General traffic management - construction phase.** Congestion on the Sparkford to Ilchester section of the A303 (“the section”) already causes serious congestion problems on local roads, especially on Friday afternoons and evenings and at holiday times (see *Appendix* below, §13, sub-sections 1-9 and i-iv). HE has undertaken to keep two lanes of the A303 open throughout the scheme’s construction phase but the speed reduction from 50mph to 40mph will exacerbate congestion problems and HE’s bland assertion that delays will “be managed through...the implementation of a Traffic Management Plan” is no reassurance. Full details of the TMP should be included with the DCO Application, a recommendation supported by the PI’s Scoping Opinion §§2.3.14, 3.3.10-12, 13.2, 13.8.2.
- 2. HGV management - construction phase.** The A359 between Hazlegrove roundabout and Mudford hill (and other local roads) is subject to a 7.5t. weight restriction but the police find this difficult to enforce: resources are limited and distinguishing HGVs which have legitimate business within the

restricted zone (and are therefore exempt) from those using the road illegally as a short-cut is time-consuming. There is some evidence that the restriction is already widely flouted, and increased congestion caused by the protracted roadworks on the A303 section is bound to tempt many more HGV drivers to use Queen Camel High Street and the West Camel Road as a way of bypassing the congestion. This would have a particularly severe impact on Queen Camel village with substantial increases in congestion and danger to pedestrians (see *Appendix*, §13) along with increased particulate and noise pollution and damage to Queen Camel bridge. The following mitigation measures should therefore be specified in the DCO Application :

- 1) In conjunction with Somerset County Council Highways Department (SCC Highways) and the Police the setting up of an enforcement regime linked to an ANPR monitoring system to cover at least the A359 south of Hazlegrove roundabout and the unclassified road between Podimore village and the Podimore roundabout. We gather that such a system is in use between Hinkley Point and the M5 and has also been used successfully on a Highways England scheme in the north of England.
- 2) Prominent signage on the approaches to the Sparkford-Ilchester section of the A303 warning HGV drivers of the weight restriction on the A359 and other local roads and the measures being taken to enforce it.

Such a move would greatly help to mitigate the negative impact on Queen Camel of the construction phase of the proposed scheme.

3. Traffic management - operational phase: traffic flow at Podimore roundabout. Traffic flow at Podimore is likely to have a significant impact on Queen Camel. When the new A303 section is operational Podimore roundabout will be the first check on westbound traffic for some thirty five miles with considerable queuing when traffic is heavy. Many vehicles will be equipped with sophisticated interactive Satnavs whose live traffic updates will warn drivers of congestion on the A303 at Podimore and advise them on possible alternative routes. Any rerouting of A303 traffic via Queen Camel High Street and West Camel Road should be limited by specifying the following mitigation measures in the DCO Application:

- 1) Whenever traffic on the westbound A303 section is very heavy the phasing of the traffic lights at Podimore roundabout should be weighted to give an even lower priority than usual to the unclassified road from Podimore village as compared to the A303, A37 and A372. This would discourage motorists from leaving the A303 at Sparkford in an attempt to 'queue-jump' via Queen Camel High Street and West Camel Road.
- 2) HE and SCC Highways should liaise with Satnav software providers to ensure that live warnings of delays at the approaches to Podimore roundabout include the unclassified road from Podimore village as well as the A303, A37 and A372.
- 3) Retaining a single-carriageway road parallel to the dual carriageway A303 (see 4., below) would help provide traffic with an alternative route which avoids Queen Camel village.

4. Retaining a single-carriageway through road that runs roughly parallel to the dual carriageway A303 (a "parallel" road). We have been given to understand:

- 1) That an earlier design retained the carriageway of the existing A303 (or a like-for-like replacement) running in parallel to the new dual carriageway.
- 2) That the idea of a parallel road was dropped, largely because the corridor on Camel Hill between the Scheduled Ancient Monument and the MOD wireless station was too narrow to accommodate both roads.
- 3) That following local representations this decision is being reconsidered.
- 4) That the operators of the relay station have indicated that the MOD might be willing to consider giving up part of its land for the construction of the new road.

