

To:
Highways England
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Quinton Business Park
Birmingham
B32 1AF

By email to: A27ArundelBypass@highwaysengland.co.uk

Cc: SDNPA

Date: 22-10-19

Dear Sir/Madam,

Highways England Consultation on Arundel By-Pass – October 2019

These are the comments of the Friends of the South Downs (South Downs Society) on the above mentioned plan. The Society has over 1,500 members and its focus is the conservation and enhancement of the landscape of the South Downs National Park (SDNP) and its quiet enjoyment. We comment on planning applications made in, or close to, the SDNP.

Thank you for giving us the opportunity to comment on this plan. Our comments are set out as attached.

Yours faithfully,

Victor S Ient
Policy Officer

SOUTH DOWNS SOCIETY

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"Friends of the South Downs" is the brand name of the South Downs Society, a company limited by guarantee, registered no. 319437 and is a registered charity no. 230329. The Society is an independent charity which relies on member subscriptions and gifts in wills.

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Highways England Consultation on Arundel By-Pass – October 2019

Summary

We consider that all four options presented by Highways England (HE), are environmentally unacceptable. There is also no benefit in building a bypass of near motorway standards when there is no possibility of motorway standard bypasses at either Chichester or Worthing.

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Our detailed comments are as follows:

Route Options

Turning to the Cyan (IV5) and Beige (IV9) options, we feel these are unacceptable: The 'land take' (dual carriageway and removal trees etc) and effect on the landscape far exceeds any possible benefits even if viewed from the roads only point of view.

Specifically:

- A well designed single carriageway with a speed restriction of 40mph would result in a steady flow along the realigned and straightened A27
- there would be traffic and environmental benefits by bypassing the steep hill past Arundel station (The Causeway).
- A new road crossing the river and valley would be less conspicuous if located as close as possible to the town, and would be little more obtrusive than the existing relief road.
- Traffic passing at 40mph would not result in excessive noise compared to 70mph traffic across the valley further south. (Lewes is affected by high noise levels from its A27 dual carriageway bypass.)

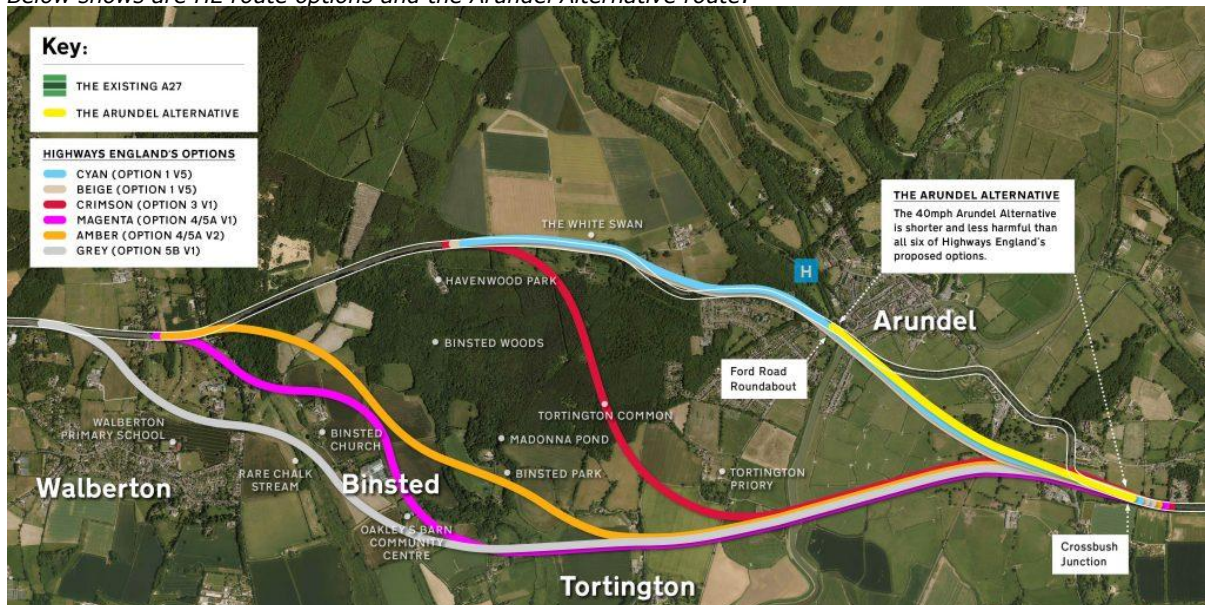
We therefore strongly support a single carriageway road, which does not involve building any section of new road through the SDNP. Compared to the 6 HE options this scheme would clearly have the least environmental impact, have the lowest cost, and could be implemented at the earliest date. We believe that with 3D modelling techniques the scheme details can be developed to achieve the best possible results.

