

SDNPA Consultation Response
A27 Worthing - Lancing Improvement Scheme
Highways England Consultation dated 18th July – 8th September
September 2017



Summary of proposals

1. The South Downs National Park Authority notes that Highways England is consulting on a single option only for the A27 Worthing-Lancing improvement scheme. The option is for a series of online junction widening and improvement schemes between West Durrington and the Sussex Pad junction at Shoreham. Most of the proposed works are within the existing road corridor within the settlement.
2. A proposed new feeder road and road widening for junction improvements would be within the South Downs National Park (SDNP) at Busticle lane (Sompting) and this proposal would result in the loss of agricultural land and its associated existing boundary hedges which are at the edge of the existing settlement on the boundary of the SDNP.

Assessment Stage

3. The assessment of impacts to date by Highways England (HE) has been carried out in accordance with the *Highways Design Manual for Roads and Bridges* (DMRB) process and is not a full Environmental Impact Assessment (EIA). In accordance with the work stages set out in DMRB the full EIA will not be prepared until the preferred option for the scheme has been selected. The following assessment is therefore based on the information made available to the SDNPA which is included in the consultation document released by HE on 19th July 2017 and other material provided at various stakeholder meetings prior to this. Further detailed assessment of the detailed design of the scheme at the EIA stage in the future will be undertaken by SDNPA in order to refine this early impact assessment of options and identify appropriate mitigation.

Summary SDNPA Response

4. The South Downs National Park Authority objects to the A27 Worthing Lancing Improvement Scheme at Busticle Lane where the proposed scheme is within the National Park. There is no evidence that any alternatives have been considered. This would be contrary to paragraph 116 of the National Planning Policy Framework (NPPF) on major development within National Parks and as supported by paragraphs 5.150 – 5.153 of the National Policy Statement for National Networks. Should there be over-riding reasons for proceeding with these proposals the SDNP has set out a range of mitigation measures in paragraphs 42 to 57 whilst noting that this is not the SDNPAs recommended or preferred solution.
5. There is also an over-riding concern that in the long term, further improvements of a more fundamental nature will be needed to the A27 corridor through Worthing and that the scheme under consultation is not a long term solution. The proposed loss of land within the SDNP associated with the proposed Busticle Lane junction realignment will however be permanent. This also informs the SDNPAs objection to the landtake from the National Park which is proposed at Busticle Lane.

6. The A27 is a significant barrier between the population of the coastal plain and the National Park. There are potential access routes to the SDNP which are effectively severed by the road. The SDNP has identified several key access locations where crossings over the A27, would provide mitigation for these impacts. The SDNPA seeks to promote sustainable travel to the National Park to reduce the impacts of traffic within it and to promote healthy lifestyles. Improvements to key crossing points across the A27 would enable greater access to the SDNP for local communities, thus mitigating this cumulative and ongoing increasing impact on severance from traffic. There are additional cumulative impacts due to strategic developments in the locality for example at West Durrington and New Monks Farm.

Detailed SDNPA Response

7. The proposed junction alterations are largely on line and within the existing A27 corridor. As a result there are considered to be limited impacts (ie low – negligible) on the Landscape, Biodiversity and Cultural Heritage of the South Downs National Park from the majority of the scheme proposals.
8. However, the impacts of the proposed Busticle Lane junction on the SDNP have been assessed as low to medium in terms of Landscape, and Cultural Heritage (ref Appendix 1, 2 & 4).
9. The impacts on access to and from the National Park have been assessed along the length of the A27 within the scheme rather than focussing on a single junction improvement. This is because there are wider cumulative impacts on access from the scheme proposals.

