Winchester City Council

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7th July 2021

Dear Ms Palmer,

Highways England M3 Junction 9 Improvement Scheme - Statutory Consultation

Thank you for your consultation regarding the above proposal.

The proposal has been considered and a number of consultations have been made with the Council's specialist officers.
Comments have been provided on the proposal separated by relevant headings within the Preliminary Environmental Information Report (PEIR) alongside general comments on the scheme.

I also include comments made by the council's specialist officers. These comments are to be considered as part of the response and have been provided as set out below:

Appendix A	Environmental Protection
Appendix B	Historic Environment
Appendix C	Archaeology
Appendix D	Landscape
Appendix E	Ecology
Appendix F	Contaminated Land
Appendix G	Economic Development and Tourism
Appendix H	Sustainability and Climate
Appendix I	Strategic Planning
Appendix J	Urban Design

1.0 Introduction

1.1 Winchester City Council (WCC) is a host authority with regard to the proposed location of the scheme. WCC remain committed to working with Highways England in a proactive manner.

Before setting out responses to the proposal separated by PEIR headings, there are general matters to raise.

1.2 WCC declared a climate emergency in June 2019. The council is committed to becoming a carbon neutral council by 2024 and is aiming for the wider district to be carbon neutral by 2030.
The declaration is a common thread through all council decisions and actions, including how we consider and respond to Nationally Significant Infrastructure Projects.
Highways England must take this declaration into account throughout development of the scheme and must be able to demonstrate how the scheme being developed is consistent with the objectives of making this declaration.
The declaration and climate impact is discussed in further detail in this report. It is however important to stress this is an interrelated issue and the City Council expect climate impact to be a key consideration throughout.

1.3 The application site includes land within the South Downs National Park. The National Park Authority are responding to this consultation separately. However, it remains the intention of WCC to work toward and hold Highways England to the highest standards given the potential impact of the scheme on the National Park and its setting.

1.4 The adopted Winchester Movement Strategy supports the delivery of junction improvement works.

1.5 Responses have been provided separated by headings in the PEIR in the order set out in the submitted document. Consultee responses have also been provided in full for further information.

2.0 Air Quality

2.1 During the construction phase, air quality impacts are one of the main concerns given the need for the diversion of traffic to other routes to allow construction of the scheme.
It is appreciated that official diversion routes would be implemented and agreed with the Highways Authority. However, there are historic issues of these routes not being followed particularly by commercial vehicles which have a higher level of impact.

Future assessments therefore need to be confident that official diversion routes are possible and actually followed by diverted traffic in reality. Once this confidence is achieved, an assessment of these routes must be undertaken from an air quality perspective to ensure that the impact is accurate. The acknowledgement this issue must be considered in the Environmental Statement (in paragraph 2.5.1 of the PEIR) is welcomed and the City Council will comment on this aspect at this stage.

2.2 Construction phase assessments must ensure they include impacts (particulate/dust and noise) relating to all depot and soil disposal locations once these have been finalised.

2.3 The use of habitat protection measures (to mitigate dust generation and dispersion) is welcomed given the proximity to designated sites and the City Council will comment on the further detail set out in the Environmental Statement at that stage.

2.4 It is important that on-going monitoring of mitigation measures takes place and the City Council would wish to see a review process throughout the construction phase to allow mitigation to be modified if necessary.

2.5 In its operational phase, the assessment shows the greatest traffic increase will be on Easton Lane (>25%). Reviewing the submitted maps *(Appendix 2.1, Figure 2.5 of PEIR)*, this increase is actually spread across Easton Lane, Wales Street and North Walls. There are also sensitive receptors on the latter roads as the amount of residential uses increase. This must be clarified for the Environmental Statement assessments, which must pay detailed attention to the impacts of this particular area and how this relates to the Winchester Air Quality Action Plan.

2.6 The full response of the City Council's Environmental Health Practitioner is provided in Appendix A.

3.0 Cultural Heritage

3.1 It is noted that Appendix 6.1 of PEIR will be used as the key baseline document to support the Cultural Heritage Chapter of the Environmental Statement that will be submitted as part of the Development Consent Order (DCO) submission. The information contained in this baseline is considered to adequately cover all relevant designated heritage assets.

3.2 It is anticipated that the impact of development on heritage assets and their settings will be considered in the Environmental Statement and supported by a Landscape and Visual Impact Assessment. The need for any mitigation above that

proposed in the Environmental Mitigation Design Plan to protect heritage assets and their settings would be informed by the forthcoming information.

3.3 Regarding Archaeology, the assessment methodologies and data sources used are appropriate and adhere to accepted sector methodologies, standard and guidance. The assessment assumptions and limitations (section 2.3, Appendix 6.1), are not considered to have compromised the reliability of the assessment nor the conclusions set out in the PEIR.

3.4 Overall Chapter 6 of the PEIR chapter and the associated appendices are considered to form an appropriate basis for the Cultural Heritage chapter in the forthcoming Environmental Statement, subject to the identified additional assessment requested in the Archaeologist's response being carried out to inform this.

3.5 It is recommended that access to the northern area of search for potential spoil management is pursued (the area has not yet been subject to geophysical survey). Cropmarks within this area suggest a higher archaeological potential than nearby areas already subject to geophysical survey and trial trenching and the results may be useful in determining which areas are taken forward. Informal discussions with the archaeological consultant indicates that access to this area is being pursued.

3.6 Identification and assessment of any important hedgerows as defined in the Historic Hedgerows should also be undertaken as part of the EIA and reported in the ES.
It is also suggested that historic Ordnance Survey mapping described in section 4.2 of PEIR Appendix 6.1 should be included within the ES baseline report.

3.7 The full response of the City Council's Historic Environment Officer is included in Appendix B. The City Council's Archaeologist response is included in Appendix C.

4.0 Landscape and Visual

4.1 As referenced in the PEIR and by the Planning Inspectorate, the methodology has not used guidance produced by the Landscape Institute: Guidelines for Landscape and Visual Impact Assessment (GLVIA3). Highways England guidance has been used instead and this must be clarified.

4.2 Gantries and signage will be a visible addition to the area and their locations are not shown on initial plans. An understanding of exact locations, heights and appearance must be supplied alongside a wider assessment of their impact from

longer distance viewpoints. The Landscape and Visual Impact Assessment (LVIA) must include these details.

4.3 It is noted that 3D models are used for only 7 of the 24 viewpoints which will be subject to LVIA assessment and this approach should be used for all viewpoints as it is useful in developing an understanding of the scale of the development.

4.4 The PEIR covers what will be considered in the LVIA. A Landscape Strategy should also be included which provides an overall objective to protect and enhance the nationally designated landscape of the National Park. The application site is the interface between the historic city of Winchester and the National Park which increases the need for this assessment.

4.5 Large scale mitigation must be implemented. Any mitigation measures which sit within the National Park are equally as important to the City Council due to the interrelated nature of the landscape and the importance of the National Park's setting. The City Council will also review detailed plans for the spoil management areas which sit within the National Park which are currently causing concern due to the lack of information available. Supporting urban tree planting in neighbouring areas and within the site is important to provide screening and assist with noise reduction.

4.6 The PEIR highlights the existing Landscape Character Assessments being used to help inform the scheme. However the National Park and City Council have previously requested that a bespoke characterisation of the landscape is undertaken as the area is unique with national park character areas being adjacent to a city townscape. No mention is made of this bespoke characterisation in the PEIR.

