

SDNPA Consultation Response

M3 Junction 9 Option 14

**Highways England Non Statutory Consultation dated
9 January – 19 February 2018**



Draft Response

1. The South Downs National Park Authority (SDNPA) notes that Highways England (HE) is consulting on a single option only for the M3 Junction 9 scheme. The proposal (option 14) is to provide free flowing road links between the M3 and the A34 both northbound and southbound. The new road connections will pass each other and the existing M3 via a combination of flyovers and underpasses. New embankments, cuttings and retaining walls will be required to achieve this.
2. Approximately 13-14 hectares of the South Downs National Park (SDNP) fall within the redline area of the proposals. (refer to **appendix 2**). This land is largely arable land, with some pasture on Easton Down and is located on the eastern and northern side of the proposals.

Assessment Stage

3. The assessment of impacts to date by HE has been carried out in accordance with the *Highways Design Manual for Roads and Bridges* (DMRB) process and is not a full Environmental Impact Assessment (EIA). In accordance with the work stages set out in DMRB the full EIA will not be prepared until the preferred option for the scheme has been selected. The following assessment is therefore based on the information made available to the SDNPA which is included in the consultation document released by HE on 9th January 2018 and other material provided subsequently to this. Further detailed assessment of the preferred route option will be undertaken by SDNPA in order to refine this early impact assessment of likely impacts to identify indicative mitigation and compensation.

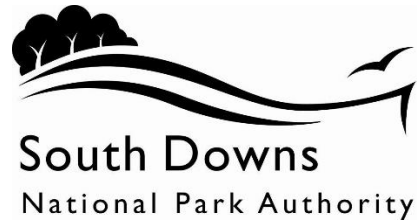
Summary SDNPA General Comments

4. The SDNPA has significant concerns about the proposals in relation to impacts on the SDNP. Winchester has a strong historic and cultural relationship with both the River Itchen and the surrounding downland. The cumulative impact of the expanding M3 conurbation and the long term and increasing severance, in terms of landscape, access and perception, together with loss of tranquillity and visual impact that this causes to the SDNP is a matter of great concern to the SDNPA. The expansion of transport infrastructure surrounding the M3 including several highway depots and the southern park and ride scheme have all added to the increasing loss of robust landscape character along the M3 corridor. HE are consulting on option 14 only, with all other options, including those which do not involve land take from the SDNP, having been rejected. This would be contrary to paragraph 116 of the National Planning Policy Framework (NPPF) on major development within National Parks and as supported by paragraphs 5.150 – 5.153 of the National Policy Statement for National Networks. Should there be over-riding reasons for proceeding with these proposals the SDNPA has set out a broad range of mitigation measures in paragraphs 42 to 57 whilst noting that this is not the SDNPAs recommended or preferred solution.
5. The M3 is a significant barrier between the population of Winchester and the National Park. This leads to increased recreational pressure on vulnerable and sensitive areas of land such as St Catherines Hill (SSSI, SAM) and the River Itchen (SAC, SSSI) on the west side of the M3 where human and canine disturbance is affecting the delicate ecosystems including for instance Odonata (dragonflies/damselflies), breeding birds, and bankside vegetation, to the

SDNPA Consultation Response

Highways England Non Statutory Consultation dated 9
January – 19 February 2018

M3 Junction 9 Option 14



detriment of the designations. The overuse and recreational pressure on these sites is also leading to erosion and the increased need for engineered solutions to increased wear and tear on paths and other structures.

6. The SDNPA notes that HE undertakes to mitigate for the impacts of the proposals however has not included any details of the proposed mitigation whilst also setting out broad statements about what mitigation should be. HE also does not include any commentary about compensation for the loss of land within the SDNP associated with option 14. Both mitigation and compensation measures should be set out by HE to enable the feasibility of broad statements and undertakings to be fully established. Of particular concern is the lack of available space and land within the red line for the installation of proper suds and filtration measures to capture the increased run off from the road surfaces in order to protect the SAC from water carried pollutants, and also the need to replace at least 6.5 hectares of lost tree planting within the same minimal areas.
7. The Government's publication of 'A Green Future: Our 25 Year Plan to Improve the Environment' includes the commitment to 'support development by embedding the principle that new development should result in net environmental gain....' The challenge and expectation is for HE to work up the details of mitigation and compensation to a sufficient standard to be enhancing for a National Park, in line with current guidelines, duties and HE's own ambitions.

