

OWSLEBURY PARISH COUNCIL STATEMENT ON THE EASTLEIGH LOCAL PLAN

(Matter 6. Main Issue: Does the Plan take a justified and suitably evidenced-based approach to strategic transport, infrastructure and delivery?)

Owslebury, an ancient village with strong links to agriculture, boasts 62 listed buildings and monuments, mostly adjoining roads through the village and outlying hamlets. The parish of just under 1000 inhabitants is located approximately 2 miles from Eastleigh Borough's northern border and is set within the South Downs National Park (SDNP), acting as a leisure hub for walkers, horse riders and cyclists accessing the amenities of the Park. The network of footpaths that surround and traverse the village include the medieval heritage trail, the Pilgrim's Trail, and the Monarch's Way. The Owslebury Equestrian Centre, Owslebury Farm Livery, Graywood Carriage Driving Centre and numerous private stables use the local lanes and bridleways, such as Water Lane, for recreation. Many cycling clubs use the roads through Owslebury for competition events.

The village is already affected by heavy commuter traffic flows during peak hours as drivers seek to circumvent traffic blockages on the main roads linking Winchester to surrounding population centres. Given the narrowness of the road through the village, which is mostly single track, and the absence of pavements, this has serious adverse effects in terms of safety (the primary school is accessed from the road), noise, pollution and the rural character of the environment. The density of traffic is also evidenced by the erosion of verges along the narrow lanes.

Since our earlier assessment of the Eastleigh Local Plan and the traffic implications for Owslebury, there have been several developments. The SDNP has published its Local Plan while Eastleigh has made significant textual amendments to its proposals (E32) and issued traffic projections for local roads within the National Park (E18). In the light of these developments we wish to elaborate on our concerns regarding the traffic consequences of the Eastleigh Plan for Owslebury.

Eastleigh's traffic assessment identifies Owslebury as the worst affected community in terms of projected incremental traffic flows. As of today the daily traffic flow through the village is around 1550 vehicles in both directions. Eastleigh's assessment projects an increase in daily

vehicle movements of 1229 or 79% on completion of the Plan. Such an increase implies severe damage to the local environment in terms of noise, pollution and congestion as well as heightened safety risks for residents, walkers, horse riders and cyclists. (DM1, DM13, S5, in conflict with NPPF 2018, para 8, cited below).

A summary of key traffic data, comparing today's flow with Eastleigh's projections is given below (more detailed data and a note on methodology is provided in the Appendix to this Statement.)

	1 day snapshot October 2019	EBC Plan Modelling	Uplift vs October 2019
Total vehicles 12 hours 7am to 7 pm	1551	2780	79%
Peak single direction flow (vehicles/hr) morning	492	882	79%
(<i>vehicles/minute</i>)	8.2	14.7	79%
Peak single directions Flow (vehicles/hr) afternoon	240	430	79%
(<i>vehicles/minute</i>)	4.0	7.2	79%
% Opposite direction vehicles @ peak morning	5%	5%	0%
% Single direction vehicles @ peak morning	95%	95%	0%

From the above it is apparent that implementation of the EBC Plan would have dramatic consequences for traffic flows through Owslebury. The average daily passage of vehicles is projected to increase by 79% to nearly 2800 but the really startling figure is the projected figure for the morning traffic peak when nearly 900 vehicles per hour are expected to pass through the village, equivalent to approximately 1 car every four seconds. Furthermore, 95% of this traffic is single direction. This means that traffic mitigation measures, which typically rely on opposing flows to slow traffic, would have a negligible if any impact on the continuous stream of vehicles through Owslebury.

Eastleigh's assessment suggests that projected traffic flows may be overstated because the model used does not identify single track roads (E18). The reasoning here is that such roads are likely to become congested to the point where travel times are increased and road users are persuaded to use alternative routes. This is hardly a reassuring prospect either for residents or leisure road users and the suggestion that traffic would be diverted is not evidence based. On the contrary, drivers are not currently put off by congestion on village lanes as they seek to avoid traffic light queues on the main roads to and from Winchester. It is therefore difficult to see why this behaviour would change in the future given the extra 27000 daily traffic movements likely to be generated by the Eastleigh development.