Landscape, Access and Visual Impact analysis (Full report in Appendix 1)

10. SDNP have appointed consultants to undertake an assessment of the Landscape and Visual impacts of the A27 Worthing scheme. This has been carried out in advance of the public consultation for the proposals in order that the authority is informed about the likely effects of the various options as the schemes are developed in more detail. At this stage SDNPA consultants have been working on outline design drawings which are not full scheme designs. Therefore these are to be regarded as interim conclusions based on the information available at this time in accordance with the DMRB process.
11. Terra Firma have assessed that the proposed Busticle Lane junction re-alignment would be unlikely to have significant adverse implications for the SDNP or for upholding its Statutory Purposes. The majority of potential effects on the assessed landscape and visual receptors were found to be ‘moderate / minor adverse’.
12. The proposed junction improvement would involve construction of a new section of road, approximately 190m in length, extending from Busticle Lane to a point on the A27, Upper Brighton Road, approximately 140m to the west of the existing junction. In addition, the improvement works would require widening of the existing A27 carriageway for an approximately 310m length to the west of the existing junction. A roadside footway would also be provided to the north of the widened road / new road, throughout.
13. The new section of road, and additional width of the existing road would require land-take from the existing arable farmland to the north of the A27. This would be a fundamental change in the nature of this land-use from fieldscape, to highway.
14. The existing thick, native field boundary hedgerow which runs alongside the 310m length of the highway improvement section would also be lost in order to facilitate construction of the new road / widened road. The most notable effect of these works would be changes to the view composition, as a large section of hedgerow would be removed. It is not clear from

the Highways England design drawings provided to date whether there is an intent to replace that hedgerow, and accordingly our assessment is made on the basis that it might not be replaced.

15. As-such it is likely that there would no longer be a vegetative screening of the metalled road-surface from viewpoints to the north, on Dankton Lane. Similarly, (from viewpoints all around, including Dankton Lane, Upper Brighton Road and Halewick Lane) the presence of infrastructure (i.e. lighting / signage), and vehicles themselves would increase within the view composition, as a consequence of removing the existing roadside hedgerow, but also as a consequence of creating the new section of road cutting across land which is currently arable farmland, and in stark contrast to the fieldscape which would remain adjacent.
16. The proposals do not show any mitigation for the loss of land within the SDNP. In view of the SDNPA's objection to this aspect of the scheme the following approach to mitigation is suggested however this is not the SDNPAs preferred course of action:
 - All mitigation should be designed from an ecosystem services approach where the proposals are designed to create multiple benefits to the functions of the landscape.
 - Plantings should be designed to integrate with the surrounding hedgerow and woodland pattern and character, and Proposals should be synchronised with habitat creation, SUDS, lighting and signage proposals as part of any scheme.

Archaeology/Cultural Heritage (Full report at Appendix 2)

17. The South Downs National Park Authority (SDNPA) commissioned Hampshire Services to carry out a Desk-Based Assessment (DBA) of cultural heritage issues relating to a section of proposed new A27 in a field to the north of Worthing. The land to the north of Worthing cross the South Downs National Park (SDNP).
18. The assessment has concluded that;
The proposed junction to the north of Worthing was located in an area of good archaeological potential with evidence for later prehistoric, Roman and medieval activity immediately to the east of the site, with further evidence for prehistoric settlement c.500 metres to the south east and cropmarks indicating prehistoric field systems c. 500 metres to the north.
19. Although no assets have been recorded within the proposed site itself, it is considered possible that as yet unrecorded features dating from the later prehistoric and Roman periods may survive here.
20. The study of available aerial photographs along the route identified a possible prehistoric field system to the north of Worthing.
21. The potential impacts upon the settings of the SDNP, other Scheduled Monuments, Listed Buildings and Conservation Areas will require more detailed investigation, leading to mitigation measures. This will be addressed by a report prepared by Nexus Heritage.
22. A programme of archaeological fieldwork consisting of field walking, geophysical survey, geo-archaeological trial pitting and trial trench evaluation should be carried out to fully assess the potential of as yet unrecorded archaeology at the site north of Worthing This programme should then be followed by an assessment statement that should set out the terms of further investigation and excavation, leading to the academic publication and public dissemination of all results.

23. Any archaeological work carried out within the SDNP should include public engagement as part of any mitigation strategy with any archives deposited in a publically accessible archive.

