

A27 Arundel Bypass Project Team
National Highways

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7 March 2022

Dear Sir / Madam

Application by National Highways (the Applicant) for an Order granting Development Consent for the A27 Arundel Bypass

Horsham District Council's Response to the Statutory Consultation

Thank you for the opportunity to provide feedback to the Statutory Consultation on the National Highways A27 Arundel Bypass Scheme, which, if implemented, would see the delivery of approximately 8km of new dual carriageway, incorporating proposals for the existing A27. This proposal is of significant interest and importance to Horsham District Council, not least because of the impact the proposals could have in the delivery of economic benefits and growth to both the south coast corridor and to this District.

Horsham District Council has previously responded to the non-statutory consultations that have been undertaken on the development of the proposed Scheme. Firstly in 2017, which was a public consultation on three options (referred to as Options 1, 3 and 5a) and secondly in 2019, when a further six improvement options formed the basis of additional public engagement. The Council has welcomed all this engagement prior to this Statutory Consultation, and we acknowledge that Option 5BV1 (also known as the 'Grey route') is now the Scheme that National Highways is taking forward as part of its Development Consent Order (DCO) application.

We would like to reiterate our support for the A27 Arundel Bypass Scheme. As we have previously highlighted there are significant problems from the many drivers wanting to travel between Fontwell and Shoreham (and in reverse) choosing a route that takes them via our District's southern villages of Amberley, Storrington, Washington and Steyning to avoid inevitable delays and congestion on the A27. This 'rat running' is a significant contributor to poor air quality in Storrington where some 18,000 vehicles a day pass through the village High Street. Rat running also occurs via Pulborough and Coldwaltham.

The Council considers that the Scheme will result in economic benefits for Storrington which are likely to be realised through reducing congestion and travel time to businesses. The Scheme could also enhance the retail centre as it will be a more attractive destination with the reduction in traffic, particularly heavy goods vehicles.

Background

The southern boundary of Horsham District is close to Arundel (4 miles) and there are a number of road connections with the A27, most notably the links via the A29 from Fontwell and the A284 from Arundel. These provide a route (via B2139/A283) passing through the villages of Amberley and Storrington, crossing the A24, continuing east to Steyning and eventually rejoining the A27 at Shoreham-by-Sea. While this route is a longer distance, it is, for many drivers, infinitely preferable to the delays and congestion they would face by remaining on the A27. Another route is via the A283 to join the A29 at Pulborough and then onto Fontwell. Traffic also cuts through from the A24 to the A29 to avoid Arundel.

A consequence of the high levels of traffic and congestion, especially at peak travel times, passing through Storrington has been poor air quality. In 2010, Horsham District Council declared an Air Quality Management Area (AQMA) in Storrington (referred to by Defra as "Horsham AQMA No 1") on account of exceedances of the air quality objective level for nitrogen dioxide (NO₂). An action plan was prepared outlining a range of measures to tackle the poor air quality. Many of these are not measures that Horsham District Council, as a district authority, can bring about directly as they relate to highway improvements which are a matter for the highway authority (West Sussex County Council). A steering group was therefore established which drew together West Sussex County Council, the local Parish Council and Members and Officers from Horsham District Council to help bring forward the measures in the action plan. Of the list of improvements, the most favoured has been for improvements to the A27 as part of the main east/west trunk route in the region.

This response is considered to accord with the Notice of Motion brought to Full Council to support the A27 Arundel Bypass Scheme which was approved on 9 February 2022.

Transport Impacts and Cumulative Effects

In response to the public consultation held in 2019, the Council favoured the 'Magenta' option (4/5AV1) as it had less adverse impact on Binsted Woods and areas of Ancient Woodland, but also the decrease in traffic using the B2139 and the A283 through Horsham District was greater for this option than for other options presented at the time.

It is noted that on p.20 of the Consultation Brochure, National Highways explain that a Transport Assessment will be published with the DCO application which will set out more detailed traffic information.

The Council would have expected to see a Transport Assessment at the Preliminary Environmental Information Report (PEIR) stage to support the proposals, particularly as the Section 42 Statutory Consultation stage is the key opportunity for stakeholders and members of the public to understand the impact of the proposals on the transport network and to share feedback with the applicant before submission of the application. The Planning Inspectorate's Advice Note Six on the preparation and submission of application documents states that "*once an application has been submitted and accepted the opportunity for Applicants to submit any additional or amended information will be constrained within examination procedures.*" The

Advice Note also states that “...*applicants need to ensure that their proposals are sufficiently developed and consulted upon prior to formal submission to the Planning Inspectorate*”.