This needs to be accompanied by measures to improve pedestrian and cycle movement across the A27 and in particular at Ford Road, with a bus service and off-road cycleway from Arundel to Ford station. We therefore we would ask you to consider the [Alternative Route](#) as supported by the [South Coast Alliance for Transport and Environment \(SCATE\)](#) and the [Arundel Bypass Neighbourhood Committee \(ABNC\)](#).

We would also ask you to put forward proposals [to the Secretary of State] to examine in detail this [alternative route](#), including carrying out detailed engineering studies whiles protecting the historical and landscape value of this unique valley. Also to:

- Take special care to adhere to the [Special Qualities of the South Downs National Park](#) including protecting and enhancing its bio-diversity and ensuring minimum light pollution in line with SNPA Local Plan Strategic Policy SD8 – Dark Night Skies.
- Dramatically improving air quality along the whole route of the A27 in Sussex
- Make provision for a significant increase in infrastructure for sustainable transport
- Make an 'action plan' to reduce carbon emissions from vehicles.

Below shows are HE route options and the Arundel Alternative route:



Further:

South Downs National Park

We support the South Downs National Park Authority in their response to the consultation, namely:

- That all the route options as currently presented, including the route outside the National Park (Grey Route 5BV1), impact negatively on the National Park and its setting. To varying degrees all would cause significant harm to the biodiversity, cultural heritage, access, recreation potential and landscape character and visual quality of the South Downs National Park.
- That Highways England should be urged to address, as a priority, the shared concerns raised in the Single Voice letter sent by the DEFRA family (Forestry Commission, Natural England, Environment Agency and the SDNPA).
- That in the absence of both a detailed scheme plan, and a committed and funded mitigation and compensation package, it is not currently possible to rank the options in terms of their impacts upon the National Park.

Also we would like you to take note of and/or act on the following:

Government Action on Carbon Emissions (Greenhouse gas emissions)

According to the UK Government - transport accounted for 33 per cent of UK emissions last year, (provisional official statistics), more than any other sector. They say "*The large majority of emissions from transport are from road transport*". Our Appendix A shows a considerable commitment to tackling this by the UK Government. We are very surprised therefore that the HE Environmental Assessment Report says it is expectation that greenhouse gas emissions will rise as a result of their options!

Transport for the South East (TfSE)

Our Society is concerned that this consultation has been made in advance of the approval of the strategy for Transport for the South East. As you may know this strategy is out for consultation currently and is not due to be formally published until later in 2020. We believe the TfSE strategy will have a significant bearing on transport planning across the south coast. Indeed, TfSE have specific reference to developing a multimodal approach to transport modelling on south coast transport corridor. See our Appendix B.

A27 at Chichester & Worthing

We are concerned that this Arundel proposal has been brought forward in advance of resolving Highways England (HE) routing strategy for both Chichester and the Worthing area. We appreciate that these sections present significant difficulties for HE but until transport routes and funding are agreed in these areas pressure on the surrounding roads in West Sussex will not be resolved; with or without an Arundel by-pass. NB: we understand the base business case for Arundel is predicated on the assumption that the A27 scheme at Worthing and Lancing will go ahead, although at present this has been mothballed by the Department for Transport (DfT).

Integrated Transport Planning (or the lack of it)

We are concerned that Highways England seem to be working in isolation to Network Rail. As you will see from our appendix C they are developing plans to increase capacity on the West Coastway rail corridor, including the Arundel link to Horsham and Gatwick.

Despite government funding currently being separated out into different 'silos' for road and rail we would hope that the agencies themselves will seize the initiative to work together and produce a solution which is altogether better for transport and the environment and uses the benefits of each mode of transport to best effect,

Proposal for Sustainable Transport

Highway England in their consultation document says: [Our comments are in blue italics]

There is relatively low use of public transport, walking and cycling in the area. This means that even a significant increase in these modes of transport would be unlikely to solve the problems of queuing and congestion on the A27 through Arundel. ***No evidence is provided to support this opinion.***

Access would be maintained for pedestrians, cyclists and horse riders across all six options, although some existing routes would need to be diverted. ***We are disappointed that very little effort has been made by HE to provide for walking and cycling. For instance, the image below shows that anyone wishing to go from south of Crossbush to the Arundel town side would have to cross to very fast moving traffic of the proposed entry/exit lanes of the A27. No traffic lights are proposed and no alternative routing is suggested by way of a green tunnel or a green bridge. Also, in another location a public footpath is proposed to be diverted by considerable distance when a simple green tunnel could have been provided.***