Summary of Impacts on Special Qualities of the SDNP

Landscape and Visual Report (Appendix 4 and figures)

8. The Itchen Valley is a major landscape feature of the western end of the SDNP. It is one of the larger Wessex chalk streams and is noted for the stable flow, clarity and temperature of its waters. The valley forms a dramatic setting to Winchester where the downland and river valley pass into the centre of the city providing many outward looking views to the surrounding landscape from within the city itself.
9. SDNPA have undertaken an assessment of the Landscape and Visual impacts of the M3 Junction 9 option 14 scheme. At this stage SDNPA officers have been working on outline design drawings which are not full scheme designs. Therefore these are to be regarded as interim conclusions based on the information available at this time in accordance with the DMRB process.
10. Digital plots of theoretical visibility has been undertaken based on the outline route information provided by HE. Where possible this has taken into account the elevated sections of the route options at junctions and bridging points, and lowered sections where this information has been made available by HE. Please refer to **Appendix 9** Fieldwork has subsequently been undertaken to verify the results of the digital plots.
11. The ZTV plots show that the visual impact on the SDNP from the proposals are quite clearly structured along well defined view corridors. The corridors are closely related to the structured topography of the area. The south East, (Magdalen Hill Down & open access land above the southern water plant), to the immediate west and north west of the proposals (Winnall Moors Nature Reserve) and immediately to the east of the proposals from Easton Lane). The impact on views in the setting of the SDNP is wider as would be expected owing to the valley topography where there are views from the opposite valley side (eg access land

SDNPA Consultation Response

Highways England Non Statutory Consultation dated 9
January – 19 February 2018

M3 Junction 9 Option 14



adjacent to Whiteshute lane) views from PROW to the north east of the SDNP, adjacent to the new development at Bartons Farm, and the northern section of the new nature reserve at Bartons Farm are also significant, although at a distance.

12. It is noted that HE have discounted townscape assessments from the landscape assessment included in the consultation documents and this is queried by SDNPA given the information included in the authorities assessment.
13. Visual impacts on the Winnall Moors Nature reserve are likely to be significant adverse given the potential loss to construction of existing roadside trees; the elevated position of the proposals relative to the viewer, and the duration of views along the river valley and towards the proposals on the western valley side. All of which would increase the extent of views of both the M3 and the A34 existing and proposed routes. The increased visibility of traffic movement which draw the eye would also be a detrimental impact on views in the still flat landscape of the flood plain reserve.
14. The landscape character of the area is identified in the South Downs Integrated Character Assessment as being in two landscape types – the Open downland (Type A) to the east and the chalk valley of the Itchen corridor (Type E).
15. Type A Open downland - Of particular sensitivity is the remote and tranquil character of the *East Winchester Open Downland* which is threatened by its proximity to Winchester and numerous transport routes. Observable changes in the past have included the introduction and upgrading of major roads, including the M3, A272, and A31 which have severed the landscape and created some incongruous cuttings and bridges.
16. The location of this area close to Winchester, and the proximity of the M3, A31 and A272, makes it potentially accessible by a large number of users. However, these same roads provide barriers to movement on foot/ horseback. There is a relatively sparse network of public rights of way, although those that exist are important – for example the South Downs Way national trail.
17. Type E Chalk Valley Systems provide a sheltered environment that contrasts with the exposed character of the surrounding downs. The rising valley sides, small field sizes, presence of hedgerows with hedgerow trees, and woodland all contribute to the enclosed and secluded character. The chalk rivers typically exhibit gentle meanders, open floodplains, and flood meadows which together create the typical pastoral character of the valley landscape. However, the sense of tranquility is often eroded by the presence of traffic on the main transport routes that occupy the valley floors, plus the presence of settlement, and small scale development along the valleys.
18. The loss of existing trees from the land surrounding the existing A34/M3 junction would have significant impacts on the character of the landscape of the SDNP particularly from within Winnall Moors Nature reserve where the loss of screening of 2 major roads would contribute to increased loss of tranquillity and stillness in an area which is already vulnerable to these impacts. In addition the dominance of the road corridors would be emphasised by this loss and further exacerbated by the imposition of roads sections at height, in cutting above the existing route and associated lighting, signage and gantries which have yet to be identified. HE have undertaken to replace lost tree plantings on a like for like basis, although

