

Report to	Planning Committee
Date	10 March 2022
By	Director of Planning
Title of Report	Response to National Highway's Section 42 Statutory Consultation on the A27 Arundel Bypass
Purpose of Report	To update Planning Committee on the SDNPA's draft response to the A27 Arundel Bypass consultation

Recommendation: The Committee is recommended to consider and provide comments on the contents of the draft response to be provided by the Chief Executive of the Authority as part of the Section 42 Statutory Consultation.

Executive Summary

Members are being asked for their views on the draft response (attached as **Appendix 1**) to the Arundel A27 bypass consultation. Members will note that the consultation formally closed on 08 March, however a short extension to the consultation period has been given by National Highways to allow consideration of this response by SDNPA's Planning Committee. However, National Highways refused to extend the consultation period to allow consideration by full Authority at its meeting on 24 March. Therefore, following consideration by the Planning committee, the Chief Executive will sign off the final response and submit in line with the revised timeframe.

Whilst the SDNPA welcome the Preferred Route now being outside of the National Park, Officers are advising that based on the Preliminary Environmental Information Report (PEIR) compiled by National Highways the SDNPA objects to the proposed development. There remains significant adverse impacts on the setting of the National Park as well as the potential for direct impact within the National Park itself. Suggestions have been made as to how the concerns could be addressed.

I. Introduction

- I.1 This report is seeking Planning Committee's views on the draft consultation response (**Appendix 1**) to National Highways' proposals for a dual carriageway bypass of the A27 around Arundel, from Crossbush to west of Tye Lane and associated works to the existing A27 between these points to 'de-trunk' the road.
- I.2 The SDNPA's Chief Executive will use provisions for urgent actions set out in Standing Order 18 following the meeting of the Planning Committee in order to agree and submit the

final response on this strategic consultation (subject to consideration of any comments from Planning Committee). Whilst the consultation closed on 08 March 2022, an extension has been granted by National Highways until 14 March 2022, but before the next National Park Authority meeting.

2. Background and Policy Context

- 2.1 A statutory consultation is being undertaken by National Highways, which is required before they submit a 'Development Consent Order' (DCO) application to the Planning Inspectorate (the Inspectorate). This is the last legally required formal consultation before National Highways submit the DCO application. Consultees and other interested parties have been invited to comment on the information made available on National Highway's website. This information includes:
- A Preliminary Environmental Information Report (PEIR), which provides a 'point in time' statement of the main environmental information available, along with some descriptions of the likely environmental effects and mitigation measures envisaged for the Scheme (this can be viewed under the background documents listed below);
 - General arrangement plans, which indicate the proposed horizontal and vertical alignment of the bypass (see link in Background Documents).
- 2.2 This consultation follows a lengthy process for National Highways (NH) to determine their preferred route for the bypass. In May 2018 a route option 5AV3 was announced by NH as their preferred route. This route would have run through the National Park (in part), without any detail provided as to how it had taken into account the requirements of planning legislation and policy in respect of Major Development in a National Park. In short this is that development consent should be refused for major road development in National Parks except in exceptional circumstances and where it can be demonstrated that it is in the public interest and following an assessment of the cost of, and scope for, developing outside the National Park
- 2.3 Prompted by the SDNPA's successful Judicial Review challenge in 2018, National Highways (formerly Highways England) reconsidered the preferred route, taking account of planning legislation and the National Policy Statement concerning National Networks by considering and assessing road routes that lay completely outside of the National Park. This resulted in a revised Preferred Route Announcement in October 2020. This route diverts south from the existing A27 at Tye Lane, continuing south-east around Binsted Woods before heading north-east across the Arun Valley Flood Plain to join the A27 again at Crossbush. The bypass itself is therefore outside of the National Park.
- 2.4 The proposed key aspects of the proposed bypass are set out below, running west to east (and shown on the Scheme Overview at **Appendix 2** and Preliminary Landscape and Environmental Masterplan at **Appendix 3**):
- New dual carriageway road provided for approximately 8km;
 - Reduction to 50mph on A27 from Fontwell East Roundabout to east of St Mary's Church, Binsted;
 - New bridleway bridge to replace existing crossing of BR392;
 - Bypass begins immediately east of BR392;
 - Overbridges at Tye Lane and Yapton Lane (height of latter undetermined, with two options proposed to overcome groundwater concerns);
 - Realignment of Binsted Rife and public right of way, with bypass across;
 - Option for relocated golf course provision associated with Avisford Park Golf Club;
 - Green bridge provided at Binsted Lane (including vehicular access provision);
 - Bridge over Tortington Rife;
 - Green Bridge provided at Tortington Lane;

- Proposed viaduct over Arun Valley, crossing Ford Road, the River Arun and its floodplain, (approximately 1.5km in length);
- New Arun Valley Railway Bridge embankment, to continue either side of railway;
- Reconfigured Crossbush Junction.

All these measures are located outside of the National Park.

2.5 Other aspects of the scheme include:

- De-trunking of the A27 (between Crossbush and west of Tye Lane) including the full extent of the single carriageway element of the existing road;
- Areas of flood compensation;
- Further planting, including new hedgerows;
- Area of new native woodland between Fontwell East Roundabout and Tye Lane;
- Temporary construction compounds at Yapton Lane, Ford Road and Crossbush;
- Diversion of other utilities.

Some of these elements, including the de-trunking and diversion of utilities, are within the National Park boundary. Very little detail has been provided in respect of these matters at this stage.

2.6 In support of the new road National Highways state that currently, the single carriageway section of the A27 through Arundel is highly congested, which leads to severe delays and unpredictable journey times. It experiences an above average number of accidents compared with other rural A-roads. They also consider that the congestion here has a knock-on effect on traffic flows through neighbouring towns and villages, including across the National Park. National Highways say they scheme will help make journeys faster, safer and more reliable – bringing the journey time down by 9 minutes. A fly-through video of the new road can be found on the consultation [website](#)

2.7 Under the NSIP process, once the application is submitted to the Inspectorate for consideration, the Authority will be invited to produce a ‘Local Impact Report’ and a written representation of our views of the proposal. We will be invited to take part in the examination hearings. Discussions with National Highways on all aspects of the scheme are expected to occur throughout the lead up to the submission (for example on a Statement of Common Ground) and right to and including the actual examination hearings. This is usual.

2.8 National Highways’ timetable indicates the application will be submitted to the Inspectorate for examination later this year.

3. Issues for Consideration

3.1 Planning Committee is asked to consider and provide comments upon the proposed response to the consultation (as set out in Appendix 1). The proposed bypass of the A27 at Arundel avoids direct incursion into the National Park, which the SDNPA welcomes. However, on the basis of the information available, the SDNPA has significant concerns regarding the impact of the Proposal on the setting of the National Park in respect of landscape character and in views from, and to, the Park. The National Planning Policy Framework (para 176) makes clear that development within the setting of National Parks should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

3.2 There are also concerns regarding the impact on wildlife and biodiversity, as a result of severance caused by the bypass and related effects on habitat quality. There also appears to be little consideration of the second purpose of the National Park, as it relates to access and recreation. The SDNPA’s draft response has been structured around broad sections relating to impact on the National Park’s special qualities and concerns regarding NH’s approach to the Environmental Impact Assessment.

3.3 Additionally the lack of detailed information, the lack of clarity and certainty around the appearance, associated infrastructure, construction, mitigation and compensation measures has resulted in the Authority being unable to make a fully informed assessment of all the impacts and the required mitigation and compensation measures.

4. Next Steps

4.1 Planning Committee is recommended to provide comments on the draft response (set out in **Appendix I**) The views provided by Planning Committee will be incorporated into the final response that will be agreed by the Chief Executive, in consultation with the Chair of the Authority who will use provisions for urgent actions set out in the Authority's Standing Orders and submit to the applicant by 14 March 2022, until which an extension to comment has been granted.

4.2 In accordance with standing orders the use of urgency powers will be reported to all members within 3 working days and also reported to the next meeting of the National Park Authority.

5. Other Implications

Implication	Yes/No
Will further decisions be required by another committee/full authority?	No – This is the last legally required formal consultation before National Highways submit the DCO application (unless National Highways voluntarily choose to carry out another consultation). This response will form the basis for any Authority response to the DCO application and examination in due course.
Does the proposal raise any Resource implications?	Yes – officers have agreed a Planning Performance Agreement with the applicant to mitigate these costs (capped at £65,000)
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Yes – no equalities implications arise directly from this paper. We have considered our public sector equalities duty as part of the response. The Planning Inspectorate and Secretary of State will have to have regard to this equality duty in their assessment of National Highway's proposals.
Are there any Human Rights implications arising from the proposal?	The Planning Inspectorate and Secretary of State will have to have regard to these matters when assessing National Highway's proposal.
Are there any Crime & Disorder implications arising from the proposal?	No
Are there any Health & Safety implications arising from the proposal?	The Planning Inspectorate and Secretary of State will have to have regard to these matters when assessing National Highway's proposal.
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy?	Any road scheme that proceeds will have significant impact. Officers will continue to work with relevant agencies to mitigate these negative impacts.

6. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
Reputational Risk from objecting (or	Medium	Low	Risks are mitigated by acting in the best interest of the National Park's purposes,

Risk	Likelihood	Impact	Mitigation
not objecting) to the Scheme			being evidence led, being clear what we are asking for and holding regular meetings with the applicant and other stakeholders.

