

A27 Arundel Consultation – response to proposed options from Campaign for Better Transport

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1. Campaign for Better Transport's Response

1.1 Concern about the scope of the consultation

Campaign for Better Transport is concerned about the limited range of options that Highways England included in this consultation. All three options would be highly damaging to nationally important assets and alternatives were not put forward that would have avoided the worst of the environmental and social impacts. This is denying a proper choice or debate to be had. Worse, alternatives were summarily dismissed without any evidence or consideration of different traffic growth scenarios.

1.2 Concern at quality and accuracy of information provided

Local groups have questioned the accuracy of reports alongside the consultation. For example, the ecological report for Option 5A appears completely at odds with what the Mid Arun Valley Environmental Survey (MAVES) has found after it commissioned a report from ecological consultant Jackie Thompson of Wildlife Splash.

If this is true for option 5A it could easily be true for the other options as well. This undermines the consultation process which needs to be re-run again with accurate information and a full range of options.

1.3 Objection to unjustified damage to South Downs National Park

We do not believe that the scheme justifies the harm that all three options would cause the South Downs National Park, which has meant to have the highest form of planning protection. They would represent major development within the National Park and Government guidance¹ is to avoid such damaging developments and "any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks".

Yet, alternative options, including a mix of lower impact road building allied with demand management and sustainable transport measures have not been properly considered. Equally, this road scheme and other road capacity expansion along the A27 corridor would increase traffic alongside and through the National Park, undermining its special qualities and statutory purposes.

This is why we have written to the Secretary of State, the Rt Hon Chris Grayling MP, along with eight other transport and conservation groups, expressing our concern about this scheme.

Not only would the scheme cause considerable damage to the landscape and setting of the National Park, but it would also destroy the tranquillity and undermine the recreational opportunities of this part of the National Park.

1.4 Objection to loss of ancient woodland

All three options would cause considerable loss of ancient woodland and while options 1 and 5A would involve the loss of a smaller area of woodland, they are all unacceptable. As the report commissioned by MAVES pointed out it is not just about area of ancient woodland but also its quality.

¹ [Paragraph 85, English National Parks and the Broads – UK Government Vision and Circular 2010 \(Defra\)](#)

Highways England is meant to be aiming to achieve no net loss of biodiversity by 2020, so it should not be contemplating the loss of ancient woodland being suggested here. This is a non-renewable resource which has been severely depleted in recent history.

1.5 Objection to impact on the Arun Valley

While the Arun Valley has no formal national designation, it is important in the setting of Arundel and the National Park. A 70mph dual carriageway raised up across the flood plain (options 3 & 5A) is likely to cause a greater impact both visually and aurally, compared to a 40mph road much lower in the landscape, as is our preferred option (see 1.7 below).

A new dual carriageway would be very dominant in the Arun Valley which is quite sensitive because it is an open floodplain with the gently rolling South Downs behind, quintessentially a lowland landscape. It is not a more rugged and dramatic landscape that could perhaps absorb such an imposing structure.

Raised up, as it would be, the dual carriageway (options 3 & 5A) would not only intrude visually, but the noise from the road would be broadcast over a wide area. It is likely to be blown up the valley and over Arundel, much as happens around Lewes, where there have been long standing complaints by local residents about the noise of the bypass there.

It would also shatter the peace of the Arun Valley which is a relatively tranquil area, much loved by local residents. The path on the western side of the river is particularly well used for recreational and relaxation purposes. With the new road, this experience would be severely degraded, if not lost altogether.

1.6 Campaign for Better Transport's preferred approach

In finding a solution to issues at Arundel, we believe that a much stronger focus should be given to:

- reducing the need to travel
- investing in public transport – the coastal railway (which is severely underfunded) and more bus services which are properly integrated with the trains, park and ride (where appropriate), etc.
- investing in better walking and cycling links such as to Ford Station and across to Littlehampton and other sustainable transport / smarter choice programmes^{2,3}
- demand management measures such as workplace parking levies in nearby towns and cities
- addressing specific local safety issues
- managing HGVs and freight movements so as to minimise their impact on the environment.

These alternatives are summarily dismissed in the consultation. In particular, on bus services, the consultation simply states that “there are no significant plans for bus improvements in the area”, yet the new Bus Services Act offers local authorities and bus operators new powers and duties to improve services in terms of information, ticketing and partnerships. These could lead to significant improvements in bus services, in which Highways England could play a pro-active role

1.7 Support for road improvements

As we have already stated we do not support any of the options put forward by Highways England. However, while we generally see road building as being a last resort, we do accept the need for some changes to the A27 around Arundel.

