

From:
Sent: 13 August 2020 13:38
To: Planning Policy
Cc:
Subject: #10648 Refined Issues and Options Consultation for the next Local Plan and #10860 draft Sustainability Appraisal scoping report

FAO: Planning Policy Team

Next Local Plan - Refined Issues and Options Consultation and Draft Scoping Report Sustainability Appraisal - Test Valley Borough Council

Dear Planning Policy Team,

Thank you for inviting Highways England to comment on the above consultation on 3 July.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M27, M3, A303, A34 and A36.

Overall, in accordance with national policy, we look to the Test Valley Borough Council to promote strategies, policies and land allocations which will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within Test Valley without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.

We have reviewed the consultation material and have the following comments that follow the order of the Test Valley Borough Next Local Plan: Refined Issues and Options Consultation July 2020 document:

1.12 Town centres:

We note that local residents commented that the good availability of local services and transport links was a key issue in the town centre.

People:

Local people also commented that good travel networks and public transport which supports residents to commute within, or outside of, Test Valley was a key issue.

Local environment:

We are pleased to see that you intend to engage with stakeholders, statutory consultees, including environment bodies, the local nature partnership and local economic partnerships and infrastructure and utility providers as

discussed in section 2.24. We welcome engaging with Test Valley Borough Council on this and future consultations in relation to the emerging Local Plan.

Review of Evidence Base

Section 2.30-1 specifies that where appropriate, evidence base studies are being prepared jointly with neighbouring authorities, including through the Partnership for South Hampshire (PFSH). We request to be consulted regarding any studies that may be being prepared in relation to transport infrastructure at the scoping stage, in order to ensure it meets Highways England's requirements for assessing any potential impact on the SRN appropriately and thereby avoid abortive works. If any impacts to the SRN are identified we welcome early discussions regarding any mitigation plans, including but not limited to potential schemes, funding sources and timescales.

Air Quality

Section 7.46 states that, "the next Local Plan's role will be to consider this matter [air quality] in relation to new development, including schemes that could potentially generate pollution as well as thinking about emissions associated with transport." We support the consideration of modal shift from the private car to more sustainable modes, as a potential contributor to air quality improvement as per the NPPF.

8 Infrastructure and Community Facilities

Section 8.3 confirms that the Council will prepare an Infrastructure Delivery Plan (IDP) to accompany the next Local Plan that will set out the Council's infrastructure investment priorities, report on investment, and help guide future investment in the Borough's infrastructure, in partnership with all key stakeholders. We request that we are consulted during the development of the IDP and any SRN infrastructure identified as necessary to facilitate the delivery of the next Local Plan is supported by a strong evidence base. The IDP should identify the proposed funding source for any improvement and timescale for delivery, including a phasing plan and scheme lead organisation.

Transport, Communications and Movement

The Local Plan section 8.6 states that Test Valley is well served by the strategic road network, with sections of the M27, M3 and other key routes, including the A303, A34 and A36 crossing the Borough. We welcome the confirmation that the Council will continue to work with partners and other agencies to maintain and improve the safety and function of the Borough's strategic transport network and local transport infrastructure, including with Highways England, Hampshire County Council Highways, Network Rail, Stagecoach, Transport for South Hampshire (TfSH), Transport for the South East, and others. We look forward to working with Test Valley Borough Council in order to ensure that a strong transport evidence base is produced to support the emerging Local Plan.

Sustainable transport paragraph 8.8 notes the Council is committed to promoting a range of sustainable transport options, working closely with partners, including Hampshire County Council (the highway authority for the local highway network), to continue improving and integrating public transport for the residents of the Borough, with continued improvements to cycling and walking networks and by seeking more accessible community infrastructure in both new and existing communities, including those in the rural areas of the Borough. We support the NPPF principles underpinning this statement.

Sustainability Appraisal - Draft Scoping Report

15 Travel and Transport

This chapter sets out how the transport aspects of the sustainability appraisal will be conducted.

Figures 23 and 24 illustrate that the key inbound and outbound commuting patterns from Test Valley are Southampton, Winchester and Wiltshire. Given the SRN provides strong road links to these locations via the A303, M27 and M3, we request that consideration of the scale of the transport impact of the proposals within the Local Plan on the SRN is fully evidence led. If mitigation is required we expect that this will be identified in the SA and Infrastructure Delivery Plan supporting the Local plan. Any IDP prepared should identify lead delivery authority, funding streams and cost as well as timescales for delivery.

Paragraph 15.21 discusses that the M27 is currently subject to a smart motorway scheme between M27 Junctions 4 (M3 Interchange) to 11 (Fareham). Further information on the progress of this scheme which is due to be completed in 2020/21 at the following page:

<https://highwaysengland.co.uk/projects/m27-junctions-4-to-11-smart-motorway/>

We note that the reference to Covid-19 disrupting regular travel patterns. We request that a robust evidence led assessment is undertaken in relation to transport within the sustainability appraisal. We request clarification is provided as to if Covid-19 travel patterns will be assessed given the comment in 15.21-22. If so, what evidence will be gathered to support this?

Paragraph 15.23 notes the importance of sustainable travel opportunities as per the NPPF, we are supportive of such measures in order to reduce travel demand on the SRN.

We would welcome a meeting to discuss the emerging Local Plan in the context of the SRN.

We hope that this response has been helpful.

Kind regards,

Web: www.highwaysengland.co.uk