SDNPA Consultation Response

Highways England Non Statutory Consultation dated 9
January – 19 February 2018

M3 Junction 9 Option 14



this is not shown in the consultation documents & the land availability for this has not been ascertained.

19. Alterations to the topography of the valley side associated with the southbound M3 slip road which is shown in a 7m deep cutting along the eastern valley side would affect the 'whale backed'¹ quality of the downland which due to the chalk geology would also be highly visible and difficult to screen. The cuttings for Twyford Down are still not fully vegetated after 20+ years for example and are recognised as significant scars in the landscape which sever its continual character.
20. The site compound is a significant risk to the SDNP in that it effectively over spills the valley setting of the existing motorway and associated infrastructure. This is a key issue in assessing the impacts on the SDNP as any overspill beyond the river valley exposes the wider SDNP to impacts from the M3 Corridor in an area of the park which has already been severely damaged by its presence. Whilst the compound and its impacts would be temporary for the duration of the works the future land use of the site would need to be protected from opportunist development proposals.
21. It is noted that HE have emphasised the need to develop the route options to avoid the HE depot located immediately to the north west of the junction which apparently 'avoids the environmental impacts arising from the potential need to relocate this facility' this seems to be a missed opportunity in minimising the environmental harm to the SDNP and also in terms of the loss of land to the landscape corridor of the M3, which is under significant pressure.
22. The proposals do not show any compensation for the loss of land within the SDNP.
 - All compensation should be designed from an ecosystem services approach where the proposals are designed to create multiple benefits to the functions of the landscape.
 - Compensation land parcels should be designed to restore robust landscape character of the chalk river valley and associated downland setting by integrating with the surrounding hedgerow and woodland pattern and character and proposals should be synchronised with habitat creation, as part of any scheme.

Biodiversity (Appendix 5)

23. The SDNPA Landscape and Biodiversity Lead (water) commissioned a data search from the Hampshire Biodiversity Information Centre (HBIC) and carried out an ecological desk-based assessment for the proposed Junction changes and area of influence.
24. Due to the range of potential options a search area 2km from the current Junction has been undertaken. All routes would be likely to have a significant negative impact on biodiversity: priority habitats, protected species, protected sites, semi-natural habitat extent, quality and connectivity, and populations of native species, these impacts will need to be fully assessed based on robust baseline information and field surveys to inform the initial route selection.

¹ Kipling 1902

SDNPA Consultation Response

Highways England Non Statutory Consultation dated 9
January – 19 February 2018

M3 Junction 9 Option 14



25. Controlling the spread of ‘invasive non-native species’ is important, and the location and managed removal of these 16 species listed on Schedule 9 of the Wildlife and Countryside Act in England and Wales will need to be implemented prior to clearance or construction work which might otherwise aid their dispersal through the area.
26. Impact of the proposal on water purification - The loss of existing mature trees and scrub will impact upon the capacity of the landscape to provide this service. In addition very careful attention needs to be made to the design, function and layout of the drainage associated with the motorway Junction proposals. There is a very significant risk that this will exacerbate the existing problems due to run off to soakaways and the potential for pollution of the SAC. Every effort should be made to mitigate the impact upon water quality that might result from surface run-off from the road network. This can be by way of careful design of the scheme to mitigate these measures, as well as a focus on retaining and enhancing the landscapes natural ability to mitigate these impact. This could be achieved by either retaining, or supplementing, tree and surface vegetation that would be lost within the red-line of the scheme.

