



**THE HIGHWAYS ACT 1980, THE ACQUISITION OF LAND ACT 1981, THE
HIGHWAYS (INQUIRIES THE HIGHWAYS ACT 1980, THE ACQUISITION
OF LAND ACT 1981, THE HIGHWAYS (INQUIRIES PROCEDURE) RULES
1994 AND THE COMPULSORY PURCHASE (INQUIRIES PROCEDURE)
RULES 2007**

PUBLIC INQUIRY INTO

**THE WEST SUSSEX COUNTY COUNCIL (A284 LYMINSTER BYPASS
(NORTH))**

COMPULSORY PURCHASE ORDER 2020

and

**THE WEST SUSSEX COUNTY COUNCIL (A284 LYMINSTER BYPASS
(NORTH) CLASSIFIED ROAD)**

(SIDE ROADS) ORDER 2020

SUMMARY PROOF OF EVIDENCE

OF

Andrew Burrows

FOR

WEST SUSSEX COUNTY COUNCIL

DFT REFERENCE: NATTRAN/SE/LAO/196

July 2021

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1. INTRODUCTION

- 1.1. My name is Andrew Burrows and I am an Associate Director with Capita Real Estate and Infrastructure. I am the Project Manager for the design team that has developed the detailed design of the A284 Lyminster Bypass North. This is a role I have held since early 2017 when Capita, as the designer acting on behalf of Jacksons Civil Engineering, were awarded the commission by WSCC.
- 1.2. I hold a first-class MEng (Hons) degree in Civil Engineering with Management obtained in 1999 and have been a Chartered Civil Engineer, CEng, MICE since 2007.
- 1.3. Following graduation from university I have over 21 years' experience predominantly developing detailed designs for larger infrastructure projects including: the 6km A6 Clapham Bypass (design team member and Assistant Designer's representative on site); M25 J25 improvement scheme and Holmesdale Tunnel refurbishment (design team member and Assistant Project Manager (PM)); M25 Bell Common Tunnel refurbishment (PM); Lyminster Bypass (PM); A2300 Improvement scheme at Burgess Hill (PM); A29 Realignment Scheme (Project Director (PD)); and Western Bridge and Link Road (PD).
- 1.4. I am familiar with the Statement of Case submitted by West Sussex County Council in connection with the promotion of the West Sussex County Council (A284 Lyminster Bypass (North) Classified Road) Compulsory Purchase Order 2020 and the West Sussex County Council (A284 Lyminster Bypass (North) Classified Road) (Side Roads) Order 2020 ("the Orders").
- 1.5. I produce this evidence to explain the design of the scheme to which the Order relates.
- 1.6. I can confirm that the contents of my proof of evidence are my professional opinion and are true to the best of my knowledge and belief and are gained from either my own direct involvement or my colleagues' direct knowledge.

2. SCOPE OF EVIDENCE

- 2.1. My evidence provides an explanation of the engineering decisions that have been made relating to the proposed design of the scheme to which the Orders relate, explaining why features have been located and sized as they have.
- 2.2. I also provide evidence in response to the main issues raised by the following statutory objectors to the Orders in relation to the technical design:
 - HCC 2011 Ltd in respect of CPO objections in reference to Plots 3a and 3b and an SRO objection;
 - Mrs R Andrew in respect of CPO objections in reference to Plots 2a, 2b, 2c and 2d and an SRO objection;

- Ricotte Investments Ltd in respect of CPO objections in reference to Plots 2a, 2b, 2c, 2d, 3a and 3b and an SRO objection;
 - T & L Crawley No.2 LLP in respect of CPO objections in reference to Plots 9a, 9b.
 - Network Rail in respect of CPO objections in reference to plots 9a and 9b
- 2.3. I also address matters raised in the withdrawn statutory objections from Punch Partnerships in respect of CPO objections in reference to Plot 7a and 8d.