There has been some debate locally about the idea of retaining a parallel road alongside the new dual carriageway A303 and the following advantages and disadvantages have been cited:

A. ADVANTAGES (varying according to whether the parallel road runs to the north or to the south of the dual carriageway, the number and location of crossing-points and the number, location and design of A303 junctions):

- 1) Better connectivity via the local road network for residents and businesses located on or near the current A303, its feeder roads and in West Camel.
- 2) Availability as a third or extra carriageway to boost the carrying capacity of the dual-carriageway A303 when traffic is heavy and to provide extra resilience as a relief road when a road traffic accident or breakdown blocks all or part of the dual-carriageway.
- 3) DURING THE CONSTRUCTION PHASE ONLY, making the new road easier, quicker, safer and cheaper to build.
- 4) Helping to maintain the viability of those businesses on the existing A303 which depend on passing trade (eg Mattia's Diner, the Camel Hill Shell filling station).
- 5) Retaining road access as at present for fields otherwise blocked off by the new road.
- 6) Retaining suitable HGV access to the MOD wireless station; the alternative access via Traits Lane is not suitable for HGVs, being narrow and with a very tight corner at the bottom.
- 7) Retaining a safer, alternative route for slow-moving agricultural vehicles which will in any case be barred from the A303 when it becomes an Expressway (see 5., below).

B. DISADVANTAGES (varying according to whether the parallel road runs to the north or to the south of the dual carriageway, the number and location of crossing-points and the number, location and design of junctions between the A303 and local roads):

- 1) Enabling and encouraging 'rat-running' by drivers using unsuitable unclassified roads as a short cut or to avoid heavy traffic on main roads.
- 2) Increasing the likelihood of congestion at Podimore roundabout where three roads (the A303, the parallel road and the unclassified road from Queen Camel and West Camel via Podimore village) would be feeding westbound traffic into a single road, the A303.
- 3) Under the current proposals some sections of the current A303 carriageway will be retained and effectively reserved for local traffic, as happens now on the former A303 carriageway between Anchor Hill and Compton Pauncefoot. However if the existing carriageway (or a replacement) were retained as a parallel route all the way from Sparkford to Podimore, much of the through traffic would switch to the parallel 'relief' road whenever there is congestion on the A303 and this would be to the detriment of the normal local road users.
- 4) Two through roads are likely to have a greater negative impact on nearby properties than one.
- 5) The wider construction footprint across the ridge of West Camel Hill would release more floodwater into the river Cam, aggravating the existing high level flood risk.
- 6) The land take required by two through roads is likely to be greater than that required by one.
- 7) Having three roads cutting across the Camels from east to west (the A303, the parallel road and the West Camel road) might be thought excessive.

Queen Camel Parish Council has not made a decision in principle either to support or to oppose a parallel road but the DCO application should give a detailed explanation of the basis on which the team has decided whether or not to include such a parallel road in the scheme.

5. **Long term plans for an Expressway.** We understand that under HE's plans for *Creating an Expressway to the South West* agricultural vehicles will eventually be barred from the A303. The first phase of the Sparkford-Ilchester A303 project (the current proposals) cannot be properly evaluated without knowing how these vehicles will be accommodated when the second phase is implemented. Given the impact of agriculture on the local economy and environment the DCO application should indicate how agricultural vehicles would be routed when the A303 section is turned into an Expressway.

6. **Sparkford junction.** In place of the two-roundabout layout shown in the Preferred Route Consultation the current proposals prefer a more convoluted layout which has caused considerable local concern:

- 1) *Prima facie* the two-roundabout layout featured in the Preferred Route Map seems preferable. It would be simpler and, being easier to visualise, probably safer and more efficient: motorists are less likely to take wrong turnings or even try reversing back along one-way slip roads.
- 2) The junction design currently proposed would significantly increase (by 1km., c.60%) a return journey from Sparkford roundabout to Hazlegrove School. This would waste time, cause inconvenience and incur expense on the part of those who have to drive to and from the school, often several times a day.
- 3) One of our Councillors has calculated that the proposed layout would generate almost half a million extra vehicle/miles annually on the part of vehicles joining the eastbound A303 at Sparkford (plus Hazlegrove School traffic) and perhaps 25,000 lost hours. The environmental and economic costs would fall disproportionately on local communities.
- 4) The proposed junction design seems profligate in its land use, with long ramps and link roads.
- 5) Drivers joining the eastbound A303 from the south would be tempted to take a short cut, staying on the A359 along Sparkford High Street and via the awkward junction by the cricket ground to join the A303 at the junction near Haynes Motor Museum. This would increase congestion on local roads and expose local communities to higher levels of noise and pollution.
- 6) The proposed raising of the dual-carriageway at Hazlegrove junction would also expose local communities to higher levels of noise and pollution as well as having a negative visual impact.
- 7) Any extra land-take required for the second roundabout in Hazlegrove Park could be compensated in part by reducing the size of the existing roundabout and the length of the link roads, and even slightly tightening the bend on the A303 so that the new road is aligned a little closer to the route of the existing road.
- 8) An alternative junction design would be to have a two level junction with a single large roundabout constructed over (preferably) or else under the dual carriageway.
- 9) This would greatly reduce the land-take and might provide an opportunity to restore something of the grandeur and setting of Hazelgrove Triumphal Arch Gateway, a Grade II* Listed Building which was severely compromised by the building of the (A303) Sparkford bypass in the 1980s.