We have no current evidence to suggest that there would be any significant switch from road use to rail use (along the A27 corridor between Chichester and Brighton) that would meet the overall future demand for travel. ***No evidence is provided to support this opinion. As we have mentioned in Appendix C, Network Rail are indeed planning improvements to capacity on the West Coastway line as well as on the 'Arundel chord' line up to Horsham and Gatwick stations.***

See HE design extract below:



The importance of the lower Arun river valley below Arundel

Whilst this is not in the National Park we would submit:

One may recall that when the boundaries of the South Downs National Park were being considered the then Countryside Agency initially suggested that Arundel town itself, Binsted Woods, Tortington Common, Binsted and Tortington villages, and the river valley immediately south of the town should be within the park. This was strongly supported, indeed proposals were put forward to extend far further south, to include the river valley as far as the east-west Coastway line. The Campaign for the Protection of Rural England and the Youth Hostel Association went even further, proposing that the Park should extend to the sea at Climping beach! In the event the draft boundary the CA suggested was smaller and Arundel and the water meadows were left out of the Park.

Nevertheless, the water meadows of the lower Arun valley provide an extremely important setting to Arundel, its Castle and Cathedral and the Downs beyond, and any new road across the valley would have a severe visual impact:

View from the south looking towards Arundel (photo by permission of Vic Ient)



Appendix A – Government Action on Carbon Emissions

In submitting our remarks our Society are mindful of the Government's unfolding commitment to tackling the threat of climate change to our planet. In particular, we would draw your attention to:

- 1) According to the UK Government - transport accounted for 33 per cent of UK emissions last year, according to provisional official statistics, more than any other sector. They say **"The large majority of emissions from transport are from road transport"**. See: [2018 UK Greenhouse Gas Emissions provisional Figures Statistical Release: National Statistics published in March 2019](#)
- 2) UK Government publication of the [Draft 'Road Investment Strategy 2'](#) released in October 2018 entitled 'Moving Britain Ahead.' Jesse Norman MP Parliamentary Under Secretary of State for Roads, Local Transport and Devolution said in the forward, amongst other things, the future road strategies need to have "a positive impact on its surroundings" he also referred to a 'green infrastructure'.

Referring to 2050 (presumably the zero carbon target which was made law in June 2019) the document went on to set out 5 key statements including the following:

"A greener network: through its use of environmentally and visually sensitive 'green infrastructure', and management of the verges and open spaces, good design will minimise the air, light, noise, and visual impacts of the SRN. Enhancements to the SRN will meet high standards of design, responding to a local sense of place, and working wherever possible in harmony with the natural, built and historic environments".

- 3) UK Government statement published 15 October 2019 entitled ['UK to go further and faster to tackle climate change'](#) where the Government set out its measures to 'go further and faster to tackle climate change, in response to Committee on Climate Change (CCC) recommendations' The publication include key note comment by Transport Secretary Grant Shapps where he said:
"From driving our cars, to catching a train or taking a flight abroad, it is crucial that we ensure transport is as environmentally friendly as possible. This is why, as well as agreeing to the CCC's recommendation on [net zero](#) by 2050, we have launched this ground-breaking plan to achieve net zero emissions across every single mode of transport".

We would also draw to your attention to the following UK government publications:

- House of Commons passed motion to declare an 'environment and climate change emergency' on 1st May 2019.
- The law for net zero carbon emissions by 2050 in the UK has been passed at the House of Commons. The UK is amending the 2050 greenhouse gas emissions reduction target in the Climate Change Act from at least 80% to 100%. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 came into force on 27th June 2019 introducing a target for at least a 100% reduction of

greenhouse gas emissions (compared to 1990 levels) in the UK by 2050. This is otherwise known as a net zero target.

- 25 Year Environment Plan launched in January 2018: A Green Future: Our 25 Year Plan to Improve the Environment
- Road to Zero Strategy: Next steps towards cleaner road transport and delivering our Industrial Strategy. New cars to be ultra-low emission by 2030 (Published 9 July 2018).
- Clean Air Strategy 2019 (Published 14 January 2019).
- Plans to end the sale of all new conventional petrol and diesel cars and vans by 2040. There will also be a new Clean Air Fund established as promised by the government in July 2017.
- Plans for tackling Roadside Nitrogen Dioxide Concentrations (Published 26 July 2017)
- The Chancellor's announcement in the Spring Statement on Wednesday 13 March 2019: Gas boilers will be banned in new homes from 2025 to tackle climate change. Measures will be included in a Future Homes Standard Policy
- Advice from the UK Government's Committee on Climate Change
- Commitment to: The Carbon Plan: Delivering our low carbon future (Published December 2011)

Appendix B – Transport for the South East (TfSE) Strategy

Transport for the South East (TfSE) is a new regional transport body. It is looking to co-ordinate strategic transport planning across the South East. [TfSE launched a draft strategy](#) on October 10th. This consultation is due to close on Friday, 10 January 2020. Later in 2020 the strategy will be finalised and presented to Government.

