

Public Document Pack

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16 February 2022

Communities, Highways and Environment Scrutiny Committee

A meeting of the Committee will be held at **10.30 am** on **Thursday, 24 February 2022** at **County Hall, Chichester, PO19 1RQ**.

Note: In response to the continuing public health measures, there will be limited public access to the meeting. Admission is by ticket only, bookable in advance via: democratic.services@westsussex.gov.uk).

The meeting will be available to watch live via the Internet at this address:

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Tony Kershaw
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Agenda

- 10.30 am 1. **Declarations of Interest**
- Members and officers must declare any pecuniary or personal interest in any business on the agenda. They should also make declarations at any stage such an interest becomes apparent during the meeting.
- Consideration should be given to leaving the meeting if the nature of the interest warrants it. If in doubt, please contact Democratic Services before the meeting.
2. **Minutes of the last meeting of the Committee** (Pages 5 - 8)
- The Committee is asked to agree the minutes of the meeting held on 19 January (cream paper).
3. **Urgent Matters**
- Items not on the agenda which the Chairman of the meeting is of the opinion should be considered as a matter of urgency by reason of special circumstances, including cases where the Committee needs to be informed of budgetary or performance issues affecting matters within its terms of reference, which have emerged since the publication of the agenda.
4. **Responses to Recommendations** (Pages 9 - 10)

The Committee is asked to note the responses to recommendations made at the 19 January meeting from Democratic Services.

10.40 am 5. **Proposed Response to the National Highways Consultation on A27 Arundel Bypass** (Pages 11 - 72)

The Committee is asked to scrutinise the draft consultation response, prior to Cabinet taking a decision on 15 March.

The County Councillors for Arundel & Courtwick, and for Fontwell, have been invited to join the Committee for the item.

12.40 pm 6. **Requests for Call-in**

There have been no requests for call-in to the Scrutiny Committee and within its constitutional remit since the date of the last meeting. The Director of Law and Assurance will report any requests since the publication of the agenda papers.

7. **Possible Items for Future Scrutiny**

Members to mention any items which they believe to be of relevance to the business of the Scrutiny Committee, and suitable for scrutiny, e.g. raised with them by constituents arising from central government initiatives etc.

If any member puts forward such an item, the Committee's role at this meeting is just to assess, briefly, whether to refer the matter to its Business Planning Group (BPG) to consider in detail.

12.50 pm 8. **Date of Next Meeting**

The next meeting of the Committee will be held on 2 March at 10.30 am at County Hall, Chichester. Confirmed agenda items include:

- Strategic Options for Processing of Separate Food Waste and Other Waste Disposal Services and Update on Joint Strategic Approach
- Proposals to Permanently Adopt the Booking Scheme Piloted at some Recycling Centres
- Highways Improvement Programme Review
- Quarterly Performance and Resources Update (Quarter 3).

To all members of the Communities, Highways and Environment Scrutiny Committee

Webcasting

Please note: this meeting is being filmed for live and subsequent broadcast via the County Council's website on the internet. The images and sound recording may be used for training purposes by the Council.

Generally the public gallery is not filmed. However, by entering the meeting room and using the public seating area you are consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes.

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Communities, Highways and Environment Scrutiny Committee

19 January 2022 – At a meeting of the Communities, Highways and Environment Scrutiny Committee held at 10.30 am at Virtual meeting with restricted public access.

Present: Cllr Britton (Chairman)

Cllr Oakley, arrived at 10.32am	Cllr Greenway	Cllr Oxlade
Cllr Albury	Cllr Kenyon	Cllr Patel
Cllr Ali	Cllr Milne	Cllr Quinn
Cllr Baldwin	Cllr Oppler, arrived at 10.34am	

Also in attendance: Cllr J Dennis and Cllr Urquhart

Part I

33. Chairman's Introduction

33.1 The Chairman welcomed Cllr Oxlade as a newly appointed member of the Committee and thanked his predecessor, Cllr Baxter, for her contributions to the work of the Committee, Business Planning Group and Task and Finish Group.

34. Declarations of Interest

34.1 In accordance with the Code of Conduct the following interests were declared:

Cllr Oxlade declared a personal interest in Item 6 as an employee of the Manor Royal Business District (BID).

Cllr Baldwin declared a personal interest in Item 8 as a member of Horsham District Council.

35. Minutes of the last meeting of the Committee

35.1 Resolved – that the minutes of the Committee held on 24 November 2021 be approved as a correct record, and that they be signed electronically by the Chairman following the meeting.

36. Responses to Recommendations

36.1 The Committee noted the responses to recommendations made at the 24 November 2021 meeting from the Leader of the County Council, Cabinet Member for Community Support, Fire and Rescue, Cabinet Member for Environment and Climate Change and the Cabinet Member for Highways and Transport.

37. Appointment to the Business Planning Group

- 37.1 Cllr Oxlade's appointment to the Business Planning Group was confirmed as the Labour Group's new representative, in replacement of Cllr Baxter.

38. Final Report of the Northern Runway Task and Finish Group

38.1 The Chairman thanked officers and members of the Task and Finish Group for their contributions at the Group's meeting on 10 November 2021, before the Group's recommendations were presented at a meeting of Cabinet on 16 November.

38.2 The Committee considered the final report of the Northern Runway Task and Finish Group, and the response to the recommendations.

38.3 Summary of responses to members' comments and questions: -

- Mike Elkington, Head of Planning Services, confirmed that the requirement to safeguard land for a runway to the south of the airport is a matter for Government and outside the scope of the consultation by Gatwick Airport Limited (GAL). Any issues relating to the areas to be safeguarded and impacts on the Manor Royal Business District (BID) are a matter for Crawley Borough Council. GAL's intentions to expand in the future using a full runway to the south is a separate matter. Mr Elkington concluded that the County Council's response to the consultation suggests that GAL should make it clear that it only intends to expand using the existing runways and that, as a consequence, it will not pursue expansion using a full southern runway.
- It is expected that GAL will provide an update on its proposals in early Spring, following consideration of the consultation responses.
- Members expressed disappointment in GAL's proposals and believed they lacked detail at the consultation stage. Members await clarity about the scheme and its potential impacts.

38.4 Resolved – that the Committee noted the report.

39. Final Report of the On-Street Parking Management Task and Finish Group

39.1 As Chairman of the Task and Finish Group, Cllr Oakley gave an overview of the Group's work and thanked officers for their support.

39.2 Introduced by Cllr J Dennis, Cabinet Member for Highways and Transport, the Committee considered the final report of the On-Street Parking Management Task and Finish Group, and the response to its recommendations.

39.3 Ninesh Edwards, Senior Advisor, addressed member concern regarding the rationale for the Task and Finish Group meeting to be held in private and not in public on 2 November 2021. Mr Edwards clarified that the Group's formation was first advertised in the papers for the Committee meeting on 30 September 2021, and this

was the opportunity for members to decide whether or not the Group should meet in public or private.

39.4 Summary of responses to members' comments and questions: -

- Cllr J Dennis, Cabinet Member for Highways and Transport, re-affirmed that the County Council's decision-making process for determining the threshold of Controlled Parking Zone applications is democratic and representative of local residents by way of consulting the appropriate County Councillors.
- It was advised that decisions should clearly communicate how residents' views have been considered to build public confidence and trust in the decision-making process.
- Miles Davy, Parking Manager, confirmed that it is anticipated the strategy will undergo a review in at least two years' time. Mr Davy stressed to the Committee that the 50% consultation response threshold is an aspiration at this stage, and that the policy has been designed to be flexible.
- Mr Davy confirmed that the percentage result of all consultation responses will be publicised as part of a detailed statutory decision report.

39.5 Resolved – that the Committee: -

- i. Asked that in future, members' attention should be drawn to the option of holding Task and Finish Groups in public or private.
- ii. Agreed that a review of the strategy should be added to the Business Planning Group's 2023/24 work programme for initial scrutiny in March 2024.
- iii. Noted the report.

40. Forward Plan of Key Decisions

- 40.1 Cllr Urquhart, Cabinet Member for Environment and Climate Change clarified that the street sweeping contract involves the recycling of the sweepings collected by District and Borough Councils.
- 40.2 The Cabinet Member for Highways and Transport promised to look into the maintenance routine for road signage cleaning and repairs, as previously raised by Cllr Quinn.
- 40.3 Resolved – that the Committee noted the Forward Plan of Key Decisions.

41. Work Programme Planning and Possible Items for Future Scrutiny

- 41.1 The Cabinet Member for Highways and Transport explained that the West Sussex Transport Plan had been due to be scrutinised at this meeting, but has been re-scheduled for consideration at the 24 February meeting as the report wasn't finalised in time.

42. Requests for Call-in

Agenda Item 2

- 42.1 The Chairman noted the recommendations agreed as part of item 7 during the Committee's earlier discussion.

43. Date of Next Meeting

- 43.1 A special meeting of the Committee will be held on 24 February 2022 at 10.30 am at County Hall, Chichester.

The meeting ended at 11.28 am

Chairman

Responses to Recommendations

Response from Democratic Services		
Agenda item	Communities, Highways and Environment Scrutiny Committee recommendations (19 January 2022)	Response
Final Report of the On-Street Parking Management Task and Finish Group	1. Asked that in future, members' attention should be drawn to the option of holding Task and Finish Groups in the public domain or privately.	The informal guidance for Task and Finish Groups is currently being revised. This will set out the different options for how these work, including meeting and reporting arrangements. The revised guidance will be shared with all members.
	2. Agreed that a review of the strategy should be added to the Business Planning Group's 2023/24 work programme for initial scrutiny in March 2024.	Noted.

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Communities, Highways and Environment Scrutiny Committee

24 February 2022

A27 Arundel Bypass - Consultation Response

Report by Director of Law and Assurance

Summary

National Highways is undertaking a consultation on a Preliminary Environmental Information Report for its preferred route for a A27 Arundel Bypass. The County Council will be submitting a consultation response, the final version of which Cabinet will consider and approve when it meets on 15 March.

Focus for Scrutiny

Particularly in respect of paragraphs 2.36-2.106 of the attached draft decision report and the detailed comments on the PEIR in Appendix C, the Committee is invited to consider on how well the draft consultation response:

- 1 Aligns with the plans, policies, and strategic priorities of the Council.
- 2 Addresses the likely significant impacts of the scheme on the Council's duties, responsibilities, and services.
- 3 Addresses the likely significant impacts of the scheme, both local and wider, on the economy, environment, and communities of West Sussex.

Proposal

1 Background and context

Cabinet plans to approve the Council's consultation response at its meeting on 15 March 2022, after giving due consideration to the Committee's feedback and how well this has been addressed in the response.

The background and context to this item are set out in the attached draft decision report (listed below), including resource and risk implications, Equality, Human Rights, Social Value, Sustainability and Crime and Disorder Reduction Assessments

Tony Kershaw
Director of Law & Assurance

Agenda Item 5

Contact Officer: Ninesh Edwards: ninesh.edwards@westsussex.gov.uk

Appendices

Appendix 1: A27 Arundel Bypass: approval of consultation response – Draft Decision

Background papers

None

**Key decision: Yes
Unrestricted
CABXX 21-22**

Report to Cabinet

March 2022

National Highways' consultation on A27 Arundel Bypass: approval of WSCC consultation response

Report by Matt Davey, Director of Highways, Transport and Planning

Electoral division(s): Fontwell, Arundel & Courtwick

Summary

In 2020, National Highways (formerly Highways England) announced the preferred route for the A27 Arundel Bypass, which would replace the existing, largely single carriageway road with approximately 8km of dual two-lane carriageway starting at Crossbush in the east and reconnecting in the west near the A27/A29 Fontwell (east) roundabout. Following construction of the bypass, approximately 6.6km of the existing A27 would be 'detrunked' and converted to a local road as part of the proposed scheme.

The scheme is a Nationally Significant Infrastructure Project (NSIP) requiring a Development Consent Order (DCO) from the Secretary of State (rather than planning permission from the local planning authority). The County Council is a statutory consultee in the DCO process and it has specific responsibilities as a 'host' authority.

In advance of an application for consent being submitted, National Highways is undertaking formal consultation from 11 January to 8 March 2022 on the proposed scheme and a Preliminary Environmental Information Report (PEIR), which identifies the likely significant impacts and any required mitigation.

A detailed analysis of the PEIR has been undertaken, with consideration being given to likely significant impacts (both direct and indirect) and whether those impacts are considered to be positive, negative, or neutral (taking into account any proposed mitigation measures). Consideration has also been given to whether further work could be undertaken by National Highways, including mitigation measures, to address issues identified as being significantly negative.

In summary, although the County Council gives 'in principle' support to the current scheme for an A27 Arundel Bypass, there are a number of matters of concern that need to be satisfactorily addressed by National Highways in advance of submission of the DCO application. These include: the requirement for key transport-related technical documents; potential adverse impacts resulting from the re-distribution of traffic on local roads; clarity about elements of the construction phase; the de-trunking strategy and opportunities to provide mitigation and wider enhancement measures; understanding how local people and supply chains can benefit and the

potential impact on local businesses and potential mitigation; impacts relating to noise and air quality; consultation on a number of Environmental Impact Assessment (EIA) methodologies; the scope for enhancement measures over and above those required to mitigate impacts; mitigation options to reduce the impact on the national carbon budget; and measures for climate change adaptation and resilience.

Recommendation

That Cabinet:

- (a) approves the comments in paragraphs 2.36-2.106 of the report and the detailed comments on the PEIR in Appendix C of the report as the County Council's formal response to the consultation on the A27 Arundel Bypass;
- (b) authorises the Director of Highways, Transport, and Planning to respond to any further stages of pre-submission consultation, in consultation with the Cabinet Member for Environment and Climate Change - in support of the formal response approved under (a);
- (c) if an application for a Development Consent Order is submitted, authorises the Director of Highways, Transport, and Planning to:
 - (i) approve the County Council's 'adequacy of consultation' response;
 - (ii) prepare and submit the County Council's written representation and Local Impact Report; to negotiate with the applicant on the DCO requirements, any S106 Agreement, and the preparation of a Statement of Common Ground; and to comment on the written representations of third parties – all in support of the formal response approved under (a);
 - (iii) attend the examination hearings and answer the Examining Authority's questions in support of the County Council's position; and
- (d) if a Development Consent Order is made, approves 'in principle' the County Council becoming a relevant authority for the discharge of requirements.

Proposal

1 Background and context

- 1.1 In 2012, the Planning Inspectorate (PINS) became the agency responsible for operating the planning process for nationally significant infrastructure projects (NSIP). NSIPs are usually large-scale developments such as new harbours, power generating stations, and electricity transmission lines, that require 'development consent' from the relevant Secretary of State under the Development Consent Order (DCO) process, rather than planning permission from the relevant planning authority.
- 1.2 Any developer wishing to construct an NSIP must submit an application for consent. Following submission, PINS examines the application and makes a recommendation to the Secretary of State, who will make the decision on whether to grant or to refuse development consent. Once made, a DCO provides all the approvals (for example, planning permission, compulsory purchase) required for a development to proceed.
- 1.3 National Highways proposes to replace and detrunk the existing, largely single carriageway, A27 at Arundel with a dual carriageway bypass linking together the two existing dual carriageway sections of the road to the east and west. The scheme is a NSIP (and requires development consent) because it would be

a new road that forms part of the national strategic road network (motorways and trunk roads) operated by National Highways. Given that the scheme is in West Sussex, the County Council is a statutory consultee in the DCO process.

- 1.4 The [National Policy Statement for National Networks](#) (NPS) sets out the need for the development of NSIPs on the national road and rail networks in England and Government policy relating to the delivery of such schemes. In due course, the Secretary of State will use the NPS as the primary basis to make the decision on the Arundel Bypass scheme.
- 1.5 In advance of an application for consent being submitted, National Highways is undertaking formal consultation from 11 January to 8 March 2022 on the proposed scheme and a Preliminary Environmental Information Report (PEIR), which identifies the likely significant impacts of the scheme and any required mitigation. In addition to consultation on technical matters, it also involves consultation with the public in accordance with the Statement of Community Consultation (SoCC), a formal document that sets out how National Highways proposes to consult the community.
- 1.6 This report outlines the scheme and the key areas for consideration by the County Council in making a formal response to the consultation.

2 Proposal details

Background

- 2.1 Improving the A27 at Arundel, Chichester, and Worthing & Lancing is the County Council's highest priority for transport (as identified in the statutory West Sussex Transport Plan 2011-2026). The improvements are needed to increase capacity, to improve reliability and safety, to help increase the competitiveness of local businesses, and to attract investment.
- 2.2 In March 2015, the Government published its first Roads Investment Strategy (RIS1), which included a commitment to improve the A27 at Arundel towards the end of Roads Period 1 (2015-20).
- 2.3 Regarding the development of the current scheme, Highways England (National Highways' predecessor) undertook public consultation in 2017 on three options, one partial online route (Option 1) and two routes for an offline bypass (Options 3 and 5A).
- 2.4 In responding to the consultation, the County Council concluded that the environmental impacts of Option 5A, if appropriately mitigated, were likely to be significantly outweighed by the substantial economic benefits over the longer term. Therefore, provided that a detailed and high-quality package of environmental mitigation measures was identified and delivered as part of the scheme, Option 5A was the County Council's preferred option because it represented the best fit with the strategic outcomes that the Authority was seeking for the A27.
- 2.5 In May 2018, Highways England announced the selection of a modified version of Option 5A as the preferred route for the bypass, after which it undertook work to develop the design for the scheme. This included consideration of alternative options to minimise the impact of the scheme on protected ancient woodland and biodiversity at the western end.

- 2.6 Following further technical work and a review of alternatives, further consultation by Highways England was undertaken in 2019 on six options, two partial online routes (Cyan and Beige) and four routes for an offline bypass (Crimson, Magenta, Amber, and Grey).
- 2.7 In responding to the consultation, the County Council concluded that the environmental impacts of the Magenta route (Option 4/5AV1), if appropriately mitigated, were likely to be significantly outweighed by the substantial transport, economic and social benefits over the longer term. Therefore, provided that a detailed and high-quality package of environmental mitigation measures was delivered as part of the scheme, the Magenta route was the County Council's preferred option for an Arundel Bypass because it was the best performing option, and it represented the best fit with the strategic outcomes that the Authority was seeking for the A27.
- 2.8 In March 2020, the second Roads Investment Strategy (RIS2) was published, including a commitment by the Government to deliver a dual-carriageway Arundel Bypass in Roads Period 2 (2020-2025). Subsequently, in October 2020, the Grey route (Option 5BV1) was announced by Highways England as the preferred route for the bypass.
- 2.9 In responding to the consultation on options by Highways England in 2019, the County Council concluded that the Grey route did not provide the best balance between the impacts on the economy, the environment, and communities.

