

Dear Highways England,

**Re: West Sussex County Council Response to Further Consultation on Options for A27 Arundel Bypass**

Thank you for the opportunity to respond to the further consultation on options for the A27 Arundel Bypass. For many years, West Sussex County Council (WSCC) has campaigned for a long-term solution to the daily problems on A27 at Chichester, Arundel, Worthing & Lancing which contribute to poor economic performance and pockets of deprivation on the West Sussex Coast. Consulting on options is a positive step forward towards the delivery of an A27 Arundel Bypass.

Highways England is requested to have regard to the contents of this Consultation Response before selecting a preferred route for the A27 Arundel Bypass.

This consultation response includes selected questions from Highways England's Consultation Questionnaire and provides a supporting rationale for the County Council's responses. At the end of the letter are also some general comments that Highways England is also requested to take into account whichever option is selected.

In preparing this Consultation Response, a draft version was scrutinised at a meeting of the County Council's Environment, Communities and Fire Select Committee on 21 October 2019. This Consultation Response has been approved through a Key Decision, which is subject to a call-in period. Provided that it is not called-in for further scrutiny, it will come into effect at 5pm on 4 November 2019. If the Key Decision is called-in for further scrutiny, then Highways England will be notified.

**Consultation Questions and WSCC Responses**

*Question B1. If the all options are brought into an affordable range, which option would you prefer? (Please tick one option)*

WSCC response: Magenta (Option 4/5AV1)

Rationale

Option 4/5AV1 (Magenta) would have beneficial traffic impacts by: reducing congestion; attracting traffic to the A27 from parallel local roads in the South Downs National Park and on the coast that are used as rat-runs; and substantially reducing the volume of traffic in Arundel. This option would also result in substantial economic benefits that are noticeably greater than Option 1V5 (Cyan) and Option 1V9 (Beige), especially because the latter would not provide sufficient highway capacity to cater for traffic growth and, over the longer-term, congestion is forecast to return by 2041.

It is recognised that Option 4/5AV1 (Magenta) would negatively affect the communities of Tortington, Binsted and Walberton. However, on balance, it is considered that Option 4/5AV1 (Magenta) would have a slight beneficial impact on community severance because the significant benefits to the community in Arundel would outweigh the adverse impacts on those smaller communities.

It is noted that the environmental assessment of Option 4/5AV1 (Magenta) has not taken into account the presence of a well preserved medieval pottery kiln that would be affected by this option although it appears likely that it could be successfully mitigated. Provided that an amendment is made to the design to address this matter, the environmental impacts of this option are similar to Option 1V5 (Cyan), but Option 4/5AV1 (Magenta) would result in less Ancient Woodland loss and includes a shorter length of road within SDNP. The alignment of Option 4/5AV1 (Magenta) would also have less impact on the historic settlement of Binsted and cross the Binsted Rife in a less prominent location than Option 5BV1 (Grey).

Although the economic benefits of Option 3V1 (Crimson), Option 4/5AV2 (Amber) and Option 5BV1 (Grey) are greater than Option 4/5AV1 (Magenta), they have worse environmental impacts. Option 4/5AV2 (Amber) would have greater impacts on Ancient Woodland and the noise, townscape and historic environment impacts of Option 5BV1 (Grey) have been underestimated because the environmental assessment has not taken account of impacts on the Avisford Grange development at Walberton or some impacts on the historic environment. The latter includes: (a) the severance of Binsted as a historical settlement into three parts, isolating its most ancient and historically important building, St Mary's Church; and (b) severance of the view along the Binsted Rife valley by crossing this very visible feature of the local historical landscape in an open area. .

Therefore, the traffic, economic and social benefits of Option 4/5AV2 (Amber) and Option 5BV1 (Grey) are unlikely to outweigh their adverse environmental impacts to the extent that they perform better than Option 4/5AV1 (Magenta).

Overall, of the options available, Option 4/5AV1 (Magenta) offers the best balance between traffic, economic and social benefits and environmental impacts, taking account of impacts on Ancient Woodland and SDNP. This is because it is the second best option for environmental impacts and impacts on Ancient Woodland and SDNP whilst also being third best option for economic benefits.