Archaeology/Cultural Heritage (Appendix 6)

27. The South Downs National Park Authority (SDNPA) commissioned Regini Heritage to assess the Desk-Based Assessment (DBA) of cultural heritage undertaken by HE in relation to the proposals.
28. The review has concluded that;
The SDNPA welcomes the inclusion of the Desk Based Assessment in its consideration of cultural heritage aspects of this scheme. In future National Infrastructure schemes the SDNPA wishes that the commissioning body submits its Cultural Heritage Desk Based Assessment to SDNPA in good time for review to allow a more effective and efficient response to be obtained;
29. That Highways England confirm the sources of Historic Environment data in these two reports and which HER takes precedence in their studies;
30. That the overall impact on the historic landscape is considered by Highways England, in either this or the landscape aspect of its reports;
31. That mitigation of the impact on archaeological assets must be undertaken in accordance with:
 - a. The Solent Thames Research Framework
 - b. The advice of the Scientific Adviser of Historic England South East
 - c. The advice of the Winchester City Archaeologist and other agent of the SDNPA, as advised to Highways England in due course
 - d. Written Schemes of Investigation to be approved by the SDNPA’s agent, to be advised to Highways England
 - e. Archaeological works to be programmed as early as possible to allow preservation by record where preservation by design is not feasible
32. That the evidence for the impact of this scheme on Registered Parks and Gardens and Conservation Areas in the SDNPA and within 1km of the Junction 9 scheme be captured by HE commissioning suitable Conservation Management Plan (for Worthy Park) and

SDNPA Consultation Response

Highways England Non Statutory Consultation dated 9
January – 19 February 2018

M3 Junction 9 Option 14



Conservation Area Appraisals and Management Plans for Abbots Worthy, Martyr Worthy and Easton;

33. That appropriate levels of resource are provided by Highways England through the Development Control Order, if granted, to undertake a programme of engagement, publication and exhibition and learning resources to support the SDNPA in achieving its statutory purposes.

Impacts on Non-Motorised Users (Access) (Appendix 7)

34. Current Situation. The M3 is both a visual and physical barrier to accessing the National Park to the east of the motorway. Existing routes for non-motorised users (NMUs) are limited and/or severely compromised.
35. There are few circular routes for cyclists and equestrians and no facilities for users with restricted mobility, for example access for all paths.
36. HE acknowledge severance caused by the existing highways estate and in particular the arrangements at junction 9. The report does not address the poor quality of this access and claims good connectivity with the National Park via footpaths such as the Itchen Way and St Swithun's Way despite evidence of loss of path width due to erosion on the river bank, low headroom and proximity to fast moving traffic.
37. Tourism and recreation are not considered to be impacted by the current situation or the proposed scheme. Our findings suggest otherwise: severance caused by the motorway is likely to contribute to the recreational pressures experienced on fragile sites such as Winnall Moors and St Catherine's Hill to the south as recreational users are deterred from visiting parts of the National Park east of the M3
38. The proposed scheme for junction 9 offers immediate benefits from what is available now for cyclists and arguably wider NMu access across the junction, and HE should look more widely at improving access through the immediate area (including the South Downs Way National Trail) and more routes in the vicinity of the proposals
39. Overall the scheme will result in a much extended junction with the addition of several new carriageways. This may deter NMu access into the National Park particularly for those on foot.
40. The two long distance routes (St Swithun's and Itchen Way) which connect the city with the South Downs in this area are severely impacted by the presence of the A34 and A33 carriageways. Access mitigation and enhancement should focus on these routes as the closest to the scheme and the issues of headroom, accessibility, path width, surfacing, and protection from proximity to fast moving traffic should be addressed. As both routes pass through or adjacent to sites managed by HIOWWT, the Wildlife Trust's input into to any proposed access enhancements will be essential

Woodland and existing trees (Appendix 8)

41. The existing tree and woodland cover on the work site, and surrounding it, provides vital visual screening for the roads themselves, but also plays a significant role in acting as a buffer to the significant noise generated by the vehicles on the roads 24 hours a day, and in absorbing significant quantities of pollution at the same time. We should also not ignore the

SDNPA Consultation Response

Highways England Non Statutory Consultation dated 9
January – 19 February 2018

M3 Junction 9 Option 14



carbon which they also lock up, further helping to offset some of the environmental consequences of the vehicular burning of fossil fuels.