TIM SLANEY
Director of Planning
South Downs National Park Authority

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Appendices:

1. SDNPA's proposed response to National Highways
2. Scheme Overview
3. Preliminary Landscape and Environmental Masterplan (6 sheets)

SDNPA Consultees: Legal Services; Chief Finance Officer; Monitoring Officer; Director of Planning; Director of Countryside Policy and Management

External Consultees: None

Background Documents [Arundel A27 Bypass Statutory Consultation 2022](#)

[Fly-through of proposed scheme](#)

[National Networks National Policy Statement](#)



10 March 2022

Mr Andrew Jackson
Project Manager for A27 Arundel Bypass

Sent via email only

Dear Mr Jackson,

A27 Arundel Bypass Statutory Consultation Section 42(1) (b) of the Planning Act 2008 and Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

I am writing on behalf of the South Downs National Park Authority (SDNPA) regarding the above Scheme.

Summary

The proposed bypass of the A27 at Arundel avoids direct incursion into the National Park, which the SDNPA welcomes. However the SDNPA has significant concerns regarding the impact of the Proposal on the setting of the National Park in respect of landscape character and in views from, and to, the Park. There are also concerns regarding the impact on wildlife and biodiversity, as a result of severance caused by the bypass and related effects on habitat quality. There also appears to be little consideration of the second purpose of the National Park, as it relates to access and recreation.

There is little information presented in the consultation documents to support the benefits, or lack of likely significant effects, that are currently being claimed. We appreciate the Preliminary Environmental Information Report (PEIR) is a 'point in time' assessment, however in this assessment we are disappointed that much of the advice provided by the SDNPA and other stakeholders has not been taken into account and the impacts on critical features downplayed. Whilst we welcome the inclusion of a specific objective to 'Respect the SDNP and its special qualities in our decision making' as part of the Scheme, it is not clear how this has been demonstrated as part of the design process of this route.

Therefore the SDNPA currently **OBJECTS** to this proposal. This is based on the overarching comments in this covering letter and more detailed technical comments in the attached appendices. We will continue to work with you and other stakeholders, in order to ensure sufficient consideration and action is taken to address the issues raised.

Impact on National Park

Landscape Character and Visual Impact

We do not agree with many of the initial conclusions reached in respect of the likely significant effects on the National Park. For example, it is stated that it is not expected that there will be significant adverse landscape or cultural heritage effects as part of the operation of the scheme. There are general assertions throughout the PEIR that the viaduct would retain the open character of the floodplain. This is not supported, in our view, by the images and the plans that are part of the

consultation documents, which clearly show the viaduct crossing the floodplain, truncating views of that landscape, adding a new large scale structure within the open floodplain and changing the scale and extent of the perception of the landscape. Whilst we do welcome that the option for an embankment across the flood plain has been discounted, the assessment of the effects of the viaduct must be made in relation to the baseline, rather than the greater harm that could have arisen from this alternative option.

Other aspects of the proposed scheme also raise concerns in respect of the impact on the National Park and its setting:

- Binsted Lane to Tortington Lane - a large amount of regrading, new features and structures are proposed in this area, in order to service the proposed bypass and existing watercourses and public rights of way. This is in close proximity to the National Park boundary, and we consider would have adverse effects on the setting of the SDNP. Further consideration should be given to this and detailed within the assessment.
- Eastern tie-in at Crossbush – we are concerned about the landform and layout of the eastern tie in and the lack of assessment of this section of the scheme in the LVIA – both in landscape and visual terms.
- Option for re-provision of Avisford Golf Course - This land is adjacent to Scotland Lane, which is a well-used bridleway, giving access to the SDNP and Arundel from Binsted. At this location views from the SDNP are extensive over the coastal plain to the south and the design of golf course in the foreground of those views could affect the semi natural and undeveloped character of the landscape in addition to the effects of the bypass construction which will also be clearly visible – so there would be combined effects from this proposal. The activity arising from this use would also adversely affect the perceived tranquillity on the edge of the National Park in this location. It is not clear how the new facility would be accessed; the road between Avisford Park Hotel, which is single track in places and the site runs adjacent to the National Park boundary, the impact of which should also be included in the assessment if this option is pursued.
- Yapton Lane (Option 2B) – the existing road alignment and character demonstrates a clear change in character as it enters the National Park and should be taken into consideration as part of the baseline character assessment. The change in the road alignment, the removal of planting and the regrading of land is considered to have the potential for further adverse impacts on the setting, and transition into, the National Park.

Whilst it might be true that traffic on the existing single carriageway element of the A27 may reduce, the road remains and it will be trafficked. The road will remain as a single carriageway, which is already part of the urban setting, and will now be viewed in the context (i.e. cumulatively) of an additional, larger piece of infrastructure to the south (the new road). This will be a significant adverse effect. The Table of Effects included in Chapter 7 suggests that after the implementation of the Environmental Management Plan, no further mitigation is likely to be required. It is difficult to understand how this conclusion has been arrived at, given the gaps in the assessment process outlined here and elsewhere in this response, and the failure to understand the impact on the SDNP from development in the setting of the National Park.

We welcome the publication of the Design Council comments (ref DCC/0965) as part of the statutory consultation documents. We are concerned that the only reference to them in the PEIR suggests that they were wholly positive (para 2.4.11). Whilst the Design Council have undoubtedly provided encouragement to some aspects of the approach so far, they also clearly state;

We are not yet convinced by the architectural merit of the proposed structures which feel formulaic and utilitarian. We also have reservations about the landscape strategy which currently does not engage sufficiently with the characteristics of the local landscape.

They go on to recommend that a 'clear and engaging design narrative' is developed in order to demonstrate 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". This approach is wholly endorsed by the SDNPA and we would welcome the opportunity to engage in this process. This would go beyond a discussion of materials or colour palette, and would be consistent with the environmentally led approach advised in the DEFRA Single Voice Letter (13 August 2019).

Part of this further work should include further work on the Design Principles. The Principles are currently vague and do not get to the heart of how to deliver an environmentally-led scheme in an historic, culturally sensitive landscape and within the setting of a National Park. For example, just being a 'viaduct' is not enough. We, and other stakeholders, have made comments during previous meetings, which have still not been taken into account.

We have significant concerns regarding the assessment of both landscape character and visual effects, given the lack of information currently presented. Understanding of the National Park designation and its setting is critical to this assessment and should be informing the design process at an early stage. Our recent meetings with your team indicate a willingness to engage more proactively, however these requests have been made repeatedly throughout the pre-application stakeholder engagement with little action being taken to date to address the concerns raised in a meaningful manner.

The LVIA should also consider the effect of the layout, alignment and design of sustainable drainage systems (SuDS), which are frequently in the vicinity of the SDNP. These elements appear to be heavily engineered and are likely to be inconsistent with local character, resulting in adverse effects on the setting of the National Park. An example of this is concerning the proposed regrading and embankments: 1:3 slopes in this landscape only occur around watercourses and are not natural features. The assertion that this will reduce the permanent landscape effects of the scheme is queried due to the level changes and severance caused by the scheme to the landscape.

In terms of the Landscape and Visual Impact Assessment evidence base itself, there is critical information we consider to be omitted, which should be included:

- The Sussex Historic Landscape Character has been omitted both here and in the Cultural Heritage chapter (other than a mention, but no consideration). This is a serious omission for this stage of the project to fail to consider the largely intact historic landscape – in particular of the Arun valley floodplain and the surrounding upper coastal plain Landscape Character Area (LCA) in which the scheme is also located. Failing to consider at an early stage could lead to an under-assessment of the impacts on the landscape and on cultural heritage. The SDNPA has previously supplied information to National Highways and their consultants about the Sussex Innings (the medieval wet hedges (ditches) in the floodplain which form the field pattern in the valley) and is included again for reference at **Appendix 2**. These features are rare in Sussex and certainly on the scale at which they exist in the Arun valley, both within the SDNP and onto the coastal plain.
- No consideration has been given to users of footpath 206 along the Arun levee bank. This footpath has been considered to incur no changes, so no mention of it is made in Chapter 12 (Population and Health) either. The presence of the road crossing over the valley and this well used public right of way will significantly affect the experience of walking along the valley between Arundel and Littlehampton (or the other way round). Views of the valley in either direction will be blocked and foreshortened by the viaduct, whilst the viaduct itself will provide noise, movement and intrusion in the otherwise still landscape of the valley. As well as the visual impact, an assessment of the effect of the proposed crossing of the valley on the landscape of the National Park and its setting should be undertaken.

- There is currently no detail or consideration of the type, nature or significance of landscape features and historic assets. This needs to be undertaken and fed into the design process.
- We have previously provided comments on the visual baseline and despite the inclusion of some additional viewpoints, our previous comments are still largely relevant. There is particular concern about the photomontage list, which has several omissions, including:
 - Views to the south from SDNP at Binsted and Tortington
 - Views to the eastern tie-in from the western valley side
 - Views towards the viaduct and SDNP from the Arun levee footpath
 - Views from Scotland Lane over proposed golf course and bypass
 - Views of the de-trunking scheme
 - Views where the viaduct design options can be appraised.
- We remain concerned that our previous comments in respect of the proposed Local Landscape Character Areas (LLCA) have not been addressed. We understand that a technical note is being prepared but we have not had the opportunity to review this. In summary, our concern is that the LLCA appear to have been created on a land-use basis, creating small area pockets. This results in a loss of context that serves to downplay any potential significant effects.

These matters have been discussed in our meeting with your landscape consultant and we understand that some of this missing detail is being rectified. We would welcome the opportunity to discuss the data once it has been collected.

Cultural Heritage

Our primary concerns relating to Cultural Heritage relate to the setting of heritage assets within the National Park (including Arundel Castle), the impact on the broader understanding of the historic relationship between the South Downs and the Coastal Plain and the archaeological potential of the areas within the DCO limits within close proximity to the National Park boundary.

