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Dear National Highways

Re: Consultation on Options for A27 Worthing and Lancing Scheme

Thank you for the opportunity to respond to the consultation on options for the A27 Worthing and Lancing Scheme (the Scheme). For many years, the County Council has campaigned for a long-term solution to the daily problems on the A27 at Chichester, Arundel, Worthing and Lancing that contribute to poor economic performance and pockets of deprivation on the West Sussex Coast. Consulting on options for the A27 Worthing and Lancing scheme is a positive step towards delivering improvements.

This response has been influenced by the views of the County Council's Communities, Highways and Environment Scrutiny Committee before being approved through a Key Decision. National Highways is requested to have regard to the contents of this Consultation Response and those of other stakeholders and the public before selecting a preferred route/option for the Scheme.

Scheme Objectives

The scheme objectives have been developed in liaison with County Council officers and other key stakeholders and broadly reflect the transport objectives of the West Sussex Transport Plan (WSTP). However, it is disappointing that some of the scheme objectives (i.e. improve road safety and facilities for non-motorised users) appear to have had limited influence on the identification and selection of the options presented for consultation. The County Council considers it key to the success of the project that all the scheme objectives are given due weight in the selection of the preferred route/option and design of the Scheme, as it evolves.

Consultation Materials

In order to allow stakeholders to consider the proposed options and engage constructively with the consultation, it is necessary to share relevant information about the impacts of the Scheme. There is a lack of information in the consultation material about the impact of the scheme, particularly traffic impacts. This falls short of what is necessary for the County Council to understand the impacts of the Scheme on the local highway network and is not consistent with the Gunning Principles (specifically Principle 2). Furthermore, as references are made in the SOAR and EAR to other technical reports (e.g. Traffic Modelling Report), it appears that this information has been produced but not published. This information would have been useful to stakeholders in responding to the consultation by allowing a more meaningful understanding of the impacts of the options. The County Council request that this information is

published as soon as possible to allow stakeholders the opportunity to consider this technical information.

The Options

The County Council has considered each of the options and general comments on each option are set out below. Additionally, issues and concerns about interventions, which are common to multiple options, are set out below under the relevant location headings. National Highways should consider all the comments before selecting a preferred route/option.

Option 1 – general comments

Option 1 appears to show the greatest journey time and delay savings, although these are modest and most beneficial to eastbound traffic. This option appears to result in an increase in collisions on the A27 corridor and would not significantly improve conditions for Non-Motorised Users (NMUs). Option 1 would not improve the Lyons Way / Sompting Road or Busticle Lane junctions or alter Upper Brighton Road.

The scale and type of impacts of this option are generally in line with what would be expected from the package of interventions, which will result in increased traffic flow on this section of the A27. Reducing journey times and delay is expected to increase the attractiveness of using the A27 corridor instead of less suitable urban and rural routes. The extent to which this option would: redistribute traffic from other local routes; the locations that are likely to benefit from reduced traffic flow; and any potential reduction in collisions, are all currently unclear.

The County Council consider that the lack of improvements at the Lyons Way / Sompting Road or Busticle Lane junctions or Upper Brighton Road in Option 1 would be a missed opportunity. This option would also fail to provide any improvements to the Lancing section of the scheme, which is not in line with the Government's ambition to deliver a A27 Worthing and Lancing Improvement. The addition of improvements at these locations would help to address long-standing problems for local residents and businesses and improve the performance of this option against the scheme objectives.

Option 2 – general comments

Option 2 appears to show the second-best journey time and delay savings, although these are modest and most beneficial to eastbound traffic. This option also appears to result in an increase in collisions on the A27 corridor and would not significantly improve conditions for NMUs. Option 2 would only provide minor alterations at the Grove Lodge junction but includes the proposed alterations on the Upper Brighton Road. No improvements are proposed at the Busticle Lane Junction in this option.

The scale and type of impact of this option are generally in line with what would be expected from the package of interventions, which result in increased traffic flow on this section of the A27. This option should also deliver a reduction in traffic using Upper Brighton Road to avoid congestion on the A27. Reducing journey times and delay is expected to increase the attractiveness of using the

A27 corridor instead of less suitable urban and rural routes such as Upper Brighton Road, which is regularly used by traffic seeking to avoid congestion on the A27. The extent to which this option would: redistribute traffic from other local routes; the locations that are likely to benefit from reduced traffic flow; and any potential reduction in collisions, are all currently unclear.

