

M3 JUNCTION 9 NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECT

Written Representation

15 June 2023

1. Introduction

1.1 This report forms the Written Representation (1) of Winchester City Council (hereafter WCC) and is to be read alongside the Local Impact Report.

1.2 WCC is one of the host authorities for the M3 Junction 9 Improvement Scheme alongside Hampshire County Council and the South Downs National Park Authority.

1.3 WCC has also entered into a draft Statement of Common Ground (SoCG) with National Highways (hereafter 'the applicant').

2. WCC Views on the Proposal

2.1 Principle

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

- sustain future growth of the national, regional and local economy
- improve the resilience of the strategic network and
- reduce through traffic in the city, allowing the reallocation of road space to pedestrians and cyclists leading to improved air quality.

2.1.2 As identified within section 5.1 of the LIR, whilst the Development Plan does not contain a policy which specifically provides the principle of development (due to its scale and unique size), there is an acknowledgement that existing infrastructure and utilities need to be improved in countryside areas.

2.1.3 The overarching principle of development is therefore considered acceptable. However, it is important to highlight that a number of areas of concern and clarification remain and these are outlined in the sections below.

2.2 Matters of Concern

2.2.1 Climate

2.2.1.1 Section 5.2 of the LIR assesses the impact of Climate against local plan policy. The LIR concludes that in the absence of appropriate mitigation the proposal is not considered to meet relevant policies.

2.2.1.2 WCC consider the emissions from the construction and operational phases to be significant.

2.2.1.3 Insufficient mitigation has been proposed. This is a missed opportunity to introduce mitigation benefits including alternative fuel infrastructure (including electric vehicle charging) and Carbon Offsetting Funds.

2.2.1.4 Paragraphs 5.2.15 and 5.2.16 of the LIR provide suggestions of mitigation techniques and WCC will continue to work proactively with the applicant in order to achieve appropriate mitigation.

2.2.2 South Downs National Park

2.2.2.1 The parts of the site within the jurisdiction of WCC also form part of the setting of the South Downs National Park. As neighbouring authority, WCC is bound by the statutory duty in Section 11a of the National Parks and Access to the Countryside Act 1949 to consider the park's statutory purposes.

2.2.2.2 WCC wish to note the significant concerns raised by the South Downs National Park within their Local Impact Report and note the conflict with a number of South Downs Local Plan policies.

The SDNP have pro-actively requested further information in order to address the majority of concerns and WCC will review this additional information alongside neighbouring authority colleagues throughout the process.

2.3 Areas of Clarification

2.3.1 There are a number of areas where additional points of clarification are requested which are summarised in Table 1 below. Full details can be found within the LIR.

Table 1

Topic	Description of Clarification
Archaeology	<ul style="list-style-type: none"> ▪ Multiple areas across documents. ▪ Outlined within paragraph 5.3.7 of the LIR
Noise & Air Quality	<ul style="list-style-type: none"> ▪ Further assessment on alternative diversion routes. ▪ Mitigation delivered through measures within the Environmental Management Plan however Noise and Vibration Management Plan not provided. ▪ Dust impacts to be mitigated through Environmental Management Plan however details not yet provided.
Biodiversity	<ul style="list-style-type: none"> ▪ The applicant has worked closely with WCC Ecology Officers to provide further information. A number of results are awaited as outlined in paragraph 5.5.2 of the LIR.
Landscape	<ul style="list-style-type: none"> ▪ 3D visualisations of gantries – clarification on any available close-up views. ▪ Details of ground used for temporary haul road. Confirmation of the final topography (assuming haul road is retained) and soil testing to ensure that reinstatement can be successfully established is required.

2.3.2 Whilst no overarching objections are made in these relevant topic areas, full compliance and support cannot be confirmed until the clarification is received.

2.4 Areas of Agreement

2.4.1 Historic Environment

2.4.1.1 The assessment made is sound and thorough and no further points of clarification are requested.

3. Conclusion

3.1 Whilst the overarching principle of the scheme is agreed to achieve the outcomes of the Winchester Movement Strategy, there remain areas of concern and points of clarification which prevent WCC being able to confirm full support for the application based on the current submission (please see section 1.2 of the LIR).

3.2 WCC will continue to work with the applicant to discuss and review additional information and it is hoped this would include GHG mitigation measures.