The setting of Arundel Castle (and indeed other heritage assets within the town, although outside the National Park) includes the open character of the floodplain as it extends to the south. Whilst it is noted that some urban development can be seen in views, the view southwards to the sea remains relatively unchanged. Both during construction and operation phases, there will be significant adverse effects from the new road (and we note that these are only acknowledged for the construction phase) and the setting of this Grade I Listed Building will be harmed substantially.

In respect of archaeology, it is understood from the information provided so far that there is significant archaeological potential within the DCO limits, including deposits of geoarchaeological and paleoenvironmental interests. No predictions or information has been provided regarding these matters, however these could have implications for the wider understanding of cultural heritage in the area.

If significant archaeological finds are made we would expect specific mitigation measures with regard to depositing and storage to be included as part of the scheme. The cumulative impacts of this project as well as other large projects in the vicinity could place unacceptable pressure on local archive facilities that would need to be resolved.

Access and Recreation

The SDNPA considers the PEIR and proposed scheme currently fails to demonstrate how it has given due regard to second purpose of the National Park, i.e. to promote opportunities for the public understanding and enjoyment of the special qualities of the Park. As well as the recognition of the importance of PROW as local assets, it is important to remember the significance of the Rights of way network as a crucial means by which local people and visitors access the National Park in line with its second purpose.

As with the broad statements made in respect of other topic areas, there are several examples throughout the documents where statements of benefit have been made prematurely. The fact is that the user experience from many existing rights of way would be adversely affected by the proposals. The proposals advise that there will be significant benefit for walkers, cyclists and equestrians as a result of the scheme, however this has not been demonstrated, as much of the alternate and additional provision has not yet been designed. There is very little in the way of new walking, cycling and horseriding (WCH) routes. 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 forced to share on road space with vehicles. Apart from the new bridleway bridge over the existing A27 there is no additional provision.

Walking, cycling and horseriding provision along and across the existing A27 would potentially have the biggest impact in terms of active travel amongst local communities affected by the scheme, and we welcome the opportunity to discuss this further as part of the proposed working group.

The PEIR advises that:

A new PRow would be introduced on Tye Lane, allowing pedestrians and cyclists to travel safely on the newly constructed overbridge by Tye Lane, over the Scheme. A new PRow that connects to the existing PRow 350 footpath would provide a connection to Binsted Lane. The introduction of these PRow has the potential to result in significant beneficial effects.

This is just provision for non-motorised users to cross the new bypass after which they are returned to the public highway. It is a compensatory measure and arguably not a significant benefit. Certainly no more of a benefit to that afforded to motorists who also use Tye Lane. The same comment applies in relation measures to for PRow 350.

We welcome the provision in principle of the Binsted Lane overbridge and the improved connectivity afforded here as a result of the realignment, however please note the concerns raised above regarding the landscape impact. These will need to be addressed as a matter of priority.

Biodiversity (including woodland)

In addition to the impact on landscape character, we are greatly concerned about the impact of the proposed viaduct and bypass on biodiversity. Whilst the bypass is outside of the National Park, habitat corridors run across the flood plain, through the woodland and hedgerows, immaterial to the designation. We do not agree that the viaduct will 'maintain habitat connectivity' for bats, and have not seen the evidence to demonstrate such a claim. We believe it will impede connectivity, as well as introducing a flight path blocker for bat and bird movements.

As with other matters, there remains significant gaps in the evidence base and many examples of where further information would be provided as part of the ES; we would strongly recommend that this information is shared prior to the submission.

We welcome the commitment to deliver biodiversity net gain as part of the scheme albeit there is work to be done on how this is to be calculated and planned for.

Climate Change

The implications for climate change as a result of this proposal will ultimately fall for the Examining Authority and Secretary of State to judge. However, we are concerned about some of the conclusions that have been reached and how impacts have been measured. For example, evidence has been collected on a local basis, whilst the impacts of the scheme have been assessed in the national context. This serves to make them appear much less significant.

Environmental Management Plans and Mitigation

As has been noted in the comments above, the SDNPA considers it is not clear how the evidence and baseline data – which is still not complete in many cases – is informing the type of mitigation proposed. As previously mentioned, the Environmental Management Plan (EMP) has been referred to throughout the PEIR as being the mechanism for resolving any likely significant effects. We have seen no detail of this and have not been assured that it would be possible to achieve such significant resolution through this Plan. It is also disappointing that a draft of the EMP has not been shared yet and we would expect a version to be shared in advance of submission. Please could you also confirm whether the EMP will cover construction and operational aspects, and whether any optionality (e.g. at Yapton Lane or the replacement golf course provision) will also be covered?

Some of the mitigation that is mentioned includes the provision of green bridges and underpasses (to be agreed with Natural England). It is important to ensure that provision for connecting suitable habitat will be delivered in connection with these features; mitigation needs to go further than the bridges themselves in order to be successful. This is required as part of the scheme, to ensure that such mitigation will be achievable – leaving to a DCO Requirement will not be sufficient.

We note that the estimation undertaken for the number of individual trees/hedges/groups/ woodlands that require removal is high, with some of these being of high quality. For us to fully understand the impact this will have and to gauge the appropriate mitigation, further information is required. No commitment has been given to replant where trees are lost. We would expect all replacement to be on a 3:1 basis not least as mature trees cannot be effectively replaced with saplings.

We would welcome the opportunity to have further discussions and input into the mitigation strategy, as has been recommended by the Design Council.

The SDNPA consider it will not be possible to fully mitigate the impacts of the scheme on the National Park. As such it is expected that there will be a requirement for there to be a Section 106 Agreement securing an agreed financial contribution (or defined mitigation works) in order for National Highways to demonstrate this protected area is conserved and enhanced. Please note, that 'on the ground' mitigation will still be expected of course in order to minimise harm within the scheme overall and the S106 would be to provide mitigation for any remaining harm.

The Scheme, Process and Approach to Environmental Impact Assessment

It is noted that most chapters of the PEIR are still gathering critical evidence to form the baseline upon which to assess the likely significant effects of the scheme. Despite this, sweeping assumptions have been made regarding the level of the effects, the type of mitigation required and the land needed to accommodate this mitigation. We are concerned about these assumptions, which we consider are premature at best (further examples provided throughout this response), and would welcome the opportunity to review the completed evidence base and assessment, prior to the submission of the Development Consent Order (DCO), to help inform the design process and identify suitable mitigation measures.

We were surprised that no traffic modelling or background data has been included to support the proposals. Of particular interest to the SDNPA is the evidence to support any rat-running that currently occurs within the National Park and consequently the evidence that this will decrease significantly so as to be considered a benefit. This should factor in the delay currently expected at the Fontwell roundabout and therefore any anticipated additional rat-running that may occur in order to avoid this delay. In respect of the Fontwell roundabout, it is noted that the scheme benefits do not take into account the additional 3 minute delay arising from the proposals at Fontwell. Given

that most westbound traffic using the bypass will continue towards Chichester, the benefits appear to be over-stated.

Throughout the PEIR, there are differing interpretations of 'construction' and 'operation' when assessing likely significant effects. Some chapters have provided a definition of these (e.g. Cultural Heritage), whilst others have not. This is particularly problematic for assessing the in-combination effects in Chapter 16, where the lack of consistency could lead to the likely significant permanent effects being downplayed. We would expect a consistent approach to construction and operation to be applied across the Environmental Statement, or for each chapter to provide a clear definition of each and the assessment of in-combination effects to take these into account.

Development Consent Order Limits

There is some doubt as to the robustness of the draft DCO limits, as we are not convinced these take into account a 'worst-case scenario' in respect of the level of mitigation/compensation required. This is important given that the draft DCO limits run adjacent to the National Park boundary in several locations and it is hard to see how some works would not encroach into the National Park. Whilst new road infrastructure, as stated in policy and legislation, should seek to avoid the National Park, mitigation measures such as habitat connectivity or accessibility improvements may be more beneficial and appropriate for the National Park location – depending on the particular details of such measures. We would urge you to consider where such measures that support the Purposes and Duty of the SDNP may be best located and adjust the DCO limits accordingly.

Conversely, there are areas of the National Park included within the DCO limits where it is not clear what activity will be taking place. This includes an area along the southern edge of Binsted Woods, where no indication is given to why it has been included, as well as the areas to the eastern and western ends of the new road where diversion works for utilities providers have been indicated. Further detail is requested with regard to the nature of these diversion works.

Some of the areas within the National Park appear to have been earmarked to provide 'habitat enhancements', however there is no detail of what these enhancements might be and how they might link to the National Park's statutory purposes.

Worst-case Scenario

You have advised that a 'worst-case scenario' is not being presented for the proposals because the contractor is already on board and therefore the scheme will be fully defined. Based on the information presented so far, this has not been the case. One of the purposes of presenting a worst-case scenario is so stakeholders are able to fully understand the uppermost impacts the scheme would have on their interests. Such an approach would provide a useful degree of flexibility for yourselves as well. The worst-case scenario should extend beyond defining the route of the bypass itself to other factors, such as the road width, verges, height and number of gantries, form of embankments, or the number of piers under the viaduct. Where information has been provided, for example in respect of the height of the viaduct, this has not been clearly defined in the PEIR how the measurement has been taken.

The additional detail to be provided should include sections (longitudinal and latitudinal), visualisations and elevations of the viaduct, bridges and embankments, to assist better understanding of the overall form and scale of the proposals, and how they respond to landscape character. This will enable stakeholders to help identify appropriate mitigation measures.

Very little information has been provided in respect of construction compounds, phasing, methods and construction traffic routes. It is therefore unclear how the construction impacts can have been assessed in each of the topic-specific chapters. This is disappointing considering the applicant already

has the contractor secured and therefore we would expect there to have been more clarity in respect of whether matters such as a concrete-batching plant, location of facilities and further details of the construction traffic management plan could be better defined.