3. DESCRIPTION OF THE SCHEME

- 3.1. The location of the proposed A284 Lyminster Bypass (North) commences from a point approximately 600m south of the A27 Crossbush junction. The Scheme comprises an improvement of the existing A284 through realignment and construction of a new highway. However, resurfacing is proposed for approximately 200m north of the commencement point as part of the noise mitigation proposals. At its southern end, the proposed bypass will connect to the southern section of the bypass which is currently being constructed as part of the mixed use North Littlehampton development to the south.
- 3.2. The Scheme comprises a new 7.3m wide carriageway with 1.0m hard strips either side. A 3m wide shared cycleway / footway runs from the northern end of the Scheme along the west side of the carriageway to reach a signalised Pegasus crossing. The Pegasus crossing provides a safe crossing point for cyclists, pedestrians and equestrians in addition to ensuring the continuity of the existing bridleway number 2163 between Lyminster and Poling. From the crossing, the shared cycleway / footway continues southwards down the east side of the proposed road to link to similar facilities further south and continuing on into Littlehampton. A T-junction will link the existing A284 (to be downgraded) to the new road which will remain open as a through road to provide continued access to the bypassed parts of Lyminster Village.
- 3.3. At the southern end of the scheme a 225m viaduct spans the entirety of the Black Ditch flood plain. Brookfield Stream to the north is to be crossed with a replacement enlarged and extended 2m box culvert.
- 3.4. The verges have been widened in a number of areas in order to maintain visibility for users of the highway.
- 3.5. Farm accesses have been provided off the new bypass at four locations. Two are located at Ch507 (east side and west side), one at Ch595, east side, and one at Ch808, east side. The four accesses provide access to plots 6c, 6b, 5c and 3b respectively. All four have similar geometry that is a significant enhancement over the minimum required by DMRB and the existing access points located off the existing A284.

- 3.6. Where possible maintenance access to drainage features, outfalls and the northern half of the viaduct have been provided from the field access.
- 3.7. To reduce the noise impacts of the scheme a low noise thin surfacing has been used along the entire route rather than Hot Rolled Asphalt.
- 3.8. The drainage networks discharge into the two watercourses that cross the scheme. Surface water flows are attenuated in buried tanks, dry ponds and over wide swales. Where possible solutions that also improve water quality have been selected, these include filter drains, swales and wet and dry ponds.
- 3.9. To either side of the carriageway planting is proposed to mitigate the impacts of the scheme. Measures include hedge lined fences, tree planting and areas of grassland.

4. RESPONSE TO OBJECTIONS

- 4.1. The majority of the objections relate to the appropriateness of the replacement accesses, the extent of the land take and the measures that have been taken to minimise the impact of the scheme.
- 4.2. The existing accesses from the A284 consist of gates located immediately adjacent to the carriageway.
- 4.3. The suggestion that the replacement accesses are not adequate and will not function is not correct. All the proposed replacement accesses have been designed in accordance with the guidance of the DMRB with the geometry improved above the minimum requirements to improve their safety and operation. Improvements include increased radii at the mouth of the junctions with gates set back to enable vehicles to pull clear of the running carriageway before having to stop to open the gates. Where the proposed carriageway is higher than the existing ground the accesses have been provided with a 'flat' platform over the first 8m (2% gradient for drainage) allowing vehicles leaving the access to easily pull away. A gradual ramp into the adjacent field has then been provided.
- 4.4. The extent of the land take for mitigation works is not excessive. The land take is essential to the provision of a sustainable scheme and compliance with current standards, planning requirements and technical guidance (SUDs etc). Temporary land take either side of the permanent works has been limited to that required for the safe construction of the highway and clearance works have been kept to a minimum.
- 4.5. The drawings that have been prepared as part of the planning and CPO process clearly show the landscaping proposals and how the scheme will function.
- 4.6. At the northern end of the scheme it has not been possible to directly replace one access that is located immediately north of the Brookfield Stream. This is due to the need to install safety fencing either side of the new culvert. The existing road alignment means that the provision of a access further to the north would require significant additional land take and tree clearance. The impact of such an access

would be disproportionate and significantly increase the impact on the scheme on the affected property.

- 4.7. The scheme will have no negative impact on the operational land owned by Network Rail as the only interface is construction traffic using the new southern bypass bridge over the rail line.

5. CONCLUSION

- 5.1. This summary proof of evidence demonstrates that the scheme has been designed in accordance with the relevant design guidance and will provide a safe and sustainable bypass to the village of Lyminster. The land required for the scheme is not excessive and is needed to construct the scheme, including the provision of safety features such as acceptable visibility lines, environmental mitigation such as landscaping, water quality improvements and surface water attenuation, and appropriate maintenance access for the ongoing operation of the road.
- 5.2. Due consideration has been given to the ongoing needs of the affected landowners and all reasonable efforts have been made to mitigate any impacts. Replacement accesses have been provided where possible and all are to a much higher standard (both spatially and from a safety context) than the existing provision.
- 5.3. The landscaping proposals are proportional to the scheme, are not excessive and will provide appropriate visual and environmental mitigation for the scheme.
- 5.4. The impacts on the affected landowners are reasonable and needed to enable the scheme to be constructed, operated and maintained.