The design for this junction should therefore be reconsidered and the DCO application should include a detailed explanation of the reasons for adopting whatever design is chosen.

7. **Rights of Way for non-motorised users (NMUs).** The A303 bisects Queen Camel parish, with most of the population and communal facilities to the south of the road and open countryside to the north. Connections between the two halves of the parish are of major importance to NMUs and under the current proposals they are seriously compromised but with one simple adjustment they could be immeasurably improved.

- 1) The current proposals would close or divert all Rights Of Way (ROWs) linking the northern and southern halves of the parish.
- 2) The PEI report asserts that the proposed ROW diversions and closures would be beneficial to human health and well-being by making NMUs take more exercise (§12.12.1); NMUs might question the benefits of being forced onto paths alongside and very close to a busy trunk road.
- 3) On the other hand NMUs currently have to take their chances with A303 traffic to get to the other side of the road; removing that hazardous option would clearly enhance NMU safety.
- 4) The declared aim of the scheme is to improve connectivity for the benefit of motorised road users travelling between the South West and London & the South East but under the current proposals the price of this improved connectivity would be poorer connectivity between the north and south halves of the Queen Camel parish for local NMUs.
- 5) HE could rectify this unfair imbalance relatively cheaply by including in the DCO application a proposal to install a bridge for NMUs from the top of Traits Lane over the dual carriageway to footpath WN23/32. Incorporating this one simple measure in the scheme would improve

connectivity for local NMUs as it does for long-distance motorists.

- 6) More generally, any support which HE is able to provide in developing rights of way and bridleways within the parish would help to mitigate the inconvenience caused by the construction of the new road and would be greatly welcomed by the community.

8. **Noise, vibration and air-quality**. The DCO application should contain details of how the impact of noise, vibration and air-pollution would be mitigated by earthworks and planting, both during the construction phase and when the road is operational, especially during its first 10-15 years before roadside planting matures and becomes effective as a screen. The communities most at risk would be those living at or around Hazlegrove School, Camel Hill Farm and Blue Haze, close to the new road and downwind from it in the prevailing southwesterly wind. When the wind comes from the northwest the residents of Wales and along the West Camel Road would be most affected, being downwind from the stretch of road which traverses the western slope of Camel Hill.
9. **Visual impact on the landscape**. Proposed changes to the route and elevation of the road would have a significant visual impact on people and properties located at or near Hazlegrove School, Camel Hill Farm, Wales and the West Camel Road. The DCO application should contain details of how this visual impact of the road will be mitigated, especially during the first 10-15 years of operation before roadside planting matures and becomes effective as a screen. Minimising the elevation of the carriageway at Sparkford and a careful planting plan with appropriate trees and hedgerows would help to conserve and reflect the historic landscape of Hazlegrove Park which is listed Grade II on the National Register of Historic Parks and Gardens.
10. **Flooding**. The DCO application should contain details of measures to control surface run-off from the new road, particularly to the west of Camel Hill summit where the route lies within the catchment area of the Cam, a river with a long history of bursting its banks. Heavy run-off from Camel Hill can severely affect the hamlet of Wales and contribute to upstream flooding in Queen Camel village.
11. **Garden Settlement Proposal**. The Council appreciates that the scheme's detailed plans and proposals cannot take full account of other purely speculative proposals but in the light of recommendations in the PI's Scoping Opinion (§§ 3.3.3 and 13.12) it would be useful if the DCO application were to give some indication of how the scheme would impact on and be affected by two postulated developments:
 - 1) The plans set out in HE's booklet, *Creating an expressway for the South West: The case for the A303/A358 corridor*.
 - 2) The plans set out in the South West Strategic Developments Prospectus, *A303 Garden Settlement Proposals*.
12. **Traffic modelling**: The team's *Provisional Local Traffic Information* report is most useful but we would add two observations and two suggestions:
 - 1) We note the reservations expressed about HE's traffic modelling in the PI's Scoping Opinion including the SCC Highways submission in (the Opinion's) Appendix 2.
 - 2) We are encouraged by the forecast that traffic on Queen Camel High Street would be reduced by c.1100 vehicles daily by 2023 and c.1200 vehicles daily by 2038.
 - 3) It would be useful to have Queen Camel High Street added to the location points on the Local traffic flow histogram map and data in Appendix D.
 - 4) It would be very useful to have comparative data on the effects on forecast traffic flows if some of the changes suggested in this submission and by other parties were adopted, eg:
 - i. A single carriageway parallel road retained alongside the new dual carriageway.
 - ii. The Sparkford junction to have two roundabouts, one to the north and one to the south of the dual carriageway.
 - iii. No junctions on the new dual carriageway between Sparkford and Podimore.
 - iv. Junctions at a number of different places as suggested by other consultees.