De-trunking

There has been no detail provided regarding what the de-trunking aspect of the Scheme might include, however there has been a lot of reliance on the de-trunking in terms of the benefits it would have on the National Park (in terms of air quality, landscape and visual, cultural heritage and accessibility). These benefits will only be realised if a high quality de-trunking strategy comes forward as part of the scheme and submitted as part of the DCO. Such a strategy, in order to fulfil the mitigation and benefits suggested in the PEIR would need to demonstrate the following:

- A lower order road with demonstrably better and safer provision for both pedestrians, cyclists and horse-riders;
- Improved connectivity north/south (i.e. across the existing A27);
- Improved landscape character and visual effects, and
- Nature recovery.

The SDNPA will continue to work with National Highways to provide further detail on these expectations and welcomes the confirmation that the applicant will be looking to set up a working group on this matter following statutory consultation. Done well, de-trunking could represent a benefit of the proposal.

Further Options

The SDNPA was surprised by the late inclusion of 2 options to resolve issues discovered at Yapton Lane and alternative provisions for Avisford Hotel Golf Course. Neither had been discussed or raised during stakeholder meetings. Both these options have the potential to directly impact the SDNP.

Approach in the PEIR

The PEIR does not appear to demonstrate a clear understanding as to why the National Park was designated, or how the Special Qualities were determined. Our concern is that if the designation is inaccurately described, then any subsequent assessment will be based on flawed information and is likely to be wrong. We therefore suggest a protocol is taken in the ES to describe the National Park designation accurately and which directly references the designation criteria for National Parks as set out in Primary Legislation as follows:

- National parks are designated by Natural England;
 - for their natural beauty and
 - for the opportunities they afford for open air recreation, having regard both to their character and to their position in relation to centres of population
- The purposes of designating these areas are:
 - conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified; and
 - promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

The topic specific chapters and in-combination summary should return to this protocol for reference in their assessment where relevant to the National Park.

Furthermore, we would draw your attention to the National Planning Policy Framework, and paragraph 176 in particular, which makes specific reference to the setting of National Parks:

The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Conclusion

The South Downs National Park is an important landscape, given the highest levels of protection; this includes its setting. Given many of the issues raised in this letter have been discussed with you previously, we are disappointed that more has not been done to address these matters by this stage. At present therefore the SDNPA objects to the scheme as currently presented. We would welcome however the opportunity to work with National Highways and your team with a real commitment on both sides to address matters and to try and resolve these issues to the maximum extent possible prior to a Development Consent Order application being submitted later in 2022.

If you have any queries regarding the above please contact Vicki Colwell (Principal Planning Officer) on 01730 819280 or vicki.colwell@southdowns.gov.uk.

Yours sincerely

Trevor Beattie
Chief Executive
South Downs National Park Authority

Introduction

The following technical comments are structured around the PEIR Chapters and other Consultation Documents.

The SDNPA expects the issues set out in our comments in the letter and below to be addressed and the SDNPA afforded the opportunity to comment before the Development Consent Order (DCO) application is submitted.

Ref	SDNPA Comment
Preliminary	Environmental Information Report (Vols 2a and 2b)
Chapter 2	The Scheme
General	What will be the operational implications for the 50mph zone? For example, will there be further signage, lighting, gantries etc, to enforce the speed limit? These elements may in themselves have an impact on the National Park and its Special Qualities.
2.1.3	We would like to see the evidence of how the congestion at Arundel has a knock-on effect on neighbouring towns and villages within the National Park.
2.3.4-5	We would recommend that reference to the setting of the National Park is made at this introductory stage (and how the scheme relates to this), so that the ES is appropriately addressing the National Networks National Policy Statement (para. 5.154). Please could 'may' be changed to 'will involve some works within the National Park', in respect of the de-trunking work, given that a large section of it is located within the National Park.
2.4.4	Further details of the proposed utility diversions are required as very limited information about the scale and nature of these is currently provided.
2.4.5-6 and Table 2.1	We understand through further discussion that the measurements referred to here are taken to road level, however further clarification will need to be provided as part of the ES.
2.4.12	This would benefit from providing clearer definitions of key features (e.g. engineering parameters) to enable clarity in terms of land take for both construction and operation stages.
2.7.21	We would expect that the impact on the SDNP would be assessed as part of the consideration of the existing A27 (and wider road network) during construction.
General Arrangement Plans	Please could sections (longitudinal and latitudinal), visualisations and elevations be provided of bridges and embankments, to enable better understanding of the overall form and scale of the proposals, and how they response to landscape character.
Chapter 3	Assessment of Alternatives
3.5.66-74	Landscape character and visual impact have not been taken into consideration as part of the assessment of alternatives of the alignment of the floodplain crossing. This should be taken into consideration and be an integral part of the design process.
Chapter 4	Environmental Assessment Methodology
Table 4.1	Landscape and Visual – the SDNPA has not yet agreed the methodology. Elements have been shared in presentations, however we have not had the opportunity to properly interrogate this or indeed see the full document in order to agree.
4.4.16	We welcome the inclusion of biodiversity net gain into the scheme, however further detail will be required about how this is calculated and how it will be secured through the proposals.

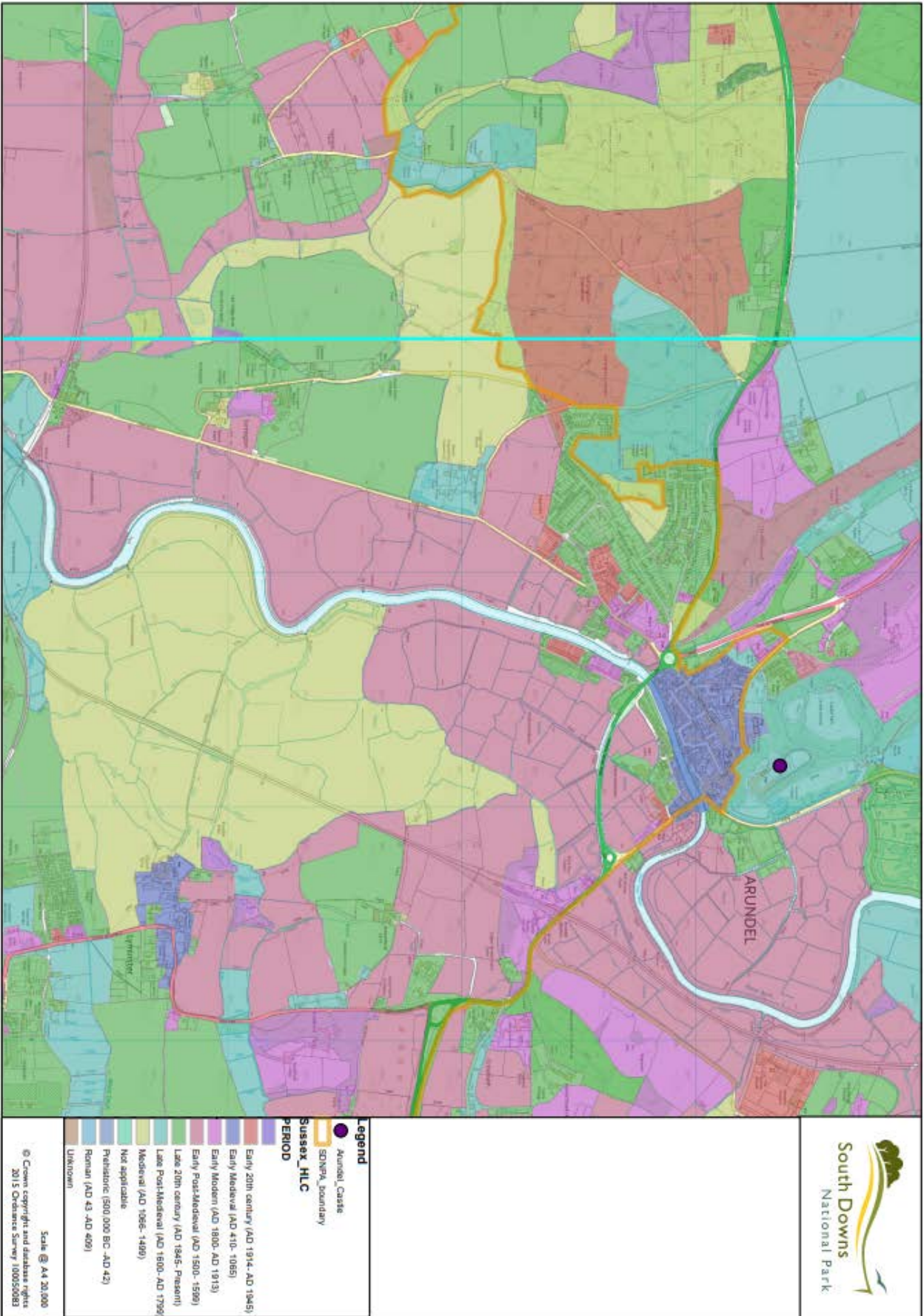
Ref	SDNPA Comment
Chapter 6	Cultural Heritage
6.2.6	The SDNPA has been in discussion with the applicant regarding the viewpoints, however we have not yet reached final agreement.
6.5.1	Whilst it is noted the Historic Landscape Character has been 'reviewed', this does not appear to have been backed up with any action. There is no reference to the historic landscape characteristics or features either here, or in Chapter 7. Further detail and clarification will be required as part of the ES.
6.7.2	We do not agree a viaduct will 'avoid' severance; of the options available to cross the flood plain, it may help to 'minimise' severance. This distinction is critical as further mitigation measures may be required and the likely significant effect would be greater.
Table 6.2 (Arundel Castle)	We do not agree that no further mitigation in respect of the setting of Arundel Castle will be available. Achieving a high quality design for the viaduct and flood plain crossing presents opportunities in terms of mitigation.
Table 6.2 (Archaeology)	Whilst we note reference has been made to recording, there is no mention of depositing. We would welcome the opportunity to discuss this further.
Chapter 7	Landscape and Visual
7.1.6	The Sussex Historic Landscape Character should be included in the list of guidance.
7.4	We can confirm that we find the extent of the study area acceptable.
7.5.3	Please note, the Special Qualities were defined by the SDNPA in 2012, not as part of the designation process.
7.5.27	We recommend that the proposed local landscape character areas were grouped as types, e.g. floodplain; valley sides, upper coastal plain; wooded downland; open downland.
7.5.27	LLCA 11 This should reference the 'middle' Arun Valley Floodplain, not lower.
	LLCA 5 and 25 For urban areas, these are too large and cover areas outside the urban fabric.
	LLCA 7 and 9 These are the same river network, with shared characteristics
	LLCA 8 This should be Binsted Upper Coastal Plan. Further we query the northern alignment of this area.
	LLCA 23 This is a field within the Wooded Estate Downland, and not Open Downland in its own right.
7.7.2	Further details required of the location of the 'substantial number of trees, including those of moderate and high quality' that are proposed to be removed. There is currently no commitment to replant, which we would expect.
7.7.18	No reference to setting of the National Park, which is a significant oversight – please include.
7.7.27	No evidence provided to back up removal of signage – benefit can therefore not be assured.
7.7.33	No reference given to footpath 206 along the Arun levee bank – note the proposed scheme will likely have a significant effect on the experience of users walking between Littlehampton and Arundel.
Chapter 8	Biodiversity
8.1.2 and Fig. 8-2	Further clarity should be provided in the ES regarding the impact to ancient and veteran trees, as well as details of the proposed mitigation.
8.3.1c	Further evidence required and clarification as to whether air quality impacts from the Scheme have been taken into consideration.
8.5.25	Note it is intended to provide further analysis of the magnitude of changes in aerial emissions (and any associated changes on the mosaics of woodland, veteran trees and grassland habitats) in the ES. We reserve comments on potential