A27 Arundel Bypass

- 2.10 Since the announcement of the selection of the grey option as the preferred route, Highways England (and subsequently, National Highways) has developed the design of the new bypass, approximately 8km of dual two-lane carriageway to the south of the existing A27 (see Appendix A: Location Plan).
- 2.11 Starting at the existing A27 at Crossbush to the east, the route would reconnect with the A27 in the west near the A27/A29 Fontwell (east) roundabout (see Appendix B: Preliminary Landscape and Environmental Masterplan). Key features of the scheme include the following works:
- a junction at Crossbush with access to and from the A27 in both directions;
 - a new viaduct spanning the River Arun and a bridge over the Arun Valley Railway;
 - new bridges over the Binsted and Tortington Rifes;
 - a new junction with the existing A27 at Tye Lane to the north of Walberton (with the A27 continuing via an underpass) enabling westbound access onto the A27 and eastbound access from the A27;
 - the closure to vehicular traffic of Tye Lane south of the new route; and
 - the closure of the junction at Arundel Road and the left-turn access from the A27 onto Arundel Road (west);
 - a new link road joining the two sections of Arundel Road;
 - new road and public rights of way crossing facilities;
 - three temporary construction compounds; and
 - a package of environmental mitigation measures.

- 2.12 Subject to consultation with the County Council (as local highway authority), approximately 6.6km of the existing A27 between the junctions with Tye Lane and Mill Road and the Crossbush junction would be 'detrunked' and converted to a local road as part of the proposed scheme. It would then become part of the local highway network to be managed and maintained by the County Council in perpetuity.
- 2.13 National Highways considers that the bypass would help to: make journeys faster, safer and more reliable; create new jobs; and have a positive effect on existing businesses locally and across the region. National Highways' objectives for the scheme are to:
- reduce congestion, reduce travel time, and improve journey time reliability along the A27;
 - improve capacity of the A27 whilst supporting local planning authorities to manage the impact of planned economic growth;
 - deliver a scheme that minimises environmental impact and seeks to protect and enhance the quality of the surrounding environment through its high-quality design;
 - improve the safety of people travelling along the A27 and, consequently, the wider local road network;
 - improve accessibility for all users to local services and facilities;
 - ensure that customers and communities are fully considered throughout the design and delivery stages; and
 - respect the South Downs National Park and its special qualities in decision-making.
- 2.14 The broad timetable for the scheme is submission of the DCO application in late summer/early autumn 2022, followed by examination through to summer 2023 and a decision by the end of 2023; more information on the DCO process is set out in paragraphs 2.16-2.24.
- 2.15 If consent is awarded, construction of the bypass would not start until 2024 with the new road completed in 2027, followed by detrunking of the existing A27 (as outlined in paragraph 2.12 above).

DCO Process

- 2.16 There are six stages in the DCO process.

Pre-application

- 2.17 Before submitting an application for consent, potential applicants have a statutory duty to carry out consultation on their proposals; this is the current stage for the scheme. The consultation provides the best opportunity for consultees, such as the County Council, and third parties to try to influence the project, whether they agree with it, disagree with it, or believe that it could be improved.

Acceptance

- 2.18 The Acceptance stage begins when an applicant submits an application for development consent to PINS. Key documents submitted by the applicant will

include the draft order, which will include a number of legislative clauses (relating to matters such as statutory nuisance, tree protection orders, and stopping-up of public rights of way) and 'requirements', which are akin to the conditions attached to planning permissions. Documents relating to mitigation of the scheme may also be submitted, for example, a Code of Construction Practice, Environmental Management Plans, S106 Planning Agreement, and topic-specific strategies.

- 2.19 There follows a period of up to 28 days (excluding the date of receipt of the application) for PINS, on behalf of the Secretary of State, to decide whether the application meets the standards required to be accepted for examination. This includes consideration of the adequacy of the applicant's consultation prior to submission.

Pre-examination

- 2.20 At this stage, the public will be able to register with PINS to become an 'Interested Party' by making a Relevant Representation, which is a written summary of a person's views on an application. As a statutory consultee, the County Council is automatically 'registered' as being an Interested Party. An Examining Authority is appointed at the pre-examination stage, and all Interested Parties will be invited to attend a Preliminary Meeting, run and chaired by the Examining Authority (i.e. a panel of inspectors).
- 2.21 Although there is no statutory timescale for this stage of the process, it usually takes approximately three months from the applicant's formal notification and publicity of an accepted application.

Examination

- 2.22 PINS has up to six months to carry out the examination. During this stage, Interested Parties are invited to provide more details of their views in writing. Careful consideration is given by the Examining Authority to all the important and relevant matters, including: compliance with all relevant policies (including the NPS); written representations; key documents; supporting evidence submitted by Interested Parties; and answers provided by them to the Examining Authority's questions (set out in writing or posed at hearing sessions).

Recommendation and Decision

- 2.23 PINS must prepare a report on the application to the relevant Secretary of State, including a recommendation, within three months of the close of the six-month Examination stage. The relevant Secretary of State then has a further three months to decide whether to grant or refuse development consent.

Post decision

- 2.24 Once a decision has been issued by the relevant Secretary of State, there is a six-week period in which the decision may be challenged in the High Court. This process of legal challenge is known as Judicial Review.

Role of the County Council

Pre-Application

- 2.25 In March 2021, PINS asked the County Council, as a statutory consultee, to comment on a scoping request by National Highways, the purpose of which was to identify the information to be provided in the Environmental Statement (ES), which will be part of the DCO submission); officers made detailed technical comments in response. In April 2021, PINS issued a Scoping Opinion, which is binding on National Highways.
- 2.26 In advance of an application for consent being submitted, National Highways is undertaking formal consultation on the proposed scheme and the PEIR, which identifies the likely significant impacts of the scheme and any required mitigation. The [Non-Technical Summary \(NTS\)](#) of the PEIR is on National Highways' consultation [website](#). As identified above, this is a key stage in the process and the County Council's suggested response, for which approval is sought, is set out in paragraphs 2.36-2.106 below.
- 2.27 It should be noted that, as a statutory consultee in the DCO process, the County Council is required to consider the proposed scheme and the PEIR on their merits regardless of the views that the Authority has expressed in response to previous consultations by Highways England on options to improve the A27 at Arundel (summarised in paragraphs 2.1-2.9 of this report).

Submission

- 2.28 If an application is submitted, the County Council, as a statutory consultee, will be expected to engage in the post-submission stages of the process.
- 2.29 As part of the acceptance process, the County Council will be asked to comment whether the pre-submission consultation undertaken by National Highways accords with their SoCC. In addition to any concerns that the County Council may have, it must also consider the views of any third parties that consider the consultation to be inadequate. Accordingly, delegated authority is sought for officers to approve the County Council's 'adequacy of consultation' response.

Examination

- 2.30 If the submission is accepted by PINS, the County Council will be invited to submit a written representation and a Local Impact Report (LIR - see paragraph 2.31). It will also be expected to negotiate with National Highways on the DCO requirements, any S106 Agreement, and the preparation of a Statement of Common Ground (SoCG - see paragraph 2.32).
- 2.31 In deciding whether to grant or to refuse development consent, the Secretary of State is required to have regard to LIR submitted by local authorities. An LIR is a technical document defined as "*a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)*". Provided that it fits within this definition, the structure and content of an LIR is a matter for each local authority.
- 2.32 It is also anticipated that a SoCG will be submitted by the applicant. The SoCG will identify issues where it is considered that the signatories agree with the applicant about the impacts of the proposed development. The contents of the final SoCG can only be agreed by the County Council following the conclusion of discussions with the applicant about the key issues and the finalising of the Authority's LIR.

- 2.33 Accordingly, delegated authority is sought for officers to prepare and submit the necessary responses and documents and to negotiate with the applicant in support of the County Council's formal consultation response. Delegated authority is also sought for officers to attend the examination hearings and to answer the Examining Authority's questions in support of the County Council's position.

Post-Decision

- 2.34 Although the County Council will not be responsible for determining the application for consent, it can play a formal role in the post-decision approvals process by becoming a 'relevant authority' for the discharge requirements in the DCO (if it is granted). The legislation allows there to be more than one relevant authority and the final decision rests with the Secretary of State but, if requested to do so by National Highways, it would help to give the County Council some control over implementation of the scheme.
- 2.35 Therefore, 'in principle' approval is sought for the County Council becoming a relevant authority for the discharge of requirements for the scheme (if an order is made). This matter will need to be the subject of pre-decision discussions with National Highways about the work that will need to be undertaken by the County Council and the recovery of costs associated with that work.

Preliminary Environmental Information Report (PEIR)

- 2.36 Officers have undertaken a detailed analysis of the PEIR, considering likely significant impacts (both direct and indirect) and whether those impacts are considered to be positive, negative, or neutral (taking into account any proposed mitigation measures). Consideration has also been given to whether further work could be undertaken by National Highways, including mitigation measures, to address issues identified as being significantly negative.
- 2.37 The following paragraphs address the key issues in relation to the proposals presented at this formal consultation stage. Following some general, overarching comments (including about technical and community engagement), key issues on a topic-by-topic basis are identified.
- 2.38 Approval is sought for the comments in paragraphs 2.36-2.106 and the detailed technical comments on the PEIR in Appendix C to be submitted as the County Council's response to the formal consultation.

General Comments

- 2.39 The County Council acknowledges that the objectives of the A27 Arundel Bypass scheme closely align with the priorities in the Authority's Corporate Plan ('Our Council Plan 2021-2025'), West Sussex Transport Plan 2011-2026, and Economy Plan 2020-2024. Nevertheless, any proposals for highway improvements on the scale proposed must be carefully and sensitively designed with particular attention being paid to significant impacts on the economy, local communities, and the environment.
- 2.40 Arundel, and the wider area around the town, is a sensitive location with a long-standing history of difficulty in securing improvements to the strategic road network. Therefore, the County Council considers that proposals for a scheme in this location should include not only the highest standard of exemplar design

and mitigation but also the opportunity to enhance the surrounding environment and leave a positive legacy for the future.

- 2.41 The proposed scheme would lead to both beneficial and adverse impacts to a range of communities and environmental receptors surrounding the proposals. Therefore, the merits need to be judged by taking careful account of all considerations, particularly the significant economic, social, and environmental impacts.
- 2.42 The County Council considers that National Highways must provide a more robust and transparent evidence base across a number of topic areas, including the necessary traffic modelling, so that the likely significant environmental effects of the proposals can be better understood by stakeholders and local communities. This needs to be presented for there to be confidence that the design of the proposed scheme and the package of mitigation and enhancement measures has been influenced by the assessment work undertaken. At present, the material presented as part of statutory consultation does not allow for this to be understood in full.
- 2.43 Therefore, although the County Council gives 'in principle' support to the current scheme for an A27 Arundel Bypass, there are a number of matters of concern that need to be satisfactorily addressed by National Highways in advance of submission of the DCO application. These include:
- the requirement for transport-related technical documents, including: a Transport Assessment (TA); a design audit; a local model validation report; a traffic forecasting report; and a Construction Traffic Management Plan (CTMP);
 - further engagement about concerns of adverse impacts resulting from the re-distribution of traffic on local roads during the operational phase;
 - clarity about elements of the construction phase, including: compounds; laydown and materials storage locations and layout; haul routes; the requirement for a concrete batching plant; and the construction programme;
 - the de-trunking strategy and its role in providing mitigation and wider enhancement measures (including biodiversity, recreation, and landscape/visual);
 - understanding how local people and supply chains can benefit from the construction, including through new employment and training opportunities, and more detailed consideration of the potential impact on local businesses and potential mitigation of any adverse impacts;
 - further analysis and scrutiny of adverse impacts on local communities relating to noise and air quality from both construction and operational phases;
 - consultation on a number of Environmental Impact Assessment (EIA) methodologies, including: a Landscape and Visual Impact Assessment (LVIA); a Residential Visual Amenity Assessment (RVAA); a historic environment baseline assessment; a baseline settings assessment; ecological surveys; an Arboricultural Impact Assessment (AIA); a Health Impact Assessment (HIA); a Walking, Cycling and Horse-riding Assessment Report (WCHAR); and a Public Rights of Way Strategy (PRoWS);

- the scope for enhancement measures, including to Public Rights of Way (PRoW) and to ecological habitats through a Biodiversity Net Gain (BNG) approach, over and above those required to mitigate impacts;
- further detail about the mitigation options being considered to reduce the impact on the national carbon budget and measures for climate change adaptation and resilience; and
- responses to the technical queries raised in Appendix C.

2.44 Therefore, the County Council will continue to engage with National Highways, particularly in the post-consultation/pre-submission period, to seek to influence the design and to avoid and mitigate any adverse impacts. This dialogue will also aim to maximise opportunities and enable the best possible outcomes for the local communities and other sensitive receptors that would be most affected by the construction and operational impacts of the scheme.

Technical Engagement

2.45 The County Council notes that Government guidance on the pre-application stage of the DCO process emphasises the benefits that the early involvement of local authorities (and communities and statutory consultees) can bring. Therefore, it is concerned that there has been insufficient technical information provided by National Highways in advance of publication of the PEIR (which was requested a number of times) and insufficient time for officers to challenge and scrutinise the technical documentation that has now been presented. It is disappointing that much of this evidence base has not been provided through the publication of the PEIR to enable stakeholders to fully consider and comment on the proposals at this stage.

Community Engagement

2.46 As a statutory consultee, the County Council had the opportunity to comment on the draft Statement of Community Consultation (SoCC) in November 2021. Although the range of consultation methods proposed was welcomed, the County Council is disappointed National Highways has not produced more engaging consultation material for the public and key user groups to respond to it at this stage. Apart from the video flyover, there is a lack of detailed visualisations, viewpoint specific photomontages, and illustrative sections to communicate benefits and potential impacts to a wider audience.

2.47 Local concerns raised with the County Council during the consultation period about the methods of engagement (as documented in the published SoCC) will be considered as evidence for inclusion in the County Council's post-submission 'adequacy of consultation' response (see paragraph 2.29).

Assessment of Alternatives

2.48 The PEIR lacks sufficient detail about how environmental criteria have influenced the decision-making process, specifically with regard to the development of the Grey Route. In 2019, the County Council raised concerns that the Grey Route (option 5BV1) did not offer the best balance between traffic, economic and social benefits and environmental impacts. Although the PEIR states that "*Environmental effects have been considered during this appraisal process*", a much clearer narrative is needed to explain how the environment has influenced the design process.

- 2.49 In responding, the County Council requested that consideration be given to all consultation responses before the Preferred Route Announcement (PRA) was made. Therefore, it expected to see a much more transparent presentation and detailed analysis of feedback within the PEIR, including how the responses had influenced the design. This must be included within the Consultation Report that will be submitted as part of the DCO application.

Proposed Scheme

- 2.50 In addition to key issues summarised on a topic-by-topic basis in the following sections, the following paragraphs address some key aspects relating to the design of the scheme.
- 2.51 The PEIR gives very little detail on the construction phase of the scheme, including information relating to haul routes, access for construction vehicles, layout, and the rationale for the location of construction compounds/laydown areas. Also, although the PEIR highlights the potential need for a concrete batching plant, no further details are given. Construction phase information is needed to give stakeholders confidence that potential impacts, which may be in place for the duration of the works (estimated from 2024 to 2027) have been appropriately assessed and mitigated.
- 2.52 The County Council wants to see a greater emphasis on the de-trunking strategy as a key element of the scheme; to date, it has not been presented in any detail to stakeholders. This could provide many opportunities to mitigate adverse impacts experienced elsewhere in the scheme and provide enhancements to the area. Not only is there potential for biodiversity benefits, but there is also an ideal opportunity for benefits to be realised for the local community, such as to Non-Motorised Users (NMU), and there should be strong engagement on the future use of the detrunked section of the existing A27.
- 2.53 The County Council is pleased to see the inclusion of a viaduct in the proposals, instead of a potential embankment crossing the floodplain. However, there are still concerns about the design and placement of the structure, and future work needs to involve specialist design input, as well as that of stakeholders, to ensure the viaduct is both sensitively designed and informed by the EIA.
- 2.54 The County Council welcomes the embedded mitigation proposed through the design process, including the introduction of a 50mph speed limit that, with a tighter road geometry, will allow a reduction in land take and overall environmental impact at the eastern extent of the scheme. However, the County Council wants to see more detail provided on the key crossing points and how the scheme can be further sensitively designed to reduce impacts upon those communities that live and work in close proximity to the proposals.
- 2.55 Overall, the County Council expects the highest standard of design, which must incorporate a clear design narrative for each element. The design must outline to stakeholders and the community how the assessment work undertaken will mitigate adverse impacts and communicate benefits through wide-ranging enhancement measures that go above and beyond those required to mitigate the scheme.

Traffic and Transport

- 2.56 The information published in the PEIR enables a very limited understanding of the impacts of the scheme on the transport network. There is insufficient

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information about the impacts of the scheme on the transport network to confirm whether the proposed scheme is acceptable to the County Council from a transport perspective.

- 2.57 To determine whether it is acceptable from a transport perspective, the County Council requests that, as a minimum, the following evidence base and further information is provided:
- a Transport Assessment (TA) detailing the impacts of the scheme on the transport network and, if necessary, identifying the mitigation measures that will be needed as part of the proposals to ameliorate any severe impacts on the transport network, together with arrangements for ongoing monitoring after the scheme has opened;
 - a design audit detailing the standards that have been applied to different aspects of the scheme and, if necessary, specifying any departures from standards;
 - a local model validation report detailing the process for building the transport model and the scheme's performance against all relevant validation criteria;
 - a traffic forecasting report detailing the process for building the forecast demand matrices, key assumptions, and outputs; and
 - a Construction Traffic Management Plan (CTMP).
- 2.58 Based on the traffic flow change diagram presented in the Consultation Brochure, it is clear that there are positive and negative effects from a traffic perspective. The increase in traffic flow on The Street and Eastergate Lane, Walberton is one of the unwelcome effects of the scheme and must be adequately assessed. The impact of the scheme on the A29 Fontwell Avenue and areas to the east of the scheme are unclear and require further investigation. In order to understand the issues and the extent to which they can be mitigated, the information requested should include diagrams detailing flow changes and models (or other suitable technical information) showing the performance of the following junctions in each assessment year:
- A27/A284 'Crossbush' junction (including any assumptions about interactions with the Crossbush service station);
 - A27/A29 'Fontwell' junctions (east and west);
 - A27/B2233 Crockerhill junction;
 - A284/A259 'Lyminster Bypass/Fitzalan Rd' junction;
 - A29/A259 junctions;
 - A27/A280 'Patching' junction;
 - A24/A280 'Findon' junction; and
 - A259/A2032 'Goring Crossways' junction.
- 2.59 Based on the information presented in the Consultation Brochure, it is apparent that the performance of the A27 Fontwell junctions is one of the reasons for some of the undesirable traffic effects of the proposed scheme. The improvements at A27/A29 'Fontwell West' junction that are being delivered as part of planned development, were not designed to cater for a scenario that included an A27 Arundel Bypass. Poor performance of these junctions has the potential to degrade the benefits of the project and lead to rat-runs through adjacent communities. Therefore, the County Council requests that National

Highways prioritises the identification of improvements at the A27 Fontwell junctions and inclusion of suitable measures in a suitable investment programme as soon as is practically possible.

- 2.60 There continues to be significant local interest in the addition of a junction between Ford Road and the proposed scheme to facilitate future development in this part of Arun District. Although it is recognised that it is not the role of the scheme to mitigate potential future development, the design should not preclude the addition of a junction at some point in the future, if sufficient development comes forward to justify a new junction. Therefore, National Highways should ensure the design, particularly of the viaduct and Tortington Lane overbridge, allows the addition of a new junction with Ford Road (with south facing slip-roads) without the need to substantially modify the scheme.