Accordingly, the environmental impacts of Option 4/5AV1 (Magenta), if appropriately mitigated, are likely to be significantly outweighed by the substantial traffic, social and economic benefits of this option over the longer term. Therefore, provided that a detailed and high quality package of mitigation measures is identified and delivered as part of the scheme to reduce impacts on the environment and affected communities, Option 4/5AV1 (Magenta) is the County Council's preferred option for an A27 Arundel Bypass. This is because it is the best performing option and it represents the best fit with the strategic objectives that the Authority is seeking for the A27.

*Question B2. The scheme budget is currently £100-250m. Affordability is an ongoing concern and if only Cyan and Beige (Options 1V5 and 1V9) remain affordable, which option(s) would you support? (Please tick all that apply)*

WSCC response: Do Nothing

Rationale

The cost of delivering major highway improvements in this area should reflect that there is a need to provide the highest standard of design, including environmental mitigation. Although clearly this cannot come at any cost, the County Council considers that the design of the scheme should be determined by what is needed to deliver its strategic objectives, rather than what is affordable.

### **General WSCC Comments**

Highways England is also requested to take into account the following comments:

#### A27 Transport Model

The A27 Transport Model is considered to be an appropriate tool to use to assess the relative performance of the options at this stage of the project, including the impact on the local highway network. However, Highways England should work with the County Council at the next stage of the project to ensure that local roads are adequately represented and also work with local stakeholders to ensure that the modelling information is well understood.

#### Highway Design

Whichever option is selected as the preferred route, the design will need to be refined to ensure that access routes are maintained and, in some cases, to ensure that undesirable effects on the local road network, such as creation of new rat-runs, are effectively managed. This should take place at the next stage once a preferred option has been selected.

#### Ford Road Junction

It is recognised that some local stakeholders would like to see a junction between Ford Road and an A27 Arundel Bypass, principally to reduce traffic on other routes. However, other stakeholders are concerned that this could lead to increased use of Ford Road as an access to/from Arundel. Highways England has not included this junction within the design of Options 3V1 (Crimson), 4/5AV1 (Magenta), 4/5AV2 (Amber) or 5BV1 (Grey) at this stage and intend to decide on its inclusion at the next stage of the project. The 2018 Arun Local Plan does not require the delivery of an A27 Arundel Bypass or a junction with Ford Road, so it is not needed to deliver currently planned development. However, a junction between Ford Road and A27 Arundel Bypass could facilitate future development and, therefore, Highways England are encouraged to ensure the design is future-proofed to accommodate a Ford Road junction at some point in the future.

#### Facilities for Non-Motorised Users

The Government's RIS1 states that; "*we will also develop sustainable transport measures at Arundel, Worthing, Lancing and east of Lewes*". However, although the designs do include some new facilities for Non-Motorised Users (NMUs), largely where they are needed to maintain public rights of way, the proposed facilities are fairly limited in scope and fail to integrate the scheme into the wider network of NMU facilities.

This is disappointing because opportunities to maximise the facility of off-road access are available in all options. This can be achieved, as a minimum, by providing new infrastructure (i.e. crossings) that is suitable for use by as many modes of transport as possible and up-grading the status of public footpaths to public bridleways or even restricted byways to provide a coherent network of routes. It can also be achieved by ensuring that grade separated crossings of the A27 are available to as many modes of transport as possible. This will help to improve safety for PROW and road users leading to improved health, leisure and community benefits of each option as well as facilitating access to employment and services. Therefore, new facilities for NMUs on the bypassed section of A27 and new connections between Arundel and Ford, the proposed A284 Lyminster Bypass, and along the River Arun should be included in the design of the preferred route; such matters should be discussed with the County Council at the next stage of the project.

Therefore, at this stage in the development of the scheme, it is the County Council's view that the limited range of NMU measures currently identified are unlikely to meet the Government's ambition for the provision of sustainable transport measures at Arundel as set out in RIS1.

If it is reasonable to expect that these measures will change traffic demand on the A27, then this should be taken into account alongside other committed transport improvements as part of the scheme appraisal. The County Council considers that this will help to respond to requests from some local stakeholders for an integrated package of transport improvements.

#### Other Options

Highways England should satisfy themselves that they have not discounted other options that would perform better than the options presented for consultation before selecting a preferred route for the scheme.