Ref	SDNPA Comment
	mitigation requirements until this has been provided, however we anticipate that dust mitigation will be of great importance considering the proximity of sensitive features and would expect there to be a specific section in relation to these features.
8.5.40	Please could the data collected in respect of veteran trees be shared with the Ancient Tree Forum?
8.5.57	We would like to see the methodology for the translocation of veteran trees (as live trees), as we have concerns about how successful this would be.
8.5.72	Further information is required in respect of location, habitat type, scale, species, maintenance and management plans before we are able to comment on whether the compensation proposed is appropriate.
8.6.28	Biodiversity units should be determined based on the most up-to-date Natural England Metric; given version 3.0 went live over a year ago, we would expect this to be used at the present time.
8.6.29	The SDNPA supports the commitment to achieving 24% biodiversity net gain, however note that this will need to be on top of mitigation measures and in order for it to be secured by the DCO, within the Order limits. Further information is therefore required to demonstrate how and where this will be achieved.
8.7.10	We do not agree at this stage that the green bridges and underpasses will 'maintain habitat connectivity for bats' as we have not yet seen the evidence to support this.
Chapter 10	Materials Assets and Waste
General	SDNPA have been in discussion with officers at WSCC and support the comments they have made in respect of minerals and waste.
10.5	We would remind the applicant that there is a requirement for a Mineral Resource Assessment to be completed for non-mineral development that takes place in the Mineral Safeguarding Areas.
10.5	We would remind the applicant that there is a requirement for a Waste Infrastructure Statement to assess the potential impact on Copse Barn.
Chapter 12	Population and Human Health
12.3.3	Frequency of use of walking, cycling and horse-riding provisions (WCH) is not necessarily determinative of the value of a route. This is particularly the case when considering connectivity.
12.5.27	As well as the importance of PROW as local assets, the PROW are also the primary means by which local people and visitors access the National Park, in line with the National Park's second purpose. This should be reflected in the chapter.
12.5.32 and Table 12.3	The second purpose of the National Park is "to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public". This should be explicitly reflected here and in the Chapter more widely.
12.6.8	PROW 350 provides good (and well used) access for walkers directly from Walberton into the National Park. It will therefore be essential to ensure the proposed realigned route via an underpass remains accessible and not permanently waterlogged.
12.8.21	A firmer commitment to mitigation measures where temporary closures are required to PROW should be provided.
12.8.23	Further information required where permanently diverting, to support claims this will not have a significant adverse effect on users. Both PROW 350 and 354 are important link routes into the National Park.
12.8.25	We would welcome the opportunity to comment on the methodology proposed for assessing the effects of the Scheme on users of the PROW network.

Ref	SDNPA Comment
12.8.39	Please clarify why these Landscape Character Areas are being used here. We would expect the chapter to be considering landscape amenity as a whole and again reference the second Purpose of the National Park.
12.8.42	It is unclear what is being proposed in terms of the new PROW at Binsted Lane. Further, the benefits described would only have a significant impact if connectivity with and across the existing A27 is implemented and the quality of surfacing is improved. Higher rights (i.e. to enable cyclists and equestrians to use routes) should also be investigated.
12.8.43	We would query whether the provision of the walking and cycling facility across the bypass (at Tye Lane) would be classified as a new PROW. Please clarify.
12.8.54	As stated elsewhere, we disagree the operation of the Scheme will not have significant adverse effects on the National Park.
Chapter 13	Road Drainage and the Water Environment
13.3.2	Further clarification on the replacement flood storage (compensation) in respect of the loss of floodplain associated with the crossing of the Arun Valley is requested. The area noted on the plans appears quite small in comparison to the level of work required. We would like clarification if any further compensation would be required further north; i.e. within the National Park.
13.5.89 and 13.8.4	No flood risk assessment has been produced yet and therefore it is not possible to surmise that there will be no significant adverse effect.
Chapter 14	Climate
14.3.11	Please clarify whether this study includes the activities required in association with respect of the de-trunking aspects of the Scheme.
General	Please confirm whether the principle of the new road and its potential encouragement of private car use has been assessed in respect of Climate Change.
General	The proposed assessment of greenhouse gas (GHG) emissions and impacts will include embodied carbon from raw materials and construction. Though no local/specific data has been presented yet – the assumptions have based this on benchmarking from similar scale national road schemes. This establishes a range of GHG emissions expressed in terms of Tonnes/Per KM construction. There is a wide variance in term of the upper and lower limit of this range. The range is quoted as 11,600 tCo2e per KM to 35,900 tCo2e per KM of construction. These are not insignificant numbers. Our own carbon baseline assessment calculates that resident and visitor vehicle travel accounts for around 463, 545 tCo2e per annum, and we are aiming for 10% reduction in this per annum. So the scheme would still cancel out any work the SDNPA could achieve on travel footprint of the National Park. The A27 itself is calculated as part of the ‘through traffic’ of the National Park – which adds another 548,383 tCo2e.
14.3.28	The scheme has been assessed as having minimal impact in the national context, however the cumulative effects and evidence collected have only been assessed on a local basis. We request that the impacts of the scheme in respect of climate change are also clarified in terms of the local impact.
14.4.33	Consideration of climate change adaptation – it would appear that the scheme will be assessed in terms of its vulnerability to the direct impacts of Climate Change, but this is only to be considered in terms of resilience, and only in respect of the scheme’s design. The only adaptation reference found was the need to consider the role of ‘emergency systems’ as a form of adaptation response. Further consideration and detail is required.
Volume 3	Figures and Plans
12.2	Note footpath LYM2202 remains severed by the existing A27, with the DCO limits finishing just to the west of the PROW. Can this be reviewed?

Ref	SDNPA Comment
Figure 2.1	Further clarification required regarding why the red line is within the National Park in this location.
General Arrangement Sheet 4	Where the bypass crosses over Ford Road the design of the road must be sufficient to accommodate a min 3m usable footway/cycleway on either side to future proof in consideration of the Arundel to Ford cycleway for which a study and revised business case are underway.
Volume 4	Appendices
App 7A para 3	There is no reference to the rarity and historic value of the ditches. No reference to the Historic Landscape Character – this is likely to result in under-assessment of the impacts on the landscape.
App 7A para 16	There is an area of Ancient Woodland within the Order Limits (and SDNP boundary) – please update statement.
App 7A para 86	As the scheme has updated, it is apparent that it is not just the de-trunking which is within the National Park boundary – please amend and be clear on what works will be within the National Park.
App 7A para 97	The assessment baseline makes no reference to the South Downs Integrated Landscape Character Assessment features and sensitivities, which for the Upper Coastal Plan states “all of the landscape and visual sensitivities listed in the landscape type evaluation apply to this character area”. Please amend and include.
App 7A para 100	Our previous comments on viewpoints provided on 09 December 2021 and 04 January 2022 remain relevant. We have particular concerns about the photomontage list.
Appendix 8 – HRA	We agree with the results of the screening report and the requirement for an appropriate assessment (and in-combination assessment) for Singleton and Cocking Tunnels Special Area of Consultation, based on the potential for habitat fragmentation and the severance of flight lines for key species.

