

**1. Matter 6, especially para 6.2, re the Arundel Bypass and whether it has a date for construction**

*An update to the first section of my previous statement, headed 'The Local Plan statement about the Bypass is incomplete and appears to be biased'.*

1.1 The Local Plan's discussion of the Arundel bypass at 15.3.7 is out of date, as it says the A27 Feasibility Study has 'been commissioned', but does not comment on the findings of the Study. I propose that the ALP does not contain sound policies concerning transport, at least in relation to the Arundel Bypass, a scheme which the ALP supports (though it is not listed as critical, essential or desirable for the ALP in the Infrastructure Development Plan, Jan 2015). I suggest that the ALP should no longer support this scheme, for the reasons given in sections 2 and 3. This section describes the A27 Feasibility Study (Arundel section) which is the background to that reasoning.

1.2 The 'A27 Feasibility Study' was published on 12 March 2015. (<https://www.gov.uk/government/publications/a27-corridor-feasibility-study-technical-reports>). The Study's section on Arundel has rejected all options except two offline bypass routes, A (already known) and B. It has not issued a map of Option B. In all tables, lists of routes, etc., of the Study, Option B is defined as 'offline, longer to avoid the National Park'. But the verbal description of Option B (A27 Feasibility Study Report 3, paras 5.2.11. to 5.2.16 – see Appendix 1) shows that its junction with the A27 and a half-kilometre section of new road leading to it are indubitably within the South Downs National Park. The description of the rest of the route is deliberately unclear, and conflates descriptions of two new Option Bs: one mainly outside the National Park through Binsted village, and one mostly inside the National Park (see map at Appendix 2).

1.3 Option B (a phrase which refers only to the western half of the Bypass, west of Ford Road) was created by the Study to compare with the western half of the already known Option A. Option A is shown in black on the map at Appendix 2. Option A is the previous Pink/Blue route, made the Preferred Route in 1993 and cancelled by the Secretary of State for Transport in 2003 because it was too environmentally damaging, after the SoCoMMS (South Coast Multi Modal) study recommended it should go ahead. Option A's eastern section severely damages the Arundel watermeadows and Tortington village. The western two-fifths of Option A passes through Tortington Common, a 180-acre woodland within the

National Park. Option A's western section was suggested in 1991 to avoid the 250 acres of Binsted Woods, a larger woodland area to the west of Tortington Common, and also in the National Park.

1.4 The Study's previous version of Option B's route, which did avoid the National Park by going through southern Binsted and Walberton, became known through a map of the options shown on the screen at the 27 August 2014 meeting of the A27 Feasibility Study's Stakeholder Reference Group. I call this 'the old Option B' (shown in grey on the map at Appendix 2). No maps were issued by the Study, but the CPRE representative at the meeting copied the routes. When the old Option B became known in August 2014, many concerned members of the public whose houses and businesses would be affected contacted the Study, MPs, Councillors and Ministers, and there was a campaign against the route from August to December 2014 by the Arundel Bypass Neighbourhood Committee.

1.5 The Study's conflation of sentences describing two different versions of the new Option B, as if they were describing one route (see Appendix 1), and its failure to provide a map, have deliberately obscured the route so as to prevent another campaign against Option B. But it is possible to discern which two routes it is describing, by their start and end points and landmarks mentioned in the text.

1.6 The junction of the new Option B with the A27 is clearly described by the Study as a T junction 0.8 km east of the A27/Yapton Lane junction (known as Avisford) (Report 3, 5.2.13; see Appendix 1). Another 'alignment' is also described, different at the north end, with a flyover junction at Avisford (Report 3, 5.2.15). Both these junctions would be within the National Park (see map at Appendix 2). A section of the new Option B leading to the junction, c. half a kilometre, would also be within the National Park whichever junction was chosen. Both versions of Option B have these two possible alignments at the north end.

1.7 In both versions of Option B the stretch of road leading to the T junction would cut off Little Dane's Wood, Hundred House Copse and Barn's Copse from the rest of Binsted Woods. The 'alternative alignment' for the north end of Option B, with a flyover junction, would destroy Hundred House Copse (a nature reserve leased to the Sussex Wildlife Trust and one of the best parts of Binsted Woods), and Little Dane's Wood. All are in the National Park.

