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Via email: Planning_Policy@bathnes.gov.uk

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Dear Planning Policy Team,

BATH & NORTH EAST SOMERSET (B&NES) LOCAL PLAN PARTIAL UPDATE

We are writing in respect of the upcoming Examination of the Bath and North East Somerset Local Plan Partial Update which proposes changes to the Core Strategy & Placemaking Plan. National Highways understands that there will be a full review of the Local Plan in 2023.

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 Partial Update places an emphasis on prioritising sustainable travel and delivering mitigation through sustainable interventions in the first instance, in line with the requirements of NPPF. We welcome 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. We should make clear that revisions to the Plan's policies must 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.

Paragraph 627 sets out that developers will be expected to identify and assess appropriate mitigation and its delivery mechanism with the Highway Authorities where they result in unacceptable impact on the local highway network, including in terms of capacity, safety and amenity. As set out in our response to the Local Plan Partial Update Regulation 19 consultation, development is also required to identify and deliver proportionate mitigation to ensure the impact of development on the strategic road network can be safely accommodated. Regarding the need for developments to formulate transport strategies using the "Decide and Provide" methodology (593d), where development will result in an impact on the safe operation

of the strategic road network, developers will be required to assess the need for appropriate mitigation and agree obligations relating to its delivery, in consultation with National Highways.

I trust the above is useful. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely,

[Redacted signature]

Sally Parish
South West Operations Directorate

[Redacted contact information]