4.7 The current information does not indicate contours or topography and it is therefore difficult to assess how features such as Sustainable Urban Drainage System (SuDS) are formed.
Understanding topography is key to the assessment of the landscape impact and whilst the areas of cut and fill can be identified there is currently no indication of heights and topography changes. The LVIA and future submissions must clearly demonstrate topography alterations including where cut and fill operations have taken place. This must include a more detailed visual demonstration of existing landform overlaid with the proposed highlighting larger areas of cut and fill. Existing and proposed spot heights should also be indicated, particularly where there are considerable changes to the landform.

4.8 Reference is made to a draft Outline Landscape and Ecological Management Plan however this has not been provided. The City Council will review this document as it will form an important part of the scheme.

4.9 It is noticed that surveys continue to be conducted on the trees within the site boundary and Arboricultural Impact reports will be submitted as part of the Environmental Statement. The City Council is therefore unable to comment on the suitability of tree removal and protection at this stage but will do so when the information is available.

4.10 The full response of the City Council's Principal Landscape Architect is included as Appendix D.

5.0 Biodiversity

5.1 The application site has high biodiversity value and includes works within and in close proximity to designated features such as the River Itchen Special Area of Conservation (SAC). Any works must respect, protect and mitigate impacts on surrounding features.

5.2 Chapter 8 of the PEIR covers this aspect of the scheme and a number of queries are raised below:

- Bat trapping surveys are being undertaken in May and June 2021 and further surveys will be undertaken later in 2021. The survey results were not included as part of the consultation. The accurate results of these surveys must be used to inform the design of the project.
- Dormice data is from 2017 and therefore outside of timeframe guidance. Dormice surveys must be updated with acceptable mitigation proposed.
- 12 notable species have been identified within the roundabout section and hedgerow removal is proposed, it is important to demonstrate how the surveys undertaken have informed the actions taken in the Environmental Statement. Collaboration with expert bodies such as Butterfly Conservation is also important.
- Clarification is required on potential improvements for bat foraging and commuting routes (such as the use of bat bridges and green bridges).
- A Biodiversity Net Gain assessment must also be undertaken.
- Reference is made to a draft Outline Landscape and Ecological Management Plan however this has not been provided. The City Council will review this document as it will form an important part of the scheme.
- The southern spoil management area is adjacent to the recreation field at Chilcomb and hedgerow removal is proposed. Clarification is sought on the impacts of this removal and the impact on biodiversity connectivity.

5.3 The above queries must be addressed prior to the examination stage and not left to be addressed after any Development Consent Order is issued.

5.4 In light of the amendment to the Environment Bill requiring NSIP applications to contain biodiversity net gain, an assessment on this issue is essential.

5.5 The full response of the City Council's Principal Ecologist is included as Appendix E.

6.0 Geology and Soils

6.1 Highways England's consultants have received a land search report from the City Council indicating any potential sources of contamination inside the application and within 250m of the boundary.

6.2 The PEIR mentions the presence of chalk pits and landfills however there is no mention of a former petrol station situated on the A33 section of the application site. It must be determined in future assessments whether any buried tanks will be disturbed and ensured there is no risk to surface water receptors.

6.3 The waste soil generated must be subject to material management plans to ensure suitability for use and storage. This will also be assessed from a biodiversity protection perspective at this stage.

6.4 The full response of the City Council's Environmental Health (Contaminated Land) Officer is included as Appendix F.

7.0 Material Assets and Waste

7.1 The City Council does not have any comment on the Mineral Safeguarding Area. This is a matter for Hampshire County Council in their capacity as Minerals and Waste Authority.

7.2 As mentioned in section 6, the City Council will review and comment on waste management plans at the appropriate time.

8.0 Noise and Vibration

8.1 Noise and Vibration impacts are a key consideration for the City Council as a number of sensitive receptors, including residential properties, are located in close proximity to the application site.

8.2 The PEIR sets out the approach which will be taken to assess and consider these impacts and this includes noise vibration control measures which follow best

practice. The exact mitigation response will be determined once full details of the construction programme are determined.

8.3 The indicated approaches to respond to noise and vibration issues appear satisfactory however the City Council will comment on the details of the mitigation response within the Environmental Assessment.

8.4 Diversion routes should also be assessed from a noise and vibration perspective as there is a risk of impact on sensitive receptors on these routes. The same approach applied in paragraph 2.1 regarding air quality also applies to noise.

8.5 It is also important to highlight that cumulative impacts between the M3 Junction 9 and M3 Smart Motorway works, the timescales of which overlap, must be considered.

8.6 It is important that on-going monitoring of mitigation measures takes place and the City Council would wish to see a review process throughout the construction phase to allow mitigation to be modified if necessary.

8.7 In its operational phase, the increase in traffic on alternative routes requires further assessment (as covered under paragraph 2.4 for air quality).

8.8 The full response of the City Council's Environmental Health Practitioner is included as Appendix A.

9.0 Population and Health

9.1 This topic brings together the issues arising from a number of other topics which focus on the impact on human health.

9.2 The use and assessment of Winchester District and South Downs National Park Local Plan Policy in this section of the PEIR is welcomed as this provides an insight into local requirements for development in this sensitive area.

9.3 The PEIR does recognise that the M3/A34 represents a barrier to the movement of people between Winchester, Kings Worthy and the National Park. The principle of enhancing the links between these areas in the form of non-motorised routes is supported.

9.4 However, it is considered that further work needs to be undertaken on the mechanisms to achieve this.
Regarding the updated footpath/cycle route which crosses the new roundabout (National Cycle Route (NCR) 23), there is little detail shown at this stage. There are

concerns that a physical barrier is not shown on the roundabout bridge over the M3 carriageway. The sight lines from the underpasses must also be demonstrated.

The Easton Lane to Kings Worthy route is restricted to pedestrians only. This limits the potential for alternative methods of transport to and from the city and is a missed opportunity.
The Winchester Movement Strategy is clear that the council seeks improvements to how people travel in and around Winchester and want a future where there is reduced car traffic but more activity in the city centre through improved travel options including cycling. The creation of a cycle route allows sustainable and more inclusive transport routes into the city and can be used to connect to other routes such as national cycle ways and the recently opened district leisure centre which serves the wider community. The route also runs parallel or between major carriageways and mitigation (in the form of screening) will be expected.
The Easton Lane to Long Walk route is also pedestrian only which excludes its use by cyclists and horse riders.

The junction as it stands is a barrier to non-motorised modes of transports and it is vital this opportunity is used to improve the connectivity between the city, outer villages and the wider countryside of the National Park beyond using a wider range of transport options.
The City Council will therefore be pursuing revisions to the connections to ensure they are accessible for all modes of non-motorised transport.

9.5 Regarding economic impacts, a key strand of the Council Plan 2020 – 2025 is a ‘vibrant local economy’. Excellent transport links and connectivity are crucial in maintaining vibrancy, creating high quality employment and inward investment opportunities in the Winchester district.

Locally, the enhancements will improve the economic vitality and competitiveness of the Winnall Industrial Estate and the visitor economy of the Winchester district and this key interchange is related to the economic growth of the whole region.

Feedback has been provided by the Winchester Business Improvement District and Hampshire Chamber of Commerce in Appendix G.

9.6 WCC has adopted a resolution to seek Employment and Skills Plans in connection with major developments. This will secure opportunities to promote apprenticeships, the use of local firms as sub contractors and to promote wider career opportunities and educational/learning roles from the scheme. It is encouraging to see the use of local labour is mentioned in paragraph 9.4.1 of the PEIR.

9.7 The full response of the Council's Business Engagement Manager (concerning economic matters) is included as Appendix G.

