



Campaign to Protect  
Rural England, Sussex Branch CIO  
Brownings Farm, Blackboys,  
East Sussex, TN22 5HG  
**Tel** 01825 890975  
**e-mail** [info@cpresussex.org.uk](mailto:info@cpresussex.org.uk)  
[www.cpresussex.org.uk](http://www.cpresussex.org.uk)

BuildaBetterA27  
West Sussex County Council  
County Hall  
West Street  
Chichester  
PO19 1RQ  
By email: [BuildaBetterA27@westsussex.gov.uk](mailto:BuildaBetterA27@westsussex.gov.uk) and [nick.burrell@westsussex.gov.uk](mailto:nick.burrell@westsussex.gov.uk)

18th March 2018

Dear BuildaBetterA27 Team,

**A27 Chichester improvements - Build a Better A27 workshops – CPRE Sussex Chichester group, response to Long List options**

This is the formal response of the Chichester group of CPRE Sussex to the long list of options presented at the BABA27 meeting of 15<sup>th</sup> March 2018 and issued via email earlier that week.

CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

CPRE Sussex has been involved in the BABA27 workshops with two representatives from its Chichester group attending all workshops and following the process closely.

**General comments on the format and information provided**

We have significant concerns over the lack of detail provided with the options summary which does not allow for a reasonably informed comment on any solution. Our comments are therefore made mainly on the basis of our knowledge of the previous detailed options presented by Highways England which appear to be similar to the options provided in the long list.

**We are very concerned by the numerical rating provided by consultants against each option.**

All possible solutions should be assessed based on a weighted cost benefit which should consider cost, economic impact, environmental impact and consequential impact amongst other things, weighed against the potential benefits.

The scores provided by consultants consider only one element of a cost benefit / value for money analysis which therefore lacks credibility and risks **influencing opinion**.

One of the terms of reference for the County councils' working group requires them to

*"Ensure that an appropriate evaluation framework is used for assessment of the improvement options"*

It is not considered that that framework for public engagement or assessment of the options is appropriate given the lack of information and unweighted rating, which does not allow the public to make an informed response.

### **Comments on the long list options**

#### **1. Suggested improvements to the current route**

- **Marginal network gains**

CPRE Sussex is generally supportive of minimal interventions that lead to improvements to the traffic flow, however these would be best considered as immediate measures to address the immediate congestion and don't on their own provide a long-term solution.

We understand that Chichester District Council has adopted a S106 policy to enable marginal improvements to be funded by developments and we suggest this should be considered as an immediate funding stream to allow marginal measures to be implemented without reliance on central government funding.

One suggestion that appears to have not been considered is a reduction in the speed limit of the existing stretch of road between Fishbourne and Portfield to 50 MPH. Such an approach may have advantages in improving the flow of traffic and improving safety.

- **Packages of individual junction improvements**

We are unable to comment in detail on individual junction improvements without more information about which junction they would serve, how they might be mitigated and the benefits of such improvements.

Generally, we are supportive of measures that will separate through and local traffic but have concerns over the environmental impact of certain options and the potential land take required.

Of most concern is the use of flyovers due to the adverse impact visually on the character of the area, urbanising the southern edge of the city. Acknowledging that underpasses are challenging due to the water table on the existing alignment, our preference would be to prioritise these over the use of flyovers as they provide substantial benefits in visual and environmental terms.

We would also like to see significant consideration given to the design of any improvement of the Fishbourne junction given its proximity to the AONB.

- **‘Smart A/B road’ concept and/or dynamic variable message signing**

CPRE Sussex is generally supportive of the Smart A/B roads concept with consideration of queue and incident detection, bus detection / priority etc, which appear to have been successfully trialled elsewhere and can offer real benefits to traffic flow without significant engineering works.

Options such as this represent a new approach to infrastructure and we feel should be given serious consideration as they can also deliver traffic related environmental benefits.

- **On-line and approach road HGV and goods vehicle priority**

We are unable to comment in detail on the concept of HGV priority as little detail is given in the literature. We have some concerns over widening of local roads to facilitate this which would lead to additional land take. We would also suggest that Public Transport priority should be considered along with that for HGVs so as to promote more sustainable transport choices.

## 1. Suggested new routes

We oppose all new off-line routes due to the impact they will have on the countryside around the City and in particular the impact of certain schemes on the South Downs National Park and the Chichester Harbour AONB, which are afforded the highest protection in terms of landscape and scenic beauty. Any northern route would encircle the city in tarmac and create severance with the National Park.

All strategic routes are suggested in the literature as potentially being viable as single carriageways, but we believe this not to be the case given the safety implications of a single carriageway for a strategic route. This would be against one of Highways England’s key objectives to improve road safety.

Specific comments on individual options are as follows:

- **New *local* road to segregate traffic accessing the Manhood Peninsula** from A27 ‘through’ traffic with a new link from the Fishbourne junction, to A286, B2201, or B2145/B2166

This appears to be akin to the Stockbridge link road which formed part of option 2 in the previous proposals. Whilst there may be benefits in providing a dedicated road to the Manhood Peninsula, the impact of a new road in proximity to the Chichester Harbour AONB makes this option, in our view, unviable.

If a link road such as this was taken forward, then it should not connect further than the A286 to avoid it becoming a bypass to the existing A27 and significant mitigation would be required to reduce its environmental impact.