Biodiversity

24. The proposed Junction improvement at Busticle lane is likely to have a very limited impact on biodiversity. There are no statutory designated sites close to this proposal. Lancing Ring local wildlife site is just over 0.5km away but has houses between the wildlife site and the proposed junction improvement and so there is unlikely to be any impact on this site.
25. The land at the proposed junction improvement site is currently agricultural land in arable cultivation, which will have low biodiversity value. There is a boundary hedge between the fields and the current A27 which will be lost and has some biodiversity value for birds and invertebrates. It is important that this hedge is surveyed further for nesting birds prior to any removal and is replaced and enhanced as part of the scheme.
26. Planting/sowing native flora into the remnant verges/land left or enclosed by the scheme at Busticle lane that attracts invertebrates and managing the verges/land sympathetically to optimise benefits for wildlife would add to the biodiversity resource.

Designated sites

27. A local-designated nature conservation site is situated within the 2km radius. Lancing Ring Nature Reserve is chalk grassland habitat.

Ecological Enhancement

28. Natural Environment and Rural Communities Act 2006 encourages the incorporation of ecological enhancements into proposals. It is recommended that initial ecological surveys and reporting seek opportunities to contribute to biodiversity enhancement of adjacent habitats and contribute to existing initiatives

Public Rights of Way (PROW) network and connectivity to the SDNP. (Full report included in Appendix I as part of the Landscape Assessment, Also refer to Appendix 3; Map of NMU access points).

29. Access to the National Park and its associated recreational value is more widely affected by the entirety of the scheme proposals than other aspects of the assessment process. This is due to the likely increase in vehicle speeds resulting from the proposed road scheme which would further limit the potential for non-motorised users to cross the A27 and gain sustainable access to the SDNP. The continuation of, and linkage to the public rights of way network to the north of the A27 would thus be further hampered by the scheme objectives. This is assessed in more detail in Appendix I. A map of access points to the SDNP which could be improved as part of the scheme mitigation has been included in Appendix 3.
30. The A27 presents a significant barrier to access in the National Park. This is particularly true for non-motorised users (NMUs) and for communities along the coastal strip including Worthing, Lancing and Shoreham. While there are some good NMU routes such as the Downs Link¹ at Shoreham, other historic rights of way have been severed by the A27 and where crossings exist they are few and far between, often at grade and considered dangerous to use because of volumes of traffic. The PROW network north of A27 includes footpaths and bridleways which link directly to the South Downs Way National Trail and to other key sites such as Cissbury Ring, but accessing these from south of the A27 is difficult.

¹ The Downs Link shared use path extends some 37 miles from Shoreham to Guildford and is accessible to walkers, cyclists and horseriders.

31. Avoidance of any further loss or degradation of NMU access should be addressed at the earliest stages of design and consultation for the Worthing proposals and should be a key objective of the improvements. However, the overall impression from the information provided by HE to date is that little consideration has been given to potential opportunities to enhance NMU access to the National Park.
32. Highways England should also seek to deliver NMU access improvements through use of their 'designated funds'. The aim of this fund is to improve accessibility for all users along and over the existing strategic road network including to reduce severance. This would also be in keeping with their responsibilities to have regard to National Park purposes, in particular to promote opportunities for the public to understand and enjoy their special qualities.
33. Appendix 3 to this response is a map of the scheme area showing the key crossing points for NMUs over the A27 which the SDNPA has identified as important to in terms of the National Park purposes set out as follows in the National Parks and Access to the Countryside Act 1949.²

'National Parks.

[F5(1)*The provisions of this Part of this Act shall have effect for the purpose—*

(a)of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and

(b)of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.]