Socio-Economics

- 2.61 Strategic improvements to the A27 at Arundel are an economic priority for the County Council because increased capacity and improved reliability and safety on the strategic road network will help to increase the competitiveness of local businesses as they recover and grow and help local people access well-paid employment. Improved connectivity within the County and with adjoining economic areas along the coast will also help to create the right conditions for inward investment, enterprise, and innovation in West Sussex.
- 2.62 Therefore, the County Council wants to see a wider analysis of the economic impacts of the proposed scheme and the extent to which it will address challenges around the competitiveness of the coastal economy including: productivity; access to customer and labour markets; attractiveness of the area for business growth and entrepreneurship; access for visitors to the coast and the South Downs National Park; and the regeneration of coastal towns.
- 2.63 The Council also expects to see a plan to ensure that local people and supply chains benefit from the construction, including through new employment and training opportunities (including a plan to encourage apprenticeships, work experience and internships). More detailed consideration of the impacts on local businesses and potential mitigation of any adverse impacts is also required.

Air Quality

- 2.64 The PEIR states that there "*is a risk of temporary adverse impacts from dust emissions during the construction works at residential properties and designated habitats located close to the scheme*". However, it also states that it is unlikely that these impacts will be significant, given that "*control measures will be implemented throughout the construction phase in accordance with the EMP [Environmental Management Plan]*". Therefore, it is disappointing that National Highways has not produced a first draft EMP to outline these measures and to allow stakeholders to scrutinise the detail at this stage.
- 2.65 Further assessment of impacts to air quality, including taking account of traffic re-routing patterns due to construction phase traffic management and Heavy Goods Vehicle (HGV) movements, has not been undertaken as details of the construction phase have not been presented. Therefore, the County Council is concerned that there remains a risk there could be changes that could worsen

air quality; this requires an evaluation of whether predicted effects are potentially significant.

- 2.66 The scheme would result in reduced traffic flows through Arundel and Storrington due to traffic travelling on the bypass and relieving pressure on some other roads. Therefore, residential properties within these areas are likely to experience an improvement in local air quality. However, some detrimental air quality impacts are expected near to the scheme and along the wider A27 corridor as a result of the expected increase in traffic flows, including around the Crossbush Junction, in some areas of Walberton, in Worthing (east of the scheme), and between Avisford and Chichester (west of the scheme). Until the evidence base and further assessment has been provided and scrutinised by the County Council (including the required TA), likely levels of impacts cannot be predicted with certainty and required mitigation packages cannot be identified.

Cultural Heritage

- 2.67 The County Council is concerned that the scheme could result in adverse effects to a number of designated heritage assets. There is also the possibility of effects to as-yet unidentified heritage assets (including deposits of geoarchaeological and paleoenvironmental interest), to archaeological features, and to historic landscapes.
- 2.68 The intention of close cooperation between the LVIA and heritage is welcomed and the identification of viewpoints from selected heritage assets is also positive. However, there is a lack of clarity with regard to the remits and methodologies of the LVIA and heritage settings, and the methodology by which the heritage assets included for viewpoints were selected. This issue is compounded by the fact that the heritage settings assessment baseline work has not yet been undertaken/issued. The contribution made by setting, and therefore by existing views, to the significance of any given heritage asset is not yet understood. It has not been agreed by the County Council that these represent the final selection and additional viewpoints may be required once further details are known.
- 2.69 National Highways is undertaking a suite of surveys and investigations (for example, geoarchaeological monitoring, trial trench evaluation, and geophysical survey) prior to the DCO application. The County Council had expected that the preliminary results of some of these surveys were included, even in draft form, within the PEIR baseline. Likewise, neither the historic environment baseline assessment nor the baseline settings assessment work appear to have been undertaken to date. These baselines could have been undertaken in draft format based on the existing information held in the West Sussex Historic Environment Record (WSHER) and other readily available sources, especially in the case of baseline settings assessment for designated heritage assets. Undertaking these initial stages of assessment could have allowed further refinement and more accurate predictions of likely significant effects within the PEIR chapter.
- 2.70 Understanding the significance of higher-value likely sensitive receptors would allow a more accurate gauge of likely effects; for example, the current assessment of the impact on Arundel Castle is simply "*Permanent adverse effects associated with the visibility of the Scheme within the landscape setting of the asset*". The opportunity has been missed to further understand and

quantify the likely effects on this and other key sensitive receptors, for example, an assessment of the precise contribution made by views to and from Arundel Castle across the Arun Valley floodplain, and the sensitivity of this aspect of the Castle's setting.

- 2.71 The current historic environment baseline assessment of the route corridor and Study Area is extremely light touch. It is disappointing that the submitted baseline does not include predictions of the archaeological potential of the various sections of the route, especially given that the preliminary results of the ongoing trial trenching are available to inform this (as well as the Archaeological Notification Areas available within the WSHER data). Further fleshing out of the baseline might have allowed more accurate assessments of likely significance of effects.
- 2.72 There are a number of areas of the design that will require continued discussion and assessment, as identified in more detail in Appendix C. The main areas of concern include adverse change to the settings of a number of high value heritage assets with the construction of the scheme, the close proximity of the scheme to the Church of St Mary's (at Binsted), and the potential for adverse effects on this Grade II* heritage asset. The location of the Yapton Lane compound would result in the total or partial loss of archaeological heritage assets identified during the recent geophysical survey and ongoing trial trenching. Although the character, date, and significance of the assets has not yet been fully assessed, they are likely to be of prehistoric date and of at least local to regional significance. The necessity of the loss of these archaeological features, purely for the siting of a temporary construction compound, has not been demonstrated to the County Council and alternative locations for this compound should be explored.

Landscape and Visual Impact Assessment (LVIA)

- 2.73 The County Council has not yet agreed to the LVIA methodology proposed, contrary to the statement within the PEIR, which states that "*the methodology has been discussed and agreed with various stakeholders during the environment focus groups for the Scheme and National Highways Landscape Policy Advisors*". In particular, the County Council has not commented on the criteria defined by National Highways for ascribing value and susceptibility to change to individual landscape and visual receptors.
- 2.74 The LVIA does not address the pre-consultation, technical comments made by the County Council regarding the selection of Local Landscape Character Areas (LCA). Noting that analysis of the landscape context should be used as an important driver for the design, it will be important for stakeholders to see the technical work to verify that the 'parent' LCA studies have not been misrepresented.
- 2.75 The PEIR does not make clear which individual elements that contribute to landscape character will be examined in the LVIA. This needs to include changes to surface landform, loss of vegetation, severance of the Green Infrastructure network, loss of ecosystems services, severance of the PRoW network, changes to features that have endured through time (which would affect indicators of Historic Landscape Character), changes to the experiential qualities of the landscape, including tranquility, and key/valued views.

- 2.76 As noted in the County Council's Scoping Response (March 2021), the criteria for determining landscape value has not been clearly outlined and should follow those set out in the Landscape Institute's Guidelines for Landscape and Visual Assessment version 3. The effects of severance and diversion of PRow (including the erosion of access, loss of public amenity, and change to the experiential qualities of the landscape) should also be considered.
- 2.77 The County Council has been engaging with National Highways to agree the locations of the viewpoints and visualisations and continues to pursue agreement on such with a view to examining potential effects. The PEIR does not examine the threshold for a Residential Visual Amenity Assessment (RVAA), and the County Council expect this to be discussed in due course with stakeholders. Consideration also needs to be given to the effect of light reflecting from windscreens. A night-time assessment should also be undertaken to consider light spill from fixed lighting and also from vehicle headlights.
- 2.78 The County Council wants to see a more holistic approach taken to the design of the scheme where it is led by an understanding of the landscape and its sensitivities. The PEIR fails to demonstrate how the design is informed by the local landscape character or to *"develop a clear and engaging design narrative ... which captures the vision of the scheme, [and] demonstrates how its component parts come together as a whole – including structures, landscape, ecology, connectivity – and illustrates how different user groups will engage with the scheme"* as recommended by the Design Council (in a letter dated 09/07/21). The County Council recommends that National Highways reviews the Design Council's comments and seeks to address the many valid points that it made.

Arboriculture

- 2.79 The County Council is concerned about potential habitat loss as a direct result of the scheme. Losses will be permanent and irreplaceable in the case of high quality, veteran, and ancient trees. Any restored or replacement habitat can take many decades to provide similar levels of ecosystem functioning as that which was lost. The assessment presented within the PEIR is only indicative, as surveys are currently being undertaken and no draft Arboricultural Impact Assessment (AIA) is available.
- 2.80 Although, it is appreciated that surveys are continuing and full details of the impacts are unknown (especially for cumulative and in-combination effects), the imprecise language including *'as far as is practicable'* gives considerable leeway for loss and damage of habitat.
- 2.81 Given that the cumulative zone of influence for biodiversity is very extensive, mitigation and enhancement should be at a landscape scale, beyond the Order Limits, to restore and create habitat connectivity. Engaging with existing initiatives along the route and beyond (for example, the 'Weald to Waves' project) could strengthen and connect these, providing 'additionality'.
- 2.82 It is critical that long-term future maintenance and management of assets is factored into the overall scheme, especially all of the proposed mitigation for habitat loss, which must be properly resourced and robustly monitored. Funding such mitigation must not be reliant on other mechanisms and must be secured through the DCO.

Biodiversity

- 2.83 The aspiration of a landscape and environment-led approach with disciplines considered together in an integrated Landscape and Environmental Masterplan is welcomed. However, permanent and harmful habitat severance, with impacts on a range of species including bats, hazel dormice, and water voles, is of major concern to the County Council.
- 2.84 Until the detailed baseline ecological data has been presented, it is difficult to assess impacts, proposed mitigation, and enhancement measures at this stage. A Phase 1 Habitat Survey of all habitats within 100m of the centreline of the scheme was undertaken in 2020/21. However, concern is raised about the narrow corridor included, given that the survey will need to inform mitigation, compensation and enhancement measures both during the construction and operational phases.
- 2.85 The mitigation measures currently designed into the scheme are lacking in detail and need to be developed going forward. Post-construction ecological monitoring and long-term habitat management will be key to the success of any package of mitigation, compensation, and enhancement measures.
- 2.86 The PEIR and associated documents lack detail on the design of the two green bridges, the two bat underpasses, the viaduct crossing of the River Arun and Arun floodplain (Arun Valley Viaduct), and landscaping plans. Therefore, it is difficult to envisage how each will function and integrate into the landscape. These aspects will need to be addressed in much more depth since they are fundamental elements of the biodiversity mitigation package.
- 2.87 The area is of national importance to bats and habitat severance is of major concern. Therefore, the design and location of the green bridges and underpasses must seek to maximise habitat connectivity for bats, both for commuting and foraging. The current plans for the green bridges do not give confidence and evidence that this will be achieved. Concern is raised that the green bridges are attempting to be too multi-functional, serving as vehicle crossings and footbridges, in addition to green bridges; this could compromise their essential purpose as wildlife corridors. The County Council wants to see evidence of where this type of approach has been successful elsewhere in the UK.
- 2.88 Land has been identified for replacement flood storage to compensate for the loss of floodplain due to new structures, such as the viaduct piers and the embankment approaches to the bridges. The potential for designing and managing the replacement flood storage areas to maximise biodiversity is an area that needs more assessment and design, and discussions with stakeholders.
- 2.89 The de-trunking of the existing A27 should provide mitigation to help compensate for habitat severance. Re-connecting habitats, notably woodland, would provide wildlife corridors for the movement of bats, dormice, birds, and other fauna, for example at Binsted Wood and Rewell Wood. Without such measures, the proposals would make Binsted Wood very isolated from the surrounding landscape. De-trunking will also present opportunities for biodiversity enhancements, over and above those required to mitigate the impacts, which should be explored as part of the overall package.

Noise and Vibration

- 2.90 A quantitative assessment of noise and vibration impacts during construction has not been undertaken within the PEIR, due to the lack of construction phase information at this stage. Therefore, only a qualitative assessment has been carried, based on professional judgment and experience of other nationally significant road schemes. This makes scrutiny of the likely significant effects of the scheme, and requirements for mitigation, difficult to determine at this stage.
- 2.91 The County Council is concerned that the results of this qualitative assessment highlight that properties at risk of adverse effects include residential properties between Tye Lane and Yapton Lane, as well as properties close to the overbridges at Tye Lane, Yapton Lane, Binsted Lane and Tortington Lane. A quantitative assessment of noise and vibration impacts arising from construction works should be undertaken and the County Council would expect further consultation on the findings and required levels of mitigation for surrounding communities.
- 2.92 When the scheme is operational, the PEIR states that the largest potential increases in traffic noise are expected to be at properties in and around Walberton, particularly those close to Yapton Lane, Binsted, and Tortington. Increases in noise levels are also expected in the vicinity of Dalloway Road and Fitzalan Road in south Arundel and Lyminster Road, south and east of Crossbush Junction.
- 2.93 Along with some locations becoming quieter due to reductions in road traffic noise, there are also likely to be increases in noise in parts of Fontwell, Slindon, Arundel, Lyminster and Crossbush, as a result of traffic redistribution. The County Council expects to be consulted as assessment work develops and about mitigation measures to be embedded into the design. Concerns are again raised about the potential adverse impacts of traffic redistribution once the bypass is operational.
- 2.94 However, until the evidence base and quantitative assessment work has been provided and scrutinised, likely impacts cannot be predicted with confidence and required level of mitigations discussed.

Population and Human Health

- 2.95 It is disappointing that a draft Health Impact Assessment (HIA) has not been undertaken, which would have enabled the risk and benefits of the scheme on population health to be evaluated by the County Council with greater rigour. There is also insufficient information in the PEIR to demonstrate how each phase of the project would impact on all sensitive receptors, such as schools within the study area, and what measures are incorporated into the design to prevent harm. Therefore, it is difficult to assess the effects of the scheme at this stage.
- 2.96 It is currently predicted that during the construction phase, there could be potential adverse in-combination effects (where combined impacts are felt) on residential properties in Walberton, Binsted, and Tortington, which are in close proximity to the scheme, as well as on education facilities including Walberton and Binsted C of E Primary School, Walberton Pre-School, and community facilities, including places of worship, village halls and medical facilities.

Construction of the scheme would require permanent land take from a number of receptors, including five residential properties on Binsted Lane, which is likely to result in the permanent loss of these properties. However, little information is given to quantify the impacts and proposed mitigation.

- 2.97 The receptors listed above are also likely to experience adverse in-combination effects during the operational phase of the scheme due to the introduction of new dual-carriageway in an area previously occupied with smaller local roads. Concern is raised about the potential health impacts to communities in areas where there is likely to be an increase in traffic flows, which needs further understanding and assessment.
- 2.98 It is also predicted that there are likely to be beneficial in-combination effects associated with a reduction in road traffic on the existing A27, including on residential receptors at Havenwood Park and parts of Arundel, including Canada Road and the north end of Jarvis Road.
- 2.99 As individual topic assessments are only at a preliminary stage, the assessment of in-combination effects has not been presented in detail within the PEIR. This, along with a robust Cumulative Effects Assessment (CEA), must be presented to inform the requirement for mitigation measures.
- 2.100 Concern is raised about the potential likely temporary adverse effects with respect to Non-Motorised Users (NMU) during the construction of the scheme. Little detail is given in the PEIR concerning mitigation measures, other than to keep access available '*where possible*'. The assessment of impacts presented are preliminary and qualitative, given that the NMU survey and a Walking, Cycling and Horse-riding Assessment Report (WCHAR) have not been presented as part of the PEIR.
- 2.101 A Public Rights of Way (PRoW) Strategy is required, setting out general principles around providing access, where possible, throughout construction and when this is not, how access can still be retained along alternative routes. Long-term closures for approximately three-four years would have a very negative impact on local communities and recreational access to the South Downs National Park. Therefore, a clearer plan is required setting out how impacts will be minimised.
- 2.102 The County Council makes more detailed comments about impacts and potential opportunities for individual PRoW in Appendix C. Further work and consultation are needed on how the scheme can better integrate into the wider network of NMU facilities. For example, proposals for detrunking the A27, which is currently a point of severance for many users, and how the scheme could tie in with the Lyminster Bypass, to provide desirable access to the south.

Climate

- 2.103 The County Council is unable to comment fully as several key documents have not yet been presented. These include the traffic modelling data and TA, a Sustainability Assessment, a Preliminary Greenhouse Gas (GHG) assessment, the EMP, and the CTMP.
- 2.104 The presented suggestions on emission minimisation are inconsistent, with confused references to material re-use, electric vehicle charging points, and provision of green bridges. Although there is some focus on adaptation with

reference to both infrastructure and use of technology, the County Council expects to see a greater emphasis on climate change adaptation and resilience.

- 2.105 Paragraph 5.17 of the NPS states that applicants should “*provide evidence of the carbon impact of the project and an assessment against the Government’s carbon budgets*”. Based on ‘*other national highways projects*’, the PEIR states that it is expected that when the full impact assessment is undertaken, it will show that the scheme would be unlikely to affect the UK’s ability to meet its overarching binding greenhouse gas reduction targets. Although emissions from highway schemes may only be 0.1% of the UK’s overall budget, it is the cumulative effect of these projects that should be considered. Therefore, the County Council expects to see detail of the mitigation options to reduce the impact of the proposed scheme on the national carbon budget.

Fire and Rescue

- 2.106 The West Sussex Fire and Rescue Service is unable to comment on the potential impact of the scheme of the Fire Station located in Ford Road, Arundel (which is staffed by retained ‘on call’ personnel) because the necessary information is not currently available within the PEIR. The proposals suggest an increase in some localised traffic and congestion, when operational and during the construction phase, and a compound operating on land east of Ford Road. This may have an impact on response standards in this area and will require modelling work to be undertaken to assess potential effects. To enable this, the results of the full TA and the Flood Risk Assessment (FRA) are required and consultation on the scheme need to be undertaken with the service to ensure that any potential adverse impacts on emergency responders can be minimised.

Next Steps

- 2.107 Following approval of the County Council’s consultation response by Cabinet, the next steps in the DCO process are as follows (with indicative timings):
- post-consultation engagement (March-July 2022): discussions with National Highways about the matters of concern raised in this report, including consideration of new or revised evidence.
 - submission (August 2022): National Highways submits its DCO application to PINS. The County Council has 14 days to submit its ‘adequacy of consultation response’ to PINS.
 - pre-examination (September-November 2022): if the application is accepted by PINS, negotiations with National Highways will continue about the DCO requirements, any S106 Agreement, and the preparation of a SoCG.
 - examination (December 2022-May 2023): examination of the DCO application and the representations and submissions of ‘interested parties’ (including the County Council’s written representation and LIR). As necessary, officers comment on third party written representations, attend the examination hearings, and answer the Panel’s questions.
 - examination report (June-August 2023): PINS reports to the relevant Secretary of State, recommending whether to grant or refuse development consent.
 - decision (September-November 2023): the Secretary of State makes the decision to grant or refuse development consent.

- post-decision (December 2023-January 2024): there is a six-week period for Judicial Review.