10.0 Road Drainage and the Water Environment

10.1 The condition of surface water when it enters the water environment can have adverse impacts on water quality with consequential impacts on its biodiversity. With the River Itchen carrying both international and national nature conservation designations it is considered important that scheme can demonstrate that adequate steps have been taken to protect the water environment from pollution. Measures to trap pollutants including micro particles and plastics should be incorporated into the gulley/water traps on any new sections of carriageway. Furthermore, the opportunity should be taken to retro fit any existing drains that do not meet this specification.

10.2 There are significant concerns regarding the amount of nitrates which enter a group of protected sites collectively known as the 'Solent SPAs'. The watercourses which traverse the site lead to the Solent SPAs and the Environmental Statement will therefore need to cover any nutrient run-off into the system.

10.3 The southern area spoil area (within the National Park) is adjacent to the recreation field at Chilcomb. This area is prone to waterlogging and greater detail relating to the profile or surplus soil and proposed drainage would be required to ensure the situation is not worsened.

10.4 Hampshire County Council as Lead Local Flood Authority will be commenting on the scheme as part of the County Council's response.

11.0 Climate

11.1 Winchester City Council declared a climate emergency in June 2019 and committed to the aim of making the council carbon neutral by 2024 and the wider district by 2030.
The council's Carbon Neutrality Action Plan (CNAP) sets out a comprehensive list of actions that will help address nearly all the council's carbon emissions by 2024 and contribute to reducing emissions district wide by 2030. These actions focus around reducing and/or eliminating carbon emissions across the three largest sources of carbon emissions including transport, energy and property/housing, and offsetting the remaining carbon. The CNAP excludes motorway emissions as 'these are national infrastructure and will require a national response'. This scheme is therefore crucial in addressing that element of the City Council's district-wide carbon neutrality targets that is completely beyond its control.

11.2 The PEIR document acknowledges that end-user emissions are anticipated to increase with the proposed scheme. Indeed, table 14-6 in the PEIR indicates that the proposed scheme will generate an estimated 3,100 tCO2e of additional operation end user emissions in the opening year 2026 compared with the current design. Given that the total emissions for the junction are roughly 3.2 million tCO2e per year, this marks only a marginal increase in carbon emissions of roughly 0.1% of the total emissions.
However, the PEIR does not include any calculation or assessment of operation end user emissions beyond the opening year and this is a significant gap in the evidence which makes it difficult to provide an informed response at this stage. Furthermore, there is no calculation and assessment of carbon emissions associated with the 3-year construction phase of the proposed scheme. This is particularly important information for understanding the longer term effects and assessing how this will impact on our district-wide carbon neutrality targets.
These matters must be addressed as part of the examination process and the City Council will scrutinise this information at that time.

11.3 A detailed assessment and calculation of the total emissions from construction and operation is noticeably missing from the PEIR, however it is accepted that an accurate assessment of carbon emissions is particularly challenging given the current stage of development design.
Nevertheless, it is difficult at this stage, with the limited data available in the PEIR, for Winchester City Council to comment on the effect of the proposed scheme on carbon emissions within the Winchester District. The Environmental Statement must expand upon the preliminary calculations within the PEIR with a full detailed assessment of GHG emissions and effects associated with both construction and operation phases.

11.4 The City Council also expects to see additional direct measures to address the increase in GHG emissions resulting from the construction and operational phases of the scheme. For example, this could take the form of additional planting (on and off site) and direct measures to reduce the number of vehicles on the road. The City Council support the inclusion of section 14.8 *'Design, mitigation and enhancement measures'* in the PEIR which demonstrates that potential mitigation measures to reduce GHG emissions are being considered as part of the design of the Proposed Scheme. The City Council also strongly support the consideration of principles c) and d) of the carbon hierarchy within the ES, as outlined in section 14.8.3 of the PEIR.

11.5 As outlined in the Winchester Movement Strategy (WMS), the proposed scheme at M3 Junction 9 will likely reduce the volume of possible traffic through the city and associated carbon emissions. However, we do note that the volume of traffic at Easton Lane is expected to increase by at least 25%. There is added concern,

however, that increasing the capacity of the junction will increase the volume through the junction, and generate additional greenhouse gas emissions as a result of an increase in traffic. Any assumption that traffic growth could be offset, emissions-wise, by an increasing proportion of the road fleet becoming electric or having lower emissions with more fuel-efficient engines, would also apply to traffic emissions if the proposed scheme did not take place. At this stage, with the current data provided, it is difficult to determine what the overall change in traffic and emissions throughout Winchester will be as a result of the road improvements. Greater modelling of traffic flows, traffic growth, and emissions is therefore required and must be provided at the examination stage.

11.6 Expanding on the issues raised in section 9, a key priority of the Winchester Movement Strategy is to provide improved active travel options and remove barriers to walking and cycling into and around Winchester. This will help to reduce traffic levels and associated carbon emissions in the city centre, by providing good quality alternatives to having to drive into the centre of Winchester.

11.7 The adaptations to NCR 23 are an improvement and it is imperative the upgrade meets the latest Government standards.

11.8 The concerns raised in section 9 are echoed from a Climate perspective. Aside from the NCR 23 improvements, there are no further efforts in the proposals to provide additional infrastructure for cyclists and other non-motorised transport. This is a missed opportunity to improve active travel infrastructure in the area and facilitate the important modality shift away from high-carbon vehicles towards low carbon alternatives.
The site has potential to increase the provision of cycling infrastructure. For example, the proposed footpath linking the A33/B3047 Junction to Winnall Industrial Estate is a 2-mile route situated close to major roads – it could be argued that this would function better as a properly-surfaced shared cycle/pedestrian path, providing a useful commuter route for cyclists.

11.9 Another aspect that is not covered in sufficient detail within the proposed scheme is information about closures/diversions of walking, cycling and horse-riding routes during the 3-year construction phase, particularly the existing NCR 23 route. This is acknowledged within section 2.4.61 of the PEIR, and further details are to be considered in the ongoing Environmental Impact Assessment work.
It is important that this is included within the ES and that efforts are made to ensure that the quality of cycling and walking is not reduced during the 3-year construction phase. A temporary reduction in ease and quality of cycling and walking as part of the construction phase may have a detrimental knock-on effect, shifting current non-motorised users of the junction back towards cars.

11.10 The full response of the City Council's Sustainability Officer is included as Appendix H.

12.0 In Combination and Cumulative Effects

12.1 It is noted there will be an overlap in timeframe for Junction 9 and Smart Motorway works. It is vital the two projects are coordinated together and any cumulative impacts (such as noise and air quality concerns for nearby residents) are responded to in combination.

12.2 There are a number of approved developments in the area which are likely to be constructing alongside the Junction 9 scheme. The contact made to local house builders and major projects as part of this consultation is welcomed.
Please note that a number of site allocations and planning consents have been missed from the search area for cumulative effects. These are listed in Appendix I.

12.3 As indicated at the start of this response, Climate is an issue which relates to all aspects of the project and should be a common thread through every consideration.

13. General Remarks

13.1 Detailed highways assessments will be made by the County Council as Highway Authority. However, the exclusion of any improvements to the junction between the A33 'Winchester Bypass' and London Road (locally called the 'Cart and Horses junction') in Kings Worthy is a concern.
Figure 2.5 of Appendix 2.1 shows a 1 to 25% increase in traffic movements from this junction onto the A33 and the additional M3 north-bound entrance from this direction may increase the attractiveness of this route. It is not understood why this junction has been excluded from improvement works when it sits as part of the wider scheme and forms parts of the red line boundary and this must be revisited by Highways England. The City Council will work alongside the Highways Authority in this regard.