#### Economic Assessment

The benefits of the options take into account the effects of the planned A27 Worthing and Lancing and A284 Lyminster Bypass schemes. The County Council remains committed to the delivery of these schemes, so potential uncertainty about their delivery is not considered to be a justifiable reason not to proceed with one of the options for an A27 Arundel Bypass. Furthermore, this potential uncertainty should not be a determining factor in the decision about which option to pursue, as this should be based on an assessment of the impacts (positive and negative) and the views of local stakeholders.

#### Environmental Assessment of Historic Environment Impacts

The environmental assessment has not taken into account the presence of a well preserved medieval pottery kiln that would be affected by Option 4/5AV1 (Magenta) although it appears likely that it could be successfully mitigated. Please contact the County Council in due course for further details.

#### Environmental Assessment of Biodiversity Impacts

It has been highlighted that the impacts on woodland of options 1V5 (Cyan) and 1V9 (Beige) may be overstated because the Arundel Arboretum has been

incorrectly defined as 'woodland', although there are still trees on the site that may be affected by these options. Although it is not considered that this error changes the County Council's assessment of the options, Highways England should take this into account before selected a preferred route.

### Environmental Mitigation Package

The County Council is disappointed that details of the mitigation measures for each option have not been provided as each option would have major adverse environmental and community impacts. These measures appear to have been identified to inform the cost estimates and could have helped to address the concerns of affected communities. The County Council is aware that some local stakeholders will not be satisfied that this information has not been published and also that no clear explanation has been given for this omission. Therefore, we encourage Highways England to explain its rationale for this decision in due course.

In accordance with Government policy and expressed aspirations, every effort must be taken to ensure biodiversity net gain is achieved through this project, in line with the Biodiversity Net Gain Assessment. The feasibility of the following measures should be investigated in developing a detailed and high quality package of environmental mitigation measures: extensive landscaping/screening; translocation of soils from Ancient Woodland to create new compensatory habitats; creation of 'green bridges' to maintain connectivity between Ancient Woodland; extensive noise mitigation; and new facilities for NMUs. Although it is not possible to replace Ancient Woodland, it is considered that it should be possible to compensate for this loss to an acceptable level, provided that sufficient land can be identified to create compensatory woodland.

An embankment would have significant detrimental impacts on landscape and visual amenity, local hydrology, reduce the flood capacity of the floodplain, sever ecological networks, and result in a significant increase in mitigation and compensatory habitat creation costs. Therefore, the environmental impacts of a viaduct, particularly on landscape and visual amenity, the water and historic environments and biodiversity including habitat severance effects are likely to be less than an embankment. Arundel is a sensitive location with a long-standing history of difficulty in securing the delivery of a bypass, principally due to the impacts on environmentally designated areas. Therefore, we consider that highway improvements on this scale should include the highest standard of environmental mitigation. The County Council is leading by example by including a viaduct in its planned A284 Lyminster Bypass (north). For these reasons, we consider that Highways England should design and seek additional funding to deliver a viaduct at the next stage of the project, provided that it can be demonstrated that the additional benefits would outweigh the costs and that this would not cause delay to the project.

### Construction

To minimise the amount of additional road traffic during construction, the County Council would welcome the use of the nearby ports, particularly Littlehampton Harbour, to transport construction materials.

### Need for Additional Funding

It is acknowledged that the budget range for the A27 Arundel Bypass in Roads Investment Strategy (2015-20) is £150-250m. The deliverability of Option 3V1 (Crimson), Option 4/5AV1 (Magenta), Option 4/5AV2 (Amber), and Option 5BV1 (Grey) is dependent upon additional funding being secured. The A27 is the only trunk road south of M25 linking key economic centres on the south coast, so it is considered to be of national importance. This is recognised by Transport for the South East which has identified that the A27 corridor should be a focus for investment. Also, due to the sensitivity of the local environment, the cost of delivering major highway improvements in this area should reflect that there is a need to provide the highest standard of design, including environmental mitigation. Although this cannot come at any cost, it is considered that the design of the scheme should be determined by what is needed to deliver Highway England's strategic objectives, rather than what is affordable. The County Council will support Highways England in seeking the additional funding to deliver Option 4/5AV1 (Magenta), as the County Council's preferred option.

I hope that this information is helpful.

Yours sincerely,

Roger Elkins

Cabinet Member for Highways & Infrastructure