Appendix 2
Historic Landscape Character – Further Information



Appendix 2
Historic Landscape Character – Further Information

Sussex Historic Landscape Characterisation
Volume IV – Gazetteer of Sussex Typology

FIELDSCAPES
INFORMAL ENCLOSURE
BROOKS INNINGS

Total Area [Ha]	Total Number of polygons	Average Polygon Size [Ha]	Occurrence of type based on total area of Broad Type.	Occurrence of interpretation of character' based on total area characterised
3768.1	83	45.4	1.7% - Rare	1.004% - Rare

DESCRIPTION OF BROOKS INNINGS

Brooks Innings are the drainage and enclosure of fresh water marshland in river valley flood plains, creating meadows bounded by “wet fences” or ditches. **Informal Brooks Innings** are where the resulting pattern is irregular or semi-regular with boundaries dominated by sinuous ditches often following the course of former streams and tributaries. Some of the ditches may have large banks associated with them as part of flood defence. The Brooks Innings in the upper reaches of the river valleys are often associated with **irregular piece-meal enclosure**. Water course are also a characteristic feature of these fields.

The Innings that took place around Rye and Pevensey were often undertaken by the church who held large tracts of land in the marshes.

[See Maps 6, 7 & 10 in “The Sussex Historic Landscape Characterisation Vol. III Atlas of Maps”].
[For list of data base attributes see Section 2.2.2. a. in Appendix II Vol. V. Sussex Historic Landscape Characterisation]

PERIOD

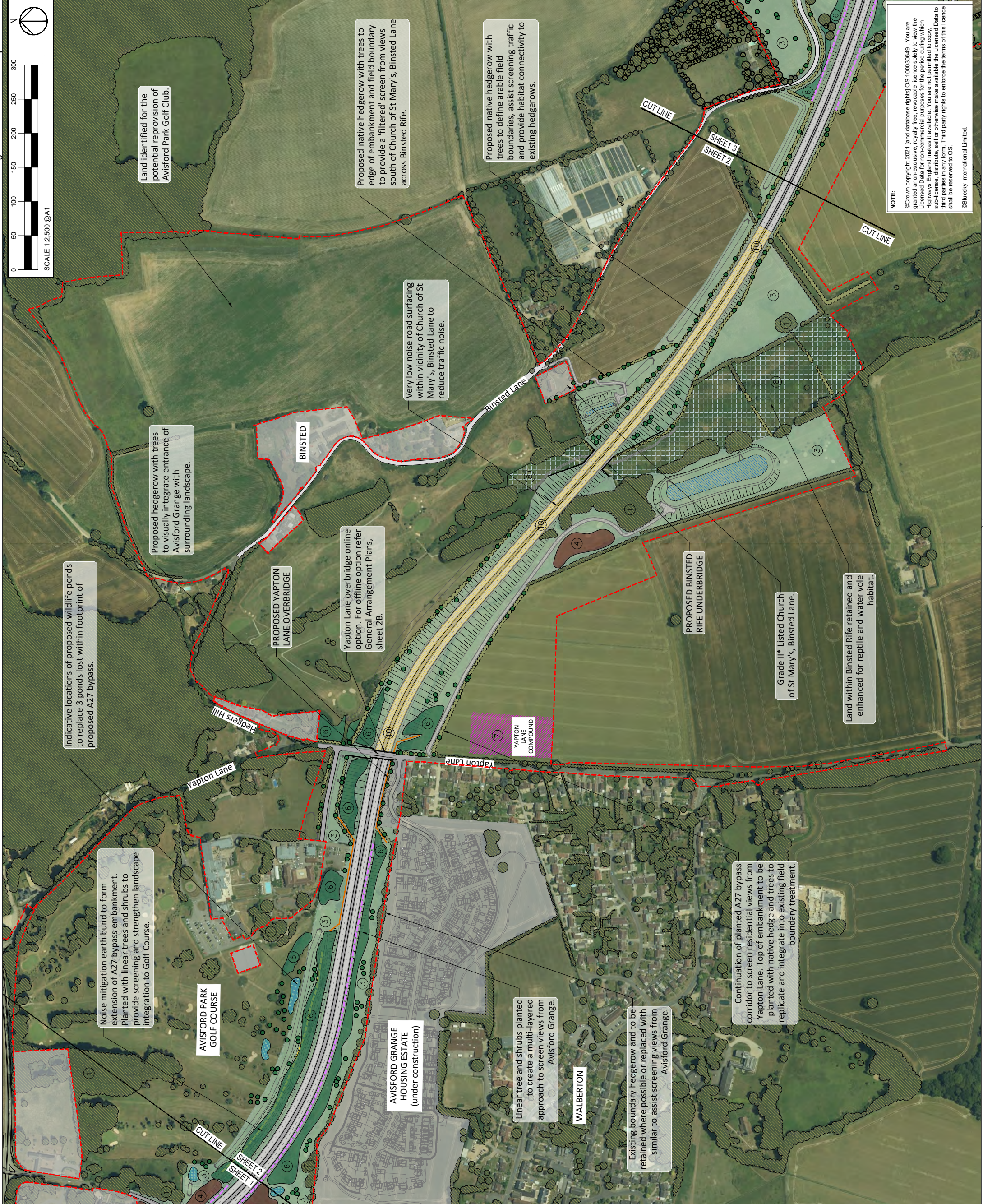
Medieval and Early Post-medieval.

REFERENCES

Eddison, J. 2000. *Romney Marsh. Survival on a Frontier*. Tempus.
Brandon, P.F. 1954. *The Making of the Sussex Landscape*. Hodder and Stoughton.
Brandon, P. 2003 *Kent and Sussex Weald*, Phillimore.

Scheme Overview





SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION BOX

IT IS ASSUMED THAT ALL WORKS ON THIS DRAWING WILL BE CARRIED OUT BY A COMPETENT CONTRACTOR WORKING WHERE APPROPRIATE, TO AN APPROPRIATE METHOD STATEMENT. THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT.

EXCEPTIONAL RISKS RELATING TO THE WORKS ASSOCIATED WITH THIS DRAWING ARE IDENTIFIED BELOW:

- NOTES**
- Existing
 - Related vegetation
 - Related 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

This drawing represents a preliminary design and will be subject to detailed consultation with the relevant authorities and the public. The design is subject to the draft Order including as a response to feedback from consultation. All proposed landscaping requirements (including retained vegetation, proposed replacement planting and individual trees), on and off site, are indicated on this drawing and subject to change. The ways related features are indicated on this drawing and subject to change. The ways related features are indicated on this drawing and subject to change. The ways related features are indicated on this drawing and subject to change.

- Preliminary Landscape and Environmental Masterplan proposals are based on highway layout 'Design Ex 3A' and associated drainage and structural elements, in accordance with Table 4.2b of DMRB, LD117 Landscape Design rev 0.
- *Very low noise surfacing is greater than a Level 3 'very quiet surfacing' material as defined in Table 9.17 in the Manual of Contract Documents
- Grayed out areas within the Scheme are excluded from the draft Order Limits.
- For complete draft Order Limits, structures, drainage arrangements, and other details, please refer to the 'DRAFT ORDER LIMITS ARRANGEMENT PLAN HE551523-BAM-HON-ZZ-OR-CH-0131'.
- Do not scale from drawing.

REVISION DETAILS		By	Check	Date	Scale
PO1	21/12/21	JB	SH		
PO2	06/01/22	JB	SH		

SUITABLE FOR STAGE APPROVAL

Client: NATIONAL HIGHWAYS
Working on behalf of: Bridge House Ltd, Tree Close, Guildford, Surrey

Project Title: A27 Arundel Bypass

FIGURE 2-1 (SHEET 2 OF 6)

PRELIMINARY LANDSCAPE AND ENVIRONMENTAL MASTERPLAN

Designed	Drawn	Checked	Approved	Date
JD	JB	JD	SH	06/01/22

Contract Reference No: 60630750
Scale: 1:2500
Drawing Title: Landscape

LINKCONNEX
TRANSFORMING HIGHWAYS TOGETHER

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Revision: 1
Drawing Number: HE551523 -BAM 70 -ELS - -DR-1D-0002
P02

Indicative locations of proposed wildlife ponds to replace 3 ponds lost within footprint of proposed A27 bypass.

Proposed hedgerow with trees to visually integrate entrance of Avisford Grange with surrounding landscape.

Proposed native hedgerow with trees to define arable field boundaries, assist screening traffic and provide habitat connectivity to existing hedgerows.

Very low noise road surfacing within vicinity of Church of St Mary's, Binsted Lane to reduce traffic noise.

Proposed native hedgerow with trees to provide a 'filtered' screen from views south of Church of St Mary's, Binsted Lane across Binsted Rife.

Land identified for the potential re-provision of Avisford Park Golf Club.

Yaption Lane overbridge online option. For offline option refer General Arrangement Plans, sheet 2B.

Yaption Lane Compound

PROPOSED BINSTED RIFE UNDERBRIDGE

Grade II* Listed Church of St Mary's, Binsted Lane.

Land within Binsted Rife retained and enhanced for reptile and water vole habitat.

Noise mitigation earth bund to form extension of A27 bypass embankment. Planted with linear trees and shrubs to provide screening and strengthen landscape integration to Golf Course.

AVISFORD PARK GOLF COURSE

AVISFORD GRANGE HOUSING ESTATE (under construction)

WALBERTON

Continuation of planted A27 bypass corridor to screen residential views from Yaption Lane. Top of embankment to be planted with native hedge and trees to replicate and integrate into existing field boundary treatment.

Existing boundary hedgerow and to be retained where possible or replaced with similar to assist screening views from Avisford Grange.