Eastleigh's assessment also points out that its traffic projections do not take account of any mitigation measures that may be introduced (E18). However, a recent study on behalf of Hampshire County Council (Bramshaw Village Traffic Calming Proposal Appraisal Report, July 2017) states that conventional traffic calming measures such as road bumps, build-outs, chicanes and pinch points can be counter-productive, since they are liable to create traffic queues as well as additional noise and emissions as cars brake and accelerate (they can also present problems for agricultural vehicles and cyclists). The study's conclusion is that such limited mitigation interventions as are practicable are likely to have only a 'slight' effect on traffic (Appraisal Report at 5). It should also be pointed out that mitigation measures such as those referred to would have the effect of urbanising the village and thereby damaging its rural character.

The need to protect the rural character of roads within the National Park is recognised in the revised wording of the Eastleigh Plan (E32). Para 4.30 states that "it will be necessary to conserve and enhance the rural character of the roads, discourage use of minor roads as through routes and ensure the cohesiveness of communities." This aim is further supported by Hampshire County Council in its Local Transport Plan (3, part A) which "commits to enhancing the rural character of highways in the National Park..." (cited in SDNP Transport Background Paper at 4.5).

Roads within the National Park have also been given special protection by the SDNP Local Plan when they qualify as "historic rural roads". According to the SDNP Local Plan adopted in July "historic rural roads" within the Park are "those roads outside towns shown in the Second Edition of The Ordnance Survey which have not undergone significant widening or

straightening in the intervening period" (Section 6.28). The relevant Ordnance Survey map is the 6 inch to mile, England and Wales Map of 1891-1914 and from this it is evident that the roads through and around Owslebury, Jackmans Hill and Whaddon Lane have not changed 'significantly'.

Since these roads are historic rural roads, or "landscape heritage assets" as they are described in the South Downs Local Plan Transport Background Paper of September 2017, they enjoy special protection. According to the SDNP Local Plan, where developments would affect traffic on such roads, "it must be demonstrated that the changes to traffic levels and patterns arising from the development would conserve and enhance the ecological, landscape and recreational value of those roads." (Section 6.31).

The SDNP Transport Background Paper also states that historic rural roads "are essential to delivering the National Park's second purpose ["to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public"] since they form part of almost any rural walk, horse or cycle ride." This is a precise description of the recreational use made of the road through Owslebury.

In conclusion, the Eastleigh plan would generate large incremental traffic flows within the National Park. The Plan fails to "conserve and enhance" the rural character of roads in and around Owslebury as required by the SDNP Local Plan, Hampshire County Council's Local Transport Plan, and the Eastleigh Plan itself (revised wording of para 4.30). Furthermore the Plan fails to take account of "historic rural roads" as landscape heritage assets whose protection, according to the SDNP, is essential to delivering the National Park's statutory purpose. The development proposal is therefore in breach of Section 62 of the Environment Act 1995 which requires local authorities to have regard to the statutory purposes of national parks. Finally, the traffic implications for the SDNP are also in conflict with Para 8 of the NPPF 2018 which requires planning authorities to recognise "the intrinsic character and beauty of the countryside" and "to contribute to conserving and enhancing the natural environment."

Nor can the obligation to "conserve and enhance" the rural character of historic rural roads within the National Park be met through mitigation measures. Mitigation implies damage limitation but the duty imposed on planning authorities is to prevent **any** damage to the

ecological, landscape and recreational value of protected roads. Furthermore, as indicated above, traffic mitigation measures are typically counter-productive and certainly cannot be expected materially to affect the traffic flows through Owslebury.

The NPPF 2018 (para 109) states that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe.” In view of the projected 79% increase in traffic movements through Owslebury we submit that the severity test is met in this case and that the Eastleigh Plan, as it affects our village, its historic rural road network, and the surrounding countryside, is therefore unsound.