3 Other options considered (and reasons for not proposing)

- 3.1 As a 'host' authority, one of the responsibilities of the County Council is to respond to the current formal consultation. The responsibilities also include: discussing the DCO requirements and S106 Agreement; providing an 'Adequacy of Consultation' response; preparing SoCG and LIR; and submitting written representations and participating in the examination process.
- 3.2 There is the option to not take on the role of being a relevant authority with responsibility for the discharge of requirements (if an order is granted). However, it seems sensible for it to undertake this task for the project (if costs are recovered) because it would give the Authority some control over implementation of the scheme.

4 Consultation, engagement, and advice

- 4.1 Internal officers have been involved in the analysis of the PEIR and preparation of the detailed comments on the PEIR in Appendix C.
- 4.2 Joint working, including the identification of key issues, has taken place with the Arun District Council and the South Downs National Park Authority. Joint working with those authorities will continue, as necessary, for the next stages of the DCO process.
- 4.3 An all-member briefing was held on 26 January 2022 at which an outline of the scheme and its impacts (and proposed mitigation) was given by National Highways, with the opportunity for questions and answers.
- 4.4 On 24 February 2022, the draft consultation response was considered by the Communities, Highways and Environment Scrutiny Committee, which resolved *****.
- 4.5 In response to the Committee's comments, amendments have been made to the Consultation Response to *****.

5 Finance

- 5.1 Although the County Council has responsibilities as a statutory consultee, there is no requirement for National Highways to fund this additional work. However, the County Council has agreed in principle to a Planning Performance Agreement (PPA) with National Highways that contributes towards the cost of the Authority engaging in the DCO process. This will enable the consultation work required to be delivered within existing budgets.
- 5.2 If a DCO is confirmed, a new PPA with National Highways will be sought in relation to the County Council discharging its requirements.

6 Risk implications and mitigations

- 6.1 There are no risks associated with responding to the consultation and engaging in the next stages of the DCO process.

Risk	Mitigating Action (in place or planned)
None	n/a

7 Policy alignment and compliance

- 7.1 Corporate Plan (Our Council Plan 2021-2025) – ‘A sustainable and prosperous economy’, one of the four priorities in the Plan, is key to the future wellbeing of West Sussex; this is especially important given the ongoing economic impact of COVID-19. Strategic improvements to the A27 at Arundel will help to ensure that businesses are supported to recover and grow, that local people have access to well-paid employment, and that the conditions are right for enterprise and innovation will have a positive impact on the long-term health of residents and on the potential of young people. Therefore, National Highways’ scheme for an Arundel Bypass aligns, in principle, with this priority. Responding to the challenges of climate change underpins the four priorities in the Plan; paragraph 7.4 of this report addresses this matter.
- 7.2 West Sussex Transport Plan 2011-2026 – improving the A27 at Arundel (and at Chichester and Worthing & Lancing) is the County Council’s highest priority for transport as identified in the Plan. The improvements are needed to increase capacity, to improve reliability and safety, to help increase the competitiveness of local businesses, and to attract investment. Therefore, National Highways’ scheme for an Arundel Bypass aligns, in principle, with this priority.
- 7.3 Economy Plan 2020-2024 – Theme 2 of the Plan is to ‘protect and revive the coastal towns’ of West Sussex. One of the headline actions under this theme is to work with central Government, Highways England, and local stakeholders to identify deliverable schemes to improve the A27 bottlenecks at Chichester, Arundel, Worthing & Lancing alongside public transport improvements. Therefore, National Highways’ scheme for an Arundel Bypass aligns, in principle, with this theme.
- 7.4 Climate Change – although focussed on the County Council’s activity, the Authority’s [Climate Change Strategy](#) is supportive of actions that reduce carbon associated with road-based transport, including through the increased use of sustainable transport options. As identified in paragraphs 2.103-2.105 of this report, the potential impacts of National Highways’ scheme for an Arundel Bypass on climate change are uncertain at this stage. However, in accordance with the NPS for National Highways, it is noted that the carbon impact of the scheme will be assessed at a national level, against the Government’s carbon budgets, not at a local level.
- 7.5 Legal Implications – the County Council is a statutory consultee in the DCO process. It has specific responsibilities as a ‘host’ authority, including: being a consultee on the draft SoCC [undertaken]; responding to the scoping request [undertaken]; responding to the formal consultation [this stage]; discussing the DCO requirements and S106 Agreement; providing an ‘Adequacy of Consultation’ response; preparing SoCG and LIR; and submitting written representations and participating in the examination process. The recommendations in this report seek to ensure that the County Council delivers its responsibilities for the current and remaining stages of the process.
- 7.6 Equalities – not applicable, as it is a response to a consultation by an external organisation.

7.7 Crime and Disorder, Public Health, and Social Value – not applicable.

Matt Davey

Director of Highways, Transport and Planning

Contact Officers

Michael Elkington, Head of Planning Services, 0330 22 26463,
michael.elkington@westsussex.gov.uk

Darryl Hemmings, Transport Planning and Policy Manager, 0330 22 26437,
darryl.hemmings@westsussex.gov.uk.

Appendices

Appendix A: Location Plan

Appendix B: Preliminary Landscape and Environmental Masterplan

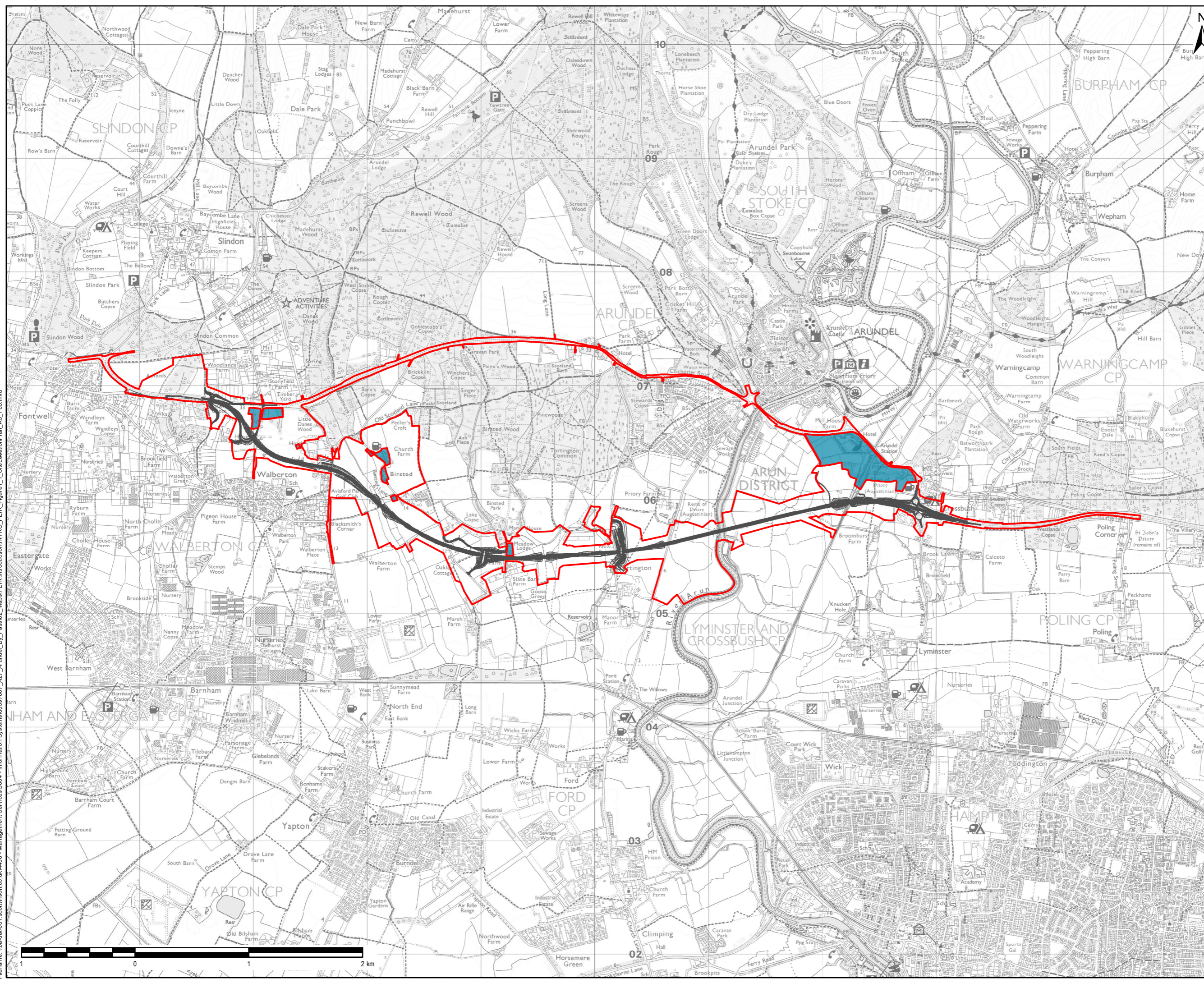
Appendix C: Detailed comments on the Preliminary Environmental Information Report

Background papers

None

DRAFT

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PEIR Vol. 3 Comments	AC	SM	04/01/22	03
Updating the Draft Order Limits	AC	AW	20/12/21	02
Revision Details	By	Check	Date	Suffix

Purpose of Issue
PRELIMINARY ENVIRONMENTAL INFORMATION REPORT

Client
NATIONAL HIGHWAYS
Working on behalf of
Bridge House
Walnut Tree Close
Guildford
Surrey



Project Title
A27 ARUNDEL BYPASS

Drawing Title
FIGURE 1-1
LOCATION PLAN

Designed SM	Drawn SM	Checked KS	Approved SH	Date 04/01/2022
Internal Project No. 60642441	Suitability S4	Volume EGN		

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Drawing Number HE551523	Highways England PIN -BAM	Originator -EGN-	Volume -DR -LE -0014	Rev P03
Location	Type	Role	Number	

File name: \\ba-dat-001.scotwilson.co.uk\4400 - Management Services\5004 - Information Systems\60597607_A27_Arundel_By_Pass\02_Maps\PEIR\Introduction\INTRO_PDIR_Appl...
 15.09.2021

Agenda Item 5
Appendix A

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FONTWELL EAST ROUNDABOUT

FONTWELL

Proposed native woodland to form extension of Ashbeds to assist with dormouse habitat loss and connectivity.

Existing field boundary hedgerow to be 'gapped up' to provide habitat connectivity for dormouse.

Existing linear trees and shrubs to be retained where possible or replaced to create a continuous woodland corridor.

PROPOSED BRIDLEWAY OVERBRIDGE (BR392)

Existing woodland corridor to be retained where possible or replaced with native woodland.

FONTWELL

Proposed native woodland to form extension of Potwell Copse (Ancient Woodland) and integrate bridleway overbridge earthworks into the wider landscape.

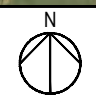
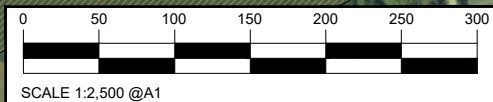
Proposed linear trees and shrubs to screen views of A27 bypass from residents north of Tye Lane and Hooe Farm to the south.

Noise mitigation barrier to reduce the effect of traffic noise on residents north of the A27 bypass.

Embankments either side of Tye Lane overbridge to be planted with native woodland to encourage north - south habitat connectivity and visual screening of the structure.

Native hedgerow proposed to curtilage of highway embankment connecting to wider network of field boundary hedgerows.

Noise mitigation barrier to reduce the effect of traffic noise on Avisford Grange residents.



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- Retained Common Land

Proposed

- LE 1.3 Species rich grassland
- LE 2.1 Woodland
- LE 2.2 Woodland edge
- LE 2.4 Linear trees and shrubs
- LE 4.4 Hedgerow with trees
- LE 5.1 Individual trees
- Location of construction compound
- Location of wetland enhancement areas
- Floodplain compensation storage areas
- Location of replaced ponds
- Attenuation pond
- Drainage ditch
- Earth bund
- Highway embankments - shorter line indicates top of embankment
- Very low noise surfacing *
- Noise barriers
- Replacement Common Land
- draft Order Limits

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First Issue	JB	SH	21/12/21	P01
For Stage Approval	JB	SH	06/01/22	P02
REVISION DETAILS				
By	Check	Date	Suffix	

SUITABLE FOR STAGE APPROVAL

Client: NATIONAL HIGHWAYS
 Bridge House
 1 Walnut Tree Close
 Guildford
 Surrey

Working on behalf of **national highways**

Project Title: **A27 Arundel Bypass**

FIGURE 2-1 (SHEET 1 OF 6)

PRELIMINARY LANDSCAPE AND ENVIRONMENTAL MASTERPLAN

Designed	Drawn	Checked	Approved	Date
JD	JB	JD	SH	06/01/22
Internal Project No.	Scale	Volume	Date	
60630750	@ A1	1:2500	06/01/22	
Subsidiary	Volume	Date		
S4	Landscape	06/01/22		

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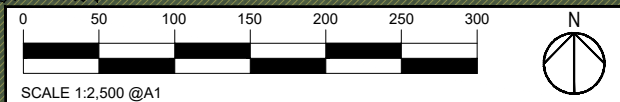
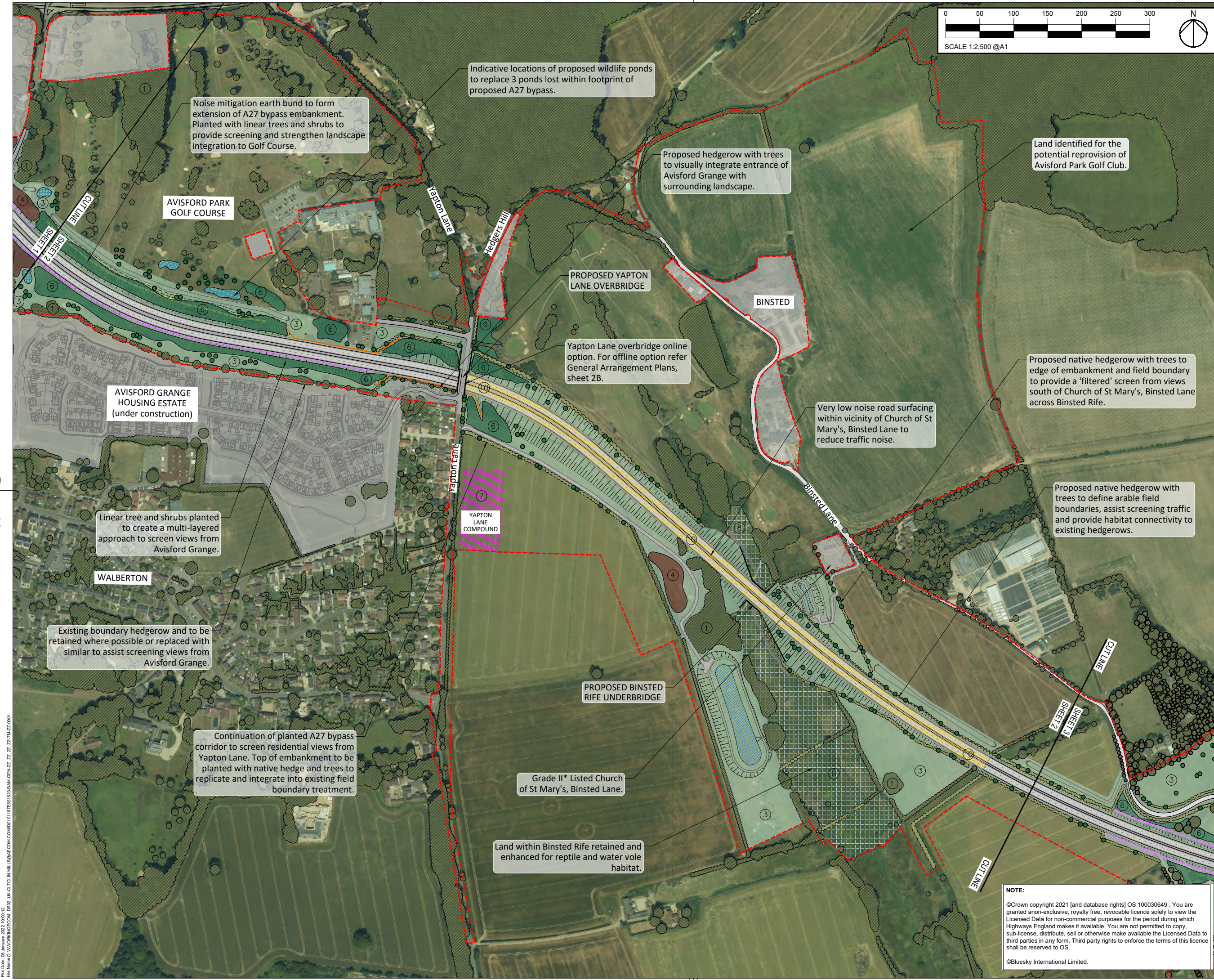
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ZZ	Location	Type	Role
			Number



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First Issue	JD	21/12/21	P01
For Stage Approval	JB	06/01/22	P02
REVISION DETAILS			
By	Check	Date	Suffix

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Client: NATIONAL HIGHWAYS
Working on behalf of national highways

Project Title: **A27 Arundel Bypass**

FIGURE 2-1 (SHEET 2 OF 6)

Drawing Title: **PRELIMINARY LANDSCAPE AND ENVIRONMENTAL MASTERPLAN**

Designed JD	Drawn JJB	Checked JD	Approved SH	Date 06/01/22
Internal Project No. 60630750	S4	Scale @ A1 1:2500	Volume Landscape	

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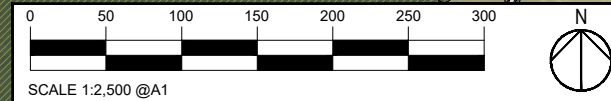
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First Issue	By	Check	Date	Suffix
	JB	SH	21/12/21	P01
For Stage Approval	JB	SH	06/01/22	P02

REVISION DETAILS

Purpose of issue

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Bridge House
1 Walnut Tree Close
Guildford
Surrey

Working on behalf of
national highways

Project Title
A27 Arundel Bypass

Figure Title
FIGURE 2-1 (SHEET 3 OF 6)

Drawing Title
PRELIMINARY LANDSCAPE AND ENVIRONMENTAL MASTERPLAN

Designed	Drawn	Checked	Approved	Date
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Internal Project No.
60630750