We recognise that this may not have been provided since the consultation documents given the impacts of Covid on traffic flows. Nevertheless, it would have been helpful to understand the specific transport impacts of the proposals, based on the most relevant up-to-date traffic data and surveys.

With reference to the development of an initial list of developments to consider the cumulative and in-combination effects, paragraph 15.2.9 of the report outlines the Local Plans which may impact on traffic flows now and in the future. This includes the emerging Horsham District Local Plan.

As National Highways will be aware, the Government has indicated a step-change in housing delivery and the Standard Housing Methodology has meant an uplift in the housing requirements placed on many districts and boroughs in the South East, including Horsham District and our neighbouring local authorities. We therefore welcome the consideration of development that has potential to come forward as part of the emerging Horsham District Local Plan in the cumulative effects assessment. However, note that there is no reference to our current Local Plan, the Horsham District Planning Framework 2015 (HDPF)¹. It is acknowledged that one of the strategic site allocations in the HDPF, Land North of Horsham, has been included in the long-list of developments, however, the other key strategic sites in the District: Land West of Southwater and Land East of Billingshurst, which are both under construction do not appear to have been taken into account.

Whilst it has been identified in paragraph 15.2.9 of the PEIR that the emerging Horsham District Local Plan (HDLP) has been used to inform the long-list of developments, it is not clear how the development coming forward as part of this Plan has been taken into account, given that no formal decision to progress the plan has been taken by this Council. It is noted that paragraph 15.2.12 of the PEIR states that “*full details of the other development projects included within the traffic model (and the factors applied during the modelling process) will be presented in the transport assessment as part of the DCO submission.*” Given this statement plus the lack of clarity around how the development coming forward as part of the emerging HDLP has been taken into account, means it is difficult for the Council to comment on the appropriateness, or otherwise, of the approach to the assessment of the cumulative effects at this stage.

Water Neutrality: Natural England's Position Statement

To ensure a robust approach in the assessment of the cumulative effects of the Scheme alongside other development, the Council would like to highlight the issue of Water Neutrality that is affecting Horsham District and parts of neighbouring local authority areas (Chichester District, Crawley Borough and parts of the South Downs National Park).

On 14 September 2021, Natural England issued a Position Statement on the mitigation of water usage and sets out concerns that development in these areas is increasing the demand for water which is thought to be harming internationally protected species in the Arun Valley². The

¹ [Horsham District Planning Framework \(2015\)](#)

² [Water Neutrality in Horsham District and its planning implications](#)

three affected local authorities are actively working with Natural England, Southern Water and the Environment Agency to find a strategic solution to address this issue. Whilst this is unlikely to have a direct impact on the provision of the proposed road upgrade, it is envisaged that it may impact the amount and speed at which development may take place in the future.

Air Quality

Paragraph 5.4.7 highlights that the air quality assessment has focused on areas where a change in operational traffic meeting the traffic screening criteria and the Storrington AQMA (referred to as the “Horsham AQMA No1”) has been included within this assessment. This is welcomed. As identified in paragraph 5.8.15 of the PEIR the Storrington area is expected to experience an improvement in air quality as a result of a reduction in traffic on the A283 to the north of the Scheme. Improvements to the A27 to reduce rat running through Storrington and neighbouring villages has long been identified³ as one of the key measures to improve air quality in Storrington and other impacted villages and these findings on air quality improvements are expected and supported, not least because of the positive health outcomes for residents within our District.

The Council’s Air Quality specialist has considered Chapter 5 (Air Quality) of the PEIR and would like to highlight that in 2016 Horsham District Council installed a new diffusion tube monitoring site for nitrogen dioxide – Storrington 19 – which has remained representative of a worst-case location in the Storrington AQMA, with concentrations well above the objective of (of 40µm/m³) until 2019. It is recommended that the results from this site are included in the air quality assessment as this will enable the evaluation of how the Scheme will impact on the receptors at the mini-roundabout of Manley’s Hill and School Hill, which is the area with the highest annual mean nitrogen dioxide in the AQMA.