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 - Noise barriers
 - Replacement Common Land
 - Draft Order Limits

This drawing represents a preliminary design and will be subject to detailed consultation with the relevant authorities and the public. A Design Statement and Comment Order indicating a response to feedback from consultation. All proposed landscape requirements (including retained vegetation, proposed replacement planting and individual trees), on and off-site, are indicative of the design and subject to change. The design drawing is provided for Statutory Consultation and inclusion within the PEI Report with the following limitations:

- Preliminary Landscape and Environmental Mitigation proposals are based on highway layout 'Design Ex 3A' and associated drainage and structural elements, in accordance with Table 4.2b of DMRB, LD117 Landscape Design rev 0.
- "Very low noise surfacing is quieter than a Level 3 'very quiet surfacing' material as defined in Table 9.17 in the Manual of Contract Documents
- Grayed out areas within the Scheme are excluded from the draft Order Limits.
- For complete draft Order Limits, detailed highways, structures, drainage and other details, please refer to the 'ARRANGEMENT PLAN HE551523-BAM-HON-Z2-DR-CH-0131'.
- Do not scale from drawing.

REVISION DETAILS		By	Check	Date	Suite
Final Issue	For Stage Approval	JB	SH	21/12/21	PO1
		JB	SH	06/01/22	PO2

SUITABLE FOR STAGE APPROVAL

Client: NATIONAL HIGHWAYS
 Working on behalf of: Bridge House, Mill Lane, Guildford, Surrey

Project Title: A27 Arundel Bypass

FIGURE 2-1 (SHEET 3 OF 6)

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Designed	Checked	Approved	Date
JD	JD	SH	06/01/22

Drawn: SA
 Scale: 1:2500
 Drawing Title: Landscape

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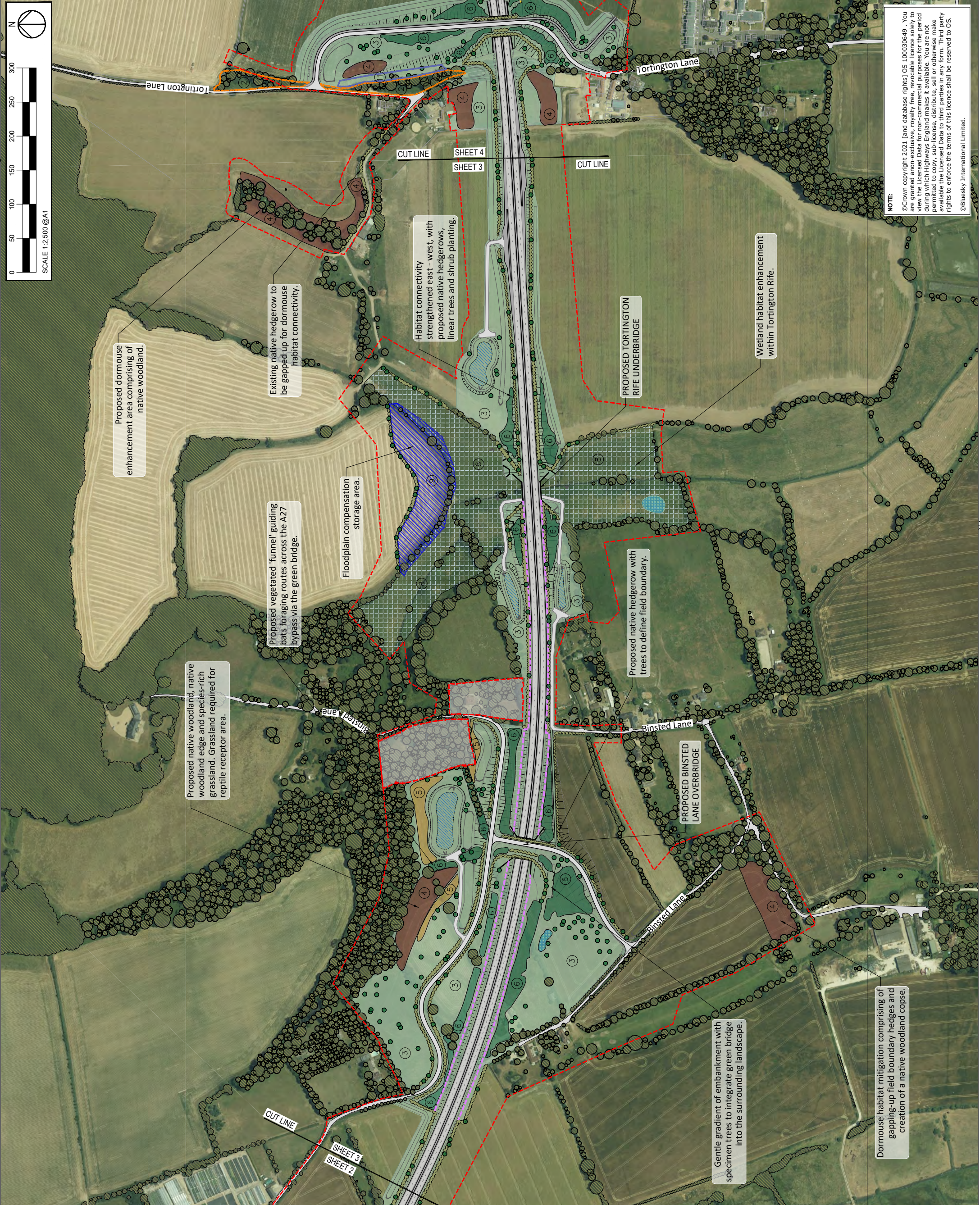
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Drawn: SA
 Checked: JD
 Approved: SH
 Date: 06/01/22

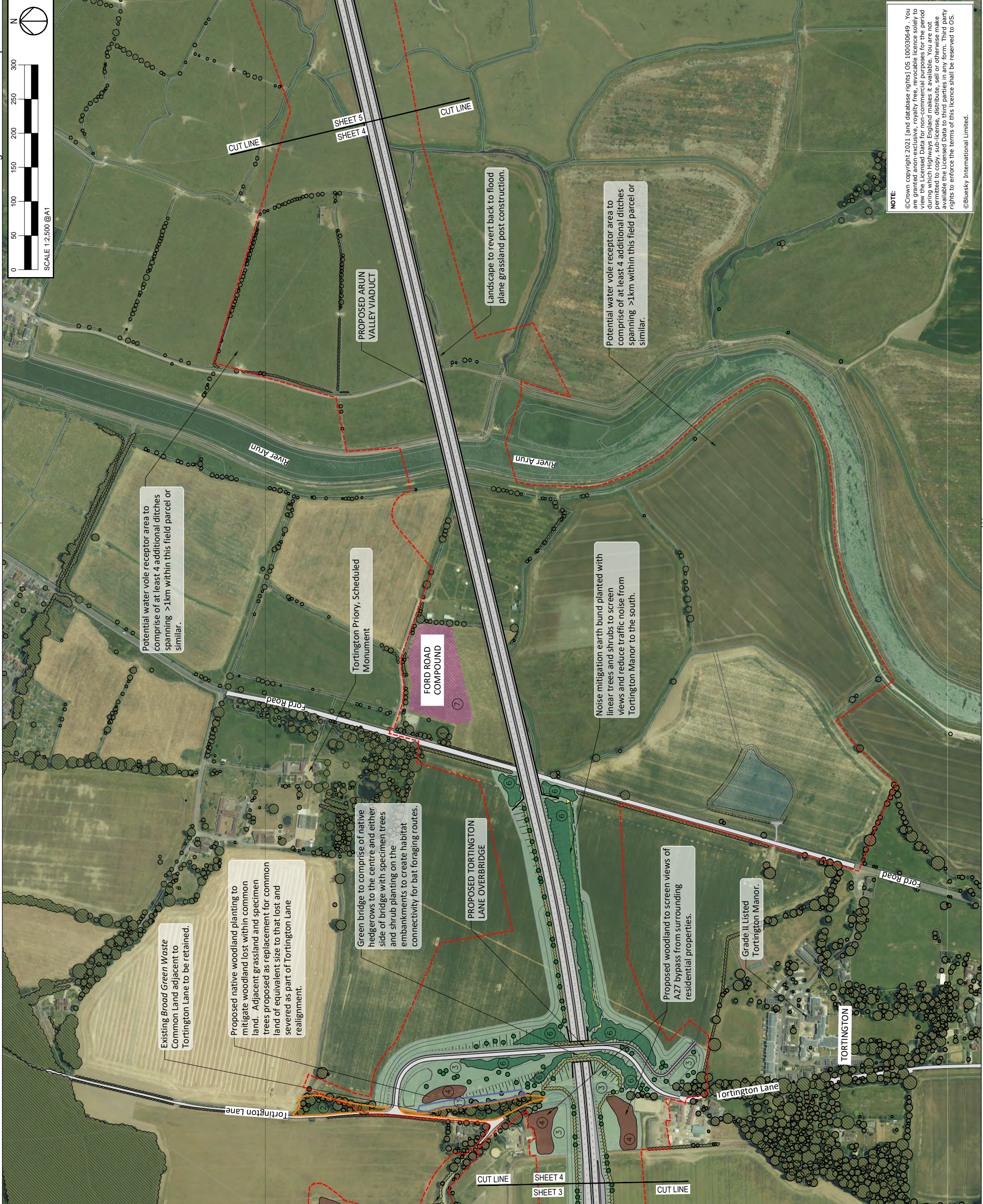
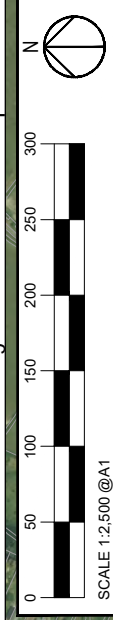
Revision: 1
 Issue: 1

Project: HE551523 -BAM 71 -ELS -
 -DR-1D-0003

Sheet: 3 of 6



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 EXCEPTIONAL RISKS RELATING TO THE WORKS ASSOCIATED WITH THIS DRAWING ARE IDENTIFIED BELOW:

- NOTES**
- Existing
 - Retained vegetation
 - 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

This drawing represents a preliminary design and will be subject to detailed consultation with the relevant authorities and the public. The design is subject to a Statutory Consultation period. All proposed landscape requirements (including retained vegetation, proposed replacement and individual trees), on and off-site, are indicative of the design and are subject to change. This drawing is provided for Statutory Consultation and inclusion within the PEI Report with the following limitations:
 • Preliminary Landscape and Environmental Masterplan proposals are based on highway layout 'Design Fix 3A' and associated drainage and structural elements, in accordance with Table 4.2b of DMRB, LD117 Landscape Design rev 0.
 • "Very low noise surfacing" is defined in Table 9.17 of the Manual of Contract Documents
 • Grayed out areas within the Scheme are excluded from the draft Order Limits.
 • For complete draft Order Limits, detailed highways, structures, drainage and landscaping details, please refer to the 'ARRANGEMENT PLAN HE551523-BAM-HON-ZZ-0R-CH-0131'.
 • Do not scale from drawing.