Scale @ A1
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Suitability
S4

Volume
Landscape

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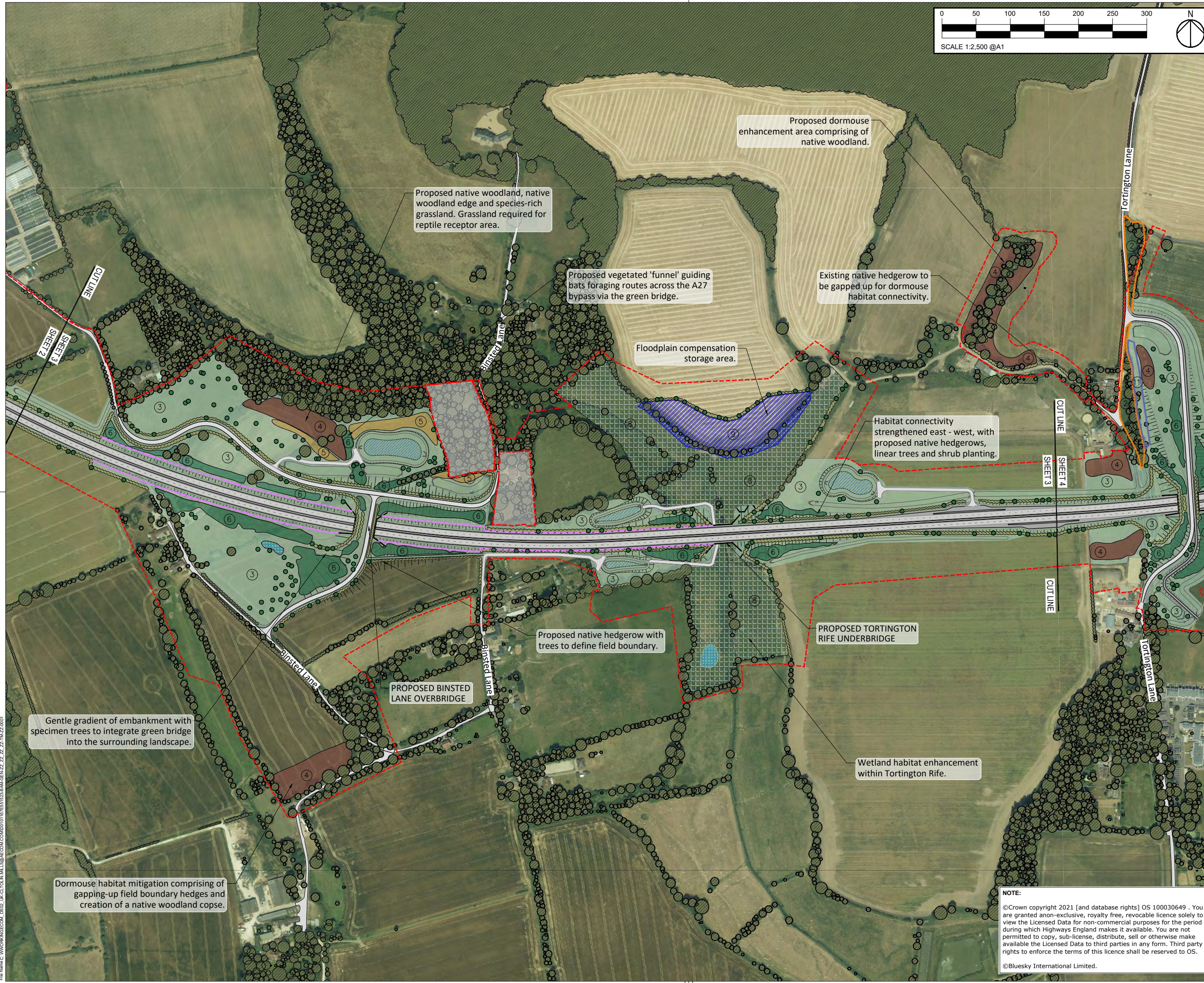
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Drawing Number	Originator	Volume	Rev
HE551523 -BAM	-ELS -	ZZ	P02

Location | Type | Role | Number



Proposed dormouse enhancement area comprising of native woodland.

Proposed native woodland, native woodland edge and species-rich grassland. Grassland required for reptile receptor area.

Proposed vegetated 'funnel' guiding bats foraging routes across the A27 bypass via the green bridge.

Existing native hedgerow to be gapped up for dormouse habitat connectivity.

Floodplain compensation storage area.

Habitat connectivity strengthened east - west, with proposed native hedgerows, linear trees and shrub planting.

Proposed native hedgerow with trees to define field boundary.

PROPOSED TORTINGTON RIFE UNDERBRIDGE

PROPOSED BINSTED LANE OVERBRIDGE

Gentle gradient of embankment with specimen trees to integrate green bridge into the surrounding landscape.

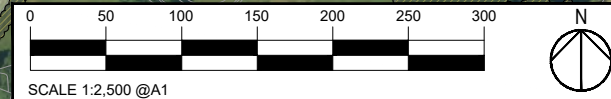
Wetland habitat enhancement within Tortington Rife.

Dormouse habitat mitigation comprising of gapping-up field boundary hedges and creation of a native woodland copse.

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First Issue	By	Date	Suffix
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For Stage Approval	JB	06/01/22	P02

REVISION DETAILS			
By	Date	Check	Suffix

SUITABLE FOR STAGE APPROVAL

Client
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Bridge House
1 Walnut Tree Close
Guildford
Surrey

Working on behalf of
national highways

Project Title
A27 Arundel Bypass

FIGURE 2-1 (SHEET 5 OF 6)

PRELIMINARY LANDSCAPE AND ENVIRONMENTAL MASTERPLAN

Designed JD	Drawn JB	Checked JD	Approved SH	Date 06/01/22
Internal Project No. 60630750	Suitability S4	Scale @ A1 1:2500	Volume Landscape	

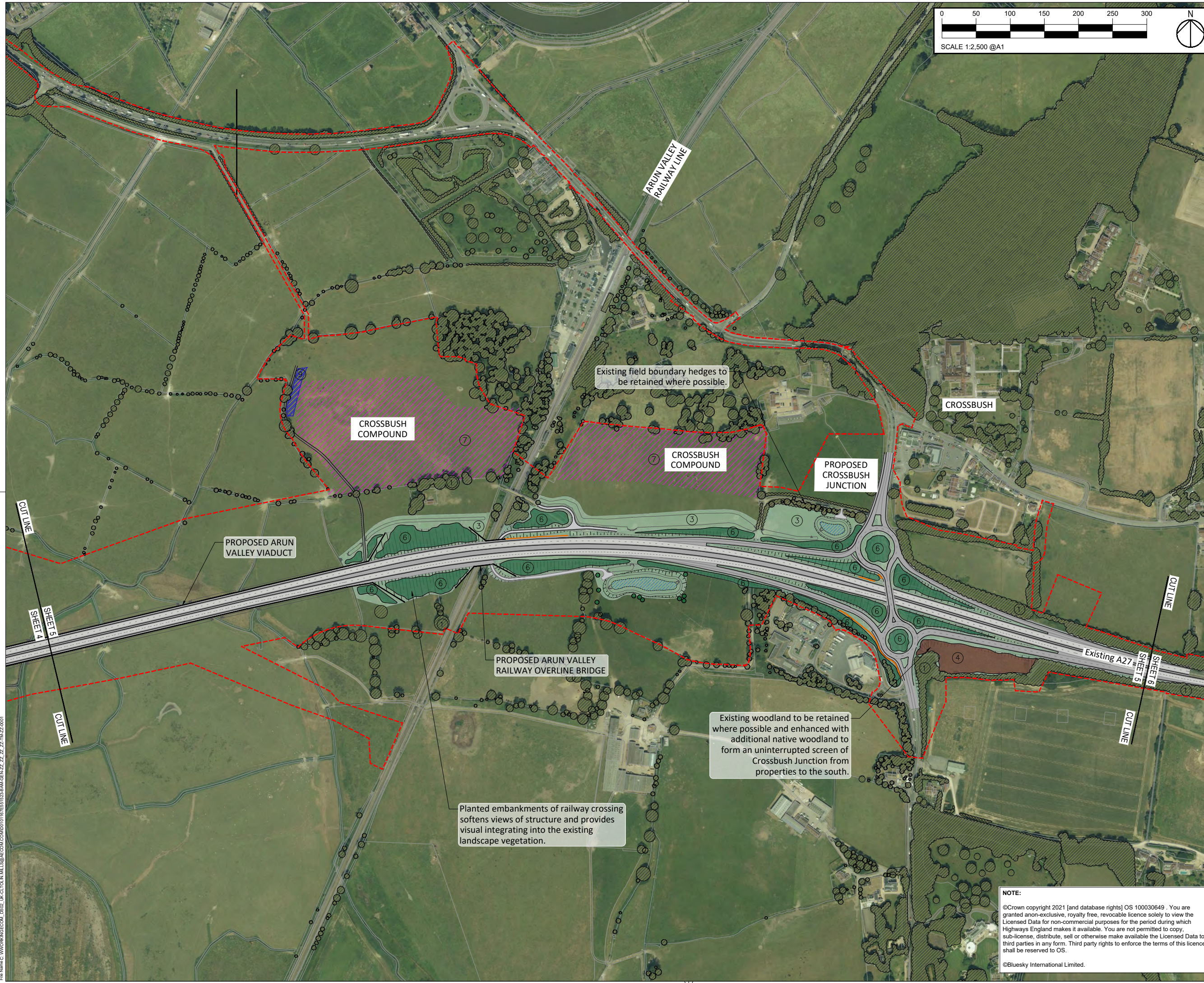
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Agenda Item 5
Appendix B

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Drawing Number HE551523 -BAM	Originator -ELS	Volume -DR-LD-0005	Rev P02
Location ZZ	Type 1	Role 1	Number 1



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Appendix C: Detailed Comments on the Preliminary Environmental Information Report

This document provides comments from West Sussex County Council (hereafter referred to as 'WSCC') on the A27 Arundel Bypass Preliminary Environmental Information Report (PEIR), published by National Highways on 11 January 2022.

The following table provides comment for each PEIR chapter relevant to WSCC, with specific paragraph/table/figure references where applicable.

NB: It does not include comments on behalf of the District or Borough Councils in West Sussex.

DRAFT

Reference	WSCC Comment
Non-Technical Summary	
General	WSCC welcomes the use of simple language and clear layout to help a non-technical reader of this document. This document could have been supplemented with more photographs/visualisations and diagrams to help the reader with understanding aspects such as construction principles.
2.1.4	Please replace ' <i>heritage value</i> ' with ' <i>significance</i> ' or ' <i>interest</i> '. WSCC is unclear what ' <i>wider influence of their setting</i> ' means; please consider re-wording for the Environmental Statement (ES).
4.1.3 and 4.1.5	The Development Consent Order (DCO) application will also include a draft of the Environmental Management Plan (EMP). Although draft, it is advised that this document will need to be very detailed to provide confidence that adverse impacts will be avoided or minimised to an acceptable level. It is unclear whether the EMP covers just the construction phase or both the construction and operational phases. WSCC expects this to be outlined within the ES.
5.2.4	WSCC would have liked to have seen the detail with regards construction haul routes shown within the documentation to allow stakeholders to have an understanding at this stage of likely construction impacts.
6.2.1	Reference should be made to the fact that the significance of any previously unknown archaeological heritage assets within the route corridor is currently unknown but could potentially be high. There currently exists the potential for significant adverse effects upon significant heritage assets.
6.2.4.	Operational effects on setting; this should be included under Section 6.3.
6.3.2	The operation of the scheme will result in some adverse effects on prominent heritage assets within Arundel, specifically Arundel Castle and the Arundel Conservation Area. The significance of these heritage assets is high and the effects may be significant.
7.2.5	Route alignment and engineering design options should be fully explored and only as a last resort should removal of veteran and ancient trees be considered. WSCC expects detailed assessment of options to cover justification for the removal of these trees.
7.2.8	WSCC should be included as a key stakeholder for consultation on woodland/tree loss and potential mitigation and it expects to be consulted on these matters as part of the ongoing consultation.
8.3.1	Lighting is only being incorporated into the scheme design where it is essential for safety reasons to reduce light spill onto bat habitat. This is critically important. Thus, for ecological reasons, it will not be acceptable to light the green bridges or underpasses (including Binsted Rife underbridge) despite their proposed multi-functional use as rights of way, bridleways and/or for vehicular traffic.
17	Where reference is made to the design of any golf course mitigation, it should also be stated that a baseline settings assessment will be needed to assess the contribution made by setting (as existing) to the heritage asset's significance; only then can the impacts of proposed changes be understood and assessed.
Chapter 1 - Introduction	

1.3.9, 1.3.10 and Appendix 1-C	WSCC welcomes the inclusion of National Highways responses to comments made by stakeholders at the Scoping Stage. However, not all comments raised by WSCC have been included. WSCC expects National Highways to include all comments in the Consultation Report for DCO submission, to ensure all comments to date have been responded to.
1.4.1	WSCC is pleased that effective stakeholder engagement has been noted as a key driver for the design evolution process. To date, it has been noted that meetings held could have provided a more meaningful platform for stakeholders to share vital local knowledge and technical input. WSCC welcomes the updating of the Terms of Reference and look forward to more opportunities to provide input into the design and development of the EIA going forward.
1.6.9	Local concerns raised to WSCC during the consultation period about the methods of engagement (as documented in the published SoCC) will be considered as evidence for inclusion in the acceptance phase Adequacy of Consultation response.
Chapter 2 -The Scheme	
Traffic and Transport	<p>There is insufficient information about the impacts of the scheme on the transport network. As the assessment of some environmental impacts (e.g., air quality, noise and carbon) are dependent on information from the traffic model, it is not possible to draw any firm conclusions based on the assessment of these impacts at this stage. As a minimum, the following should be provided:</p> <ul style="list-style-type: none"> • Transport assessment (the scope of which should be agreed with WSCC); • Design audit identifying any departures from standards; • Local model validation report; • Traffic forecasting report; • Road safety audit; • Construction traffic management plan; and • Walking Cycling Horse Riding Assessment Report (WCHAR).
Traffic and Transport	<p>It is unclear how the scheme will perform as part of the wider highway network which is already congested in places. The scheme has the potential to exacerbate existing issues and create new ones. The apparent rat run on The Street in Walberton requires further investigation to understand the causes and potential solutions which should be included in the proposed scheme. In order to understand the issues and the extent to which they can be mitigated, the information requested should include diagrams detailing flow changes and models (or other suitable technical information) showing performance of the following junctions in each assessment year:</p> <ul style="list-style-type: none"> • A27/A284 'Crossbush' junction (including any assumptions about interactions with the Crossbush service station); • A27/A29 'Fontwell' junctions (east and west); • A284/A259 'Lyminster Bypass/Fitzalan Rd' junction; • A27/B2233 'Crockerhill' junction; • A29/A259 junctions; • A27/A280 'Patching' junction; • A24/A280 'Findon' junction; and • A259/A2032 'Goring Crossways' junction.

General Arrangement (sheet 1 of 9)	The proposed Tye Lane junction with existing A27 and Mill Lane involves an acute turn for westbound traffic at the end of a long straight where presumably national speed limit will apply. There is potential for road safety issues. WSCC expects a road safety audit and details of how the recommendations are addressed within the design to be produced.
General Arrangement (sheet 1 of 9)	Latest cycle design guidance (LTN 1/20) recognises the need for segregation between different users and generally seeks to move away from shared use facilities such as the proposed footway/cycleway alongside the detrunked A27. WSCC expects evidence to justify the choice of design solution in this location as there appears to be plenty of space available.
General Arrangement (sheet 4 of 9)	The Tortington Lane overbridge has the potential to affect the deliverability of a junction with Ford Road, now or in the future. This should be taken into account in determining the dimensions of this structure which should not preclude the addition of a Ford Road junction designed to current standards.
General Arrangement (sheet 4 of 9)	It is unclear what design standards have been used to design the Tortington Lane overbridge which appears to include a steep gradient on the southern side of the A27. A design audit is expected, setting out what standards have been used and any departures from standards that will require WSCC approval.
General Arrangement (sheet 5 of 9)	The proposed Crossbush junction looks quite small. A junction model (or similar information) is expected to demonstrate that the scheme will operate to an acceptable level without significant queuing on the A284 and existing A27. It is not clear whether the proposed scheme includes enough queuing space for traffic to turn right into the service area without queuing back through the roundabout/slip road. Evidence is required that the queuing space is sufficient.
Table 2.1	The height of the viaduct has the potential to affect the deliverability of a junction with Ford Road, now or in the future. This should be taken into account in determining the clearance height and ensuring the viaduct height does not preclude the addition of a Ford Road junction designed to current standards.
2.3.5	WSCC expects detailed engagement on the de-trunking strategy going forward, including the potential to mitigate impacts elsewhere and the wide ranging opportunities this element of the scheme could bring to the local area. This sections also states ' <i>de-trunking of the existing A27 carriageway may involve some works within the National Park given that a large section of it is located within the designated area</i> '. WSCC suggests this is changed to 'will' as this is more accurate.
2.3.15	' <i>The PEI Report is based on the maximum area of land likely to be required for construction and operation of the Scheme</i> '. There needs to be a clearer understanding of construction working areas, haul routes, and clarity that enough land is available for mitigation and enhancement within the Draft Order Limits before certainty can be had on the above statement.
2.4.3	WSCC requests that a crossing schedule is produced for inclusion within the ES, to outline each type of crossing (e.g. watercourse, road, PRoW) and a brief description of the construction methodology to be used.
General	WSCC requests further consultation on surfacing along the entire route and the benefits of using a ' <i>very low noise</i> ' surfacing for the entire length, rather than proposed for just the section adjacent to the Church

	of St Mary's Church.
2.4.11	WSCC welcomes the review by the Design Council and wants National Highways to acknowledge all comments made, rather than just that stated in this paragraph. The review was wide ranging and WSCC would request the design feedback given is taken on board, with clear narrative in the ES as to how they have been factored into the design.
General	WSCC welcomes reference to the ' <i>Road to Good Design</i> '. Importance must be placed on the criteria for good design within the National Networks NPS (NN NPS), where it states, ' <i>Applicants should include design as an integral consideration from the outset</i> ', and ' <i>Visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost</i> '. WSCC wants to see how these criteria have been applied to the final design presented as part of the DCO application.
2.4.12	WSCC wants to see the overall footprint minimised as far as possible and, therefore, it would be useful if a table was given on the key features (engineering parameters) for stakeholders to understand both construction and operational land-take.
2.4.16 and 2.4.17	Understanding where required lighting, signage, speed cameras, location of vehicle restraint systems and emergency and maintenance access would be required, will be needed for a full and robust EIA to be undertaken. WSCC requests that this information is included as part of the EIA going forward. Consultation on a lighting strategy will be required with key stakeholders.
2.5.1.d	Sections and visualisations which show how the proposed green bridges will sit in the landscape and how their design has responded to landscape character will also be required.
2.6.2	Proposals that involve the extension or creation of new golf facilities will need to be factored into the LVIA too, including viewpoints and the ZTV. WSCC request that viewpoints and visualisations are included to show the likely impact of the golf course on visual and landscape receptors.
2.6.8	It is unclear what design standards have been used to design the option for an offline Yapton Lane overbridge. A design audit should be provided setting out what standards have been used and any departures from standards that will require WSCC approval.
2.7.1 and 2.7.2	The requirement for a concrete batching plant to enable construction of the scheme should be confirmed, along with its associated impacts presented within the ES.
2.7.4	Further details regarding the construction programme should have been provided, even in a preliminary sense to aid the assessment of impacts and required mitigation. This will be required within the ES.
2.7.8	The optioneering work to locate the chosen compound locations should have been discussed with stakeholders ahead of PEIR publication. What consideration for sensitive receptors has been undertaken? Confirmation on whether ZTVs for each compound have been undertaken is required. Further details on layouts, locations (along with any smaller compounds not included in the consultation material) should be consulted upon prior to ES stage assessment. Concerns are raised with the close proximity of some sensitive receptors to the locations outlined, including Yapton Lane compound, (residential properties along Yapton Lane and archaeological sensitivities) and Ford Road. Also of concern are potential effects to