- v. Bridges or underpasses enabling minor roads to cross the A303 at various different places (as suggested by other consultees).
- vi. The upgrading of this section of the A303 into an Expressway.

13. Conclusion.

There appears to be overwhelming local support in principle for the dualling of the Sparkford-Ilchester section of the A303. Some elements of the current proposals are highly controversial but if our recommendations are adopted we believe that the scheme would win substantially more local support. If on the other hand our recommendations are ignored we would come under pressure to reconsider our previous neutral position over the Preferred Route and might have to ask the Planning Inspector to reject the proposals and recommend that the Route 2 option be reconsidered.

We hope that Highways England and the Project Team will take our comments in the spirit in which they are offered, as constructive rather than critical, and we look forward to a continuing dialogue in the hope that through working together we will secure the best possible outcome for local communities and the environment as well as for the wider travelling public.

For and on behalf of Queen Camel Parish Council

Yours sincerely,

Patrick Pender-Cudlip

Clerk and Responsible Financial Officer to Queen Camel Parish Council
The Cobblers, High Street, Queen Camel, Yeovil BA22 7NE.
Tel. 01935 850692 queencamel.clerk@gmail.com

APPENDIX

Planning Inspectorate Statutory (Scoping) Consultation – Queen Camel response, 22nd December 2017

Information to be included in the Highways England (HE) Environmental Statement (ES)

We would be grateful if you would take account of the information below in drawing up your Scoping Opinion; all references are to HE's *Environmental Impact Assessment Scoping Report* of November 2017 [version P13]. Although the sections in this response follow the order of the *Scoping Report* please bear in mind that this Council's greatest concerns relate to part 3 of Section 13, the scheme's **impact on the local road network** (see below).

Section 2 The Scheme: The Scheme is predicated on a longer term plan for the A303 which anticipates "*that future enhancements would make this section 'expressway' compatible*" (2.3.3, p.6). We would be grateful if you would advise the applicant that the environmental impact of the current proposals cannot be properly assessed without more information on the nature and scale of these possible "*future enhancements*". We hope that the ES will include a summary of any further engineering works required to turn the road into an 'expressway', a list of the licensed and unlicensed classes of vehicles and drivers which would be excluded from the 'expressway', an indication of what provision would be made for the excluded vehicles, and a forecast of any consequential change in traffic volumes.

Section 6 Air Quality: The proposed road realignment at the Sparkford end of the Scheme as well as a probable increase in traffic on the upgraded A303 would likely increase the exposure to pollutants of young children and staff at Hazlegrove School, along with residents of properties at Camel Hill and Blue Haze. These properties would be closer to the realigned road and in the prevailing southwesterlies they are downwind from it. We would therefore be grateful if you would advise the applicant to reconsider his decision not to implement any air quality mitigation measures (6.8.2, p.30) and we hope that such measures will be included in the ES.

Section 8 Landscape and Visual Effects: we hope that the ES will detail measures to mitigate the visual impact of the raised section of road on the western ridge of Camel Hill, as seen from the south.

Section 13 People and Communities

1. Study area (13.2, p.97): there may be technical reasons why the study area extends no further than 250m. from the scheme but this does seem unduly limited. It implies that the scheme will not greatly affect the majority of Queen Camel residents (who live <1200m. from the scheme) let alone the children and staff at Hazlegrove School (<600m.) In reality all will be much affected by the Scheme, especially during the construction phase.

2. Severance (13.3.8, p.101): the list of communities in the vicinity of the Scheme should include the hamlet of Wales and the Preparatory boarding School at Hazlegrove Park.