*(2)The said areas are those extensive tracts of country in England **F6** . . . as to which it appears to **[F7Natural England]** that by reason of—*

(a)their natural beauty, and

(b)the opportunities they afford for open-air recreation, having regard both to their character and to their position in relation to centres of population,

it is especially desirable that the necessary measures shall be taken for the purposes mentioned in the last foregoing subsection'

34. This is particularly relevant for the urban coastal strip where there are significant numbers of residents without cars with few opportunities to access the countryside. Some of these same residents experience health inequalities which could in part be addressed through better access to greenspace and the health and wellbeing opportunities offered by National Parks.

Busticle Lane Junction

35. Access to the PROW network is not directly impacted by the proposed Busticle Lane junction improvement although it does form part of the overall impact on severance due to the A27 along the northern edge of the coastal plain. The proposed scheme does not make any new provision for non-motorised users and the SDNPA would be supportive of a range of improvements to crossing points to enhance the opportunities for the communities either

² <http://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>

side of the A27 (a map of key crossing points along the A27 to facilitate access to the SDNP is included in Appendix 3)

36. Better access could also be achieved through the prioritisation of potential crossing improvements at other locations within the improvement scheme area.
37. Any new infrastructure should be accessible to the largest possible range of users and therefore be designed to take into account the needs of walkers, cyclists, horse riders and people with disabilities.

Summary of Economic impacts (Full report in Appendix 5)

38. When the economic study was being produced the plans for the A27 at Lancing/Worthing were still at the design options stage, with an overall funding envelope of £50-£100m and an expected construction timeframe of 2021-23.
39. Please note that for the purposes of this economic assessment, an online dualling scheme (Option F) has been considered as set out in the 2015 A27 feasibility study by PB. The A27 abuts the SDNP between Sompting and Lancing but since this is already a dualled stretch, it is presumed that no widening works would take place here. The BCR presented is 6.5 : 1 suggesting that there will be net positive economic benefits for a dualled online option.
40. As suggested in the report, a no dualling scheme has been proposed as the only option and more simple junction improvements are made which would include Busticle Lane, though not include any dualling.
41. The scheme would serve an area of major housing and commercial development. Adjacent to Shoreham airport, there is a current planning application (with Adur & Worthing Local Planning Authority, reference AWDM/0961/17) for 600 homes and an IKEA . While this has not been demonstrated to be 'dependent' on the dualling scheme under review, it involves an upgrade of the Sussex Pad traffic lights to a new roundabout interchange .
42. NB:
There are likely to be cumulative impacts on the SDNP purposes from this proposal resulting from increased traffic, impaired access to the SDNP together with increased severance due to increased road width and traffic speeds. The SDNPA advocates for an integrated and joined up approach (between all parties) to the design of the mitigation for impacts on the SDNP, including NMU access to the SDNP.
43. Specific local access issues from north of the A27 may occur in relation to Worthing Golf Club, and in relation to farm accesses from the SDNP. The extent of these issues would depend on the detail of option design. This would also be the case in relation to severance impacts and access to the Park, which could be net positive or harmful dependent on design
44. Overall the combined schemes along the A27 (from Chichester, Arundel, Worthing/Lancing, and East of Lewes would have localised impact for the economy, both good and bad with little impact for the SDNP businesses.

Summary assessment tables

45. The tables included in Appendix 4 shows both the potential negative and positive impacts on the Special Qualities of the SDNP in terms of the Environmental Impact Assessment subject areas which are laid down in the EIA regulations 2017³.

³<https://www.gov.uk/guidance/environmental-impact-assessment>

46. A low impact is regarded as zero or neutral. The table shows that the assessment process has identified a generally low level of impacts with Landscape and Cultural Heritage being assessed as medium level of negative impacts. It is considered at this stage that mitigation measures proposed would be adequate to reduce the potential impact on the SDNP to an acceptable level and may have a positive assessment of impacts in relation to cumulative impacts on access following mitigation measures as outlined below;

Mitigation

47. The following recommendations for mitigation should the scheme be developed are separated into themes for Landscape, biodiversity, access and cultural heritage in order to assist with the assessment process for Environmental Impact Assessment. The SDNPA would however strongly advocate for an integrated approach to design and mitigation where mitigation measures are designed to provide multifunctional ecosystem services benefits to the SDNP.

