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England (A27 Arundel Bypass Consultation)

By email: A27ArundelBypass@highwaysengland.co.uk

10th October 2017

Dear Highways England

Arundel A27 Bypass Consultation 2017

This is the formal response of the Sussex branch of the Campaign to Protect Rural England (CPRE Sussex) to the above consultation. 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 and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

Summary of our response

We are deeply concerned that the options presented for the Arundel Bypass, particularly options 3 and 5a, would damage the existing character or distinctive features in the surrounding landscape, including the South Downs National Park and its special qualities, mature woodland (most of which is ancient semi-natural woodland), the Arun floodplain, tranquillity and dark night skies, which are highly valued and irreplaceable. The iconic view of Arundel and Arundel Castle would be heavily impacted. This some of the best Sussex has to offer in terms of beauty and heritage – our national treasures.

We believe that a new bypass on its own will not be a 'silver bullet' and that any road investment programme should be part of wider measures to tackle congestion such as a move away from car-dependant new development and investment in infrastructure for sustainable travel, particularly the rail network. Earlier this year, the Campaign to Protect Rural England (CPRE) commissioned research into the impacts of major road building programmes using evidence from Highways England (analysis of 80 Post-Opening Project Evaluations or POPEs, 2 yearly meta-analysis of POPEs) and detailed case studies. The research showed that traffic on new roads increased faster than background traffic, new pinch points were created by additional road capacity and there was little or no evidence of economic benefits from the road schemes analysed. The CPRE 'End of the Road' report summarises these findings and

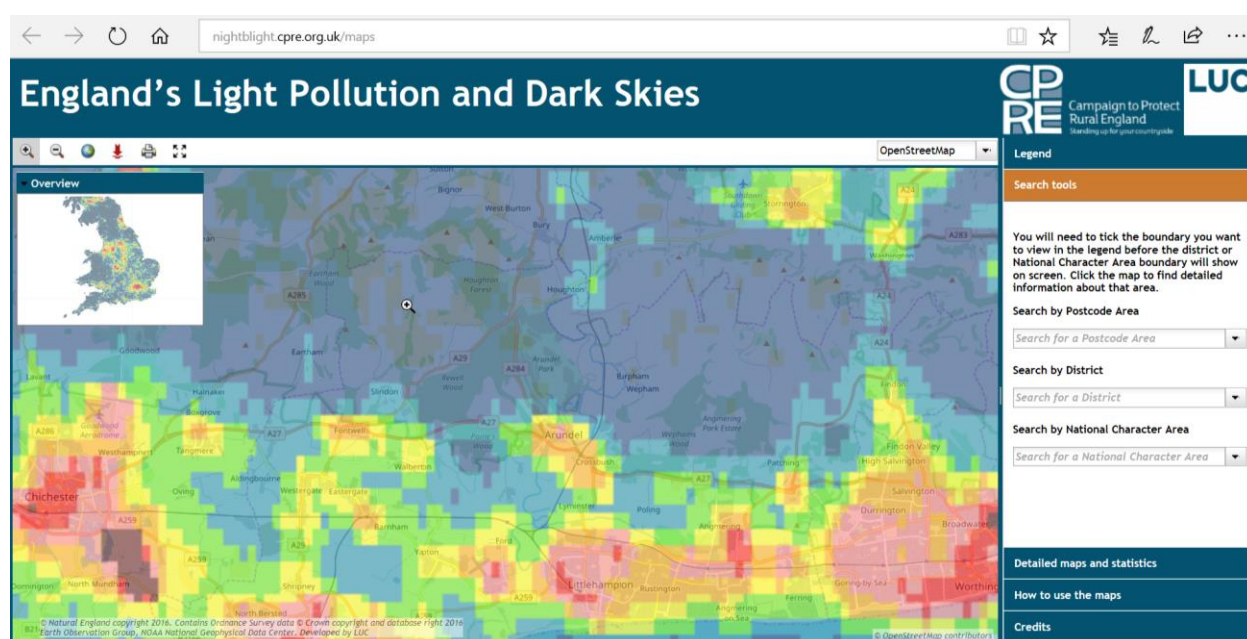
gives recommendations for an alternative approach.¹ We believe that an integrated mobility strategy should be developed for the South Coast to reduce the demand for car use.

