

A27 Chichester Bypass Consultation – response to options from Campaign for Better Transport

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1. Campaign for Better Transport's Response

1.1 No support for proposed options

Campaign for Better Transport does not support any of the proposed options for expanding the existing A27 bypass around Chichester. None will properly address the transport issues facing local people and those travelling past Chichester.

We believe that a holistic approach is required to address transport need in the area and focussing on road building will not provide the solutions required or provide good value for money.

1.2 No justification for harm to Chichester Harbour AONB or South Downs National Park

We do not believe that the scheme justifies the harm that it will cause to the Chichester Harbour Area of Outstanding Natural Beauty (AONB), but equally we do not believe that a northern bypass should be resurrected. Such a move would cause considerable harm to the South Downs National Park.

Any argument against impacting upon one of these nationally designated landscapes, equally applies to the other. Neither should be harmed and the benefits of this scheme, slight as they are, are not sufficient to warrant damaging these landscapes either.

1.3 Wider impact not considered

We are concerned about the knock on impact that this road scheme will have on Arundel and Worthing where there are real fears about the harm that new road construction will have on local communities and on the South Downs National Park. The expansion of the A27's capacity around Chichester is not only going to increase traffic through Arundel and Worthing but it is going to encourage more traffic to pass adjacent and through the South Downs National Park for a much longer length. This goes against Government policy as outlined in English National Parks and the Broads: UK Government Vision and Circular 2010 which states:

85. Improvements of main routes through the Parks are governed largely by considerations outside those relating to the Park area itself. However, there is a strong presumption against any significant road widening or the building of new roads through a Park, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks. [our emphasis]

Much of this is repeated in the National Planning Policy Framework:

5.152 There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly.

A more holistic approach to tackling transport issues along the south coast needs to be brought forward: one that avoids damaging the South Downs National Park or demolishing much needed homes. The current focus on exclusively expanding the A27 is going to draw more traffic and pollution through the National Park contrary to Government policy as laid out above. It is not going to provide value for money and in the longer term will hold back the south coast economy.

1.4 What a more holistic approach would look like

We believe that a much stronger focus should be given to:

- · reducing the need to travel
- investing in public transport the coastal railway and more bus services which are properly integrated with the trains, park and ride (where appropriate), etc.
- investing in better walking and cycling links, both within the city but also across the A27 and into the surrounding areas
- demand management measures such as workplace parking
- addressing specific local safety issues
- making small scale localised junction changes
- getting HGVs to pay their true costs for using the road network

1.5 Benefits overstated

We do not believe that the huge amount of money being proposed for this scheme is warranted by the fairly modest changes in journey times that users of the A27 will experience. However, these modest improvements do not account for the greater congestion that road users will experience in towns and cities along the south coast as the expanded A27 encourages more people to drive. Journeys do not start and finish on the A27 and the added congestion at the start and end of people's journeys will reduce the claimed benefits of this expansion, as well as increasing air and noise pollution.

1.6 Ignoring the needs of vulnerable road users

We are extremely disappointed to see Highways England coming forward with yet another road scheme where it is completely ignoring the needs of vulnerable road users, despite having only this year adopted many new strategies promoting them [Cycling Strategy – January 2016, Accessibility Strategy – May 2016]. It is also difficult to see how its approach fits with the Cycling and Walking Investment Strategy and the Government's desire to double cycling by 2025 and to reverse the decline in walking.

The statement in the consultation documents that pedestrians and cyclists will be accommodated at a later date is not acceptable. They need to be designed into the process from the beginning to ensure that the design does not compromise these users and the infrastructure they require. If they are only considered after the road layouts have been set it could be too late, as by then it is often deemed too difficult or expensive to make any substantial changes.

The information on vulnerable road users is not to an acceptable standard, combining as it does pedestrian and cycle infrastructure, so it is unclear exactly what is present on the ground. Important, difficult, or missing links are not highlighted and no attempt appears to have been made to explore the potential, of cycling in particular, in reducing motorised traffic in and around the A27. Chichester sits on a coastal plain and the area around is largely flat. With the right investment, substantial levels of cycling could be achieved.

1.7 The benefits of non-road solutions

Investing in non-road solutions, could provide substantial health and economic benefits both direct and indirect and reduce long-term pressure on the NHS. It would help people access jobs more effectively, particularly new entries into the job market, who often have less resources and don't own a car. We have research that shows the value in investing in these lower cost measures¹.

¹ Improving local transport helps the economy – experience from the Local Sustainable Transport Fund

Creating better walking and cycling links to form a safe and attractive network would also boost the tourism industry. Many holiday makers are increasingly looking for good quality activities and this combined with the increase in popularity in cycling make high quality cycle networks an increasing requirement for any serious holiday destination. While the city does have the Centurion Way, this only heads north into the South Downs. Accessing the coast and beaches to the west and south is far more problematic with the existing cycle infrastructure, yet it is to these areas that many visitors will be drawn, particularly families with younger children.

Investing in the public realm and encouraging more people to walk and cycle or to get into the city by public transport would also help make the city a more pleasant and attractive place to be. This would not only draw in more visitors but it would also attract investment as businesses will want to relocate and stay in the area as part of their appeal to keep and recruit new staff.

All of the above show how this alternative approach could have a real and positive impact on the local economy, as well as transforming Chichester into a more attractive and accessible location.

1.8 Better planning

There is no reason why the new housing around Chichester need be held up if it is properly planned and adequate investment is made in sustainable transport. New suburbs need to be of sufficient density to support public transport at all times of the day and evening and not just at peak hours, with good links to the city centre and other services. Walking and cycling links need to be safe, attractive and direct, with local services provided within the communities wherever possible to reduce the need to travel.

1.9 Conclusion

Overall, we do not support any of the proposed options and indeed have concerns about what and what is not being proposed. It is a worry that the wider impact of these proposals does not appear to have been considered which has significant implications for the South Downs National Park, even if this part of the A27 does not lie within it. In addition, alternative options to expanding road capacity have not been looked at to any serious degree. These are two major oversights, significant enough for a halt to be called to the process.

The strong local dissent about the future of the A27 shows how much people are concerned about the impacts a new or expanded A27 would cause on the city and its environs. It should serve as a warning that road building is rarely the solution to our transport woes and that far more effort and investment needs to be put into a broad range of alternative solutions aimed at reducing traffic and the need to travel.

We hope that the results of this consultation will lead to a reappraisal of this scheme and that a more holistic approach to addressing transport need is brought forward.

22 September 2016 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 Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428