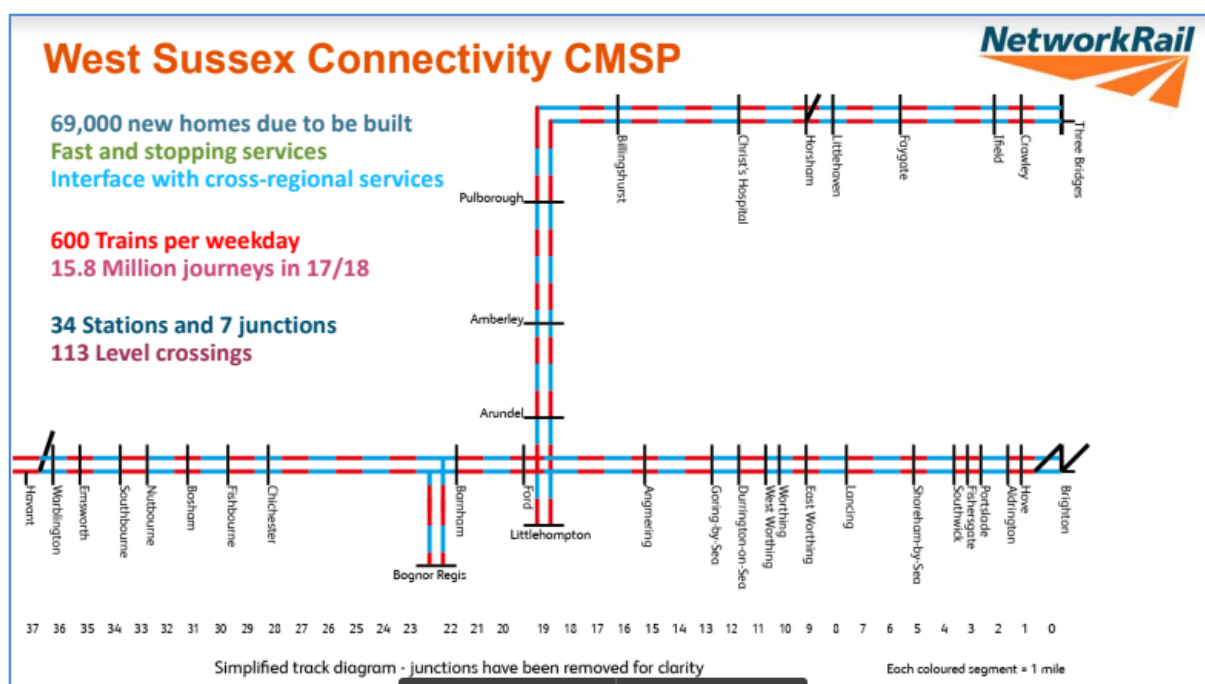
On the main page of their strategy website they say: “Transport is the only sector whose environmental impact continues to grow while others reduce theirs”. They go on to say they want to tackle issues like congestion, air quality, employment, housing and energy while growing a sustainable economy – together and in a joined-up way.

Their opening remarks are (we have underlined some key statements)

- The journey to a more prosperous, sustainable South East will rely on working in partnership toward a shared vision, and planning around people – not vehicles. Our strategic priorities set out what we need to achieve along the way.
- Cutting the South East’s carbon emissions to net-zero by 2050, minimising its contribution to climate change.
- A seamlessly integrated transport network with passengers at its heart. Resulting in simpler journey planning, payment and interchanges between different forms of transport.
- Improved air quality supported by initiatives to reduce congestion and emissions, and encourage more use of public transport.
- A transport network that protects and enhances our natural, built and historic environments. One which embraces the principle of ‘biodiversity net-gain’ and consumes less resources and energy.
- A ‘smart’ transport network using digital technology to manage transport demand, encourage shared transport and make more efficient use of our roads and railways.

Appendix C Rail Improvements in West Sussex

Network Rail SE Region is currently running the 'West Sussex Connectivity CMSP' looking at significant upgrades to the West Coastway line and faster and more frequent services between Havant and Brighton, along with improvements for the Arun Valley line. The Network Rail work addresses: local and long distance rail connectivity; wider transport connectivity with other modes including ways of reducing traffic congestion on key roads; accommodating future growth in peak time travel demand and housing growth. At a recent (Oct 19) south coast meeting of [Railfuture](#) a strategic planner updated those present confirming the above. Here is an extract from the presentation:



This follows on from a strategy presentation made in April 2019 by Network Rail on the West Coastway. Click [HERE](#) to see the PDF of the presentation.