13.2 The exclusion of the Cart and Horses junction is also related to the Kings Worthy – Winnall footway which starts at this location.
As discussed previously, this route is currently restricted to pedestrians and should be revised to ensure it can be used by other modes of non-motorised transport. The scheme is a major development for the area and it is important this local junction is included and improved by connecting an inclusive non-motorised route to the city from this location.

13.3 It is currently unknown whether the traffic flows shown in figure 2.5 of Appendix 2.1 are from the first year of operation or whether they have modelled predicted future road use. Clarification is requested on this point.

14. Conclusion

14.1 At this point in the NSIP process the City Council is not expressing a view regarding the merits of the project and, by extension, whether it is able to support the proposed scheme.

14.2 As indicated in a number of sections throughout this response, more information is required to address a range of issues to allow a fully informed and balanced view to be reached.

14.3 Winchester City Council is ready to engage with meaningful and proactive discussions with Highways England alongside colleagues at Hampshire County Council and the South Downs National Park Authority.

Please contact the lead officer Robert Green if you have any enquiries or would like to discuss the response further.

Yours Sincerely,

Julie Pinnock BA (Hons) MTP MRTPI
Service Lead – Built Environment
Winchester City Council

Appendix A – Environmental Protection

Overall I have no major objections to the indicated direction of travel of the assessment detailed within the PIER in terms of air quality or noise. However I do "reserve the right" to make more detailed comment when the full information is available within the subsequent Environmental Statement.

Below are a few comments that you may choose to include in any overall feedback at this stage:

1 Construction Phase

The main concern is the noise and air quality impacts that could occur to the wider local population from diversions necessary during the construction phase. There have been issues with noise impacts during current diversions regarding works on the A34, particularly relating to commercial vehicles not following official diversion routes. Potential additional hard closures to facilitate a better uptake of official diversion routes may need to be considered and discussed with the Hampshire County Council. Only once we can have confidence that the official diversion will, as far is reasonably practicable, be followed can an assessment of these impacts then be considered acceptable.

Construction phase assessments should ensure they include impacts (particulate/dust and noise) relating to all Depot and Soil Disposal locations once these have been finalised.

Depending upon the proposed start date, reference should be made to potential cumulative construction phase impacts that could occur if this development overlapped with the M3 Smart motorway (junction 9 to 14) works.

2 Use Phase

The current assessment shows the greatest traffic increases, away from the strategic road network, will be on Easton Lane (greater than 25 percent). Although looking at the supporting maps it is suggested this is actually Easton Lane, Wales St and North Walls. It is requested this is clarified going forwards, as there are more sensitive (i.e. domestic) receptors on Wales St than on Easton Lane itself (which is mainly fronted by commercial premises). It is requested that the full Environmental Statement pays specific detailed attention to impacts in this particular area. In particular noise impacts should not just be dismissed if they are less than 3dB based on an LA10 18 hour impact as this can potentially "average out" issues.

Regards

Phil Tidridge
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Appendix B – Historic Environment

Key issues:

The preservation of listed buildings and their setting (S.66 P (LBCA) Act 1990; Strategic Policy SD12 and Policy SD13 of the South Downs Local Plan (2014-33); Policies CP19 & CP20 Winchester District Joint Core Strategy; NPPF Section 16

The preservation or enhancement of the character or appearance of conservation areas (S.72 P(LBCA) Act 1990; Policies DM27 & DM28 of the Winchester District Local Plan Part 2 Adopted 2017; Policy CP19 & CP20 Winchester District Joint Core Strategy; NPPF Section 16).

Comments and advice:

I have reviewed the Preliminary Environmental Information Report (PEIR) Appendix 6.1 Detailed Cultural Heritage Baseline and the Environmental Mitigation Design Plan.

It is noted that Appendix 6.1 of PEIR will be used as the key baseline document to support the Cultural Heritage Chapter of the Environmental Statement that will be submitted as part of the DCO submission. The information contained in this baseline is considered to adequately cover all relevant designated heritage assets.

It is anticipated that the impact of development on heritage assets and their settings will be considered in the Environmental Statement and supported by an LVIA. The need for any mitigation above that proposed in the Environmental Mitigation Design Plan to protect heritage assets and their settings would be informed by the forthcoming information.

Rachel White – Historic Environment Team Leader 30/06/2021

Appendix C – Archaeology

Key policy issues:

The preservation, conservation, investigation and recording of archaeological interest:

- National Policy Statement for National Networks (NPS NN) (2014): Historic Environment, para. 5.120 – 5.142;
- Ancient Monuments and Areas Act 1979;
- Hedgerow Regulations 997 (amended 2003);
- National Planning Policy Framework: Section 16;
- National Planning Practice Guidance (PPG) (2019): "Historic Environment"
- Policy DM26 Winchester District Local Plan Part 2; Policy CP20 Winchester District Joint Core Strategy;
- South Downs Local Plan Policy SD16: Archaeology

Comments:

Thank you for consulting on this NSIP Preliminary Environment Information Report (PEIR) for the proposed M3 Junction 9 scheme. These comments relate to the consideration of upstanding and buried archaeological remains within the scheme's red line boundary and its zone of theoretical visibility.

Chapter 6 of the PEIR report, the Non-Technical Summary and associated appendices (6.1 – Detailed Cultural Heritage Baseline; 6.2 – Geophysical Survey Report; 6.3 – Archaeological Evaluation Report; 6.4 – Geophysical Survey Report), deal with Cultural Heritage (including archaeology) in relation to the proposed scheme.

This response has also been compiled cognisant of the results of more recent geophysical survey and trial trenching which have yet to be formally reported / were available for the PEIR.

<u>Baseline and assessment methodology</u>

Appendix 6.1 of the PEIR comprises a baseline study which outlines current knowledge and understanding of the archaeological potential (including data from new archaeological surveys and investigations), within a study area around the proposed scheme's red line boundary and identifies their significance and setting. The extent of the study area (300m for non-designated assets and 1km for designated assets), was previously agreed with Stantec, Highways England's archaeological consultant.

The assessment methodologies and data sources utilised for this PEIR are appropriate and adhere to accepted sector methodologies and standards and guidance. The assessment assumptions and limitations (section 2.3, Appendix 6.1), are not considered to have compromised the reliability of the assessment nor the conclusions set out in the PEIR.

Section 4 of Appendix 6.1 provides a detailed and comprehensive description of the archaeological and historical baseline within the study area, both designated and non-designated assets, known and currently unknown. Previous impacts within the scheme area have been assessed and information from previous and new ground investigation works have been included.

Section 5 of Appendix 6.1 comprises a Statement of Significance for heritage assets within the proposed scheme boundary and ZTC (section 5.3 covers archaeology). The significance and setting of both designated and non-designated assets (known and potential assets) and historic landscapes has been clearly identified and described.

PEIR report – Chapter 6

Chapter 6 of the PEIR report summaries the archaeological baseline (6.6), previous archaeological investigations, data sources, assessment methodologies and assessment criteria (6.4). Assessment limitations and assumptions are outlined (6.5) together with relevant legislative and policy framework (6.2). Previous and proposed consultations and responses to the Scoping Opinion are provided in section 6.3 of this report.

Table 6-5 provides a summary of Receptor Sensitivity which is agreed.

Mitigation

Section 6.7 provides a summary of design, mitigation and enhancement measures for the proposed scheme, which are considered appropriate. In addition to the measures set out herein, discussions undertaken to date have identified areas within the scheme area where further trial trenching could be undertaken as part of a staged mitigation programme following the granting of any Development Consent Order. Alternatively these areas may be subject to strip-map-sample mitigation.