3. The impact of the scheme on the local road network: this is a matter of major concern to this Council and residents of Queen Camel, especially in relation to the construction phase.

- In claiming it is "*possible*" that overnight work "*could cause temporary disruption for MT's along the A303, A359 and adjoining side roads...and cause disruption for local communities*" (13.7.1, p.106) the applicant gravely understates the problem.
- We appreciate assurances that "*The People and Communities assessment will factor these traffic management requirements in*" (13.7.1, p.106) and that "*A Traffic Management Plan (TMP) would be implemented during the construction phase of the Scheme, to ensure that access is maintained and disruption is minimised as far as possible*" (13.8.1, p.108). However more concrete detail is needed at an early stage.
- **We therefore respectfully request that you advise the applicant to show a far greater appreciation of the magnitude of the traffic management problem and ask that detailed mitigation measures be set out in the ES rather than leaving them to be worked out with consultants and contractors at a later time.**

The applicant may find the following local information helpful in assessing the problem:

1. Local traffic on Queen Camel High Street (the A359) averages c.7,000 vehicles in the course of a 12-hour day, with almost 800 vehicles per hour at peak times, resulting in periodic congestion. Whenever there is congestion on the Sparkford-Ilchester section of the A303, for example at weekends and holiday times (especially in the summer) or after an RTA, the High Street is flooded with through traffic using Satnavs to find a way round via local roads. The knock-on effects include more severe congestion on Queen Camel High Street, heavy traffic along the West Camel Road (an unclassified road) and gridlock on Wales Road and Blackwell Road (a narrow unclassified road, partly single lane).

2. The A359 is heavily used by emergency service vehicles and as a result congestion in Queen Camel can have a serious effect on people and communities over a much wider area.

3. Vehicles avoiding the congested section of the A303 are often directed by Satnavs to the West Camel Road, passing close to the Medical Centre and the Primary school - both of which serve communities far beyond the village. Patients attending the Medical Centre use the road and local children have to cross it on their way to and from school, so congestion on the A303 inconveniences and can endanger two of the most vulnerable groups in Queen Camel and neighbouring communities.

4. We understand that throughout the construction period the applicant plans to keep open one lane of the A303 in each direction, as at present, but it will be necessary to reduce the speed limit from 50mph to 40mph in coned lanes. This is bound to increase the frequency and severity of congestion on the A303 with greater congestion of local roads an inevitable knock-on effect.

5. We understand that nighttime closures of the A303 will be required on occasion and this is likely to result in heavy traffic flows through the heart of Queen Camel all night.

6. There is a 7.5t. weight restriction on the High Street and other Queen Camel roads but it is widely flouted and seems unlikely to deter HGV drivers trying to avoid congestion on the A303.

7. There is a right-angled corner at the southern end of the High Street where long or wide commercial vehicles trying to squeeze past each other find it difficult to avoid mounting the narrow pavement at times, endangering pedestrians including children walking to and from school.
8. At times the density of traffic on the A359 leads to gridlock between the three pinch points on the High Street.
9. Roadside parking on the High Street and at Hill View (on the A359 to the north of the bridge) often restricts traffic to a single lane, especially when wide agricultural and commercial vehicles are involved, and this creates further congestion. We would therefore request that the following mitigation measures be considered to supplement whatever official diversions are put in place:
- i. Signage on the A303 (east of Sparkford and west of Ilchester) advising that drivers using Queen Camel High Street and West Camel Road to bypass congestion on the A303 are likely to encounter longer delays.
 - ii. Similar signage warning HGV drivers of the measures in place to enforce the 7.5t. weight limit on local roads (see iii below).
 - iii. Setting up a system in conjunction with the County Highways Department and the Police to ensure compliance with and enforcement of the 7.5t. weight restriction on the A359 and West Camel Road. One possible model is the Hinkley Point traffic management scheme with its use of advanced number plate recognition technology.
 - iv. In the longer term, investigating the merits of retaining the existing A303 carriageway as a possible A303 relief road and for local traffic.

We hope you find this information useful in helping you prepare your Scoping Opinion for Highways England's Environmental Statement.

Yours sincerely,

Patrick Pender-Cudlip

Clerk and Responsible Financial Officer to Queen Camel Parish Council
The Cobblers, High Street, Queen Camel, Yeovil BA22 7NE. Tel..01935 850692
queencamel.clerk@gmail.com