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Dear Planning Policy Team,

BATH & NORTH EAST SOMERSET (B&NES) LOCAL PLAN PARTIAL UPDATE REGULATION 19 AND SPD CONSULTATION

Thank you for consulting National Highways on the B&NES Local Plan Partial Update Regulation 19 Consultation.

Highways England was renamed National Highways in August 2021. Prior to April 2015 the organisation was known as the Highways Agency. National Highways is a government owned company responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises parts of the A46 and the A36. In addition, though being in neighbouring Districts, M4 J18 to the north (South Gloucestershire) and M5 J20 and 21 to the west (North Somerset) are SRN junctions and routes also potentially affected by development in B&NES. It is on the basis of these responsibilities that National Highways has provided the comments that follow in this letter.

The SRN fulfils a strategic function to enable the safe, effective and efficient long distance movement of people and goods and makes a significant contribution to enabling and sustaining economic growth, prosperity and productivity, while also contributing to wider sustainability objectives and improved accessibility to key economic and social services. This strategic function is unlikely to change, and we therefore need to ensure and where necessary safeguard our network so that it continues to be fit for purpose now and into the future. It is on the basis of the above that the following comments have been made.

National Highways is keen to ensure that transport and land use planning policy is closely integrated and that the network is able to deliver sustainable economic growth. In this respect, National Highways draws your attention to “The Strategic Road Network - Planning For The Future - A Guide To Working With Highways England On Planning Matters”, National Highways’ Licence issued by DfT and DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development.

As set out in our response to the Regulation 18 consultation dated February 2021, we are interested in the potential traffic impacts on the SRN of any development site proposals and/or policies coming forward through the Local Plan process and need to ensure that these are fully assessed during the plan-making stage. It is imperative, through the development of the

transport evidence base which should include assessment of impacts and identification of any necessary mitigation, to identify any necessary infrastructure improvements or interventions needed to safely and sustainably deliver growth aspirations at this early stage, as set out in Government policy and the Circular 02/2013.

In line with the Regulation 18 draft, the consultation document places an emphasis on responding to the challenges posed by climate change and identifies achieving a significant shift to mass transport, walking and cycling as a step in tackling this issue. The consultation document proposes amendments to current Local Plan policies with the aim of helping to achieve this. Whilst this is strongly supported by National Highways, the proposed policies should not jeopardise the opportunity to secure strategic highway interventions that may be identified as necessary to enable planned growth to come forward, or address existing safety or capacity constraints. Whilst recognising the value of sustainable transport measures, these do not negate the need for, or importance of, highways schemes where appropriate.

We welcome proposed amendments to the Local Plan to seek to increase the provision of and access to sustainable travel choices and reduce reliance on the private car, which can reduce reliance on the SRN and help ensure its safe and efficient operation. We are therefore supportive of revisions to Policy ST1 'Promoting Sustainable Travel' which set out that transport proposals should align with relevant area-specific transport strategies, plans, policy documents, local guidance and the current adopted Joint Local Transport Plan, to avoid prejudicing the delivery of the relevant transport strategy and required infrastructure.

In respect of transport infrastructure, the recognition in paragraph 606 that physical infrastructure must be delivered in a timely way in order to support new development, in accordance with Core Strategy Policy CP13, is also welcomed. National Highways also supports the inclusion of paragraph 627 which makes clear that where developments are assessed as having an unacceptable impact on the local highway network, including in terms of capacity, safety or amenity, developers will be expected to identify, assess and appropriate mitigation, and comply with relevant planning conditions and obligations relating to its delivery.

Since our response to the Regulation 18 consultation dated 17 February 2021, we have been engaging with the Authorities in respect of the likely impact of the additional housing allocations proposed around Bath and Keynsham. Following a review of the supporting transport evidence produced in support of these proposed allocations it has been agreed that the Plan's supporting Transport Strategy will set out the need for growth to provide proportionate mitigation to ensure the impact of development on the safe operation of the strategic road network is not severe. We look forward to continuing to engage with the Council regarding the transport evidence base and Transport Strategy required to support the Plan.

We trust that our response will be helpful and assist you with your Local Plan Partial Update and we look forward to working with you as the Plan progresses. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely,

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