Impact on the Special Qualities of the South Downs National Park

All 3 options would impact on the National Park; however, we believe that options 3 and 5a are far more damaging, particularly in respect of the following special qualities;

1. Dark Night Skies.

In May 2016, the South Downs National Park became an International Dark Sky Reserve (IDSR) and the emerging local plan includes Policies to protect Dark Night Skies. According to CPRE research (<https://nightblight.cpre.org.uk/maps>) Options 3 and 5a would cut through land which currently experiences very dark night skies. This would bring light pollution to an otherwise undisturbed area of countryside.



"All generations and cultures have looked up and wondered at the stars. But sadly, this part of our shared environment has been degraded." Lord Martin Rees, Astronomer Royal.

Apart from the impact on people's experience of the countryside, there is an increasing awareness of the effect that light pollution can have on wildlife, by interrupting natural rhythms including migration, reproduction and feeding patterns.² We therefore believe that Option 1 is the only Option which supports the Dark Sky Reserve Status of the National Park.

¹ <https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>

² Royal Commission on Environmental Pollution (2009) *Artificial Light in the Environment* <https://www.gov.uk/government/publications/artificial-light-in-the-environment>

2. Diverse, inspirational landscapes and breathtaking views

Clearly landscape issues are of paramount importance in relation to the National Park, which in planning terms is afforded the 'highest status of protection in relation to landscape and scenic beauty' (NPPF para 115.)



The A27 Arundel Bypass Environmental Study Report (June 2017) by WSP/ParsonsBrinkerhoff notes that *'Options 2, 3, 4, 5, 5A and 5b could have significant landscape and visual impacts on the setting of Arundel from the floodplain, and in views from Arundel towards Littlehampton and the coast. Adverse visual impacts could not be mitigated satisfactorily because screen planting would not be in keeping with the open character of the floodplain. It would be necessary to raise the level of the A27 across the Arun floodplain either on an earth embankment or viaduct with a new bridge over the River Arun.'*

The undulating topography of this area creates an intricate landscape composed of several locally distinctive character areas which are highly susceptible to change. For Option 1, the close alignment of the new offline section to the existing A27 would reduce landscape and visual impacts on the Arun floodplain. The only option which is satisfactory in terms of the Landscape and Visual Impact is Option 1.

3. A rich variety of wildlife and habitats including rare and internationally important species

All 3 Options presented are damaging to wildlife and habitats. We agree with the A27 Arundel Bypass Environmental Study Report (June 2017) by WSP/ParsonsBrinkerhoff that the 'irreplaceable' loss of ancient woodland (5ha for Option 1, 6ha for Option 5a and 24ha for Option 3) cannot be acceptably mitigated 'due to the time it would take for replacement woodland to reach the same level of maturity.' Option 3 clearly involves the loss of a considerable amount of irreplaceable ancient woodland and associated habitat fragmentation.

Although Option 5a involves the loss of less ancient woodland, Binsted Woods contains a very rich variety of wildlife and habitats, including rare and nationally important species. We believe that although 6ha of ancient woodland would be taken by Option 5A, at least 15 hectares of the remaining high quality semi-natural woodland would be degraded.

Option 5A would sever chalk streams which drain Binsted Woods, and are part of a rare and irreplaceable habitat. This would affect rare species further down those streams such as the south end of Binsted Rife which contains a rare Flushed Fen habitat. Binsted Woods and the surrounding countryside support many rare species: for instance, 13 of the UK's 17 bat species have been found in one short survey at the west end of Binsted Woods. Three are Notable Species, two are 'Annexe 2'. Ongoing surveys by MAVES (www.maves.org.uk) show that dormice and water voles are found in Binsted's fields, hedges and ponds. There are four dormice monitoring sites within Binsted Woods. Dormice are a European Protected Species and water voles are a National Protected Species. Many species need to forage, breed or hibernate in areas outside the woods and their ranges would be cut off by Option 5A.

