

**M5 Junction 25 Development**

**Objection to planning application 4/38/17/0205 by Somerset County  
Council**

# 1. Objection

## 1.1 Introduction

Campaign for Better Transport is disappointed that Somerset County Council has ignored it and other stakeholders' responses to the consultation on the junction design carried out last autumn. The issues raised here in this objection were brought up in the consultation and clearly show how this application is contrary to a whole raft of national policies and guidance.

## 1.2 Poor quality provision for vulnerable road users

Campaign for Better Transport strongly objects to the poor quality of the provision for vulnerable road users, particularly pedestrians and cyclists in this application. Their needs have not been properly considered in the design of this junction, even though some infrastructure has been proposed.

As a consequence, the provision for pedestrian and cyclists is sub-standard. It is indirect, awkward, exposes them to high levels of pollution for some considerable time, is unpleasant and will not feel safe.

Apart from pedestrians and cyclists being lumped together on paths, some quite narrow, these paths are placed close to the road carriageway except for one short section inside the roundabout that sits over the M5. Given that cars and lorries will be moving at fairly high speed in and around this junction and in high volumes, these paths will not feel that safe or be that pleasant. There are also many sharp turns in the paths, particularly at crossing points, which are awkward for cyclists to negotiate.

Pedestrians and cyclists will have to use eight crossings to get from one side of the junction to the other, such as if travelling from the A358, or from villages such as Ruishton in the east, to Blackbrooke Park Avenue in the west. Further crossings are then involved if trying to access the shops and entertainment on the far side of the A358.

This is a ridiculously high number of crossings and will entail pedestrians and cyclists being kept waiting for long periods, leading to them taking a significant amount of time to negotiate this junction. What is worse is that some of these crossing points do not appear to be signalised. This means that pedestrians and cyclists will have to run the gauntlet of the traffic, making crossing these roads quite problematic at certain times of the day, if not downright dangerous. As a consequence, few people will walk and cycle and most will drive, adding to congestion and pollution in the area.

## 1.3 Exposing pedestrians and cyclists to air pollution

The length of time it will take to negotiate the junction will lead to pedestrians and cyclists being exposed to unnecessarily high levels of pollution. This is a direct result of the high number of crossings where they will have to stand and wait before they can cross the road. Where there are no signalised crossings, they could be stood waiting for even longer at peak periods when traffic flows are heavy.

This is contrary to national, local and Highways England policies which seek to reduce exposure to air pollution in order to comply with mandatory air quality standards.

## 1.3 Contrary to national policy

While this application might support economic development, the poor quality design for pedestrians and cyclists will undermine its value in practice: by undermining sustainable transport routes, it will increase traffic using the roads and this junction in particular, which will contribute to increased congestion and delays.

It is also contrary to national policy on supporting sustainable transport and placing development where it can be well served by sustainable transport.

A core planning principle of the National Planning Policy Framework (NPPF) as set out in paragraph 17 is:

*“Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable.”*

Paragraph 29 states:

*“Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives...The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel...”*

Quite clearly, not only is this proposal not balanced in favour of sustainable transport modes it is also denying people any real choice: driving a car is really the only practicable option being offered. What has been proposed cannot be described as being anything other than a token gesture towards sustainable transport, given the poor quality design with so many crossings.

In addition the application undermines the Department for Transport's Walking & Cycling Investment Strategy (21 April 2017) which has the aim for England:

*“We want to make cycling and walking the natural choices for shorter journeys, or as part of a longer journey”*

It also states that:

*“Walking and cycling should be seen as transport modes in their own right and an integral part of the transport network, rather than as niche interests or townplanning afterthoughts.”*

Unfortunately, Somerset County Council has not recognised the importance of walking and cycling in this application and treated active travel as an inconvenient afterthought. It is clear that this scheme will not contribute to the Strategy's targets of increasing walking and cycling and potentially will undermine them by making the journeys so off-putting that most people will be deterred from using the pedestrian and cycle facilities at this junction.

## **1.5 What is needed for pedestrians and cyclists**

What is needed for pedestrians and cyclists are fewer crossings overall, with all at-grade crossings, being signalised. Thought needs to be given to providing safe, direct and attractive bridges or underpasses to reduce the number of hold-ups that pedestrians and cyclists will have to endure, or a single bridge over the junction as proposed by Sustrans. These bridges and underpasses and the ramps to them need to be provided along 'desire' lines. The current trend for zig-zag paths or ramps up to bridges, adds to the distance pedestrians and cyclists have to travel and makes the crossings awkward and less pleasant.

Even if the ridiculous number of crossings is ignored, the current path designs are sub-standard. They should, as a piece of infrastructure attached to the Strategic Roads Network, conform to the standards required of that network and those are set out in the Interim Advice Note (IAN) 195/16. As the design does not meet these standards, the application should be refused, or at the very least the proposal sent back to the drawing board for the pedestrian and cycle access to be rethought.

## **1.6 Conclusion**

This application is a missed opportunity to promote walking and cycling and to reconnect communities separated by the M5 and this junction. In addition, it is contrary to national planning policy and will undermine the Government's recently adopted Cycling and Walking Investment Strategy.

We believe that the planning application as submitted will provide sub-standard facilities that are so bad as to deter all but the most hardy or desperate pedestrians and cyclists.

New infrastructure attached to and effectively part of the Strategic Road Network should conform to the standards employed on that network: in this case this means IAN 195/16.

Given this failure to comply with design standards, and for the other reasons given above, this application should be refused. At the very least, we ask that it be deferred for a rethink of the walking and cycling facilities.

**19 July 2017**

Chris Todd  
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX  
Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428