Local stakeholders have expressed concern about the deliverability of closing the Hadley Ave Junction, as access will need to be maintained for deliveries and refuse vehicles. Alongside demonstrating how access will be maintained, there is a need for National Highways to explain the impacts of closing the Hadley Avenue Junction to both A27 users and those using Hadley Avenue for local journeys.

The County Council consider that the lack of improvements at the Busticle Lane Junctions in this option would be a missed opportunity to address problems for local residents and businesses.

Option 3 – general comments

Option 3 offers the worst journey time and delay savings and appears to show that improvements to journey times and delay in parts of the corridor can effectively be cancelled out by the lack of improvements elsewhere on the corridor (i.e. Lyons Way / Sompting Road). This option also appears to result in an increase in collisions on the A27 corridor and would not significantly improve conditions for NMUs. Option 3 would only provide minor alterations at the Grove Lodge junction but includes the proposed alterations on the Upper Brighton Road and at the Busticle Lane Junction. No improvements are proposed at the Lyons Way / Sompting Road Junction in this option.

The scale and type of impact of this option are generally in line with what would be expected from the package of interventions, which result in increased traffic flow on this section of the A27. Reducing journey times and delay is expected to increase the attractiveness of using the A27 corridor instead of less suitable urban and rural routes such as Upper Brighton Road, which is regularly used by traffic seeking to avoid congestion on the A27. The extent to which this option would: redistribute traffic from other local routes; the locations that are likely to benefit from reduced traffic flow; and any potential reduction in collisions, are all currently unclear.

The extent of the impact of Option 3 on SDNP and the need for this incursion into SDNP is unclear from the consultation material. Although the impact is expected to be small, National Parks are protected from major development, including road building, in the National Policy Statement on National Networks. Therefore, this presents a risk to the deliverability of the Busticle Lane Junction improvement. National Highways should confirm the affected area and explore whether it is possible to design this out of the scheme during later phases of the project. If it is not possible to remove the impact on SDNP, then National Highways should demonstrate that exceptional circumstances exist to justify taking this improvement forward.

The County Council consider that the lack of improvements at the Lyons Way / Sompting Road Junction in this option would be a missed opportunity and clearly contributes to a poor value for money score.

Offington Corner Junction

Local stakeholders have expressed concern about the introduction of traffic signal controls at the Offington Corner Junction and closure of the Goodwood Road arm, which features in Options 1, 2 and 3. There is a need for National Highways to set out the reasons for closing the Goodwood Road arm as the number of users is very low and it does not have a significant impact on operation of the junction.

Although additional crossing facilities are proposed as part of the Offington Corner Junction improvement, which is positive, replacing the existing single - stage toucan crossing on A27 with a two-stage crossing could worsen this existing facility for NMUs. The County Council recognises that with the limited space available, difficult choices will need to be made about how to balance the needs of different users. National Highways should seek to demonstrate how the crossing facilities will provide an overall benefit to NMUs.

Grove Lodge Junction

Local stakeholders have often reported that the performance of this junction for traffic and its related environmental impacts (e.g. air quality) is improved when the traffic signals are not in operation. The County Council recognises that the traffic signals are vital to ensuring safe pedestrian and cycle access across this busy junction. In the absence of a grade-separated crossing, this provides an important means of access to Worthing College. The County Council is aware that National Highways have considered options that could remove traffic signals at the junction. Therefore, National Highways should set out its rationale for using traffic signals and why options that did not include traffic signals at the Junction were discounted prior to the consultation.

Environmental Impacts

Although the environmental impacts of the options are generally not significant and there is little to differentiate between the options, the impacts do appear to be adverse, which conflicts with the scheme objective to enhance the environment wherever possible. Therefore, National Highways should identify suitable mitigation for adverse impacts (e.g. use of zero emission construction equipment) and opportunities to improve the performance of the scheme against its environmental objective. Whichever option is taken forward, there is an opportunity to do this through the Biodiversity Net Gain Strategy at the next stage of the project. The WSTP seeks to achieve at least 10% biodiversity net gain on major transport schemes and the County Council consider that National Highways should aim to achieve this as a minimum.

Construction Impacts

The County Council is concerned about the impacts of constructing the scheme on local residents and businesses due to the lack of alternative routes. Full road closures and night-time works in residential areas can have negative impacts on residents and businesses. Therefore, National Highways should seek to minimise these impacts and avoid disruptive works at busy times of year.