As outlined in para. 6.7.3, the proposed mitigation measures will result in knowledge gain and a better understanding of the historic environment within the scheme area, in addition to delivering public benefits (knowledge and awareness).

As is specifically noted, the ability to record archaeological remains is not a factor in decision making as to whether loss of remains should be permitted.

Further to the mitigation proposals contained in this PEIR, ongoing discussions will be held to formulate an Outline Mitigation Strategy which will form part of the forthcoming ES.

Table 6-1 confirms that community outreach and enhancement through the use of public art / exhibitions (including the use of digital technology to engage with areas such as ecology and heritage), will be considered during the design phase of this OMS, further to previous stakeholder discussions. The Preliminary Environmental Mitigation Design Plan (PEIR Appendix 2.1 General Figures, Fig. 2.6) includes areas where public art installations could potentially be installed.

Assessment of potential effects

Potential effects arising from scheme impacts (both direct and indirect) are detailed in Sections 6.8 of the PEIR, both from the construction and operation phases. Para. 6.8.3 & 6.8.4 outline the identified potential impacts and these are agreed.

Para. 6.8.6 details potential impacts to two Scheduled Monuments within the ZTV:

- Temporary effects may occur to the Magdalen Hill round barrow cemetery (NHLE: 106746), if the southern area is chosen for spoil management (PEIR Appendix 2.1 General Figures, Fig 2.3 Indicative Land Use Plan). However this would form a temporary effect and would not result in any residual effects following reinstatement of the area. Further assessment of this area will be undertaken, however the acceptability of this area for spoil management will require careful consideration and liaison with Historic England.

- St Gertrude's Chapel (NHLE: 1005518) may experience some adverse effects arising from increased noise; further assessment work is to be undertaken with regard to this. The PEIR also indicates that there could be some visual impacts arising from the construction phase and although this would be temporary further assessment will be undertaken. Again, the views of Historic England will be important with regard to these potential temporary and permanent effects.

The PEIR report indicates that it has not yet been possible to assess in detail potential scheme impacts to the setting of a third Scheduled Monument (NHLE: 1001825). Further assessment is to be undertaken as part of the EIA and will form part of the forthcoming ES.

The conclusions set out in para. 6.8.9 of the PEIR with regard to the assessed impacts and effects upon buried heritage assets within the scheme area and Table 6-6 – Potential effects before mitigation upon known archaeological remains, are concurred with.

Proposed further work

Para. 6.1.2 of the PEIR report indicates that the current baseline document (Appendix 6.1) is an evolving document which will be updated for the ES with the results of additional archaeological surveys and trial trenching undertaken as part of the EIA process and following further consultations and assessment work undertaken in relation to the final scheme.

Section 6.9 of the PEIR report details further work anticipated to be undertaken as part of the ongoing EIA and forthcoming ES. Proposed further assessment work and consultation is also set out in Table 6-1 and within para's. 6.33 to 6.3.8 and Section 6.8 of the PEIR. These are agreed.

<u>Conclusion and further recommendations</u>

Overall Chapter 6 of the PEIR chapter and the associated appendices are considered to form an appropriate basis for the Cultural Heritage chapter in the forthcoming ES, subject to the identified additional assessment and the matters set out below being carried out to inform this.

It is recommended that access to the northern area of search for potential spoil management is pursued (the area has not yet subject to geophysical survey). Cropmarks within this area suggest a higher archaeological potential than nearby areas already subject to geophysical survey and trial trenching and the results may be useful in determining which areas are taken forward. Informal discussions with the archaeological consultant indicates that access to this area is being pursued.

Identification and assessment of any important hedgerows as defined in the Historic Hedgerows should also be undertaken as part of the EIA and reported in the ES.

It is also suggested that historic Ordnance Survey mapping described in section 4.2 of PEIR Appendix 6.1 should be included within the ES baseline report.

Finally, following recent discussions with the Archaeology and Heritage consultant it is understood that revisions are to be made to the scheme to exclude an area of extant earthworks relating to historic water meadows from an area of proposed

ecological enhancement; the area having previously been identified as landfill. This is welcomed.

Tracy Matthews
Historic Environment (Archaeology) Officer
01/07/21

Appendix D – Landscape

Response provided having reviewed the following:

- Preliminary Environmental Information Report (PEIR) HE551511-VFK-EGN-X_XXXX_XX-TN-LE-0004 P07 May 2021 (Section 7: landscape and Visual)
- Non-Technical Summary of the PEIR HE551511-VFK-EGN-X_XXXX_XX-TN-LE-0019 P04 May 2021 (Section 4: Landscape and Visual)
- Preliminary environmental mitigation design plan 48176 Rev B
- Preliminary environmental mitigation design: Sections AA - CC 48176 Rev A
- Preliminary environmental mitigation design: Sections DD - EE 48176 Rev A
- Preliminary Zone of Theoretical Visibility and view locations
- Webinar: *Our effect on the environment: landscape, visual impacts, wildlife and habitats* Monday 14 June 7.00pm – 8.00pm

At this stage we have mainly reviewed section 7 of the PEIR and viewed the recording of the Webinar.

The Landscape and Visual Impact Assessment methodology being used is stated as that of Highways England - LA107 Landscape and Visual Effects (Highways England, 2020) rather than the guidance produced by the Landscape Institute: Guidelines for Landscape and Visual Impact Assessment (GLVIA3) although this has been referenced in 7.4.1. and we do note that this was also raised by the Inspectorate (see below)

Reference	Comment	Response
Page 25 Paragraph 4.4.11	*"The Inspectorate encourages the Applicant to take account of more recent guidance such as Visual Representation of Development Proposals: Technical Guidance Note 06/19 (Landscape Institute 2019), and Infrastructure: Technical Guidance Note 04/20 (Landscape Institute 2020), where relevant.*	Noted and relevant standards and guidance reflected in Section 7.4 of this PEIR.

Full details of the scheme are still to be designed however an indication of gantry and sign locations and heights within the landscape would be useful to understand better how visible these features may be when assessing the landscape and visual impact. This has been noted to be actioned within section 7 of the PEIR. 24 viewpoints including from elevated positions and the Cathedral as well as PRoWs and schools will be assessed although we understand that preliminary draft AVR wirelines based on the 3D model are only for 7 view locations. What is the justification for not preparing all viewpoints in this way? They are very helpful in developing an understanding of the scale/massing/alignment of the proposed

highway improvements. We assume these will form part of the LVIA. The webinar indicated that further zone of theoretical visibility work and modelling is required – we look forward to reviewing the outcomes.

Section 7 of the PEIR covers in the main what will be considered and assessed in the Landscape and Visual Impact Assessment to be produced as part of the Environmental Statement. The PEIR should include a Landscape Strategy providing an overall objective to protect and enhance the nationally designated landscape of the SDNP and the interface between the historic city of Winchester and the National Park.
We have comments on the Preliminary Environmental Mitigation Design (PEMD) in line with the Shared Asks note dated 21 April 2021 and the Winchester Urban Fringe Proposals restoration Rev 7 plan submitted jointly by WCC and SDNP:

- The scheme will never be fully mitigated due to its nature of a being a large scale infrastructure project however large scale mitigation must still be implemented and reference made to the Winchester Urban Fringe Proposals restoration Rev 7 plan submitted previously by SDNP. Although only areas 3 and 8 lie within WCC boundary all areas within SDNP that sit adjacent and are visible from Winchester's boundary are viewed as important to WCC and are highly important to the setting of the SDNP. The preliminary environmental mitigation design does not reflect the suggested mitigation from SDNP and WCC outside of the indicative application boundary. This includes a request for urban tree planting in the Winnall area of Winchester to enhance noise abatement, improve air quality and landscape screening. Within the site boundary we would support increased tree planting over chalk grassland which would provide much needed screening and assist with noise reduction.

