

Rt Hon Chris Grayling MP
Secretary of State for Transport
&
Rt Hon Michael Gove
Secretary of State for the Environment and Rural Affairs

23 May 2018

Dear Secretaries of State,

Safeguarding the environment for future generations

Earlier this year the Government announced its 25 year Environment Plan with the stated aim of leaving our environment in a better state than we found it. This is a very laudable aim and one that we wholeheartedly support.

However, to achieve such a vision requires all government departments and agencies to play their part. A recent decision by Highways England to pursue a highly damaging road scheme on the A27 at Arundel, would, if confirmed, contradict this vision and set a very damaging precedent.

This new road would destroy six hectares of ancient woodland and would permanently scar the South Downs, England's newest National Park. It has been brought forward after an inaccurate and misleading consultation that did not examine all options, particularly ones that would have minimised environmental harm. Highways England is now proposing a solution that is contrary to government guidance and policy.

The National Policy Statement (NPS) for National Networks, agreed by Parliament in 2014, is quite clear that new roads should not be built in National Parks unless there are exceptional circumstances and that ancient woodland must be protectedⁱ.

Highways England has failed to follow this policy, instead appearing to base its proposals on what budget might be available rather than what is needed and what would be acceptable.

Additionally, the new road has been justified on the basis of a large number of small time savings for private individuals which has little relevance to the economic case for the road. Many of these savings are hypothetical and their use is highly questionable.

In summary, the business case does not stack up, neither "exceptional circumstances" nor overwhelming "national interest" has been demonstrated as the NPS requires, and the

scheme would cause severe and irreparable damage to two of our most precious national assets: ancient woodland and the South Downs National Park.

We are therefore asking you to order an immediate review of the Highways England scheme at Arundel and its plans for the A27 more broadly.

Yours sincerely,

Stephen Joseph OBE, Chief Executive, Campaign for Better Transport

Fiona Howie, Chief Executive, Campaign for National Parks

Crispin Truman, Chief Executive, Campaign to Protect Rural England

Craig Bennett, Chief Executive, Friends of the Earth

John Sauven, Chief Executive, Greenpeace

Kate Ashbrook, General Secretary, Open Spaces Society

Vanessa Griffiths, Chief Executive, The Ramblers

Nicola Scothern, Regional Director, RSPB

Stephanie Hilborne OBE, Chief Executive, The Wildlife Trusts

Beccy Speight, Chief Executive, The Woodland Trust

cc: Jesse Norman MP, Minister for Transport
Andy McDonald MP, Shadow Secretary of State for Transport
Rachael Maskell MP, Shadow Minister for Transport
Sue Hayman MP, Shadow Secretary of State for Environment, Food and Rural Affairs
Lillian Greenwood MP, Chair, Transport Select Committee
Nick Herbert MP, Arundel and South Downs
Councillor Louise Goldsmith, Leader, West Sussex County Council
Councillor Mrs Gillian Brown, Leader, Arun District Council
Margaret Paren OBE, Chair, South Downs National Park Authority

ⁱ National Policy Statement for National Networks (December 2014) states:

- Paragraph 5.32: The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of ancient woodland unless the national need for and benefits of the development, in that location, clearly outweigh the loss
- Paragraph 5.150: Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks have the highest status of protection in relation to landscape and scenic beauty
- Paragraph 5.151: There should be an assessment for meeting the need elsewhere or in some other way
- Paragraph 5.151: The Secretary of State should refuse development consent in National Parks except in exceptional circumstances
- Paragraph 5.152: There is a strong presumption against significant road widening or the building of new roads in a National Park
- Paragraph 5.152: Planning of the Strategic Road Network should encourage routes that avoid National Parks