

1 April 2021

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Direct line
+44 207 444 3678

Email
sarah.fitzpatrick@nortonrosefulbright.com

By email

The Square
Temple Quay
Room 3 O/P
Temple Quay House, 2
Bristol BS1 6PN

Attention:

A27ArundelBypass@planninginspectorate.gov.uk

Your reference

Our reference

SFIT/1001149637

Dear Sirs

A27 Arundel Bypass DCO: Scoping Report

We act for Walberton Parish Council. At Appendix 1 to this letter is a "Table of Comments on EIA Scoping Report". We would be grateful if you could take these into account when issuing your Scoping Opinion. We provide an overview of our commentary on the Scoping Report below.

The Scoping Report ignores the importance of the village communities that the Bypass will pass through, but in particular Walberton and Binsted. Neither Walberton nor Binsted are identified by Highways England as villages, yet at a factual, community, and operational level these villages operate as such. These rural villages with their dispersed farmsteads have ancient origins dating back to before the Norman Conquest with Medieval and Roman remains in evidence. The historic landscape and the principal buildings that punctuate it have changed little over centuries and it is vitally important that the character of these villages is properly understood and the impact of the proposals on these villages fully assessed.

Highways England's approach in the Scoping Report is to assess effects on only limited aspects of the villages, such as a particular residential property within the noise zone, or the visual effects on a particular listed building. This approach fails to assess the cumulative intra-project impacts of the proposals on the villages. This relates to Landscape and Visual, Cultural Heritage, Noise and Air Quality effects as a minimum.

The village of Binsted will be bisected by the bypass, neighbours will be physically cut off from one another and from community events and facilities such as the 12th Century St Mary's Church, or the village Strawberry Fair, and footpath connections are also severed. In Walberton the annual fireworks venue will be lost. The effect on these communities, which operate as cohesive tight-knit communities where neighbours largely all know each other is at a serious risk of being lost; this social aspect of the impact on these communities is all but ignored in the Scoping Report and should be assessed. The Population and Human Health chapter will need particular attention. The effect on these communities should also be assessed cumulatively with other identified effects.

The proposed scope of the Biodiversity chapter omits some important areas of assessment that are referred to in the Appendix.

[PPE-#28891534-v1](#)

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The Scoping Report also contains a number of factual inaccuracies, for example a plan showing Walberton C of E school shows the school where it was located 13 years ago and has since been demolished and rebuilt in a different location. It is also evident that the Scoping Report has been put together perhaps to a large extent relying on a 'map based' approach. Given COVID restrictions in the past 12 months this is to a limited extent understandable, but when the EIA is undertaken it is crucial that Highways England undertake site visits and do proper field based assessment to support its assessment of effects. The importance of a robust assessment cannot be overestimated. Hopefully this will eliminate the factual errors.

We look forward to sight of your Scoping Opinion in due course.

Yours faithfully,



Sarah Fitzpatrick

Appendix 1

Walberton Parish Council

Table of Comments on EIA Scoping Report

Paragraph Reference	Comment
Chapter 1 - Introduction	
1.2.7	HE have failed to take into account the Walberton Neighbourhood Plan as part of the suite of policy that will be considered by the Secretary of State. The Walberton Neighbourhood Plan is part of the local development plan, adopted March 2017. A revised Neighbourhood Plan is going to referendum on 6 May 2021 and should be taken into account as an emerging policy. There are important policies including those relating to heritage/archaeology in the Neighbourhood Plan which should be considered.
Chapter 3 – Assessment of Alternatives	
	HE have not discussed how the grey route was ultimately chosen and what environmental benefits it has over the alternatives. HE should consider the “Arundel Alternative”, as well as tunnelled and cut and cover solutions for part of the route, particularly where major adverse effects are predicted on receptors, these include effects on heritage e.g. the 12 th century St Mary’s Church, Binsted, and effects on communities with the villages of Binsted and Walberton being physically divided by the proposed bypass.
Chapter 6 – Air Quality	
6.8.4	The Scoping Report expressly scopes out emissions of PM2.5 but no detailed reasoning is given. Measurements of air quality regularly incorporate PM2.5 levels and so, without adequate reasoning, these should be assessed as part of the proposed scheme. PM2.5 can have serious effects on health.
6.8.7	HE have not included the Avisford Grange housing development as a receptor for air quality, despite its close proximity to the proposed scheme, existing residents, and large number of future residents.
6.8.8	Previous assessments have failed to identify receptors at Walberton C of E Primary School and 2 pre-school. These should be included in future assessments.
6.8.10	Walberton Recreation Ground is a public park that was not assessed as a sensitive receptor previously. It should be included in future assessments.
6.8.13	HE have failed to take into account non-exhaust emissions, such as those from tyres and brakes. These should be considered as part of the air quality assessment.