- The PEIR highlights the Landscape Character Assessments being used to help inform the scheme however WCC and SDNP have requested that a bespoke characterisation of the landscape is undertaken – no mention is made of this. The character of the area is unique with the national park character areas adjacent to the city townscape – an urban/rural fringe.

- **Topography:** As the PEMD does not indicate contours/topography it is not easy to assess how the SuDS features in particular will work in receiving surface water run-off and how these outlet into the watercourses/rivers. No SuDS features are indicated south of the junction. Features such as these are ideal for providing some of the mitigation in particular water quality and bio-diversity. Amenity value must also be considered particularly where features are close to the walking/cycling network. Figure 2.4 shows indicative cut and fill and general arrangement however a more detailed visual demonstration of existing landform overlaid with the proposed highlighting larger areas of cut

and fill would assist in understanding the proposed topography. Existing and proposed spot heights should also be indicated, particularly where there are considerable changes to the landform and must be shown on the sections in Figures 2.7 & 2.8.

- **Cycling/walking network:** New routes for pedestrians are proposed. Cycle access is indicated across the roundabout only to join up with the national network. We would support enhanced provision of a multi-use network for walking, cycling and equestrian on both the proposed and existing routes thereby opening up the area more widely to access for all.

- The M3 has always been a barrier to the South Downs National Park for residents (physical and perception). Along with the proposed environmental enhancements such as increased biodiversity and additional screening and the creation of new areas of soft landscape WCC would support as many links across the M3 as possible allowing access into and from the National Park – permeability and inter-connectivity. Sub-way links are not considered ideal as they do not promote an attractive/enhanced entrance/exit to the Park and City nor are they perceived by many users as safe. Bridges and open routes are considered preferable even if these are to be located a little removed from the main site.

- **Spare soil:** Southern area is shown located adjacent to the north of the recreation field at Chilcomb. The pitches here are already prone to waterlogging, we would require greater detail relating to the profile of the surplus soil and the proposed drainage to ensure that the recreation ground does not come under further waterlogging pressures from surface water run-off. To create these spare soil areas hedgerows require removal – the webinar indicated that these may not all be reinstated, what proposals are there for the green infrastructure of the area and biodiversity connectivity? The other two areas indicated appear to be changing the existing landscape profile – greater detail is required to understand these changes fully.

- **Construction:** During construction phase compound 4 is indicated at Christmas Hill – this is a considerable way from the site. How will construction traffic impact upon the area?

- **Trees**: Has an arboricultural impact assessment been undertaken? There appears to be no information on the amount of existing trees and woodland nor a survey showing trees to be retained and those lost due to the proposals.

- **Maintenance/management:** Reference has been made to a draft Outline Landscape and Ecological Management Plan (OLEMP). When is it anticipated that this will be available for review?

Appendix E – Ecology

Please see comments below:

- HRA & River Itchen SAC (including consideration of qualifying features including aquatic invertebrates such as southern damselfly and freshwater fish) is still required.
- Further bat trapping surveys are being undertaken in May and June 2021 – how will this be reported in / used to inform this project?
- Further surveys in 2021 are being undertaken to fully establish the status of these roosts - how will this be reported in / used to inform this project? Have Natural England been approached in relation to potential for European Protected Species Licenses (EPSL)?
- Dormice data is from 2017 and therefore over the three year age that is recommended in guidance. What mitigation is proposed as dormice are considered to be present within all suitable habitat? Have Natural England been approached in relation to potential for European Protected Species Licenses (EPSL)?
- Terrestrial invertebrate surveys during 2020 have identified twelve notable species largely associated with the flower rich grasslands within the motorway roundabout, and to the east of the motorway roundabout - how will this be reported in / used to inform this project?
- 8.8.5 *Where hedgerows cannot be retained, either during construction or following landscaping activities these will either be replaced or translocated where practical, along with enhancement of existing hedgerows through gaps filling where necessary. This includes the hedgerows running alongside Easton Lane.* – How will hedgerow be assessed in advance to ensure no impact on the habitat and species utilising hedgerow?
- 8.8.6 *A mosaic of chalk bunds, native scrub and natural regeneration will be created along a stretch of the redundant A34 between the M3J9 gyratory and the River Itchen crossing. The chalk bunds will be planted with larval food plants for priority species of butterfly.* – Which butterfly species, and who will be consulted on this (ie. Butterfly Conservation)?
- A fiEMP (Environmental Management Plan) is proposed for construction impacts.
- A habitat creation package is included in the appendices (Preliminary Mitigation Design Plan).
- Table 8.6 states: *Direct mortality through collision with traffic is likely to already occur given the presence of bats near to existing major highway corridors. The Proposed Scheme will not significantly alter the existing road layout (in relation to its existing effects on foraging and commuting bats) and is not considered to worsen the existing situation in relation to mortality of*

bats. – Have improvements been considered at important foraging & commuting routes – ie bat bridges / green bridges?

- What Biodiversity Net Gain assessment has been undertaken?
- What ecological monitoring & maintenance is proposed following completion of the project?

Richard Smith MSc CEnv MCIEEM
Principal Ecologist & Biodiversity Officer
Natural Environment and Recreation

Winchester City Council
Colebrook Street
Winchester, SO23 9LJ

Appendix F – Contaminated Land

Overall I have no major objections to the indicated direction of travel of the assessment detailed within the PIER in terms of contaminated land. However I do "reserve the right" to make more detailed comment when the full information is available within the subsequent Environmental Statement.

The consultants working on the project have had a land search report from us indicating any potential sources of contamination inside the application area and within 250m of the application boundary. The PIER has stated the presence of chalk pits and landfills situated in the development area, however there is no mention of the former petrol station situated on the A33 section of the application area. The applicant needs to determine in any future assessment if the proposed road scheme will disturb any buried tanks and there is no risk to surface water receptors.

It is understood that the proposed highways scheme has the potential to generate significant amounts of waste soil. If this is the case it is requested that we be consulted in relation to any material management plans, to ensure suitability for use.

James Hucklesby
Environmental Health Protection Officer
Environmental Health
Winchester City Council
Colebrook Street
Winchester, SO23 9LJ

Appendix G – Economic Development and Tourism

Policy

The economic and tourism team at Winchester City Council would like to support this application in principle.

One of the key strands of the Council Plan 2020 to 2025 is a 'vibrant local economy'. Excellent transport links and connectivity are crucial in maintaining this vibrancy, creating high quality employment and inward investment opportunities in the Winchester District.

The City of Winchester Movement Strategy strongly supports enhancing the strategic road network capacity on the M3 to:

- sustaining future growth of the national, regional and local economy
- improving the resilience of the strategic network and
- reducing through traffic in the city leading to improved air quality.

The Enterprise M3 and Solent Local Enterprise Partnership's A STRATEGIC ECONOMIC PLAN FOR THE ENTERPRISE M3 AREA 2018 – 2030 suggests that:

> "The efficient functioning of this strategic transport network is a priority for businesses, communities and visitors to our area, as well as the UK's economy. These vital arteries and transport hubs connect markets, help people access jobs, enable businesses to connect with each other and their customers, drive international trade and help unlock planned development. The network plays a crucial role in supporting wider economic prosperity and competitiveness."

The Solent Local Enterprise Partnership: SOLENT STRATEGIC TRANSPORT INVESTMENT PLAN 2016 states that:

> "The road network is critical for both the national and the local economy. There are currently a number of points of stress on the motorway network which impact on the economic performance including the M3 J9/A34: this is a critical node connecting Solent (especially freight) to production centres and markets in the north and the midlands but a major bottleneck."