48.

The following **Landscape mitigation** is recommended at this stage should the scheme be developed, this is not conclusive; further recommendations may be made as the scheme develops and further details are given;

- i. An alternative alignment of the Busticle Lane link road could reduce the scale of the proposed junction and thereby minimise the land take and associated detrimental impacts on the National Park. In particular the creation of left over land within the 'loops' of the proposed road alignment is likely to result in these spaces becoming redundant and poorly maintained, thereby failing to enhance the SDNP or being consistent with local rural character at the edge of the settlement.
- ii. A scheme of native hedgerow replacement along the north side of the proposed road widening scheme at Busticle Lane;
- iii. An appropriate scheme of native planting within the proposed cut off 'loops' of the new link road at Busticle Lane (ie not suburban, ornamental or 'civic' in character);
- iv. Detailed design of the proposed landform around the new junction is not yet available and may require further mitigation
- v. Preparation of an appropriate road lighting scheme across the project to minimise impacts on Dark night skies to the north and to reflect the International Dark Night Sky status of the SDNP following further assessment of likely impacts at the EIA stage;
- vi. A 'minimal signage' approach where the A27 has a rural character and is adjacent to the SDNP;
- i. SUDS schemes –The Authority would strongly advocate SUDs where possible and other natural drainage interventions. These need to be sensitively designed in the landscape to reflect the local character of surface water bodies and drainage patterns. In addition SUDS schemes which drain to a soakaway system would be discouraged due to impacts on water quality from pollutants entering the local water supply. A series of filtration processes would be strongly recommended for all SUDS proposals.

49. The following **Biodiversity mitigation** is recommended at this stage should the scheme be developed, this is not conclusive; further recommendations may be made as the scheme develops and further details are given;

- ii. An appropriate habitat creation and land management scheme for the Busticle Lane junction improvements should be developed which integrates with sensitively designed SUDS schemes, access routes (see below: access mitigation), land form and landscape structure planting.
- iii. If further land take is available due to agricultural viability issues with parts of the field being too small to farm then these areas should also be incorporated into a habitat

- creation and land management scheme, land and dowry which could be donated/given to interested community groups, or other.
- iv. The Authority strongly recommends the inclusion of SUDS schemes which incorporate biodiversity enhancements as part of the detailed design. SUDS schemes which drain to a soakaway system would be discouraged due to impacts on water quality from pollutants entering the water supply. A series of filtration processes would be recommended for all SUDS proposals.
 - v. Natural Environment and Rural Communities Act 2006 encourages the incorporation of ecological enhancements into proposals. It is recommended that initial ecological surveys and reporting seek opportunities to contribute to biodiversity enhancement of adjacent habitats and contribute to existing initiatives.
50. The following **Cultural Heritage mitigation** is recommended at this stage should the scheme be developed, this is not conclusive; further recommendations may be made as the scheme develops and further details are given;
- i. The potential impacts upon the setting of the SDNP, other Scheduled Monuments, Listed Buildings and Conservation Areas will require more detailed investigation, leading to mitigation measures.
 - ii. A programme of archaeological fieldwork consisting of field walking, geophysical survey, geo-archaeological trial pitting and trial trench evaluation should be carried out to fully assess the potential of as yet unrecorded archaeology at the site north of Worthing
 - iii. This programme should then be followed by an assessment statement that should set out the terms of further investigation and excavation, leading to the academic publication and public dissemination of all results.
 - iv. Any archaeological work carried out within the SDNP should include public engagement as part of any mitigation strategy with any archives deposited in a publically accessible archive.
51. The following **Access mitigation** is recommended at this stage should the scheme be developed and is not conclusive; further recommendations may be made as the scheme develops and further details are given.
52. The SDNPA notes that the non-motorised user (NMUs) and access proposals are still being developed by HE. The Authority welcomes the opportunity to provide advice on the SDNPA aspects of access. The Authority seeks to address the likely cumulative impacts of the proposals on the existing severance effect of the A27 between the population of the coastal plain and the National Park.
- i. Recommended access improvements which provide mitigation for severance on access routes to the SDNP have been identified on the map in Appendix 3.
 - ii. Depending on the land take arrangements for the field at Busticle Lane there is an opportunity to create an off road/'behind the hedge' connection to Dankton Lane Bridleway from Halewick Road which would link the crossing points at the junction to an off road route.