- **New full southern route** between Fishbourne junction & A259 Bognor Road east of the A27
  - ***Multi-purpose road*** with local junctions to access to the Manhood Peninsula
  - ***Strategic road with no local junctions*** to segregate ‘through’ Bognor traffic

For the same reasons as the local road above, we have significant concerns over the construction of a bypass to the south of the City which in addition would generally cut through undeveloped areas and high value agricultural land.

It is not considered that a southern bypass is viable.

- **New *strategic* northern route** between A27 west of Fishbourne junction and near to Tangmere, with a junction at the A286 to give access to Midhurst and north Chichester, or no intermediate junction.

This option appears to be along the route of the previously discounted options 4 or 5. The considerations in the consultants document acknowledge the significant environmental impacts this could have on the countryside to the north of the city and in particular on the National Park into which it would cross. It is not felt that these impacts could ever be viably mitigated.

This option has been previously discounted, and it is not considered to be a defensible or viable option as it does not comply with national policy and legislation including;

- the duty to have regard to the twin purposes of the National Park under Section 62 (1) of the Environment Act (1995)
- The Governments 'National Networks Planning Policy Statement', which has a presumption against building of roads in National Parks and strongly encourages the planning of the strategic road Network to avoid National Parks, The Broads and Areas of Outstanding Natural Beauty.
- DEFRA's 'English national parks and the broads: UK government vision and circular 2010'. Which states that 'Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks'

For these reasons it is felt that this option should be removed from the long list of options as it risks taking forward an option which in the words of the CEO of Highways England "has almost no chance of success"

- **New *local* northern route** between A27 west of Fishbourne junction and Temple Bar utilising and improving some existing local roads to limit new construction

As with many of the options there is limited detail on what this option would actually entail. However, the principle of upgrading existing rural roads to the north of the city to provide a bypass is strongly opposed by CPRE for the damage it would cause to the rural character of the area and rural communities.

It is also not considered that this would address the problem, the provision of a "local" road to the north would not carry local traffic as suggested (the majority of local traffic on the A27 is from the south and so would not be able to access such a road), it would instead carry through traffic and so would act as a strategic route.

This option is strongly opposed by CPRE and is considered to be unviable.

- **New *multi-purpose* road northern route** between A27 west of Fishbourne and near to the A27 at Portfield providing a stronger local functionality than route variants above, including junctions on B2178 and A286

The description of this route suggests that it would take a route along the north and east side of Summersdale and then across the Westhampnett Strategic housing site before joining at Portfield.

This option is strongly opposed for many of the reasons that we oppose the other offline routes in terms of environmental damage.

In addition, however the major flaw with such a proposal is the route that it would need to take through the Westhampnett Strategic housing site which has recently been granted outline consent for the first phase of housing, providing 300 homes.

The land is allocated for up to 500 homes in the adopted local plan and routing a new road through the site would jeopardise the delivery of this site, putting at risk a substantial percentage of the District Council's allocated land supply, which in turn would lead to a failure of the current local plan.

The consequential impact of this would lead to further development pressure for other less sustainable sites around the City and cause further harm to the character of the area. This option is therefore considered to be entirely unviable as a realistic option and should be immediately withdrawn from the long list of options.

## **2. Walking, cycling, public transport and other improvements**

CPRE Sussex is pleased to see that modal measures to support larger interventions have been given consideration. Whilst acknowledging that these measures will not relieve the congestion on their own, we believe that many of them should be given further consideration as to how they might form part of a package of measures.

Of particular interest are improvements to pedestrian and cycle routes both close to the A27 and further afield, as well as improvements to public transport through bus subsidies, enhanced frequency of services, priority routes and most importantly an integrated public transport system to make this option more desirable and user friendly, and in turn encourage less use of private cars.

Generally, we are supportive of many of the modal measures proposed but have concerns over the concept of introducing planning conditions to reduce residential site car park allocations. Such a policy would likely lead to overspill of parking on to residential streets and road safety issues and would in our view have a negative net benefit.

### **Summary**

In summary, CPRE Sussex **objects** to significant new road schemes, both online and offline which would have an impact on open countryside and in particular the South Downs National Park and Chichester Harbour AONB.

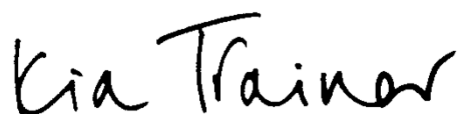
CPRE Sussex also has significant concerns about the impact that a new road through the Westhampnett Strategic site would have on the housing delivery and the consequential impact on the local plan, which could open up development pressure for other less sustainable sites around the City.

CPRE Sussex believe that a "fix it first" approach should be taken to addressing the congestion on the A27.

We believe that minimal measures to address the congestion coupled with modal interventions and smart technology for vehicles and traffic management, will provide a more sustainable solution that will be the most environmentally beneficial and will provide a future proof approach that will align with changing trends in how we move people.

We trust these points will be taken into account in determining the options taken forward for further consideration.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The script is cursive and fluid, with the first name "Kia" and last name "Trainor" clearly distinguishable.

**Kia Trainor,  
Director, CPRE Sussex**

**On behalf of the CPRE Sussex Chichester Group.**