42. The methodology being applied to assess the relative quality of the arboricultural resource at this stage is solely based on desk based methods. This means that it is not possible to make any more than the most basic of assessments, and though this is acknowledged in the documents and further ground based survey recommended as the preferred option is being explored, it is not possible to attribute any confidence in the value assessments at this stage. BS5837: 2012 (trees in relation to construction) gives a more effective value assessment, which also includes consideration of cultural and environmental values.
43. Option 14 would result in the loss of 6.35 ha of existing tree planting /woodland. Compensatory planting has been alluded to, but no detail provided as to where this will be, or what it might be comprised of.
44. It is likely that with the increased heights of the development it will not be possible to adequately screen the development with trees from key viewpoints, not even into the longer term.
45. More thorough assessment of this must be made clear at this early stage, and further consideration to mitigation to be factored in as soon as possible.

Tranquillity (Appendix 10)

46. Tranquillity is a perceptual quality of the landscape, and is influenced by things that people can both see and hear in the landscape around them. It is considered to be a state of calm, quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence that it helps to promote health and well-being. As a special quality of the National Park, it is a characteristic of the landscape that visitors and residents greatly value. These are not characteristics that apply uniformly across the whole National Park, some areas are considered more tranquil than others based on a wide number of influences.
47. A site based assessment was undertaken by SDNPA officers. This assessment considered the area in the context of the road corridor as it is currently configured, and how tranquillity is currently experienced. Officers then considered the direct impacts of the scheme on some of the factors that currently enhance the tranquillity of the area – such as landform or screening by existing bands of mature trees. From this it is possible to interpolate how the scheme would impact upon current levels of tranquillity, and the characteristics that are most susceptible to change from increased noise or visual impact.
48. The site assessment considered five locations that would be affected by the extent of construction, two directly on the road corridor, two more areas immediately adjoining and one that considered more distant impacts (Refer Appendix X).
49. **Winnall Moors Nature Reserve (south):** At present the more negative visual and auditory impacts of the road are screened or softened by the trees and mature scrub in the distance. It is likely that these will be lost as a result of the proposed scheme. This will have a significant negative impact on tranquillity at this location as the negative visual and auditory impacts of the road corridor will have an increased influence across this area.

SDNPA Consultation Response

Highways England Non Statutory Consultation dated 9
January – 19 February 2018

M3 Junction 9 Option 14



50. **Winnall Moors Nature Reserve (north):** Though this area adjoins, and is crossed by, the major road corridor it is enclosed and wooded. It is still possible to experience a positive experience in terms of tranquillity due to the existing landform, the influence of the river valley, existing tree cover and the way the road network currently sits within the landscape. The regrading of the roads, proposed changes in topography, and loss of landscape trees and screening will exacerbate these negative impacts on the tranquillity of the area.
51. **Easton Down:** This area is bisected by the M3 carriageway (northbound) though once again the Itchen River corridor exerts a strong positive influence. The area has a very enclosed feel and exhibits many positive qualities that lessen and mitigate the roads wider impacts upon tranquillity.
52. **Magdalen Hill:** The road corridor has much less of an influence on tranquillity at this distance in terms of noise or visual detractors. Road noise from the B3404 is far more intermittent, and road noise from the M3 corridor is far more distant and moderated. It is possible to experience many of the visual and auditory factors that make a positive contribution to tranquillity.
53. **Impact of the proposals on the current situation –** The proposed scheme would firstly cause the loss of many of the mature trees and areas of scrub that currently provide noise regulation benefits. This would increase the current issue around road noise. In addition by raising some sections of the A34/A33 onto an embankment across the Itchen Valley this will be further exacerbated. The M3 corridor at this section will also become more prominent both visually and in terms of noise impact. There is a strong case to either retain, or replant, tree and vegetation that would be lost within the red-line of the scheme.