² [Improving local transport helps the economy – experience from the Local Sustainable Transport Fund](#)

³ [Impact of the Local Sustainable Transport Fund – Summary Report](#)

We would be supportive of a single carriageway bypass which starts at an improved Crossbush junction and heads across the flood plain, south of the railway line to link in with Ford roundabout. This would resolve most, if not all, of the issues around Arundel. It would bypass the main hold-ups caused by the badly designed Crossbush junction, the pedestrian crossing by the station and Causeway roundabout. It would leave Ford roundabout in the middle of two sections of free-flowing road and so traffic should flow fairly smoothly.

This is in effect a low impact option 1. Option 1 is already the cheapest option and the one with the best cost benefit ratio. The cost of this new stretch of road (a low impact option 1) would be even cheaper while offering virtually all the benefits. It is therefore likely to offer a better cost benefit ratio and better value for money than any of Highways England's options.

Any road building should be part of a package of measures, including those listed in paragraph 1.6 above, so as to give those travelling in and through Arundel more choice in how they get about. It would increase efficient use of the limited road space in the area and lead to the best long-term outcomes.

1.8 Questioning the modelling

We are not convinced by the results of the modelling presented in the consultation documents. For example, it shows that option 5A would result in 2,000 more vehicles a day using the A27 east of Fontwell compared to option 3 in 2041. Given that these two options are near identical in traffic terms between Fontwell and Crossbush, this does not seem realistic.

Equally, it is claimed that option 5A would lead to 4,000 vehicles a day less using the A29 (in 2041) compared to option 3. Again, given that these options in traffic terms are near identical, this difference does not seem justified. It also appears to contradict the figures for the A27, where there is only a 2,000 vehicles a day difference in traffic between the two options. So where have 2,000 vehicles a day gone if they haven't used the A29 or diverted onto the A27? There appears no sensible answer and therefore points to the modelling and assumptions underpinning it being wrong.

We also object to the modelling assumption that traffic will continue to grow as projected. Traffic growth is not a given as has been shown over the years and if this issue was properly addressed (by managing demand) the benefits of any road construction might actually be realised. What is also of concern is that no assessment has been made of the impact of induced traffic and congestion in surrounding towns and cities. As it stands, the calculated benefits, averaging out at around a 4 minute saving in 2023, are not that great and could easily be lost elsewhere on the network by the extra traffic that is generated by this road construction.

We dispute the assertion in the consultation that alternative measures cannot address the problems at Arundel. The document refers to and dismisses the potential of public transport, walking and cycling to tackle the problems in the area, yet these, combined with other measures, such as car sharing for journeys to work, and better freight management, could make a huge difference to travel demand. In addition, new technology is transforming travel options and mobility services, through the use of data and mobile phone-based on-demand services and payment. Yet current modelling does not take account of the potential of these to change future demand.

Finally, no assessment has been made of the cumulative impact that increasing road capacity along the A27 would have on traffic levels, both on the A27 and on surrounding areas. The additional induced traffic that this would result in would further negate any perceived benefits as traffic and congestion rise in surrounding towns and cities, most likely wiping out any marginal gains made. It would also draw even more traffic into and alongside the National Park, contrary to Government guidance as noted in paragraph 1.3 above.

1.9 Approach to mitigation is back to front

The approach of Highways England appears to be that because a new A27 would not deliver particularly large benefits, building a tunnel to safeguard the special qualities of the National Park is deemed too expensive, because the cost-benefit ratio would be too low. However, had the benefits from the road been greater, because it was more important economically, then a tunnel could have been justified.

This is completely the wrong way around. The South Downs is designated a National Park because the landscape is of national importance. It is worth safeguarding in its own right, not because some road may or may not be economically significant. As the Guidance states: "In exceptional cases where new road capacity were deemed necessary, a thorough assessment would be needed on the loss in environmental value resulting from any new infrastructure. This would need to be accompanied by measures to minimise any damage and where possible measures to enhance other aspects of the environment..."⁴

The only measure that could realistically minimise any damage from a new Arundel bypass, other than constructing a low impact option 1 as outlined in paragraph 1.7, would be to tunnel the A27, as only a tunnel would limit the significant landscape and ecological impact of the new road. However, even then some compensatory measures would still be required and the design of the tunnel, its portals and approaches would need careful consideration, as would the impact of any new junctions. Noise pollution and other aspects would also still need to be mitigated.

1.10 Conclusion

Overall, we feel that the consultation is flawed and needs to be re-run with a full range of options, including ones that do not cause significant harm to the South Downs National Park and do not result in the loss of ancient woodland.

Government guidance is clear that investment in the strategic road network should be aimed at steering traffic away from National Parks not towards them as the current options would do. A lower cost and lower impact solution is available, but if a dual carriageway is insisted upon, then the road should be tunnelled to minimise its impact. Anything less would be a tragedy and a dereliction of environmental stewardship and could set a dangerous precedent in other National Parks.

⁴ [Paragraph 86, English National Parks and the Broads – UK Government Vision and Circular 2010 \(Defra\)](#)

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Chris Todd
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX
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