Requested Changes

In each option, no improvements are currently proposed at the A27 / Grinstead Lane Junction in Lancing. The County Council is aware that an improvement is required as part of the nearby New Monks Farm development, which should complement the Scheme. However, the delivery arrangements for this scheme are currently unclear, as it could either be delivered by the developer or National Highways. National Highways should explore whether it would reduce disruption to users of the corridor, to deliver this scheme as part of the A27 Worthing and Lancing scheme rather than as a standalone, developer-led project.

Rat-running on local roads to avoid congestion on A27 is a long-standing issue and concern for the County Council. The County Council welcomes recognition of the issue and that Options 2 and 3 attempt to tackle the problem in Sompting by making Upper Brighton Road one way eastbound between The Templars and Church Lane. However, this proposal will negatively affect buses and cyclists, which would also need to find alternative routes and for this reason, the proposal needs further refinement. In refining the proposal, National Highways should explore ways to maintain access for cyclists and buses, which would enhance the attractiveness of using these modes; for example, by introducing a bus gate with cycle access on Upper Brighton Road.

The County Council has recently consulted on plans for active travel infrastructure in Sompting and Lancing, including an east-west cycle route to improve the attractiveness of active travel. This scheme will complement the A27 Worthing and Lancing scheme by helping to manage traffic demand. Therefore, following the options consultation, National Highways should work with the County Council to better integrate the proposals for Upper Brighton Road and the east-west cycle route.

County Council Preference

The County Council considers that the scale of the proposals in the options are not sufficient to address the issues on the A27 Worthing and Lancing or adequately cater for the scale of development that the Government is seeking on the West Sussex Coast. As outlined in the WSTP, there continues to be a need for a large-scale solution to come forward, in line with Transport for the South East's Strategic Investment Plan. However, it is acknowledged that the scale of investment required and the technical challenges that would need to be overcome mean that this could only happen in the long term. Therefore, there is a need to invest in improvements that will assist in meeting the strategic objectives while not precluding large-scale improvements from coming forward in the future.

The option with best value for money is Option 1, which does not include improvements at Lyons Way / Sompting Rd, Busticle Lane or Upper Brighton Road. However, the appraisal for Options 2 and 3 appears to indicate that improvements at these locations would also be beneficial. Although these effects are expected to be beneficial to the local road network, further transport modelling information is needed to confirm that the effects on local roads are acceptable. It is also disappointing that the options do not include further improvements to facilities for NMUs.

Given the options all show potential to provide localised reductions in journey time and delay and have the potential to align with some of the WSTP objectives, the County Council support the implementation of a package of improvements in the short-term. However, the County Council does not have a preference for any of the options as they are currently presented. Whichever option is taken forward, there is need for further refinement and to: demonstrate how road safety will be improved; improve facilities for NMUs; and avoid, mitigate or enhance the environment.

As the cost of all options exceeds the available budget, National Highways will need to revise the options and/or seek additional funding to deliver the scheme. The County Council's preference is for National Highways to seek additional funding to deliver the scheme and, on the basis that it is affordable and offers value for money, develop an option that delivers improvements at all the locations for potential improvements identified in the options for consultation.

Additional Opportunities

The additional technological, traffic management and active travel opportunities outlined in the consultation brochure are generally welcome as they align with the WSTP and its Area Transport Strategies for Adur and Worthing. However, further development of these proposals is needed after the consultation to ensure they are compliant with latest cycle design guidance (LTN1/20) and integrate with the wider network of existing and planned active travel facilities. In order to provide a continuous east-west cycle route and link to key destinations, as envisaged in the Worthing and Adur Local Cycling and Walking Infrastructure Plan, the proposed shared use path alongside the A27 should be extended to Lyons Farm.

The additional opportunities would assist the Scheme to achieve its strategic objectives, particularly those relating to road safety and NMUs. As the options do not currently achieve these strategic objectives, National Highways should integrate the additional opportunities within the Scheme.

The County Council has not allocated funding for any of the additional opportunities, all of which would require additional funding over and above that allocated to the RIS2 scheme. Although the County Council is generally supportive of the proposals, a financial contribution from the Authority cannot be guaranteed, as funding is not currently allocated for this purpose. There may be potential to use developer contributions in the area if the proposals would help to mitigate the impacts of development; this should be discussed with the Local Planning Authorities.

I hope that this response is helpful and look forward to further discussing the matters raised above with you after the consultation.

Yours sincerely

Joy Dennis

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