1.8 The deliberate mistake leading to two possible routes for the rest of Option B appears in paragraph 5.2.12 (see Appendix 1): ‘From Ford road the proposed route continues on a straight alignment for a further 600m (approximately), passing over Tortington lane via a new bridge, before turning slightly to the **east** for approximately 800m to a new bridge over Binsted Lane [East]’. The road is being described from east to west. As it is already going due west, only ‘north’ or ‘south’ make any sense.

1.9 If ‘south’ is meant, this suggests a route (shown in orange on the map at Appendix 2) which at first skirts the edge of the National Park, with an overbridge over Binsted Lane [East] south of Lake Copse, and then curves round to the north through the middle of Binsted very close to houses and the 12<sup>th</sup>-century church. This fits the description in the next sentence (5.2.12) – ‘to the west of Binsted Lane [East], the proposed route curves northward for approximately 700m and runs in a broadly straight alignment for 1.3 km to a new junction on the existing A27 route’.

1.10 This Option B route also explains the reference to Meadow Lodge (just south of the National Park boundary) in the Study’s Report 2, Table 6-8,: ‘Binsted church and rectory will also have their setting affected, as will Meadow Lodge, a Grade II Listed Building’ (though other listed buildings, e.g. Church Farm, Glebe Cottage and Morley’s Croft, equally affected, are ignored).

1.11 If ‘north’ is meant, this implies a different route, and matches what the Study says about overbridges in the next sentence (5.2.12). After an overbridge at Binsted Lane [East], ‘The route passes over Spinningwheel, Old Scotland Lane and Binsted Lane (north), all of which are via new overbridges’. ‘Spinningwheel’ can only mean Spinningwheel Copse, which is about 350m inside the National Park. This would mean a new Option B wholly within the National Park west of the Tortington section (shown in red on the map at Appendix 2).

1.12 This version of the new Option B would be very like ‘Green route 1’ (see Appendix 3), which was compared with Option A in 1992 by the Department of Transport’s consultants Environmental Assessment Unit of Liverpool University Limited (EAULUL), and found to be more damaging because of its effect on Binsted Woods. That process led to the choice of Option A as the Preferred Route in 1993. Another reason given by EAULUL for rejecting ‘Green route 1’ was that its T junction with the A27 would soon be changed to a smoother curve with a flyover junction at Avisford, which would destroy Hundred House Copse.

Junctions similar to all the Study's junctions of Option B with the A27 have therefore been previously rejected, whichever path the rest of it takes. SoCoMMS (2002) also looked at the Green routes and rejected them.

1.13 Although one is mainly within, one mainly outside the National Park, both these two Option B routes would destroy Binsted's beauty, unity and isolation, and its connection to Binsted Woods. Binsted was an independent parish from mediaeval times until 1933. Its boundary brooks provided watermeadows, and its central land was at one time farmed communally in strips. Its unity and isolation can still be felt. The mass of Binsted Woods partly encloses the northern part of the parish and extends into the fields, with many connecting copses and hedges, giving a sense of beauty and wildness. Ten of Binsted's 38 houses and 10 of its fields are within the National Park, while four other houses are right next to National Park woodland (see map at Appendix 4).

1.14 The more southerly version of Option B would pass from east to west through southern Binsted (where most houses are), and then through the centre of Binsted from south to north, destroying Binsted Nursery (a plant nursery) and the fields where the annual Strawberry Fair is held to raise money for the fabric of 12<sup>th</sup>-century Binsted Church. It would pass very close to listed houses Meadow Lodge, Morley's Croft, Glebe House, and Church Farmhouse, and the listed St Mary's church (12<sup>th</sup> century), with the 'flyover' version passing close to listed houses Beam Ends (now Quince Cottage) and Swiss Cottage and the listed Royal Oak Inn (see map at Appendix 4). The listed Avisford Hilton is just across the B2132 in Walberton but would be affected by both the proposed flyover junctions.

1.15 The more northerly version of Option B would cut off five woods from the rest of Binsted Woods, two to the south (the Shaw and Lake Copse), as well as the three to the north near the junction (Little Dane's Wood, Hundred House Copse and Barn's Copse), and damage or destroy three more, the Lag, Spinningwheel Copse and Pedler's Croft. The first overbridge would be within Binsted Park, the curving mediaeval-style 'pocket park' (created about 1800 around ancient oak trees, one of which remains; see Appendix 6) wholly enclosed in woodland, one of the most beautiful parts of Binsted Woods. The second overbridge would be over Spinningwheel Copse, a noted site for bluebells and other wildflowers (see Appendix 6). Ash Piece, north of Spinningwheel Copse, is a noted site for dormice.