National Planning Policy Statement for National Networks, applicable to all road and railway Nationally Significant Infrastructure Projects (Department of Transport, 2014) identifies:

> "a critical need to improve the national networks to address road congestion…to provide safe, expeditious and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth. Improvements may also be required to address the impact of the national networks on quality of life and environmental factors".
>
> "a need for development on the national networks to support national and local economic growth and regeneration, particularly in the most disadvantaged areas. Improved and new transport links can facilitate economic growth by bringing businesses closer to their workers, their markets and each other. This can help rebalance the economy"

Economic and tourism growth

On a local level the enhancements will improve the economic vitality and competiveness of the adjacent Winnall Industrial Estate.

Excellent transport links are also crucial to the ongoing vitality of the visitor economy of the Winchester District. The improvements will reduce journey times from many destinations with visitors' choice of destination strongly influenced by drive time from their homes.

It is estimated that around 0.35 million overnight tourism trips were made to Winchester in 2018. £263.4 million was spent on trips to Winchester in 2018 by overnight and day visitors, up by 3% compared to 2017. The total value of tourism activity in Winchester in 2018 is estimated to have been around £339.1 million, up by 2% compared to 2017. (The Economic Value of Tourism on Winchester, 2018).

This key transport interchange, where the A34 meets the M3, links the north with the ports of Southampton and Portsmouth and Southampton Airport, and is crucial to the economic growth of the whole region.

Kevin Travers, Head of Infrastructure, Transport & Place, at Enterprise M3 Local Enterprise Partnership said:

> "Improvements to Junction 9 remains a key strategic priority for us. Together with Solent and Dorset LEPs we have all highlighted Junction 9 of the M3 as being a junction of strategic importance to the LEPs as well as the wider national economy.
>
> The M3/ A34/ M40 corridor functions as a vital artery for strategic highway flows, providing connectivity between different regions of the UK. The

> congestion and delay problems at Junction 9 are a key concern for all three LEPs that need to be addressed as a matter of priority.
>
> The cities and large towns of Southampton, Portsmouth, Bournemouth, Poole and to some extent Winchester are anticipated to play a role as engines for growth, whereby they will accommodate considerable planned growth in housing and jobs, as we respond to the pandemic. The future economic performance and success of these urban centres is reliant on the continued provision of efficient and reliable strategic transport links by road and rail."

It is recommended that a full economic impact appraisal including GVA figures and job creation numbers is carried out before the full planning application is submitted.

Local business community

The local business community have lobbied for years for improvements to enable free-flowing links between the M3 and the A34 both northbound and southbound. Leaders from the Winchester Business Improvement District and Hampshire Chamber of Commerce have commented on the proposals below.

Paul Spencer, Chief Executive of Winchester Business Improvement District, said:

> "The proposed scheme at M3 Junction 9 will reduce congestion and improve journey times which will have a positive impact on Winchester City Centre. At busy times Junction 9 struggles and the new proposals will increase capacity at this key transport interchange and remove the need for vehicles to use Winchester as an alternative route."

Mark Mills-Goodlet, Group Managing Director of Winchester Motor Group and Chair of the Winchester Business Strategy Group of Hampshire Chamber of Commerce, added:

> "Having worked in Winchester for thirty five years I am all too aware of the traffic chaos that occurs in the city during Bank Holidays or at peak periods when the M3 Junction 9 cannot cope with the volume of traffic. Not only does this have a detrimental effect on the businesses in Winchester, but has a seriously negative affect on air quality. A free flowing junction 9 would negate the need for motorists to use Winchester as a short cut."

Employment and skills

The close proximity of the residential area of Winnall gives local people an opportunity to benefit from jobs created. In May 2021 the St Bartholomew ward of Winchester City Council which includes the Winnall area had an unemployment rate

of 4.5% compared to a Winchester District average of 3.3%. Local unemployment rates have increased during the COVID-19 pandemic.

The council follows the Construction Industry Training Board (CITB) client based approach for all large scale planning applications. This means the council will require an employment and skills plan to maximise local employment and training opportunities created through the construction of the M3 improvements.

It is suggested that more detailed work is carried out on the potential longer term impact of the improvements in terms of job creation.

Sustainability

Winchester City Council has joined local authorities across the country in declaring a climate emergency. The council aims to make itself carbon neutral by 2024 and achieve the same with the wider district by 2030.

We would look to Highways England to provide carbon offsetting funds or solutions to reduce the carbon emissions from the proposed solutions. Activities that provide local employment or active travel opportunities would be encouraged.

Alison Woods
Business Engagement Manager
Winchester City Council

Appendix H – Sustainability and Climate

Carbon emissions

In June 2019, Winchester City Council declared a 'Climate Emergency' and committed to the aim of making the activities of Winchester City Council carbon neutral by 2024, and the district of Winchester carbon neutral by 2030. The council's Carbon Neutrality Action Plan (CNAP) sets out a comprehensive list of actions that will help address nearly all the council's carbon emissions by 2024 and contribute to reducing emissions district wide by 2030. These actions focus around reducing and/or eliminating carbon emissions across the three largest sources of carbon emissions including transport, energy and property/housing, and offsetting the remaining carbon. The CNAP excludes motorway emissions as 'these are national infrastructure and will require a national response'. This scheme is therefore crucial in addressing that element of our district-wide carbon neutrality targets that is completely beyond our control.

The PEIR document acknowledges that end-user emissions are anticipated to increase with the proposed scheme. Indeed, table 14-6 in the PEIR indicates that the proposed scheme will generate an estimated 3,100 tCO_{2e} of additional operation end user emissions in the opening year 2026 compared with the current design. Given that the total emissions for the junction are roughly 3.2 million tCO_{2e} per year, this marks only a marginal increase in carbon emissions of roughly 0.1% of the total emissions. However, the PEIR does not include any calculation or assessment of operation end user emissions beyond the opening year and this is a significant gap in the evidence which makes it difficult to provide an informed response. Furthermore, there is no calculation and assessment of carbon emissions associated with the 3-year construction phase of the proposed scheme. This is particularly important information for understanding the longer term effects and assessing how this will impact on our district-wide carbon neutrality targets.

A detailed assessment and calculation of the total emissions from construction and operation is noticeably missing from the PEIR, but do we accept that an accurate assessment of carbon emissions is particularly challenging given the current stage of development design. Nevertheless, it is difficult at this stage, with the limited data available in the PEIR, for Winchester City Council to comment on the effect of the proposed scheme on carbon emissions within the Winchester District. We expect that the Environmental Statement (ES) will expand upon the preliminary calculations within the PEIR with a full detailed assessment of GHG emissions and effects associated with both construction and operation phases.

WCC also expects to see additional direct measures to address the increase in GHG emissions resulting from the construction and operational phases of the scheme. For example, this could take the form of additional planting (on and off site) and direct measures to reduce the number of vehicles on the road. We support the inclusion of section 14.8 *'Design, mitigation and enhancement measures'* in the PEIR which demonstrates that potential mitigation measures to reduce GHG emissions are being considered as part of the design of the Proposed Scheme. We also strongly support the consideration of principles c) and d) of the carbon hierarchy within the ES, as outlined in section 14.8.3 of the PEIR.