Background to the scheme

53. The A27 Worthing and Lancing Improvement scheme is identified within the Government's 2015-2020 Road Investment Strategy (RIS) which states that England's strategic road network requires upgrading and improving to ensure it can deliver the performance needed to support the nation in the 21st century. A budget of £50-£100m has been allocated to the scheme. This scheme forms part of a package of schemes to improve the A27 corridor between Chichester and Polegate. The schemes are;

Chichester (withdrawn following consultation in 2016)

Arundel (due for consultation in August-Oct 2017)

Worthing/Lancing (consultation during July-Sept 2017)

East of Lewes (Consultation completed 2016 – preferred option announcement due 26th September 2017)

54. The Worthing scheme is 6km in length from Forest Lane west of Worthing to Grinstead Lane/ Manor Road junction east of Lancing. The South Downs National Park boundary runs to the north of the scheme, except for at Busticle Lane where the scheme requires land take to allow a new junction to be constructed.

Planning process

55. It is understood that permission for the Worthing – Lancing Scheme may be granted through the National Infrastructure Planning process which is undertaken by the Planning Inspectorate (PINS) on behalf of the Secretary of State. The National Park Authority would be considered to be a ‘relevant’ Local Authority and will be invited to produce a *Local Impact Report* to submit to PINS for their consideration during the application process.

Planning policy

56. *National Policy Statement for National Networks*⁴ (NNNPS), This is a planning policy document which sets out planning guidance for the development of national significant infrastructure projects on the road and rail networks. The Secretary of State will use the NNNPS as the primary basis for making decisions on development consent applications for National Infrastructure projects.

57. The following paragraphs specifically refer to development within National Parks and set out the basis for decision making when this is proposed by the applicant:

- i. Para 4.26 Regarding the assessment of alternatives for schemes within National Park
- ii. Para 5.148 Assessment process refers to the need for applicants to adhere to the requirements of the Government circular 2010 on the ‘English National Parks and the Broads’⁵ or successor documents.
- iii. Paras 5.148-5.155 Set out the approach to the tests for major road schemes within National Parks;

National Planning Policy Framework

58. Paragraph 115 of this document states that great weight should be given to conserving landscape and scenic beauty, wildlife and cultural heritage in National Parks, the Broads and Areas of Outstanding National Beauty;
59. Paragraph 116 then goes on to say that planning permission should be refused for major development in these areas except in exceptional circumstances and where it can be demonstrated to be in the public interest and meets the following tests;
- i. The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - ii. The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - iii. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

⁴ <https://www.gov.uk/government/publications/national-policy-statement-for-national-networks>

⁵ <https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>

60. *Local Plan documents* may also be considered relevant by PINS;

- The emerging South Downs Local Plan (Submission Version, September 2017).
- Adur District Local Plan (1996)
- Adur Local Plan - Submission Adur Local Plan 2016: Inspector's main modifications, Revised 22nd June 2017

61. *Other relevant local documents:*

- Partnership Management Plan – Shaping the future of your South Downs National Park 2014-2019

APENDICES

Appendix 1 –Landscape and Access Impact Assessment for Busticle Lane Junction

Appendix 2 Heritage Desktop Assessment for A27 Worthing Lancing scheme

Appendix 3 Map of Non-Motorised User crossing points

Appendix 4 Table of Environmental Impact Assessment of the proposals taking into account the Special Qualities of the SDNP.

Appendix 5 Economic Impacts of the A27 on the South Downs National Park

