

For the attention of: Planning Policy Team, Test Valley Borough Council

Proposal: Test Valley Draft Local Plan, Regulation 18 Stage 1 Consultation

Our Reference: 16018

Dear Planning Policy Team,

Thank you for inviting National Highways to comment on the Regulation 18 Stage 1 Test Valley Draft Local Plan.

National Highways 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 National Highways 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 A303, A34, A36, M27, M271 and M3.

Overall, in accordance with national policy, we look to Test Valley Borough Council to promote strategies, policies and land allocations that 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 or at its junctions because of planned growth within the borough, 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 being 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.

The Regulation 18 Stage 1 materials focus solely on strategic matters and priorities in terms of a draft vision and draft spatial strategy, supported with draft policies and proposals. We look forward to seeing the Stage 2 materials, more particularly the detailed proposals for site allocations and draft development management policies, the latter including policies providing more detail concerning infrastructure needs supported by transport modelling accounting for the wider impacts of development traffic.

Our review of the Stage 1 materials, more particularly the Draft Local Plan 2040 itself, generated the following observations:

- The *'presumption in favour of sustainable development'* at the heart of the NPPF is noted (para 2.6).
- That *'development will take place in sustainable locations'* and will *'support the delivery of infrastructure'* (para 2.21), will *'facilitate and support sustainable transport modes'* (para 2.27) and *'encourage active and sustainable modes of transport ... whilst also seeking to reduce the impact of travel in particular by private car'* (para 2.28) are also noted. We agree that

'facilitating access to public transport, enabling an increase in sustainable movements and use of low carbon transportation along with having large rural areas in the Borough, presents a significant challenge for the Local Plan 2040' (para 2.62).

- That *'infrastructure will need to be phased in tandem with the progress of the build out of the development ... to ensure that as the development comes into use and occupations increase, there is sufficient and appropriate infrastructure that meets their needs'* (para 4.116) is noted.
- That *'some development sites may be required to provide infrastructure of a scale and cost that may affect the viability of the development'* (4.117) is noted.
- Paragraph 4.125 says, *'the County Council will need to work with Transport for South East on any improvements to the strategic network'*. We would have expected National Highways to have been listed too (i.e. *'The County Council will need to work with Transport for South East and National Highways on any improvements to the strategic network'*).
- The development and logic of the draft spatial strategy (as revealed in Draft Local Plan 2040, Regulation 18 Stage 1, Spatial Strategy Topic Paper, February 2022) appears reasonable. We look forward to seeing detailed proposals for site allocations.

National Highway supports Test Valley Borough Council's commitment to work with partners to consult on potential developments coming forward within the borough. We look forward to continuing the ongoing work with all parties to identify and produce a robust transport strategy which would inform the size and scale of development deliverable within Test Valley up to and beyond the Local Plan process.

I hope this is helpful.

Kind Regards

Patrick Blake, Spatial Planning Manager – South East

National Highways [REDACTED]

Tel: [REDACTED] | Mobile: [REDACTED]

Web: <http://www.highways.gov.uk>

GTN: 0300 470 1043

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National Highways Limited | General enquiries: [REDACTED] [REDACTED]

[REDACTED] | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

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