1.16 The Study's summary here (5.2.14) about the impact of Option B as opposed to Option A illustrates its misunderstanding of the National Park woodland and of bypass

history. It states that Option B ‘reduces the impact on the South Downs National Park compared to Option A, as the proposed alignment of Option B avoids Tortington Common and Lake Copse, whereas Option A passes through Tortington Common’. The Study is unaware that EAULUL’s 1992 report showed that Binsted Woods were nationally important and that fragmentation would ‘substantially damage their national importance’ (see Appendix 5). This in itself suggests that Option B has a greater ‘impact on the South Downs National Park’ than Option A. Any study of the National Park’s ‘Special Qualities’ (which include long views, strong communities proud of their heritage, and historic farming patterns) also confirms that any option through Binsted is more damaging than Option A.

1.18 The Study has recommended for rejection all its initially suggested online or near-online options for improving the A27 at Arundel, giving reasons which include their effect on the National Park. It has suggested taking forward only the previously rejected Option A, and this new ill-defined Option B, which does not ‘avoid the National Park’ as all its headings and tables claim. These contradictions, and the deliberate obscurities and misunderstandings listed above, make the Study invalid.

1.19 This suggests that new comparisons of options for the proposed public consultation will have to start again from scratch. Options have been compared before and no acceptable bypass route found (since the route decided on in 1993 - now Option A - was rejected in 2003). In these circumstances it seems unlikely that the road will be built within the time scale suggested by the government (starting within the next ten years). The Inspector may therefore consider that on Matter 6, para 6.2, the date of construction of the Arundel Bypass is unknown and whether it will happen at all is uncertain.

## **Appendices for section 1: Contents**

**Appendix 1:** Description of Arundel Bypass Option B from the A27 Feasibility Study Report prepared by Parsons Brinckerhoff February 2015 for the Highways Agency, Report 3, 5.2.11-16.

**Appendix 2:** Map of Arundel Bypass Option B routes in the A27 Feasibility Study. Orange and red lines show two versions of Option B whose descriptions are conflated in the Study (Report 3, 5.2.11-16) to prevent a repetition of the concern and campaigning caused by the route shown in grey, revealed in August 2014.

**Appendix 3:** Map of Arundel Bypass Green routes 1, 3 and 4 as compared by EAULUL with the Pink route in 1992, leading to the Pink/Blue route (Option A) being made the Preferred Route.

**Appendix 4:** Houses and listed buildings in Binsted, and the two Option B routes for the Arundel Bypass described by the A27 Study, Report 3, 5.3.11-16.

**Appendix 5:** Extract from the report by the Environmental Assessment Unit of Liverpool University Limited of 1992 'The Binsted Wood Complex: a brief appraisal', which states their national importance. NB The 'Binsted Wood Complex' did not then contain most of Tortington Common. Tortington Common was added to the 'Binsted Woods Complex SNCI' in 2003.

**Appendix 6:** Photographs of Spinningwheel Copse and Binsted Park.

## **2. Matter 6, para 6.2, re soundness**

*Update to the second section of my previous statement, headed 'the Local Plan does not conform to NPPF para 182'*

2.1 Now that the Study has been published, and both the offline options (A and B) for the western section of the bypass are partially or largely in the National Park, there is an even stronger case (than before) for looking at 'reasonable alternatives' to an offline Arundel Bypass, i.e. online or near-online solutions. As I said in my previous representation, the Local Plan's support for an Arundel bypass (TSP3, LAN DM2, 15.3.7) does not conform with the definition of soundness in the National Planning Policy Framework, para 182. The second point of this paragraph reads: 'The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence'.

2.2 The Study included 8 online or near-online options in its initial stages (Report 2, Table 5-6), but rejected them either at that stage or a later one for a variety of reasons – expense, effect on the National Park, failure to achieve full dualling, effect on the town of Arundel, or difficult of construction on the current A27 which allowing traffic through. Because it is now apparent that the only options recommended, A and B, are extremely damaging to the National Park, those criteria and options need to be looked at again.

2.2 If only offline bypass options A and B are taken forward, 'proportionate evidence', i.e. evidence sufficient to identify and appropriately assess all feasible solutions, on 'reasonable alternatives', including various forms of online work (many of them new) suggested by the consultants or by local community stakeholders, will not have been provided.

2.3 In order to be 'sound', the ALP should contain support for study of the online and near-online options for the A27 improvements to continue, and for such options to feature in any public consultation.