As outlined in the Winchester Movement Strategy (WMS), the proposed scheme at M3 Junction 9 will likely reduce the volume of possible traffic through the city and associated carbon emissions. However, we do note that the volume of traffic at Easton Lane is expected to increase by at least 25%. There is added concern, however, that increasing the capacity of the junction will increase the volume through the junction, and generate additional greenhouse gas emissions as a result of an increase in traffic. Any assumption that traffic growth could be offset, emissions-wise, by an increasing proportion of the road fleet becoming electric or having lower emissions with more fuel-efficient engines, would also apply to traffic emissions if the proposed scheme did not take place. At this stage, with the current data provided, it is difficult to determine what the overall change in traffic and emissions throughout Winchester will be as a result of the road improvements. Greater modelling of traffic flows, traffic growth, and emissions is therefore required.

<u>Cycling and walking infrastructure</u>

A key priority of the WMS is to provide improved active travel options and remove barriers to walking and cycling into and around Winchester. This will help to reduce traffic levels and associated carbon emissions in the city centre, by providing good quality alternatives to having to drive into the centre of Winchester. We have noted that efforts have been made in the proposed scheme to improve the current cycling and walking provision at the junction. Firstly, the scheme proposes to upgrade the substandard National Cycle Route 23 that already exists across the junction, and reconnect the two ends of Easton Lane where were truncated when the M3 was built – a noticeable improvement for cycling and walking. It is imperative that the upgrade to the National Cycle Route (NCR) 23 meets the latest Government standards for cycling infrastructure set out in LTN 1/20. Secondly, two new footpaths will improve the accessibility of the area for walking. The new footway for the western side of the scheme will link the A33/B3047 Junction to Winnall Industrial Estate situated on Easton Lane. The footpath proposed on the eastern side will link Easton Lane with Long Walk.

We do, however, share concerns with non-motorised user groups, such as Cycle Winchester, regarding the cycling infrastructure provision included in the Proposed Scheme. Rather than taking the opportunity to maximise opportunities for active travel in and around Winchester and curb carbon emissions from transport, the scheme proposes only an upgrade to the pre-existing NCR 23 route. Currently, aside from this, there are no further efforts in the proposals to provide additional infrastructure for cyclists. We feel this presents a missed opportunity to improve active travel infrastructure in the area and facilitate the important modality shift away from high-carbon vehicles towards low carbon alternatives. There is scope in the scheme to increase the provision of cycling infrastructure. For example, the proposed footpath linking the A33/B3047 Junction to Winnall Industrial Estate is a 2-mile route situated close to major roads – it could be argued that this would function better as a properly-surfaced shared cycle/pedestrian path, providing a useful commuter route for cyclists.

Another aspect that is not covered in sufficient detail within the proposed scheme is information about closures/diversions of walking, cycling and horse-riding routes during the 3-year construction phase, particularly the existing NCR 23 route. This is acknowledged within section 2.4.61 of the PEIR, and further details are to be considered in the ongoing Environmental Impact Assessment (EIA) work. It is important that this is included within the ES and that efforts are made to ensure that the quality of cycling and walking is not reduced during the 3-year construction phase. A temporary reduction in ease and quality of cycling and walking as part of the construction phase may have a detrimental knock-on effect, shifting current non-motorised users of the junction back towards cars.

Appendix I – Strategic Planning

Proposal: Highways England M3 Junction 9 NSIP - Consultation

The proposed M3 Junction 9 improvements are a Nationally Significant Infrastructure Project and will be dealt with by a Development Consent Order (DCO) application. This will be assessed by the Planning inspectorate, when submitted, who will make a recommendation to the Secretary of State.

An Environmental Impact assessment (EIA) is required to be developed in two stages: the Preliminary Environmental Information Report (PEIR) which is subject to public consultation before an Environmental Statement is prepared to accompany the DCO application. The Council has been consulted on the PEIR along with other stakeholders and the public.

The PEIR is an initial statement of the main environmental information available, along with descriptions of the likely environmental effects and mitigation measures envisaged. The PEIR has been updated following a previous assessment in 2019, to reflect modifications to the scheme and additional assessment information/material. The information is preliminary as there is an iterative process of scheme development and EIA, with the final EIA work reported within the Environmental Statement that will accompany the DCO application. The PEIR covers 10 key topic areas, including air quality, noise, biodiversity and water environment, as well as 'in combination' and cumulative effects.

Assessment

The list of topic areas appears comprehensive and covers all the areas in which impacts may be expected. The majority of topic areas will be subject to comments from specialist consultees either within or outside the City Council. The Strategic planning issues relate mainly to the Local Plan policies relevant to each topic (listed in section 2 under each topic in the PEIRS) and the 'Cumulative Effects' topic area, particularly the list of 'other developments' which may need to be assessed for cumulative impact.

In responding to the previous (2019) consultation, comments were made about the relevant policies and concerns were raised about the narrow (2km) radius used to identify other developments and the absence of some substantial schemes. These concerns seem to have been largely taken into account and a much longer list of 'other developments' is now used.

<u>Local Planning Policy Documents</u>
The Development Plan currently consists of:

Winchester District Local Plan Part 1: Joint Core Strategy – Adopted March 2013;
Winchester District Local Plan Part 2: Development Management and Site Allocations - Adopted April 2017;
Winchester District Gypsy, Traveller and Travelling Showpeople Development Plan Document – Adopted February 2019;
Hampshire Waste & Minerals Plan – Adopted October 2013;
South Downs National Park Local Plan – Adopted July 2019.

The Local Plan policies relevant to each topic are listed in section 2 under each topic in the PEIRS. These generally appear to highlight the key policies, with the following exceptions:

- Topic 8 Biodiversity – Local Plan Parts 1 and 2 are not listed but include relevant policies, particularly LPP1 policies DS1, CP15, CP16 and CP17 and LPP2 policies DM23 and DM24;

- Topic 13 Drainage and Water Environment – policies from Local Plan Part 1 are wrongly listed under the 'emerging local plan' heading;

- No Supplementary Planning Documents appear to be listed. Those which may be most relevant within the City Council's area (outside the SDNP) are:

    - High Quality Places SPD 2015
    - Draft Air Quality SPD 2021
    - Kings Worthy and Abbots Worthy Village Design Statement 2007
    - Littleton Village Design Statement 2010
    - St Giles Hill Neighbourhood Design Statement 2020

<u>Cumulative Effects</u>
The expanded search area and list of 'other developments' is welcomed. This appears to cover the key developments within the City Council's area, with the exception of:

- The following site allocations/planning consents appear to be missed:

    - WIN8, land at Stanmore, Winchester (planning consents 17/00641/FUL and 18/01792/REM)
    - CC1, Sandyfields Nursery, Colden Common (planning consent 17/00641/FUL under construction)
    - NA2, The Dean, Alresford (various planning consents);

- Sir John Moore Barracks, Littleton – to be vacated and sold for development by MOD (although not part of a Local Plan allocation or planning application currently);

- There is a risk of overlap and double counting of schemes in the Station Approach, Winchester area. Local Plan Part 2 policy WIN5 sets out development principles for the Station Approach area as a whole, which is sub-divided into the 'Carfax' site and 'Cattlemarket' sites, with policies WIN6 and WIN7 setting out the respective requirements. Planning application ref 19/00601/OUT (ID1) also relates to the Carfax/WIN6 part of the area.

Steve Opacic
Strategic Planning Projects Officer
3.6.2021

Appendix J – Urban Design

I have reviewed the Highways England M3 Junction 9 consultation documents – Report ref: Preliminary Environmental Impact Information Report (PEIR) Date: May 2021, and as Urban Design I have no comments.

Considerations on design should be covered by Highways Authority and Visual Impacts by Landscape.

Regarding Sustainability, this is a matter outside of my area of expertise but I am assuming that, as an all-encompassing subject, it should be considered across all areas.