

# NH/24/07232 Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19)

From

Patrick Blake

To

Planning Consultation

Cc

Recipients

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Dear Surrey Heath Borough Council,

Thank you for inviting National Highways to comment on the Local Plan 2038 Pre-Submission Draft (Regulation 19).

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 M3, particularly junctions 3 & 4.

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.

We would be concerned if any material increase in traffic were to occur on the SRN or at its junctions because of planned growth within the borough, without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.

A Statement of Common Ground (SoCG) was signed between National Highways and Surrey Heath Borough Council (SHBC) in June 2024. In the SoCG, it was noted by SHBC that National Highways had been consulted on all stages of the modelling exercise from the Strategic Highways Assessment Report (SHAR). National Highways originally had questions regarding the M3 modelling in the SHAR, but these were resolved following further information provided by Surrey County Council regarding traffic which may detour off of the M3 as a result of modelled delays. Future modelling of M3 J3 and an operational analysis of the eastbound on- and off-slip arrangement taking account of the detouring traffic will be undertaken as and when sites come forward, subject to this, National Highways agreed to the findings and conclusions of the SHAR.

Our responses to Local Plan consultations are guided by relevant policy and guidance including the DfT Circular 01/2022 and National Planning Policy Framework (December 2023) (NPPF).

We have reviewed the available information, our comments are set out below.

## **Policy IN2 – Transportation**

National Highways welcomes the aim of this policy which is to ensure that new developments are positively designed for sustainable modes of travel. The promotion of development in locations where travel can be minimised and sustainable modes catered for is in line with DfT Circular 01/22. We welcome the explicit requirement for development to contain mitigation which maintains the safe operation and performance of the SRN where this is necessary, further reinforced by the requirements of policy IN1 for developments to provide necessary infrastructure or financial contributions to mitigate highway impacts. This policy also contains the requirement for proposed developments to include a Transport Assessment and Travel Plan. We would add that where a development is likely to place a significant number of trips through any SRN junction, early engagement with us at the scoping stage is recommended.

## **Housing Allocations**

We have reviewed the various housing allocation policies HA1-HA4 and note that there are none which are directly adjacent to the SRN. However, we would like to highlight that should unallocated development come forwards which is adjacent to the SRN, this will require early engagement with National Highways in relation to boundary concerns such as geotechnical matters, drainage and lighting.

## **Employment Allocations**

Policy ER4 supports the provision of a net increase in total employment use floorspace at Watchmoor Park, the single largest employment site in the Borough. This site is located close to M3 J4 which currently experiences congestion during the peak periods. It should be ensured that any application proposing an increase in employment use at Watchmoor Park includes a comprehensive assessment of the impact of the proposals on M3 J4 within the Transport Assessment. As a minimum, applications for floorspace increases here will need to include full turning movements of development traffic at M3 J4, and junction capacity assessments may be required for proposals with significant impact.

## **Transport Evidence Base & Infrastructure Delivery Plan**

To ensure that the Local Plan is deliverable, the transport evidence base should demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work forms a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation that the plan and its allocations are reliant upon has a reasonable prospect of delivery within the timescales of when the identified growth is planned. As noted above, significant work has been undertaken to date on the Strategic Highways Assessment Report (SHAR) and the progress of this has been reflected in a Statement of Common Ground (SCG07).

The July 2024 IDP document includes mention of schemes on the M3. It should be noted that National Highways has no currently committed schemes or proposals for M3 J3 or J4. However, as demonstrated in the SHAR (and agreed by NH in the SoCG), there is no reliance on any M3 schemes to demonstrate that the local plan and its allocations are deliverable (therefore sound).

The IDP states that SE Water have identified a need to find a way to transfer water across the M3. Any updates and progress with plans should be communicated to NH at an early stage so that comments can be provided.

We look forward to continued engagement with Surrey Heath Borough Council and Surrey County Council as the local plan progresses.

If you have any questions with regards to the comments made in this response, please do not hesitate to contact us via [REDACTED]

Regards

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