



**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 OF PROOF OF EVIDENCE

OF

TONY SYMONDS

FOR

WEST SUSSEX COUNTY COUNCIL

DFT REFERENCE: : NATTRAN/SE/HAO/229

July 2021

Contents

1. INTRODUCTION	3
2. SCOPE OF EVIDENCE	3
3. DECISIONS SHAPING THE SCHEME	4
4. RESPONSE TO OBJECTIONS	5
5. CONCLUSION	6

1. INTRODUCTION

- 1.1. My name is Tony Symonds and I am the Design Manager at Jackson Civil Engineering Group Limited, who have been appointed by West Sussex County Council since 2017 to undertake the role of Scheme Designer and Principal Designer for the A284 Lyminster Bypass (North). Jacksons have appointed Capita to undertake the design on our behalf.
- 1.2. I hold a BSc (Hons) in Civil Engineering, am a Certified Member of the Association of Project Safety, and hold several other industry acknowledged qualifications, including Site Management Safety Training Scheme, New Roads and Streetworks Act Supervisor.
- 1.3. I have 40 years' experience in the civil engineering/construction industry.
- 1.4. For the past 12 years I have been Jackson's Design Manager responsible for overseeing and successfully delivering (either directly or via my team) the design phase of design and build schemes. Prior to this I was a site based Project Manager responsible for the delivery of the construction phase of civil engineering schemes including by-passes, infrastructure, bridges and other structures.
- 1.5. For the past 8 years I have also acted as a fully qualified Principal Designer (formally CDM Co-ordinator) Lead for Jacksons.
- 1.6. I have been involved in the project since it was awarded to Jacksons in early 2017 in dual roles, Design Co-ordinator and Principal Designer Lead. As Design Co-ordinator it is my role to manage Capita and the design programme, liaise with all other design parties and the client. As Principal Designer Lead my role is to "plan, manage and monitor the pre-construction phase and coordinate matters relating to health and safety during the pre-construction phase to ensure that, so far as is reasonably practicable, the project is carried out without risks to health or safety" (CDM Regulations 2015, Regulation 11(1)).
- 1.7. I am familiar with the Compulsory Purchase Order Statement of Reasons and the Side Roads Order Statement of Reasons, and the Statement of Case submitted by the Council in connection with the promotion of the West Sussex County Council (A284 Lyminster Bypass (North)) Compulsory Purchase Order 2020 ("the CPO") and the West Sussex County Council (A284 Lyminster Bypass (North) Classified Road) (Side Roads) Order 2020 ("the SRO") (jointly referred to as "the Orders").
- 1.8. I produce this evidence to explain the applicable underlying engineering, logistical and health and safety decisions that have influenced the design of the Scheme to which the Orders relate.
- 1.9. 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 on the engineering, logistical and health and safety decisions that have been made relating to the proposed design and layout of the Scheme south of the Black Ditch. This specifically

concerns the building of the viaduct and the associated southern contractor's temporary site compound and access road to the flood plain, and explains why the features have been located and sized as shown within the Scheme's Southern Access Compound Arrangements Drawing. I respond to the main issues raised by T&L Crawley No.2 LLP in respect of CPO objections in reference to Plots 10a and 10b. of CPO objections in reference to Plots 10a and 10b.

3. DECISIONS SHAPING THE SCHEME

- 3.1. Constructing a significant structure such as the viaduct requires good access from the public highway for deliveries (via Lyminster Bypass (South)), a site compound space for a high standard of welfare facilities and storage, wash down areas for all construction traffic, storage for construction materials and a sufficient hard paved and drained area to accept deliveries (some of which will be abnormal in size carrying 24 m long beams).
- 3.2. Fixed geometry of viaduct
 - 3.2.1. The road alignment design to tie-in to the Lyminster Bypass (South) requires the viaduct to cross Black Ditch at an angle (skewed) rather than perpendicular. This means that the access and plant-reach required to build the ditch span is more readily achieved from one side (CPO plot 10b). For instance, the largest of the river beams must be lifted in from the western side of the viaduct.
- 3.3. Buildability and methodology considerations
 - 3.3.1. The viaduct design approach was chosen to suit industry common practice build methods for this type of structure.
- 3.4. Drainage design strategy
 - 3.4.1. The approach for the scheme drainage design was to target areas where pond features would work best. This has been discussed in Andrew Burrows' Proof of Evidence and resulted in all major drainage features being incorporated to the east of the new route.
- 3.5. Site access considerations
- 3.6. For construction purposes, access to the viaduct from both ends is required. From the north the access must be on the west side to avoid all deliveries and plant having to cross the areas of carriageway which would be still be under construction, therefore not trafficable. It then followed that the southern access and cranes ought to be on the western side also to avoid similar access/drainage constraints and allow the cranes to pass equipment and materials to each side of Black Ditch.
- 3.7. Health and Safety
 - 3.7.1. Health and safety considerations for construction works are governed by many Regulations, Codes, Standards and other documents, with one of the most applicable and important being the Construction (Design and Management) Regulations 2015.
 - 3.7.2. Arrangements must include:
 - sufficient space to access the site compound

- segregation between vehicles and pedestrians
- areas for vehicles to safely manoeuvre without interfacing with the public
- vehicles under the control of a banksman whilst manoeuvring
- a sufficiently sized access road to reverse down to the works.

This can only be achieved with all vehicles under the full control of a single principal contractor in a large private compound area with the access to the works leading directly from it.

4. RESPONSE TO OBJECTIONS

4.1.1. Alternative compound location on Land Parcel C

As to the objection from T&L Crawley No2 LLP, we did consider the option of using land parcel C however it was our considered opinion there are a number of unavoidable constraints which make this alternative impracticable if not impossible and these include:-

- It would result in the compound being outside of the currently red line boundary of the Planning Permission.
- It would be very difficult for vehicles to manoeuvre in and out of a compound entrance on the eastern side, especially the abnormal load lorries required for the beams.
- It would not readily possible to relocate the flood plain access road and piling platform to the Land Parcel C area.
- If the piling/crane platform was relocated to the eastern side, the proposed large mobile crane would not have the lifting capacity to place the beams on the viaduct river span as it will be a longer reach.

4.1.2. Locate site compound on flood plain to the north of Land Parcel B

We approached the Environment Agency about this alternative and they advised that they "would not recommend" having a site compound on a flood plain.

Given the negative response from Environment Agency, we dismissed this option.

4.1.3. Access road location alongside Land Parcel B (utilising Plot 9b), but not having use of Land Parcel B

The T&L Crawley No2 LLP suggestion that vehicles access through Plot 9b and turn around on an area on the flood plain to the north of Land parcel B is unviable.

It is unlikely the Environment Agency would be agreeable to this.

For both health and safety and operational reasons it is best practice to reverse the larger vehicles down slopes. Therefore the vehicle turning area must be at the higher level (Plot 10b)

These works will not be possible without possession of and use of Plot 10b

5. CONCLUSION

For the reasons set out above I consider that the Council have explored all practical options and I conclude that the only safe and viable proposal is to locate the site compound in Plot 10b and then to build an access road and piling/crane platform along the western side of the proposed viaduct.