Revision	By	Check	Date
1	JB	SH	21/11/2021
2	JB	SH	06/01/22

SUITABLE FOR STAGE APPROVAL
 NATIONAL HIGHWAYS
 Working on behalf of
 national highways
 Bridge House
 100 High Street
 Guildford
 Surrey

Project Title
A27 Arundel Bypass

FIGURE 2-1 (SHEET 4 OF 6)

PRELIMINARY LANDSCAPE AND ENVIRONMENTAL MASTERPLAN

Designed	Checked	Approved	Date
JD	JD	SH	06/01/22

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 EXCEPTIONAL RISKS RELATING TO THE WORKS ASSOCIATED WITH THIS DRAWING ARE IDENTIFIED BELOW:

- NOTES**
- Existing
 - Retained vegetation
 - 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

This drawing represents a preliminary design and will be subject to detailed design and construction. It is intended to provide a visual representation of the proposed scheme and to inform the public of the proposed scheme. It is not intended to be used for construction purposes. All proposed landscape requirements (including retained vegetation, proposed replacement planting and individual trees), on and off site, are indicative of the proposed scheme and are subject to change. The drawing is provided for Statutory Consultation and inclusion within the PEI Report with the following limitations:

- Preliminary Landscape and Environmental Mitigation proposals are based on highway layout 'Design Ex 3A' and associated drainage and structural elements, in accordance with Table 4.2b of DMRB, LD117 Landscape Design rev.0.
- *Very low noise surfacing is quieter than a Level 3 'very quiet surfacing' material as defined in Table 9.17 in the Manual of Contract Documents
- Grayed out areas within the Scheme are excluded from the draft Order Limits.
- For complete draft Order Limits, detailed highways, structures, drainage and other elements, please refer to the 'ARRANGEMENT PLAN HE551523-BAM-HGN-ZZ-OR-CH-0131'.
- Do not scale from drawing.

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

SUITABLE FOR STAGE APPROVAL

Client: NATIONAL HIGHWAYS
 Working on behalf of: Bridge House, 1st Floor, Close Guildford, Surrey

Project Title: A27 Arundel Bypass

FIGURE 2-1 (SHEET 5 OF 6)

PRELIMINARY LANDSCAPE AND ENVIRONMENTAL MASTERPLAN

Designed	Checked	Approved	Date
JD	JD	SH	06/01/22

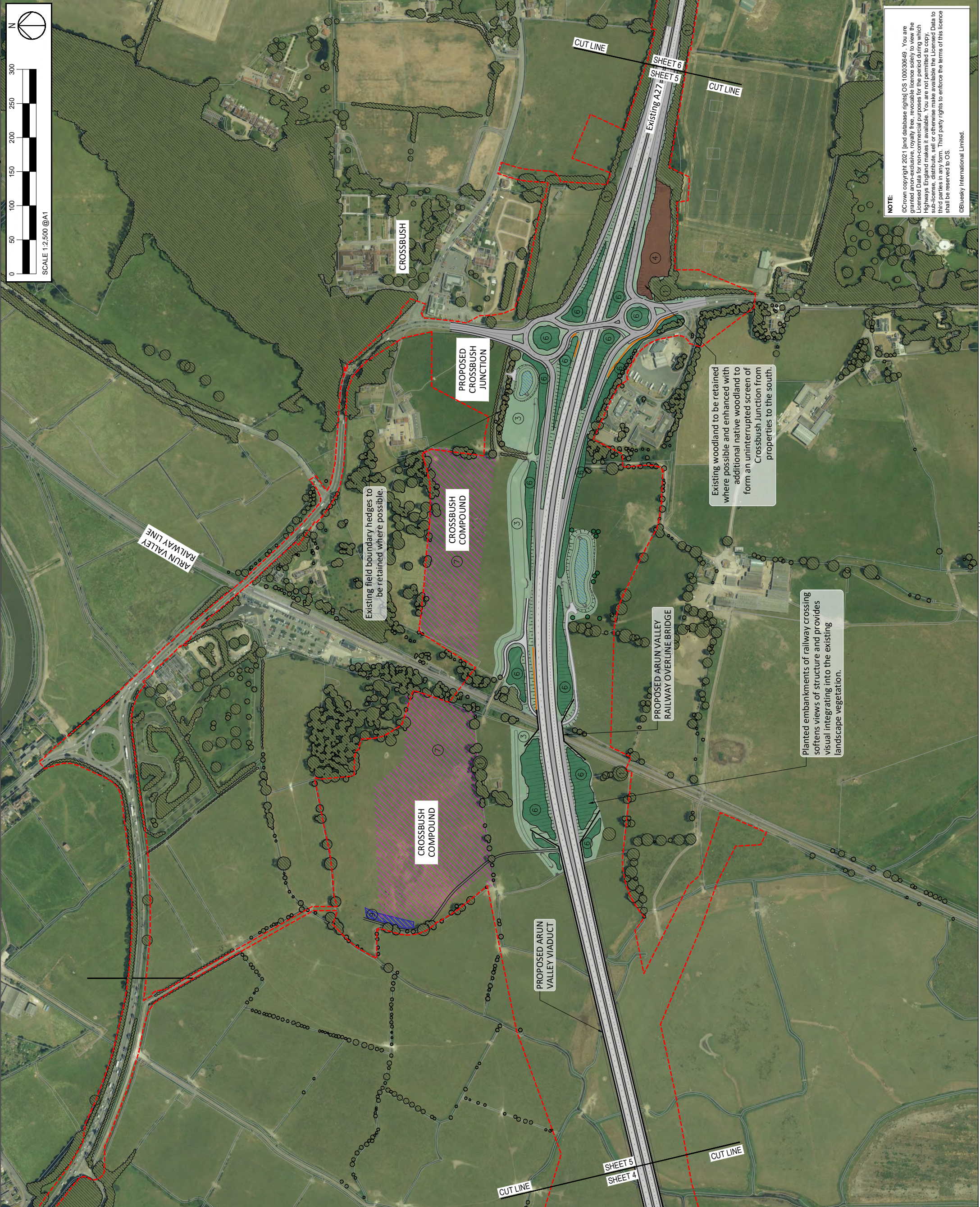
Drawings: 60830750
 Project No: 1260
 Discipline: Landscape

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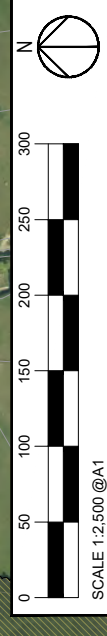
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 The Quadrant
 Beckenham Drive
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Revision: 1
 Drawing Number: HE551523 -BAM-73-ELS -DR-1D-0005
 P02



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NOTES

Existing
 Retained vegetation
 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

This drawing represents a preliminary design and will be subject to detailed consultation with the relevant authorities. The design is subject to a Statutory Consultation and will be subject to detailed consultation with the relevant authorities. The design is subject to a Statutory Consultation and will be subject to detailed consultation with the relevant authorities. The design is subject to a Statutory Consultation and will be subject to detailed consultation with the relevant authorities.

• Preliminary Landscape and Environmental Masterplan proposals are based on highway layout 'Design Ex 3A' and associated drainage and structural elements. In accordance with Table 4.2b of DMRB LD117 Landscape Design rev 0.

• 'Very low noise surfacing is quieter than a Level 3 'very quiet surfacing' material as defined in Table 9.17 in the Manual of Contract Documents

• Groyed out areas within the Scheme are excluded from the draft Order Limits.

• For complete draft Order Limits, detailed highways, structures, drainage and other works, please refer to the 'ARRANGEMENT PLAN HE551523-BAM-HON-ZZ-OR-CH-0131'.

• Do not scale from drawing.

First Issue	By	Check	Date	Issue
	JB	SH	21/11/21	P01
	JB	SH	06/01/22	P02

REVISION DETAILS

Revision	By	Check	Date	Issue

SUITABLE FOR STAGE APPROVAL

Client:
 NATIONAL HIGHWAYS
 Working on behalf of
 Bridge House
 10000 Guildford Road
 Guildford
 Surrey

Project Title
A27 Arundel Bypass

Drawing Title
FIGURE 2-1 (SHEET 6 OF 6)

PRELIMINARY LANDSCAPE AND ENVIRONMENTAL MASTERPLAN

Designed	Drawn	Checked	Approved	Date
JD	JB	JD	SH	06/01/22

Design Project No.
 60630750

Drawn By
 SA

Checked By
 SA

Approved By
 SH

Date
 06/01/22

Revision No.
 1

Revision Description
 Landscape

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Drawing Number
 HE551523

Revision
 1

Volume
 -BAM 74 -ELS -

Sheet
 -DR-1D-0006

Scale
 1:2500

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