	PRoW and how these compounds will be accessed for 3-4 years from the local road network.
2.7.24	A clearer understanding of the work and associated impacts of the utility diversions is needed as part of the ES, including whether enough land with the Draft Order Limits been included to facilitate this if consultation with suppliers/owners/managers has not been undertaken in detail and solutions are not finalised. No detail on the potential effects of these diversions have been included in the PEIR.
2.7.28	Clarity is required on where properties would be demolished and the impact of this across all EIA topics needs addressing. No detail is given, although five properties along Binsted Lane are referred to in paragraph 12.6.2, and reference to Morley's Croft (Grade II listed building) in 6.8.5 where it states, ' <i>Should construction unavoidably require this building to be demolished, it is likely that its loss would be significant</i> '. WSCC is concerned this level of detail has not been confirmed in the PEIR.
General	Concern is raised about potential effects upon Arundel Fire Station and the impact to emergency response times. Further details, including Flood Risk Assessment (FRA), TA and the CTMP are required, and consultation with West Sussex Fire and Rescue during the next stages of the project.
Chapter 3 - Assessment of Alternatives	
3.4.4/3.4.5	The PEIR lacks sufficient detail about how environmental criteria have influenced the decision-making process, specifically with regard the development of the Grey Route. In 2019, WSCC raised concerns that the Grey Route (option 5BV1) did not offer the best balance between traffic, economic and social benefits and environmental impacts. Although the PEIR states that ' <i>Environmental effects have been considered during this appraisal process</i> ', a much clearer narrative is needed to explain how the environment has driven the design process. Constraints mapping and scoring criteria should be included within the ES chapter, to make the assessment much more transparent. How feedback from the community and stakeholders have influenced the design must be clearly demonstrated and the main reasons for the selection of the chosen option and the rejection of alternatives should be presented in accordance with the requirements of the EIA Regulations in the ES.
3.5.65	WSCC welcome the decision of a viaduct option for the River Arun crossing, over that of an embankment. However, there are still concerns about the design and placement of the structure and future work needs to involve specialist design input, as well as that of stakeholders, to ensure the viaduct is both sensitively designed and informed by the EIA. There must be the highest standard of design, which must incorporate a clear design narrative. The design must outline to stakeholders and the community how the assessment work undertaken will mitigate adverse impacts and communicate benefits through wide-ranging enhancement measures that go above and beyond those required to mitigate the scheme. WSCC had expected the flexibility in design height indicated within the PEIR to be further assessed to allow the EIA to inform this design element.
Chapter 4 - Environmental Assessment Methodology	
General	WSCC welcomes, pursuant to Regulation 14 (4) of the 2017 EIA Regulations, the resultant ES being prepared by competent experts. WSCC had expected to see that the PEIR provided a Statement of

	Competence to this effect. WSCC expects to see this at the ES stage.
General	WSCC wants to see commitments to monitoring in the ES where required. It is recognised that monitoring is an important element in the management and verification of the actual proposed impacts. It is understood that the outline management plans, across a number of environmental topics, will be submitted along with the DCO application. It was expected a full list of these should be included in the PEIR as a minimum, and it would have been very helpful to stakeholders to see some draft outline documents, especially with the contractor on board as part of the design team.
Table 4.1	WSCC have not yet agreed to the LVIA methodology proposed, contrary to the statement within the table. In particular, WSCC has not commented on the criteria defined by National Highways for ascribing value and susceptibility to change to individual landscape and visual receptors.
4.2 and 4.2.3	It is also noted that the draft Order Limits seem to go outside of the indicative Scoping Boundary from March 2021; this should be confirmed by National Highways and any implications outlined in the ES.
General	Without undertaking a more transparent, detailed, and less preliminary assessment, it is unclear whether likely impacts from the proposals will be mitigated sufficiently. This also does not give confidence the design has been informed by the assessment work undertaken and the draft Order Limits are a 'worst case land take', as currently stated in the PEIR.
4.5	The statement that a preliminary assessment has been undertaken and that it is considered (at this stage) there are unlikely to be any significant environmental effects associated with major events. This needs a clear evidence base presented to understand how this conclusion has been reached. WSCC would be concerned about any increase in flood risk, which would have the potential to impact local residents, and await the final FRA for comment further.
General	It is unhelpful that statements of significant effects are made without the transparency in the impact matrix scoring (sensitivity/importance and magnitude of effect which allows a significant or non-significant scoring to be concluded) and much is left to professional judgement without the necessary evidence base. WSCC expects a full transparent assessment to be undertaken for the ES.
General	The Scoping Report stated an intention to adopt a 'landscape approach' to assessment in general; to ensure impacts to environmental receptors are understood in an integrated way. Despite this stated intention, there is poor integration between the different chapters. Given the scale of the development and its potential to impact on numerous different environmental factors, the importance of cross-disciplinary work cannot be overstated for this scheme and along with a robust CEA, must be further addressed in the ES.
General	There is inconsistency between the way construction and operational phase impacts are presented. For example, effects on heritage assets via change within setting; preferably within the construction stage; reference to the effects being ongoing and permanent should be made within the operation section.
General	The importance of the EMP is made in the PEIR. However, it would have been helpful to have a first outline draft of this document available as part of statutory consultation to give stakeholders confidence that

	measures and procedures will be defined and secured through the DCO. This must be presented as part of the DCO application.
Chapter 5 - Air Quality	
General	WSCC refers to comments also made by Arun District Council (ADC) with regard to air quality matters.
General	Reference should be made to ' <i>Breathing Better a partnership approach to improving air quality in West Sussex</i> ' (May 2018). WSCC and all West Sussex District and Borough Councils are committed to ensuring that the County is a healthy place to live.
5.1.7	The Scoping Opinion requested that PM2.5 assessment was included. The Environment Act 2021 indicates that Government is committed to setting a target for PM2.5. It is suggested that a PM2.5 assessment takes place in preparation for the Government target which may be introduced before a decision is taken on the DCO.
5.3.3	The air quality assessment is based on fixed traffic demand. Outputs from the variable demand model should be provided to confirm the location and significance of the effects on air quality.
5.3.6	The assessment of construction impacts on air quality is only qualitative. WSCC expects a quantitative assessment to be undertaken for the ES to allow for meaningful scrutiny of potential impacts.
5.8.5	Details of construction phase HGV movements have not been provided. A quantitative assessment should be provided to allow the impacts on air quality to be fully assessed.
General	Until the evidence base and further assessment has been provided and scrutinised by WSCC (including the required TA and construction phase information), likely levels of impacts cannot be predicted with certainty and required mitigation packages discussed.
Chapter 6 - Cultural Heritage	
6.1.2	The ES must include reference to geoarchaeological deposits.
6.1.5	WSCC questions why a fuller baseline assessment has not been produced for the PEIR. The baseline would obviously need to be updated for the ES with the results of the ongoing field surveys, to incorporate previously unrecorded archaeological/geoarchaeological heritage assets. However, the West Sussex Historic Environment Record (WSHER) data, supplemented by other sources such as Lidar, site walkover and desk-based research, is sufficient to produce a much more complete assessment of the historic environment baseline resource, and the archaeological potential along the route, than has been provided within the chapter.
6.1.5	It is not clear why a baseline assessment of significance (and the contribution made by setting) for designated heritage assets has not undertaken earlier in the DCO process. Such a baseline settings assessment should have been prepared in order to inform the process of scoping in/out of heritage assets and selection of viewpoints for the LVIA. Ongoing survey work is unlikely to change the assessment of significance of designated heritage assets (or non-designated built heritage assets). In the event that additional built heritage assessment work is planned in order to inform assessments of significance, a preliminary statement of significance for these assets could still have been undertaken for PEIR stage.

6.1.5	The significance of designated assets is touched upon only once in 6.8.6, points a-n; this comprises only a single-word assessment of value (high/very high) and only for those designated assets assessed as likely to suffer ' <i>potential significant effects</i> ' due to changes within their setting. No supporting qualitative statement of significance, in accordance with Historic England methodology, nor methodology setting out how value/significance has been assessed, is provided. WSCC would therefore very much disagree that ' <i>the significance of designated assets is considered within the PEI Report</i> ' as this has not been done in a consistent, meaningful, or transparent way. It's not clear why this exercise has not been carried out for designated assets at the very least.
6.3.1	The information required to produce a baseline and preliminary assessment of significance for designated heritage assets would have been available at the time of writing the PEIR and it is not clear why a draft version this has not been produced to draft/preliminary stage. Further justification is required.
6.3.3	The sources listed in Section 6.5, including full WSHER search, would be considered sufficient to inform the production of a fully detailed, if preliminary, baseline assessment for PEIR stage. With the results from ongoing surveys to be added for the ES. The baseline included here is much lighter touch, which is unhelpful.
6.4.2	The wider 5km study area for higher value assets is welcomed and necessary, especially in regard to the viaduct section, situated within the open floodplain landscape, likely to be prominent within longer range views from a number of heritage assets located at some considerable distance. WSCC expects to see this flexible approach extended. Consideration should be given to the creation of a bespoke ZTV generated specifically for the floodplain/viaduct section of the route, extending to 5km, and including designated assets of all grades. The purpose being to pick up any designated assets graded below II* (i.e., Grade II LBs; Registered Parks and Gardens) which might have long-range, designed views contributing to their significance which incorporate the Arun valley floodplain, and thus be affected by the scheme. Such heritage assets may well not be picked up by the current methodology.
6.5	In general, the baseline provides a well-written and concise narrative overview of the historical development of the study area. However, the level of detail is less than expected and is somewhat inconsistent in degree of detail (e.g., Bronze Age vs Iron Age sections), with some heritage assets recorded on the HER and located within the redline boundary not mentioned or mentioned only in passing as part of a wider monument class. The lack of WSHER reference numbers within the text means it is difficult to ascertain whether specific assets/finds/features have been included within the baseline or considered. For example, the reference to a Roman villa ' <i>at Walberton approximately 440 m south of the Scheme</i> ', as opposed to reference to the accepted identifier as per the WSHER, ' <i>Roman Villa site at Blacksmith's Corner, Walberton</i> ' (MWS8590).
6.5.9	See comment for 6.1.5
6.5.11	This statement is contradicted by 6.5.12, which discusses a number of Palaeolithic findspots recorded within the Study Area. Was the intention to refer to the lack of previously recorded Palaeolithic archaeological sites or features, of secure provenance (as opposed to findspots), within the Study Area?

6.5.16	The Avisford Grange Report was added to the WSHER in 2021; records suggest that the last WSHER search undertaken for the route was on 26/11/2020. The WSHER User Guide states that HER data should be held for a maximum of 12 months. The HER should have been consulted to check for recent updates prior to finalisation of the PEIR, at a minimum.
6.5.16	Although the results of the ongoing trial trenching have not yet been reported, the WSHER identifies a number of undated features identified from aerial photography and/or Lidar (the latter identified as a source from which this baseline was compiled). Accepting that any feature identified by such non-intrusive methods (such as the ring ditch identified in the 'golf course mitigation field', north-east of St Mary's Church Binsted, WSHER MWS15137) remains undated, these possible and probable features should be discussed within the baseline, within the most appropriate period section.
6.5.17	The baseline does not touch upon research questions for the area; WSCC expect the inclusion of such within the ES/baseline. Specifically for this period, WSCC would want to see discussion of the emerging evidence on the coastal plain for intensification of settlement, transport, and storage of goods during the late Iron Age/early Romano-British period. The findings from adjacent Avisford Park add to this body of evidence. Any potentially contemporary features from ongoing scheme field investigations should be discussed, and their significance assessed, in the context of this wider picture, which might elevate the significance of individual features/activity beyond a basic functional and period-based interpretation. Assessment of significance needs to consider the potential of previously unrecorded archaeological features to contribute to research questions relating to this transitional phase and changes in the landscape, settlement pattern, industrial and agricultural patterns, and transport network.
6.6.4	WSCC expects Pleistocene deposits of Palaeolithic archaeological/geoarchaeological potential, as well as historic landscapes to be included within this section of the ES.
6.7.2	A viaduct is likely preferable to an embankment in terms of both change within settings of heritage assets, and physical impacts (direct and indirect) to buried archaeological features and deposits. However, the design will be key. Any crossing of the floodplain will necessarily be elevated and highly visually prominent from a number of higher-grade heritage assets to a greater or lesser degree. Within the ES, a robust settings assessment and understanding of significance, the contribution of setting and the sensitivity to change of the affected areas will be vital to accurately capture likely impacts to sensitive receptors. This should include ensuring that mere intervisibility with the viaduct is not taken as a proxy for an adverse effect to significance, and likewise that non-visual effects are fully assessed. The option of lowering the vertical alignment of the scheme over the Arun floodplain would likely reduce the impacts upon heritage assets, in particular Arundel Castle. Further assessment work needs to be undertaken.
6.7.3	The intention to balance screening of intrusive views of the road with the need to preserve the current open landscape setting of the Church of St Marys (which makes a positive contribution to the significance of the Grade II* listed building) is welcomed. The success or otherwise of this balancing act will hinge upon the detailed design of the scheme although the potential for significant, permanent adverse impacts to significance

	remains high. The potential for substantial harm to this high value heritage asset has certainly not been ruled out, as the baseline settings assessment has not been undertaken. Further consultation with stakeholders is needed here.
6.7.4	It is encouraging to note that heritage has been considered in the drafting of the draft EMP. However, the same consideration does not seem to have been given to the siting of compounds and laydown areas; the location of several compounds seems likely to result in significant permanent physical effects to non-designated archaeological heritage assets, as well as temporary adverse effects to designated assets via changes within setting.
6.7.6	WSCC requests the terminology for investigations vs mitigation is checked e.g., <i>'a programme of archaeological mitigation and recording proportionate to the level of impact and the value of the assets affected.'</i>
6.7.9	The proposed use of ultra-low noise surfacing and lowered speed limit in the vicinity of St Mary's Church is welcomed. The exact locations of acceleration and deceleration around this zone, and how this interacts with the surfacing, need to be confirmed before the benefits/reduced harm of these mitigation measures can be accurately assessed.
6.8.2	The loss or truncation of the assets highlighted in this section as <i>'known assets that may be significantly affected'</i> is noted, and it is assumed this has been calculated on a 'worst case scenario' basis, although the methodology and evidence base for this assessment is not presented. In the absence of the baseline assessment to refine the presence, distribution, significance and likely impacts, this list causes concern. The principle of the loss or truncation of many of the assets listed here (a non-exhaustive list which does not include the results from the ongoing evaluation fieldwork) has not yet been agreed or justified as acceptable or unavoidable. In particular, items c, f, h, i and m will need further assessment of significance and likely impacts before the principle of their loss can be weighed in the 'planning balance' exercise.
6.8.5	The loss of Grade II Listed Morley's Croft should be avoided unless the success of the scheme hinges on its unavoidable removal (see paras 5.131 and 5.133 of the NPSNN). Its loss would certainly (as opposed to likely; the asset is identified as high value in 6.8.6 point j) be considered a significant adverse effect.
6.8.8	There can be a tendency when assessing construction phase effects to write non-physical temporary effects off, purely on the basis they are not permanent and irreversible. However, the 3-4 year duration of the construction programme means that, whilst temporary, these structures will comprise substantial fixtures in the landscape, with some degree of longevity. WSCC requests the effects of the scheme should be assessed in light of this.
6.8.9	The loss or severe truncation of a substantial prehistoric enclosure (identified during geophysical survey and confirmed via the preliminary results of the ongoing trial trenching) is proposed, in an area outside the route corridor, purely for the construction of a compound. It is not at all clear on the basis of the information provided that this potentially significant adverse effect upon a (previously unrecorded) archaeological heritage asset is unavoidable. In line with the intentions stated in this section, WSCC would expect to see greater efforts to minimise the impacts of compounds upon heritage assets; both above-and below-ground.

6.8.14	The magnitude of the beneficial effect upon heritage assets as a result of detrunking remains to be assessed; this will differ for different heritage assets. The benefit is likely to be greatest for those heritage assets currently identified as noise sensitive receptors along the existing A27. In the absence of the baseline settings assessment, it is not possible to state that a reduction in traffic will automatically result in a meaningful beneficial effect; it first needs to be identified the degree to which setting contributed to significance. Any asset that receives significant benefit from a reduction in traffic noise, may also be at risk of significant adverse effects due to increase traffic noise as a result of the new route alignment. Assessment work should ensure that harm and benefit is weighed fairly for the detrunking vs the new scheme.
6.8.15	In the absence of the baseline assessment work, it is not yet possible to make this assertion.
6.8.16	Even with the embedded mitigation of surfacing in the vicinity of the Church of St Mary's, Binsted, the change in setting and associated increase in noise, visual intrusion, change in character, loss of tranquillity, and severance of existing views, will still remain and will need to be robustly assessed in the ES.
General	<p>Trial trenching coverage for the scheme is generally excellent and the majority of route corridor and major impacts areas covered. However, the following exceptions have been identified:</p> <ul style="list-style-type: none"> • South of Proposed Bridleway Overbridge (BR391), east of Copse Lane and Potwell Copse; the evaluated area did not include the south-east portion of the field; this area now appears within the redline, and the proposed tie-in with Copse Lane extends into this unevaluated area; • A parcel on land immediately south of Avisford Park House and east of Tye Lane was not evaluated; • Location of attenuations ponds either side of Binsted Rife, and laydown area, have not been evaluated; it is agreed that site and water table constraints make trial trench evaluation impractical, but note that this area has not been evaluated; • Land either side of Tortington Rife, within route corridor/works areas, not evaluated due to hydrological reasons; • Land SW of Binsted Lane (in vicinity of and south-east of Oakley's Barn), required for utilities diversions; not evaluated; and • There may well be the need for subsequent phases of trial trench evaluation, in the event that additional areas of impacts, especially for compounds, utilities, mitigation and access, are identified.
General	Due to the hydrological constraints of the floodplain and the deep overburden known to be present, effective field evaluation of the viaduct section of the route has been challenging, with Trial Trenching descoped here as a result. The programme of geoarchaeological monitoring and investigations within this section of the route is welcomed. Care must be taken to ensure the archaeological potential of this section of the route is assessed fully beyond the assessment of geoarchaeological potential arising from the search work. The potential for in situ Pleistocene archaeological sites and features to be preserved at depth should be considered in addition to the geoarchaeological and paleoenvironmental potential. The inability to evaluate or mitigate this section effectively should not be used as justification for accepting the impacts of piling without clear justification; the areas of impacts along this section will be

	substantial and extensive, with cumulative impacts to any archaeological deposits or in situ features present at depth below alluvial deposits.
General	Assessment of significance of effects; the omission of the likely magnitude of effects is not helpful. The methodology states that in the absence of the detailed baseline assessment work, a ' <i>worst-case scenario</i> ' has been adopted for assessing likely significant effects. Table 6.2 assesses the likely permanence and whether the effect will be adverse or beneficial (following embedded mitigations). However, when assessing on a ' <i>worst-case scenario</i> ' basis, WSCC would expect to see a preliminary assessment of the magnitude/severity of potential effects. This could be expressed as a range, e.g., 'permanent adverse effect, likely minor to major adverse'. The current methodology serves to downplay where there is the likelihood for significant adverse effects. For example, the assessment for Arundel Castle, one of the major sensitive receptors for the scheme, is assessed only as; ' <i>Permanent adverse effects associated with the visibility of the Scheme within the landscape setting of the asset</i> ' and ' <i>Permanent beneficial effect from removal of traffic from the setting of the asset during operation of the Scheme</i> '. In the absence of a likely magnitude of effect being provided, the impression is given that the (likely slight) beneficial effect of a reduction in traffic through Arundel may balance out the (likely more significant) adverse effects of the scheme upon this nationally significant heritage asset. The omission of assessment of magnitude of effect therefore gives a false impression of the likely significant effects of the scheme.
General	The assessment of cumulative impacts should specifically include a consideration of the piecemeal loss of non-designated archaeological heritage assets on the Sussex coastal plain. Recent housing developments in the vicinity of the redline boundary (around Walberton and Binsted in particular) have identified further evidence for an apparently extensive landscape of multi-period prehistoric and Romano-British activity. The ES should assess how the scheme will impact archaeology which might form part of this emerging prehistoric landscape (with further evidence almost certainly forthcoming from the trial trench evaluation).
General	The location of the Yapton Lane compound will result in the total or partial loss of archaeological heritage assets identified during the recent geophysical survey and ongoing trial trenching. The character, date and significance of the assets has not yet been fully assessed, but they are likely to be of prehistoric to Romano-British date and of at least local to regional significance. Significance may be influenced in the case of a demonstrable relationship with features excavated at Avisford Grange, and with the Blacksmith's Corner Roman villa to the south of the route corridor. The loss of these archaeological features, located in land outside the route corridor, purely for the siting of a 'temporary' construction compound, has not been sufficiently justified. Alternative options for this secondary compound should be explored, and if none are viable, convincing justification should be provided to support this.
General	There is likely to be an impact from topsoil stockpiling areas, on the assumption that the existing topsoil in the areas will be removed prior to stockpiling, and that subsequent removal of the stockpiles has the potential for impact to buried archaeology. Any areas proposed for topsoil storage, or storage of other materials where topsoil removal will be required, should be assessed within the ES.