Chapter 7 – Cultural Heritage	
7.4	While Highways England (“HE”) incorporate the listed buildings in the area into their scope, they fail to mention the many buildings or structures of character that are listed locally by the local planning authority. There are four locally listed buildings in Binsted. These are the Old Rectory, Grove Lodge, Bramble Barn and the Black Horse Pub. The Old Rectory is 100m from the grey route, the Bramble Barn is less than 200m and the Grove Lodge is approx.. 200m. The Black Horse Pub will lose its serene outlook over the Binsted Rife valley as a result of the proposed scheme. These locally listed buildings, all non-designated heritage assets should be incorporated into HE’s scope. Walberton parish has 39 listed buildings and Slindon has 62 listed, not 6 as shown in the report.
7.4.2	No mention is made of the ancient village of Binsted, which has 9 Grade II listed buildings (8 houses and St Mary’s Church), an archaeological notification area, a Roman Road, Moot Mound, and was vitally important in the life story of Laurie Lee who’s poems were inspired here.
Chapter 8 – Landscape and Visual	
8.4.10	Incorrect reference is made here to Walberton as a settlement, when it is in fact a village.
8.4.18	HE have only referred to “Binsted Wood” when the Binsted Woods Complex local wildlife site includes Binsted Woods and Tortington Common.
8.4.22	HE have noted that Public Right of Way footpath no.350 between Walberton and Binsted crosses the proposed scheme corridor, as does bridleway no.392 to the north-west of Walberton, but it fails to mention that footpath no.341 that connects Binsted Lane to the South Downs National Park is cut off as a consequence of the raising of Binsted Lane.
8.4.39	HE have not included either existing or the future properties as part of the Avisford Grange development.
8.5.5	There is no mention in the scoping report of the change in the Walberton village landscape as a result of the increase in traffic caused by the proposed scheme, despite mention of how the Arundel landscape will change due to decrease in traffic.
8.8.24	The assessment of visual impact during the night-time will use the same study area as the daytime assessment, even though the light emanating from the proposed scheme at night will be further reaching than the visual impact of the proposed scheme during the daytime. A different spatial scope is required.
	No reference is made to the landscape and visual impacts on the Sussex villages in particular, the ancient village of Binsted, or Walberton, as a cumulative impact, rather than the impact on individual views or properties comprised within the villages.
Chapter 9 – Biodiversity	

	HE's Scoping Report fails to grasp the importance of the Binsted Woods Complex to local wildlife. The Complex is a great foraging location and bats can travel up to 15km per night to forage there. HE need to establish the importance of the complex and its surrounds to bats commuting from the wider area to the south and the west as the road will act as a significant barrier and HE need to assess how the bat species in Binsted Woods, that depend on a diet associated with wetland habitats, will access these habitats.
	HE have not considered the numerous rare and declining species of bird and how the noise of the proposed scheme will affect their ability to hear each other call and ability to hear predators.
	HE have failed to include in their scope several priority species, including toads, hares, hedgehogs and harvest mice. These are all declining nationally and are all located within the area of the proposed scheme.
	HE have focussed on each species individually but they have failed to take into account the cumulative impact the scheme will have on the many protected species within the area.
9.7.1	HE have recognised the risk of accidental mortality of barn owls during the operational phase. However, it is known that many species of animals including (but not limited to) badgers, birds, hedgehogs, bats, reptiles, toads and invertebrates are routinely killed by traffic. HE have not scoped these risks into their report, or how they will prevent/mitigate these deaths.
Chapter 10 – Geology and Soils	
10.4.5	Incorrect reference to the route crossing south of Binsted, whereas the route runs through Binsted.
10.4.10	Table 25 includes “Binsted Rife Priory Farm, 50m north of the proposed scheme”. Binsted Rife (a stream that runs along the valley between Binsted and Walberton) is not located on or near Priory Farm. Clarity should be provided as to which location the spray irrigation licence applies to.
Chapter 12 – Noise and Vibration	
12.3.8	HE should consult with Walberton Parish Council when assessing areas that will require an operational phase noise assessment; they have not referred to as consultees in the Scoping Report.
12.4.2	The Scoping Report states that Walberton C of E School is within 600m of the boundary study area. This underplays the effect of the route on Walberton C of E School, which is less than 200m from the grey route. HE are also asked to note the current location on the school, the old school was demolished 13 years ago and is shown incorrectly on HE's plans. See plan below, showing the correct location of the school.

<p>12.4.2</p>	<p>There is a failure to mention residential properties in Fontwell, Slindon, Crossbush and Lyminster when referring to potential sensitive receptors within 600m of the boundary. There is a failure to mention other sensitive receptors. Fields in Binsted are home to rare breed sheep. It is well documented that sustained traffic noise can have detrimental effects on farm and wild animals, and wild birds, resulting in lower growth rates, a deterioration of feed efficiency and other detrimental effect on some biological functions.</p>
<p>Chapter 13 – Population and Human Health</p>	
<p>13.4.4</p>	<p>HE state that the proposed scheme runs south of the village of Binsted, whereas it actually runs through it.</p>
<p>13.4.5</p>	<p>Incorrect reference to Binsted Road being crossed by the scheme, which should read “Binsted Lane”.</p>
<p>13.4.10</p>	<p>Reference that no community facilities are located directly alongside the route is incorrect. HE have failed to refer to Binsted Church and churchyard, which are directly alongside the route.</p>
<p>13.4.11</p>	<p>Reference is made to Binsted Nursery being 200m from the proposed scheme, whereas part of the nursery is within the red line boundary of the proposed scheme.</p>
<p>13.4.12</p>	<p>Reference is made to proposed scheme crossing the boundary of Avisford Park Golf Course, whereas it actually runs through the golf course on both sides of Yapton Lane.</p>
<p>13.5.7</p>	<p>HE recognise the impact that the construction phase will have on the severance of communities but no mention has been made of the operational phase, which also needs to be scoped in. Intra-project effects need to consider that a quiet peaceful countryside area that include historic villages and tight knit communities will become severed by the presence of the A27 bypass and associated viaducts, and will become dominated by the presence of these urbanising features and the lack of quiet and</p>

	peace that once existed. Tunnelled and cut and cover solutions should be considered for the bypass in these locations
13.6.1	Mitigation has been proposed in the form of overbridges on Tortington Lane, Binsted Lane and Yapton Lane. The Binsted Lane overbridge is over 7m high and has an oppressive effect on the houses/community below. The Binsted Lane overbridge does not have sufficient ramps and tie-ins and some fields are consequently made inaccessible. The connectivity needs to be fully assessed before this overbridge can be put forward as a mitigation measure. Tunnelled and cut and cover solutions should be considered for the bypass in these locations.