

From: [REDACTED]
To: [Planning Policy](#)
Cc: [REDACTED]; [REDACTED]
Subject: NH/24/04953 Test Valley Local Plan 2040 Regulation 18 Stage 2 Public Consultation and Call for Sites
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For the attention of: Planning Policy Team

Proposal: Test Valley Local Plan 2040 Regulation 18 Stage 2 Public Consultation and Call for Sites

Our Reference: NH/24/04953

Dear Planning Policy Team,

Thank you for inviting National Highways to comment on the Test Valley Local Plan 2040 Regulation 18 Stage 2 Public Consultation and Call for Sites.

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 your Local Plan 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 welcome the Council's vision to provide sustainable development with a focus on reducing carbon emissions whilst promoting active travel and public transport use to limit car journeys and congestion locally, and on the wider network.

National Highways are happy to engage collaboratively with Test Valley to ensure the Council's transport evidence provides a robust and proportionate assessment of the impacts of the emerging development strategy in the Local Plan on the SRN. This can help the production of a positively prepared and justified development strategy. It is important that this work is informed by national policy, including DfT Circular 01/2022 as well as the updated NPPF (December 2023). To help the Council understand how National Highways engages with plan-making, please read our aforementioned updated Planning Guide:

https://nationalhighways.co.uk/media/2depj2hh/final-cre23_0370-nh-planning-guide-2023.pdf

Development Options and Policies

We previously responded to the Test Valley Draft Local Plan, Regulation 18 Stage 1 Consultation on 5th April 2022. The Local Plan at that stage did not have site allocations or an understanding of the impact to safety or capacity on the local or strategic highway networks. The current Local Plan consultation now includes site allocations and includes a transport evidence base, which we have commented on below. Policy S3 – Spatial Strategy Policy 3 (SS3): Housing Requirement states that provision will be made for the delivery of 11,000 new homes across the plan period (2020-2040).

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 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 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.

We support policies TR1 Active and Sustainable Travel and Policy TR2 Assessing Transport Impacts which relate to the provision of sustainable transport infrastructure and ensures transport impacts of new development can be recognised and used to shape the proposals at an early stage. National Highways notes that the Draft Local Plan does not include a policy relating to transport infrastructure which effectively prevents development from occurring until necessary infrastructure is available. National Highways would suggest that this policy is included in order that the impacts of new developments do not cause congestion on the SRN without the mitigation required being place.

Specific Development Proposals

We have reviewed the specific site allocations in the Draft Local Plan and note that there are several large sites which are adjacent to or close to the SRN;

- Land at Bere Hill, (Policies NA4-NA8 & SA4-SA7) which has 1,400 houses and the Walworth Business Park (Policy SS8), which both lie adjacent to the A303 junction with A3093
- Policy SS8 Andover Airfield Business Park, Policy SS8 West Portway Business Park, Policies NA9 & SA8-SA12 Land South of Thruxton Aerodrome, (all strategic employment sites) which all are situated adjacent to the A303 junction with A342
- Policies NA9 & SA8-SA12 Land South of Thruxton Aerodrome which is adjacent to the A303 junction with Wiremead Lane
- Policy SS8 University of Southampton Science Park and Policies NA9 & SA8-SA12 Kennels Farm employment allocation which lies adjacent to the M27 junction 13
- Policy SS8 Adanac Park adjacent to the M27 junction 3
- Policy SS8 Thruxton Aerodrome (allocated for 15ha of strategic employment land) which is in close proximity to the A303 junction with Wiremead Lane
- Policies NA4-NA8 and SA4-SA7 Land at Velmore Farm allocated for 1070 dwellings and 1.5 hectares of employment land
- Policies NA9 and SA8-SA12 Land at Upton Lane (8.5ha) which are all large employment site allocations adjacent to the M27 junction 3

When identifying the preferred strategy for the spatial options, consideration will need to be given to assessing the cumulative impact of new sites that might be taken forward together with already planned growth on the SRN. We welcome further dialogue on potential growth options. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably practicable. As previously stated, we will support proposals that consider sustainable measures which manage down demand and reduces 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 look forward to discussions to ensure that the impacts to the SRN from proposals are fully considered and that an appropriate package of mitigation measures are identified.

Transport Evidence Base

We understand that the supporting Transport Assessment is preliminary and high-level at this stage. It outlines the modelling that has been undertaken and the potential impacts of the two proposed spatial options tested for Test Valley Borough. Although not necessarily expected at Regulation 18 stage, (i) no detailed description of the development or use of the two models used – North Hampshire Transport Model (NHTM) and Solent Sub-Regional Transport Model (SRTM) – is supplied (e.g. Local Model Validation or Forecast Reports), (ii) mitigation is yet to be identified and tested, and (iii) insufficient information is supplied to assure NH that the SRN will continue to operate safely and efficiently with the addition of Local Plan traffic. A full baseline study and detailed assessment of the preferred growth option is recommended in the Preliminary Transport Assessment.

Notwithstanding the above, the supplied assessment provides an overview of the potential traffic-related impacts of the two growth options that were tested in addition to a future baseline or future reference case situation using two transport models covering Test Valley, namely:

- The North Hampshire Transport Model (NHTM).
- The Solent Sub Regional Transport Model (SRTM).

These models appear to be sufficiently comparable to provide consistent assessments of the north and south of Test Valley.

The results of the modelling presented in the Preliminary Transport Assessment suggest:

- Junctions within the northern parts of Test Valley do not significantly deteriorate (i.e. over 85% volume over capacity) between the Future Baseline and Growth Options 1 or 2 except at junctions around Andover, key locations on the A303 and along the A338 near its junction with the A303. Of the two options, Growth Option 2 has the least impact on the SRN. Importantly, there don't appear to be any V/Cs above 90% on the SRN and NH currently have no concerns on roads and junctions on the LRN affecting off slips from the SRN. However, NH will want to see all links and junctions with high V/Cs on the SRN or with a potential to affect the SRN identified and flows (actual and demand), V/Cs, delays and queues provided by movement not just by link.
- As is already the case, parts of the highway network in the southern part of Test Valley are expected to be congested in the Future Baseline situation. However, conditions do not appear to significantly deteriorate with Growth Options 1 or 2.

As already stated above, further information is required to assure NH that the SRN will continue to operate safely and efficiently with the addition of Local Plan traffic whichever of the Growth Options progresses to the Regulation 19 stage. The nature of the current assessment (i.e. high level) and the intention to refine it are noted. However, NH would welcome being engaged in the development of the assessment of the impacts of the Local Plan on the SRN and the locations affecting the SRN and the need for and nature of mitigation options. Further, given the 'high-level' nature of the current assessment, current statements concerning the need or not for mitigation must be considered tentative.

To ensure that the Local Plan is deliverable, a transport evidence base should be

provided to demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the identified growth is planned. Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document should set out any SRN mitigation required to deliver the Local Plan development. We would welcome the opportunity to discuss this ahead of the next Local Plan consultation.

We look forward to working with all parties to identify and produce a robust transport strategy which would inform the size and scale of development that is deliverable. This will form a key piece of evidence to demonstrate that the Local Plan is sound and therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the growth is planned.

I hope this is helpful.

Kind Regards

Patrick Blake, Area 3 Spatial Planner

National Highways | [REDACTED]

Tel: [REDACTED]

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

GTN: [REDACTED]

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