General	Whilst the impacts associated with the compounds and topsoil stockpiling areas are at least outlined in the PEIR, the referenced 'laydown areas' do not appear to be covered. It is not currently clear what, if any, groundworks will be involved, and if there may be archaeological impacts from laydown area. In particular, it is noted that a laydown area is proposed in close proximity to Tortington Priory Scheduled Monument; this is a potential cause for concern and may entail additional impacts during construction phase.
General	The location of the proposed access track for the attenuation pond south-west of the Church of St Mary's, Binsted, is of concern; there may be the potential for additional, avoidable impacts to the church due to additional changes within its immediate setting; details on the need for and design of this feature are expected in the ES.
General	The potential for additional impacts to the archaeological resource arising from off-site ecological mitigation/biodiversity net gain habitat creation is unclear. Any such off-site mitigation should be included within the ES assessment.
General	It is of concern that the LVIA appears to have considered the road corridor only in selection of viewpoint, and not included other areas of impacts. In particular, the field earmarked for the potential golf course relocation, east of the Church of St Mary's. The field has been included within the trial trench evaluation, but it appears that this area, as well as the temporary structures such as compounds, have not been included within the ZTV. Creation of a new 18-hole golf course within this arable parcel will introduce change into the settings of heritage assets above and beyond that caused by the road itself, in particularly to the Church and surrounds. The results of the trial trench evaluation indicate the presence of heritage assets of archaeological interest which might be truncated or removed. If this option is taken forward, there should be detailed heritage and archaeological impact assessment for the golf course re-provision, including settings. WSCC would also expect to see a ZTV and, if appropriate, viewpoints, for these additional areas of impact, not just for the main route corridor itself.
Chapter 7 - Landscape and Visual	
Figure 2.1	Details of the Preliminary Landscape and Environmental Masterplan (PLEM) for the Yapton Lane offline overbridge option are required.
Figure 2.1 (Sheet 1 of 6)	<ul style="list-style-type: none"> • Woodland planting at (4). It is unclear how this planting assists with connectivity as it appears to comprise discrete parcels. Consideration should be given to ways of connecting new habitat so that it contributes to Green Infrastructure. WSCC request a Green Infrastructure Plan that illustrates connectivity between existing and proposed features; • Why are Ashbeds and land to west included within the red line? Can this area be used for further planting?; • 'Noise barriers' need to be included in illustrative sections and assessed as part of LVIA. Details of height and materials need to be included. WSCC requests consideration should be given to green solutions such as http://www.etsluk.com/; • Locations of proposed hedgerows and tree lines should be informed by existing and historic landscape pattern and opportunities taken to restore historic field patterns where possible; and • More specific detail required on 'downgrading' of existing A27 is

	required including illustrative sections and inclusion in the LVIA.
Figure 2.1 (Sheet 2 of 6)	<ul style="list-style-type: none"> • The proposed 'layered landscape' needs to be informed by and respond positively to the existing landscape character including the historic landscape pattern; • Why is land to the east of Yapton Road compound within red line? WSCC requests this area is excluded if not required. Is Yapton Road compound shown to the correct size?; • Proposed linear tree belts, hedgerows and earth bunds and their locations need to be informed by an understanding of landscape character; • Proposals that have the potential to impact the historic and rural character of the Church of St Mary's, Binsted including the A27 (and associated planting, lighting, noise, bunds, and noise attenuation measures) and proposed golf course need to be carefully considered and informed by an understanding of landscape character. The proposal also needs to be factored into the LVIA and represented by viewpoints; • It is not clear if the attenuation pond will hold water permanently. WSCC would prefer this feature to contribute to biodiversity/ green infrastructure and be less engineered and more natural in shape. Consideration should be given to making sure access tracks are rural in character and do not have a suburbanising effect.
Figure 2.1 (Sheet 3 of 6)	<ul style="list-style-type: none"> • More details are required of the floodplain compensation area and how this is to be planted and maintained and its appearance and function outside of flood events; • Location and shape of proposed landscape elements (including attenuation basins, woodland extensions, planting, boundaries etc) needs to be informed by an understanding of existing character and historic landscape patterns; and • Why is the land north and south of Binsted Lane (to south of proposed A27) within the red line? WSCC requests this is removed if not required as part of the scheme.
Figure 2.1 (Sheet 4 of 6)	<ul style="list-style-type: none"> • Is the Ford Road compound shown to the correct size? • Temporary haul roads, storage areas, concrete batching plant (if required) etc need to be shown on plans; • Why is land south-west of Tortington Priory within red line? WSCC requests this is removed if not required as part of the scheme; • Proposed ditches for water vole receptor area need to be informed by local landscape character and historic field patterns; and • Details are required of how land reverting 'back to flood plain grassland' will be maintained are required.
Figure 2.1 (Sheet 5 of 6)	Are compounds shown to the correct size? Details of screening will be required and they will need to be assessed within construction phase of LVIA.
7.2.3	WSCC have been engaging with National Highways regarding LVIA methodology, including the location of viewpoints. Final agreement on the location of viewpoints and visualisations needs to be reached, which needs to include visualisations that show the proposed extension to the golf course, green bridges, compounds, haul roads, concrete batching plant, gantries, lighting, detrunking and factor into the LVIA all these additional elements which form part of the wider scheme.

7.3.3	States ' <i>Further detail is given later in this chapter regarding the threshold for Residential Visual Amenity Assessment</i> '. This appears to be missing. WSCC expect this to be included in the ES and further discussions with stakeholders undertaken.
7.4.5	The preliminary ZTV is based on the centreline of the proposed highway at a height of 4.5m to account for lorries. The ZTV needs to also reflect other elements that may sit at above lorry height such as bridges, gantries etc and include development away from the immediate highway such as concrete batching plant, haul roads, compounds and the proposed golf course, all of which have the potential to cause visual impact.
7.5.1	<p>The landscape assessment needs to examine all the aspects that contribute to landscape character as set out in GLVIA, which includes:</p> <ul style="list-style-type: none"> • (5.4) including: – physical influences – geology, soils, landform, drainage, and water bodies; – land cover, including different types of vegetation and patterns and types of tree cover; – the influence of human activity, including land use and management, the character of settlements and buildings, and pattern and type of fields and enclosure; • the aesthetic and perceptual aspects of the landscape – such as, for example, its scale, complexity, openness, tranquillity or wildness; • the overall character of the landscape in the study area, including any distinctive Landscape Character Types or areas that can be identified, and the particular combinations of elements and aesthetic and perceptual aspects that make each distinctive, usually by identification as key characteristics of the landscape; and • (2.19) Character is not just about the physical elements and features that make up a landscape, but also embraces the aesthetic, perceptual and experiential aspects of the landscape that make different places distinctive. <p>Where the landscape character assessments mention key views, these too must be taken into consideration in the landscape assessment as they contribute to the landscape character and can be affected by development.</p>
General	Appears to be no reference to Historic Landscape Character in the LVIA. There needs to be discussion of disruption to any historic field patterns caused by the proposals.
7.5.7	Turner's many views of the Arun and Arundel should be referenced as valued views in the visual assessment: https://www.tate.org.uk/art/artworks/turner-arundel-castle-on-the-river-arun-d18140
7.5.24-27	<p>Clarification requested in comments by WSCC on 1.7.21 (included below) regarding selection of LLCA and their key characteristics is still outstanding:</p> <ul style="list-style-type: none"> • There is no explanation of the characteristics identified that make each of the 26 Local Landscape Character Areas' distinctive from the others, other than the comment that "we have reviewed existing landscape studies and identified local LCAs at a scale appropriate to the scheme corridor and reflecting changes in the landscape". Verbal explanation from TR suggested that

	<p>information from all the published LCAs at national / county / district and SDNP level have been collated and updated in order to define the 26 LLCAs. However, if LCX have misinterpreted any of the published studies, then their evidence baseline will be erroneous; and</p> <ul style="list-style-type: none"> This analysis of the landscape context should be used as an important driver for design, and it will therefore be important that all stakeholders get to see the technical work in order to verify that LCX have not misrepresented the 'parent' LCA studies. WSCC therefore request this information/evidence is presented to the environment subgroup attendees ahead of the PEIR being published, to provide timely feedback into the process.
7.5.40.b	'Not consider views from parts of recreational routes that would be closed during the construction phase'. It is unclear if this refers to not assessing in the 'construction' assessment routes that will be closed in that period or any PRow that will be closed.
7.5.40.c	WSCC requests that residents of Avisford Grange development should be included as receptors in future baseline.
7.5.40 Visual d	WSCC requests the impact of reflected light on windscreens is undertaken as part of the required assessments.
General	Should include reference to valued views as depicted in JMW Turner's views of Arundel referenced in 2b 7.5.7
7.6.4. Planting b	Planting should respect the existing landscape character and historic landscape pattern. Introducing uncharacteristic woodland blocks or screen planting could undermine landscape character. Species selected need to be the native species for example <i>Populus nigra ssp. betulifolia</i> .
7.7.19	If views across the proposals are a key characteristic of the SDNP LCA, then these should be assessed as a landscape characteristic. The SDNP viewshed study should be referred to: https://www.southdowns.gov.uk/wp-content/uploads/2015/10/Viewshed-Study-Report.pdf
Table 7.3	'After the implementation of the EMP, no further mitigation is likely to be required.' Without an early draft EMP available (to assess what measures will be included) or a LVIA, design changes and additional mitigation cannot be ruled out.
Response to email from Charlotte Williams on 6.1.21 – Viewpoint consultation	<p>WSCC wants the following viewpoints to be included for assessment within the LVIA:</p> <ul style="list-style-type: none"> Tye Lane adjacent to Harvest House; Views from the cemetery, London Road adjacent to St Phillips Catholic Primary School; Footpath 241, south of Pedler's Croft; and Several more along the route of the existing A27 to consider the visual effects of de-trunking (including at its connections with all PRow's and roads... Mill Road, Tye Lane, Shellbridge Road, Yapton Lane, Binsted Lane (at Threecorner Wood), Binsted Lane (at East and West Lodges), Jarvis Road, Bridleway's 397, 3667, 386, Footpaths 388, 3400, 347, 3067, 346, 348, 2207, and also on the Arundel Relief Road (across the watermeadows), and The Causeway (by Arundel station), and on the hill to Crossbush (between both parts of Crossbush Lane)
General	Illustrative sections are required to understand the proposals in more

	depth and their impact especially with regard to roadside planting, screening, viaduct, green bridges, highways lighting, gantries and signage, junctions, cuttings and embankments, acoustic fencing, bunds and basins, compounds, haul roads, golf course redevelopment, Yapton bridge, detrunking, etc. These should show nearby built form, indicative vehicles and pedestrians for scale. Elevational drawings will also be required to show the appearance and scale of bridges, viaduct, gantries, acoustic barriers etc and help understand fully their likely impact. Viewpoint photographs or photomontages should have been included. The flythrough is helpful but more visualisations are required for the DCO submission.
Landscape and Visual Baseline (Appendix 4c)	
14	WSCC expects that the proposed tree planting reflects the existing character and degree of openness/enclosure. Tree planting to screen the proposal could have a negative impact on the landscape character.
57	b. <i>"Clear views to the higher ground of the Downs to the north"</i> are a key characteristic of LCA SC8 and impacts on them should be assessed as part of the landscape assessment.
60	j. <i>"Key close dramatic views of Arundel (castle, Roman Catholic cathedral, parish church, clustered hillside housing) from the south"</i> . k. <i>"Seaward views from elevated positions"</i> . l. <i>"Long views of river valley towards the Chalk Downs and Arundel from the south."</i> These are all key characteristics of LCA SC10 and impacts on them should be assessed as part of the landscape assessment.
100	Final location and number of viewpoints and location of visualisations needs to be agreed with stakeholders, including WSCC.
101	VP 23 is shown on HE551523 as a location for a type 4 visualisation but does not appear in table 7-A-2. Orientation of VP 29 is incorrect on plan.
Chapter 8 - Biodiversity	
8.2.3	This section is misleading. These three Focus Group meetings in 2021 did not address biodiversity specifically and no WSCC ecologist was present.
8.3.1 b and c	The ecological assessment is ongoing and the full results of the ecological surveys will be reported in the ES. WSCC requests the completed ecological survey reports ahead of DCO submission, if possible, and for a programme of when each ecological survey will be completed and made available.
8.3.2	It is not possible to provide detailed comments on the PLEM and the likely effectiveness of embedded mitigation measures without seeing the ecological surveys upon that decisions have presumably been based. e.g. without seeing the bat survey data, notably bat flight paths, it is not possible to provide meaningful comments on the locations chosen for the green bridges. Likewise, without seeing the reptile survey reports, it is not possible to comment on the location and extent of proposed reptile habitat required for reptile receptor areas. Some general comments are given below: <ul style="list-style-type: none"> • Avisford Park Golf Course: three ponds within the road footprint will be lost and it is proposed to create replacement ponds within the golf course but in close proximity to the new A27. Given that trunk roads are a significant hazard to amphibians, it is

	<p>recommended that the replacement ponds should be at least 250m from the road;</p> <ul style="list-style-type: none"> • The new attenuation pond shown to the west of Binsted Rife, just south of the proposed A27, appears very artificially 'planted' in this floodplain. WSCC requests this is designed to be more natural and managed to enhance the biodiversity of the rife floodplain; • The watercourses, including Binsted Rife and Tortington Rife, are extremely important features in this landscape. Their routes are not easy to identify on this plan. WSCC expects these to be highlighted and labelled in the ES; • Flood compensation storage areas should be better integrated into the landscape so they can function more naturally and as a result provide benefits to biodiversity; • Binsted Lane overbridge: The T-junction road arrangement immediately to the north of the bridge, plus associated embankments, present considerable barriers to the movement of animals. Thus, this design does not appear conducive to encouraging animals to use this 'green bridge'; • All the proposed mitigation measures shown on this PLEM are within the Draft Order Limits. Given that the scheme will have major adverse ecological impacts, including habitat severance, stretching across a much broader landscape, mitigation measures will need to extend into the wider landscape. Presumably there will be substantial off-site mitigation and compensation measures. They should all feature on this PLEM; • WSCC assumes there are ecological surveys of the sites identified for construction compounds. It is difficult to comment on the choice of sites without access to the supporting ecological surveys. Clarification is needed whether these sites will be returned to their former use or used for habitat creation.
8.3.3	<p>Evidence (best practice guidance or scientific research) is needed to support the chosen design of the 'green bridges' at Binsted Lane and Tortington Lane. Is there confidence that they will function as green bridges for wildlife as well as their use by vehicles, pedestrians and horses? Are the two 'green bridges' sufficiently wide given their multi-functional use?</p>
Table 8.1	<p>A Phase 1 Habitat Survey of all habitats within 100m of the centreline of the scheme was undertaken in 2020/21. This seems a very narrow corridor given that this survey will need to inform mitigation, compensation and enhancement measures both during the construction and operational phases. Furthermore, site compounds, storage areas and temporary access routes would need to be included in the Phase 1 Habitat Survey.</p>
8.5.43	<p>This is subject to review, as the woodland surveys are currently not available. As highlighted in 8.5.38, the Ancient Woodland Inventory did not include sites of less than 2ha. It is possible that the recent surveys will identify further areas of ancient woodland.</p>
8.5.45	<p>Every effort should be taken to retain ancient and veteran trees through the route alignment and engineering design.</p>
8.6.5 and 8.7.10	<p>The green bridges may, depending on their design, location and landscaping, provide some habitat connectivity but it is a very bold statement to suggest that they will maintain north-south habitat connectivity across the new road. Evidence is required to support this</p>

	claim.
8.6.27	Another potential enhancement measure could be to enhance the nine ponds within the Study Area, all of which are of limited diversity (See 8.5.67).
8.7.8	It is stated that ' <i>Lighting is only being incorporated into the Scheme design where it is essential for safety reasons.</i> ' Given the significance of the area for bats, in particular, lighting is a very sensitive issue. The Lighting Strategy will require significant ecological input.
Chapter 9 - Geology and Soils	
General	There is no detail or evidence base presented about the amount of land affected during construction and operation, or the sensitivity and value of that land (ALC and soil surveys not undertaken). A basic assessment of the overall likely footprint for construction and operation of land needed would have aided clarity of the findings. There is also a lack of mitigation measures proposed, (such as that to be contained within the Soils Management Plan (SMP)). WSCC expects to see this level of detail within the ES.
9.9	How will the potential footprint be affected if the viaduct height was lowered, as outlined in Table 2.1, would this lead to increase land take and potential environmental impacts?
9.9.3	WSCC expects to see an assessment of the golf course re-provision area fully assessed within this chapter.
Chapter 10 - Material Assets and Waste	
10.1.7	Reference to JMLP is not correct, this should read Joint Minerals Local Plan July 2018 (Partial Review March 2021).
10.2.1	It is not clear when further consultation with WSCC as Minerals and Waste Planning Authority will take place. This should take place in advance of submission of the DCO application.
10.4.3	This para states, ' <i>The study area for alternative materials (secondary and recycled aggregates) is the southeast England region (comprising Berkshire, Buckinghamshire, East Sussex, Hampshire, Isle of Wight, Kent, Oxfordshire, Surrey and West Sussex), as set out within LA 110 (Ref 10-1)</i> '. WSCC welcomes reference to the use of alternative, recycled and secondary aggregates. Primary aggregates are a finite resource; therefore, the use of recycled and secondary aggregates should be prioritised where possible. Although it is accepted that materials can be sourced from a wide geographical location, onus should be on sourcing materials as locally as possible to limit the distances that HGVs travel.
10.5.8	WSCC welcomes that the safeguarding guidance has been referenced, and that National Highways have noted that safeguarded sharp sand and gravel is present within the draft Order Limits.
10.5.20	WSCC is due to publish an updated AMR (2020/21) in February 2022, that will be available on the WSCC website - https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/monitoring-reports/
10.8.4 - 5	Although there is reference to sharp sand and gravel safeguarding, there is no further information provided, and instead an explanation of where no significant effects are expected.