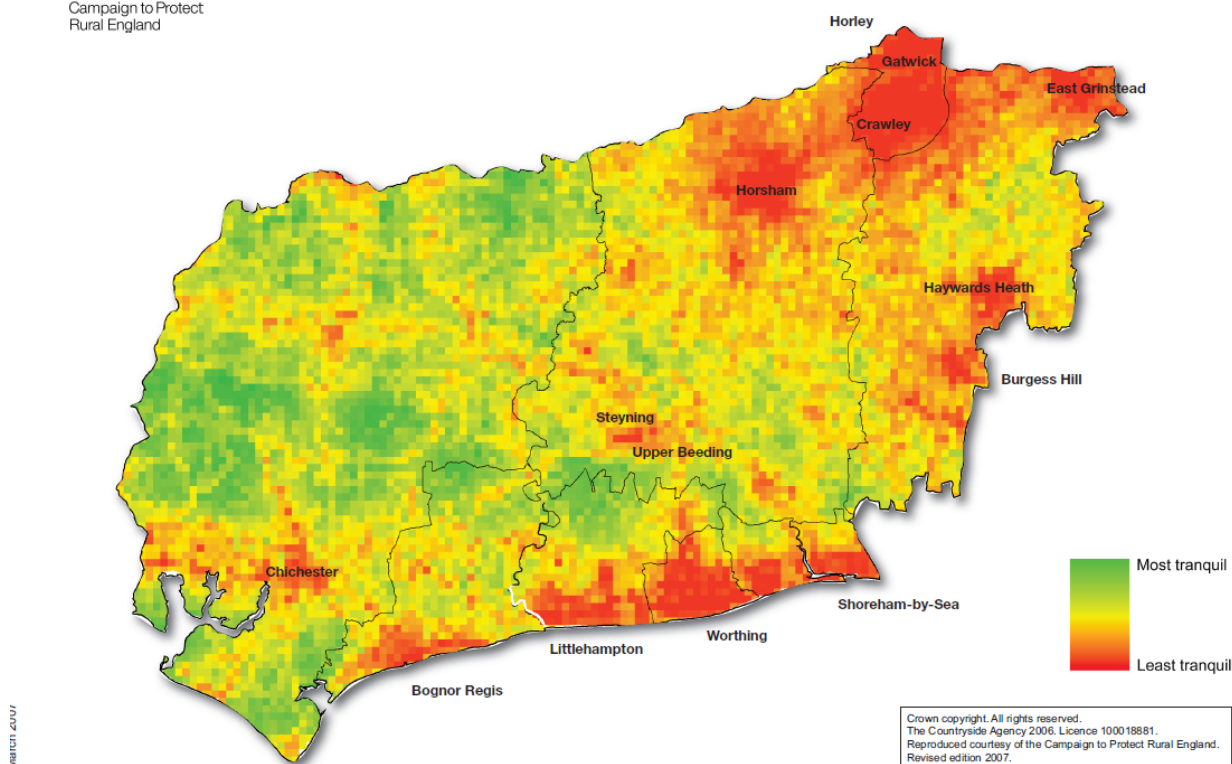
4. Tranquil and Unspoilt Places

Although all the Options would lead to an increase in noise and disturbance, Options 3 and 5a would intrude into areas of the countryside which currently experience high levels of tranquillity as evidenced by CPRE Data (see the CPRE Tranquillity Map below.)

The A27 Arundel Bypass Environmental Study Report (June 2017) by WSP/ParsonsBrinkerhoff states that 'Tranquillity, which is high in rural areas away from the existing A27, would be lost and could not be mitigated.'



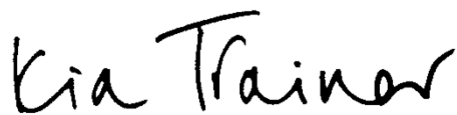
Tranquillity map: West Sussex



Conclusion

We believe that all 3 Options, as presented in the proposals, are unacceptable in their current form due to their negative impact on the countryside and particularly the South Downs National Park. We also believe that road building alone will not solve congestion on the A27 – it will merely shuffle the traffic along to the next pinch point. CPRE Sussex believes that we need to create a more holistic transport strategy for the South Coast which includes investment in rail and other infrastructure to reduce the need to travel by car. **If road improvements are taken forward as part of a wider strategy we would like to see an improved version of Option 1** which has the least negative impacts on the South Downs National Park and its special qualities, ancient and mature woodland, the Arun floodplain, tranquillity and dark night skies. Option 1 already offers a much better benefit to cost ratio than Options 3 and 5a.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The script is cursive and fluid, with the first letters of "Kia" and "Trainor" being capitalized and prominent.

Kia Trainor
Director, CPRE Sussex