Regarding Particulate Matter 2.5 (PM_{2.5}), which is a key pollutant affecting people’s health, it is recommended that the results from Storrington AURN⁴, which are available until the end of 2016 are included in the assessment. The PEIR does not make any references to those results. Also, there are errors to co-ordinates in Table 5-1 so they cannot be plotted and it is not possible to tell where these sites are.

Delivering the Scheme and the Wider Transport Network Context

The possibility of a bypass around Arundel has long been mooted with numerous studies undertaken since 1987, as detailed in Chapter 3 of the PEIR. The Council is therefore pleased to see the launch of the Section 42 Statutory Consultation which is an important part of the pre-application process of a DCO application and demonstrates a firm commitment by National Highways towards delivery of the Scheme. It is noted from the consultation documentation that submission of the DCO application is intended to take place in late 2022 and **the Council is hopeful that the application is accepted, and consideration of the Scheme can swiftly progress through the DCO process through to construction and opening of the road in 2027, as anticipated** and set out in paragraph 3.3.1 of the PEIR on the Project Lifecycle.

³ [Storrington Air Quality Action Plan \(2012\)](#)

⁴ Automatic Urban & Rural Network for national air quality monitoring

In the Council's response to the public consultation in 2019 on the various route options, we suggested that, as part of the Scheme, significant increases in provision for cycling could contribute to a reduction in the number of car journeys. The Council also highlighted that public transport use is fairly low in this area and we urged more serious consideration to be given to improving public transport as a further means of effectively managing the transport network in the future.

With the exception of some footway/cycle connections in the immediate vicinity of the bypass designed to mitigate the impact of the Scheme, it is disappointing that there appears to be no wider consideration of securing improvements in sustainable transport measures to additionally ease traffic impacts in this part of West Sussex. It is hoped that reducing rat running through the District's southern villages will lead to an increase in active travel in these locations because residents will feel safer to choose to walk or cycle with less vehicular traffic. It is considered that understanding these wider implications as part of the Transport Assessment and the **opportunities for delivering improved sustainable transport opportunities will form an important element of the DCO application. This is particularly important as the Council is concerned that without this, there is a risk that additional housing development in West Sussex could ultimately offset the benefits of a new bypass.**

Consultation

The Council has had regard to the Statement of Community Consultation (SoCC) that has been published alongside the other consultation documents. It is acknowledged that National Highways has previously undertaken public consultation on route options in 2017 and then a further options consultation in 2019 and the Council has therefore had the opportunity to provide comments at both of these stages. These preceding non-statutory consultations have been welcomed and it is considered that this will help to demonstrate to the Planning Inspectorate that a robust approach to stakeholder engagement has been undertaken.

As detailed in paragraph 1.1.3 of the SoCC, only the Host Authorities were consulted on the Draft SoCC and therefore as a Neighbouring Authority, Horsham District Council has not been informed about the approach to consultation prior to the publication of the consultation documents on 11 January 2022.

The approach to consultation set out in the SoCC is considered to be comprehensive and the inclusion of in-person consultation events is welcomed (with an acknowledgement that the impacts of the Covid-19 pandemic may require adjustments to the publicised events). It is noted that no in-person events have been scheduled to take place in Horsham District, although the villages of Amberley and Storrington do form part of the consultation area. Nevertheless, the inclusion of six live chat sessions and the depositing of consultation materials at Storrington Library should help to provide sufficient opportunities for all interested stakeholders to understand the proposals in more detail and speak with experts from the Project team.

The consultation documents through the Virtual Consultation Room have been clearly presented and laid out with the information well communicated. Council officers have however reported difficulties accessing some of the material, in particular, the Figures in Volume 3, which I understand was reported to you on 11 February 2022 where it was subsequently confirmed by the Project Team that there was a technical fault with accessing the documents. I am also

aware that the icon entitled “*How do we develop a new road scheme?*” was also not accessible for part of the consultation period. Whilst we consider this is not likely to have significantly compromised the consultation process, we hope these observations will help to improve future consultations.

Thank you once again for the opportunity to provide our comments on the proposals and we look forward to seeing the submission of the DCO application and supported to implementation of the Scheme by 2027 as anticipated.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J. Chowen', written in a cursive style.

Cllr Jonathan Chowen
Leader of the Council