10.8.8	Although the target for use of recycled aggregates is 26%, based on national guidelines, National Highways should strive to achieve a higher target.
10.8.13	Regarding the potential impacts on the Stubbs Copse waste facility, the PEIR states ' <i>The construction of the Scheme is not expected to directly impact the operation of this waste management facility due to the limited extent of the construction works required within the waste infrastructure consultation area. Therefore, no significant effects are anticipated</i> '. It is important the thorough consideration is given to ensuring that any activities do not prevent or prejudice the operation of the waste site.
General	<p>WSCC welcomes reference to the Minerals Local Plan, Waste Local Plan, and Minerals and Waste Safeguarding Guidance. WSCC is concerned however, that there is no detail provided on how safeguarded minerals and waste resources/sites will be considered, beyond reference to the EIA and to further consultation (set out in para 10.2.1).</p> <p>WSCC expects to see a Waste Infrastructure Statement focusing on Stubbs Copse, in line with the safeguarding guidance, to demonstrate that the waste site is not prevented or prejudiced in its operations. This should include consideration of the existing vehicle movements to/from the site.</p> <p>WSCC would like to see a Mineral Resource Assessment, to ensure that needless sterilisation of minerals (safeguarded sharp sand and gravel) does not occur. One way to prevent needless sterilisation occurring is through prior extraction, which is detailed in the safeguarding guidance, and would be welcomed.</p> <p>Consultation with WSCC, as Minerals and Waste Planning Authority, allowing time to consider any assessments undertaken by National Highways, should take place in advance of submission of the DCO application.</p>
10.8.11	This states ' <i>worst-case scenario requiring the disposal to landfill of 95% of earthworks cut material has been assessed, comprising approximately 513,000 m³ of material for disposal (assuming a bulking factor of 1.2). This quantity of material equates to approximately 0.81% of total regional landfill capacity</i> '. WSCC expects this figure to be considerably lower and a clear strategy following the waste hierarchy should be presented, including a Strategic Waste Management Plan as part of the ES.
10.3.2	This states ' <i>Data on the type and quantity of materials required to construct the Scheme, and the type and quantity of waste generated from Scheme construction, are not currently available</i> '. WSCC requests this data is made available, as it is not possible to make any assessment without it.
Chapter 11 - Noise and Vibration	
11.2.2	WSCC welcomed consultation on the baseline monitoring locations and methodologies for noise. As stated in an email from WSCC in August 2021, a clearer narrative is required with regard to baseline noise locations and whether temporary construction compounds, haul routes, batching plant etc have been taken into account when deciding upon likely monitoring positions as well as the route itself. Clarification is also needed regarding ecological/built heritage assets considered as potential locations at this stage.
11.3.1	WSCC raised concerns that details of the construction traffic, diversion

	<p>routes, construction schedule, construction methodology and plant requirements are not yet confirmed. Therefore, a qualitative assessment has been carried out at this stage, based on professional judgment and experience of other nationally significant road schemes, of the likely noise and vibration effects of the activities described in Chapter 2: The Scheme, following the application of best practicable means to minimise noise and vibration levels. Little meaningful feedback can be given by stakeholders until quantitative assessment has been undertaken and the impacts of construction traffic on noise sensitive receptors without details of the volume and routes (and their proximity to noise sensitive receptors) that are proposed to be used.</p>
11.3.2	<p>This paragraph refers to a validated traffic model of the local region. Details must be provided of the model and validation in a Local Model Validation Report (or similar technical documents). Feedback cannot be made on the outcomes of the preliminary operational phase noise assessment until certainty and scrutiny on the traffic modelling upon which it is based has been undertaken.</p>
11.5.3	<p>A much clearer detailed table of non-residential NSRs should be included and mapped for the purposes of assessment.</p>
11.6.3	<p>Traffic may redistribute during the construction phase to avoid delays resulting in temporary impacts that it has not been possible to assess. Please provide details of likely traffic re-routing onto alternative roads during construction and associate temporary noise impacts.</p>
11.9.5	<p>Further evidence is required to substantiate the conclusion that the offline option for Yapton Lane is better in noise terms. The number of properties that would benefit from the reduction in noise due to the offline overbridge is quite small compared to those in Avisford Grange that would benefit from a deeper cutting. It is not possible to fully assess this and provide informed comments without a more detailed assessment.</p>
Chapter 12 - Population and Human Health	
General	<p>There has been no consultation since the Scoping Stage with WSCC regarding health and wellbeing and any methodologies to be used to undertake Health Impact Assessment work, or Equality studies. As stated in the NN NPS, National Highways needs to <i>'identify measures to avoid, reduce or compensate for adverse health impacts, as appropriate'</i>. Clarity is required on the human health impacts for both the construction and operational stages of the scheme. No detail on the potential impacts upon the determinants of human health have been provided, or on the level of land take required which may impact upon private/residential properties. Therefore, further consultation will be required through the next stages of the scheme development.</p>

12.3.3	<p>The PEIR states '<i>where the Scheme cuts across a walking, cycling or horse-riding route, endeavours will be made where possible to ensure that all routes are kept in place by offering safe and well-planned diversions during the construction phase. At this stage, it is not possible to confirm the length of time that each route would be temporarily closed</i>'. WSCC is concerned that no detail on the construction phase impacts to PRowS has been included, and consultation on a draft Public Rights of Way Strategy (PRowS), which outlines these details should be undertaken as part of the next stages of the scheme. The timescales should be clarified as the process goes on, but possible alternatives should also be assessed as to their suitability because this comment is vague and gives no confidence mitigation is going to be suitable to try to accommodate lawful public use during construction where possible to reduce the impact on PRow users for the estimated three year duration of construction.</p>
12.3.3	<p>No NMU surveys or WCH Assessment Report (WCHAR) have been presented as part of the PEIR. Concern is raised about the statement on frequency of use of WCH and its indicator of the recreational value of a route. These routes may be used in a limited manner due to the difficulties in crossing the existing A27. A WCH Assessment Report should therefore be provided for consultation with stakeholders.</p>
12.5.59	<p>The road safety performance across large administrative areas (district, county etc) do not necessarily reflect what is happening on the section of A27 that is expected to be bypassed or the area of scheme influence. More detailed analysis is required of the road safety performance in the area of influence of the scheme and a quantitative assessment of the likely benefits in a Transport Assessment.</p>
Specific comments on PRowS	<p>Some further queries on specific routes are given below:</p> <ul style="list-style-type: none"> • BW392 - in principle support proposal for a NMU route, and welcomes the inclusion of this crossing the existing A27 route. • FP350 - currently provides good and well used access for walkers directly from Walberton across to the Church of St Marys and then on into the SDNP. Further clarity on the detail is needed, concern is raised about the user experience with the path proposed to be realigned under the new road, including drainage and lighting concerns. WSCC requests discussions on whether upgrading of this route from footpath to Bridleway is possible, as it offers a good off road access between Yapton Lane and Binsted Lane. Section 12.8.42 mentions a new PRow that connects to the existing PRow 350 footpath, which would provide a connection to Binsted Lane, further detail is needed. • FP354 - proposal in principle supported for grade separated crossing of new road but need to consider access up slope on southern side of road and mitigation to meet DDA compliance where possible. Also as this bridge will be carrying vehicular traffic as well, how is NMU traffic being safely accommodated alongside this vehicular traffic? • FP3403 - this is quite a big diversion and changes route from off road to on road for some of the journey, albeit a quiet road with access traffic to properties. How is this pedestrian route being accommodated alongside vehicular traffic and is there a provision for pedestrians to link to FP3401 from the proposed diversions northern end? • FP206 - appears to be no material change to the line but it is an

	<p>aspiration of Arun DC to upgrade this footpath to Bridleway in the future so this needs to be considered when designing head clearance over this route so it is future proofed.</p> <ul style="list-style-type: none"> • FP2207 - in principle support the grade separation from the proposed new road. • Further discussions are needed on how the scheme could tie in with WSCC's Lyminster Bypass near Crossbush. Pedestrian, equestrian and cycle access is desirable and would be interesting to consider how these two schemes can tie in and provide access south. • Also there is potential for upgrade of FP2189 to Bridleway to create an NMU facility east from Crossbush to tie in with existing network.
12.6.7	<p>A PRoW strategy would be beneficial for the whole project, setting out general principles around providing access throughout construction where possible and when this is not, how access can still be retained along alternative routes. Long term closures for up to three years will have a very negative impact on local communities and recreational access to the SDNP, so a clearer plan of action is required setting out how this will work.</p>
12.8.2	<p>Full assessment of permanent land take and loss of properties to residents on Binsted Lane is required, including the detrimental impacts to occupants and owners.</p>
General	<p>The assessment seems light on detail and WSCC would recommend reference to the iPROW paper titled "<i>Environmental Impact Assessment: Appraising Access</i>".</p>
General	<p>Without detailed assessment, whether there will be '<i>significant benefit for walkers, cyclists and horse riders as part of the Scheme</i>' is yet to be demonstrated. There is very little in the way of new routes specifically for NMUs, and there are opportunities to go further than the current scheme. Those identified have been provided either because the original alignments needed to be diverted or mitigated for because of the bypass or they are provided in short sections where without separate provision, users would be required to share road space with vehicles. Apart from the new bridleway bridge over the existing A27 there are no details about the approach to detrunking. Provision for walking, cycling, and horse riding would potentially have a large impact in terms of increased uptake of active travel amongst local communities.</p>
12.8.6	<p>WSCC raises concerns regarding the potential impact of both the construction and operational phases of the proposed scheme upon Walberton and Binsted C of E Primary School. Concern is raised regarding not only the close proximity of the new bypass alignment and its construction, but also the potential redistribution of traffic during the operation of the scheme and its effects upon road safety. The PEIR gives no detail upon specific impacts and lacks any detail in relation to proposed mitigation measures. WSCC would expect the school site to comply with the relevant Department for Education Building Bulletins e.g. BB103 (Area Guidelines for Mainstream Schools) and mitigation must be in place to ensure those requirements and especially around noise and air quality are met. Further consultation is therefore required with WSCC and the school itself during the next stages of the project, to ensure any anticipated adverse effects are appropriately mitigated. Not all facilities have been included here. There is also the Walberton Community Play Centre, Walberton Pre-School and Walberton Playgroup in the vicinity,</p>

	and all need to be considered within the assessment.
12.8.32	WSCC expects a wider analysis of the economic impacts of the proposed scheme and the extent to which it will address challenges around the competitiveness of the coastal economy including productivity, access to customer and labour markets, attractiveness of the area for business growth and entrepreneurship, access for visitors to the coast and the South Downs National Park, and the regeneration of coastal towns.
12.8.34	WSCC query why no locations in Walberton area are at risk of temporary adverse impact due to dust emissions. Is this an error?
12.8.43	There appears to be provisions to cross the new road with overbridges but these are likely to be highway assets and not PROW as they will run alongside vehicular carriageway. This issue needs to be considered carefully so the provision is suitable and does not deter users travelling so close to vehicular traffic.
Chapter 13 - Road Drainage and the Water Environment	
General	There is no mention of the 'Lower Tidal River Arun Strategy (LTRAS)', which is an EA study of the lower sections of the River Arun and covers the Arundel area. Consideration should be made to this strategy.
General	Detailed ground investigation and ground water monitoring have yet to be completed; therefore, the potential impacts have been considered qualitatively within the current assessment. WSCC wants further consultation on these matters once the assessment is developed.
13.3.2	Flow gauging, water quality sampling, aquatic ecology and hydro morphological walkovers have and are still being undertaken. WSCC would like to see the same level of monitoring continue during and after the construction work is complete.
13.5.81	A number of private water supplies have been identified. Are any of these outside of the EA's Source Protection Zones? What, if any, level of monitoring will be in place during the construction to ensure these water supplies are not affected during the construction phase?
General	A detailed Flood Risk Assessment has yet to be carried out. Therefore, WSCC request consultation on this document prior to the DCO application being submitted.
13.5.96	WSCC are not aware of any areas of emerging groundwater within the study area, when local groundwater levels are high. However, WSCC understands this does happen along other sections of the A27, so needs to be considered.
13.5.111	This refers to historic flooding in Barnham, but it does not mention the late 1990s event when the culvert under the road and railway became blocked leading to property flooding at the time. Can National Highways confirm if the date in the report is wrong and it should read 1998, not 1968?
13.6	Although the temporary impact that construction can have on the water environment is discussed, controls are not outlined. WSCC has witnessed in recent years significant uncontrolled silt run-off from major construction sites and the damage it has done to the local water environment. Therefore, it is important that these issues are considered and suitable controls put in place during the construction phase. The culverting of minor watercourses is discussed. This work will require 'Ordinary Watercourse Consent' from Arun DC and culverts should be a

	minimum of 450mm diameter.
13.6.8	WSCC notes this section identifies three non-linear surface water features, although four are listed.
13.6.12	This section states that ' <i>piles have the potential to interrupt groundwater flows</i> '. Current best practice should be followed to limit this effect, and further discussion and engagement will be required with relevant stakeholders to ensure method statements and relevant mitigation is put in place.
13.6.21 and 3.7.4 (h)	This section states ' <i>there is the potential for operational drainage discharges to alter the flow regime of receiving watercourses and to impact upon water quality</i> '. These issues need to be considered carefully as increased flood risk and/or pollution would not be acceptable. It is noted that the 'Design, mitigation and enhancement measures', section 13.7.4 (h) contradicts this statement, stating that there will be no increase in flood risk or run-off rates.
General	It will be important that a robust maintenance plan is put in place following construction and all third-party responsibilities are identified.
General	Special consideration during the design stage needs to be given at camber/topography changes to avoid the risk of cross carriageway flow leading to aquaplaning/reduced visibility due spray hazard. Also the placing and maintenance of gullies in low spots which are likely to block due to high levels of leaf fall should be carefully considered through the design process.
Chapter 14 - Climate	
14.1.3	The chapter needs to refer to the draft West Sussex Transport Plan (WSTP) 2022-2036 (currently post-public consultation) West Sussex Transport Plan Review - West Sussex County Council
14.1.3	The West Sussex Plan 2017 – 2022 is superseded. The current one is 'Our Council Plan 2021 – 2025' Our Council Plan - West Sussex County Council
14.3.20/ 24	WSCC cannot make comment without scheme specific data, for example, the preliminary Green House Gas (GHG) assessment. There is a lack of construction emissions data, which along with all the required construction information would give stakeholders more confidence about the construction phase. WSCC expects to see all these documents in draft form before the DCO submission in order to comment and provide a meaningful response.
14.3.23	Without seeing a draft version of the EMP and associated documents (such as the construction worker travel plan) WSCC cannot have certainty that aspects will be covered and therefore secured through the consenting process. A draft version, along with a commitments register, should have been forthcoming as part of the consultation.
14.3.23	WSCC requests that this is split and more clarity provided. The examples of emission mitigation are helpful, but the co-benefits of re-use of material arisings is not the same as the inclusion of a green bridge or the provision of EV charging points.
14.3.23	WSCC requests details of proposed EV charging points on this stretch of the road, and clarification of why drivers would stop on this stretch (which should be flowing), rather than charging points be increased at Fontwell or at Crossbush. WSCC would welcome charging infrastructure

	that complement the EV Strategy and recent contract award for EV charging countywide.
14.3.24	With regard to the Net Zero Highways Plan, WSCC would like to see how this scheme specifically contributes to the ambitions of Net Zero corporate emissions by 2030, being Net Zero for maintenance and construction by 2040 and Net Zero carbon for travel on roads by 2050. This is not spelt out clearly in the report.
14.3.28/14.3.35	WSCC acknowledges that the emissions from this scheme may only be 0.1% of the overall UK budget, but from a cumulative perspective, every scheme has a part to play. Information on this scheme's potential to be a 'Near Zero' scheme could be presented and considered.
14.3.31	WSCC is disappointed that the ES assessment is not presented in a preliminary form and WSCC would expect to see draft assessment work before submission of the ES.
General	No reference is made to the WSCC Climate Change Strategy - the Authority has an ambition to be both carbon neutral and climate resilient to 2030. Although the Strategy is about WSCC's local actions, many of the West Sussex Local Authorities have similar ambitions and it would be helpful to understand how this nationally important scheme aligns with the delivery of these collective ambitions at the local level.
14.4.13	WSCC expects to see more localised data if stations exist. WSCC requests that a longer-term data range is considered, to reflect the more recent variation in climatic extremes. It is proposed that a Local Climate Impact Profile (LCIP) could be useful to inform this. It is requested that National Highways consider funding the preparation of a scheme-specific LCLIP. (WSCC has one 1998-2008 but not published – available on request).
14.4.28 and 14.4.36	WSCC expects to see reference and consideration given to drought, given the southeast status as water-stressed. National Highways is requested to check the impact of water neutrality on the scheme proposal. Map showing the Sussex North Water Resource Zone in West Sussex (document unsuitable for assistive technologies)
14.4.29	No detail is provided on adaptation measures. While 14.4.31 provides suggestions on mitigation, it is contradictory as a green bridge is not a mitigation (emission reduction) measure. There are no suggestions provided for adaptation. WSCC requests that proposed adaptation measures are provided for consideration, for example, alternative highways surfacing. Further reference to LA114 would be beneficial (referred to in 14.4.38) with more detail.
General	WSCC would like to see clearer references to carbon off-setting. WSCC's preference is for on-site (insetting) where possible, to achieve widest benefit, further details should be provided.
Chapter 15 - Cumulative, In-combination and Project-wide Effects	
15.2.5	WSCC requests clarity on the cut-off point for developing the CEA prior to DCO submission. WSCC should be consulted on the development of the long list of CEA projects to be taken into consideration.
15.2.7	Many of the assessments are based upon the forecasts derived from the traffic modelling, which is why the lack of any documentation outlining this modelling is unhelpful. Further consultation on these topics is expected.

General	WSCC expects to see any impacts caused by direct interaction between planned projects (such as Rampion 2 onshore cable route, if this is likely to interact) mitigated, which could involve joint working method statements if required. Further assessment of potential impacts of these projects should be undertaken with the ES.
15.3	There is potential for both adverse and beneficial in-combination effects associated with the scheme. Clearer assessment is needed on the in-combination effects of multiple adverse impacts upon any one individual receptor, especially those sensitive receptors in close proximity to the route.

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