

## **Evidence note for the South Downs National Park Authority about the impacts of the Arundel Bypass routes put forward by the Department for Transport's consultants in the A27 Feasibility Study**

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### **1. Summary**

Two off-line bypass routes, Options A and B, were proposed at Arundel by the consultants for the Feasibility Study, at their Reference Group meeting of 27 August 2014.

- Option A, across Tortington Common, which is in the South Downs National Park, conflicts with the twin Purposes of the SDNP and its 'Position Statement' of July 2014.
- Option B, designed to go south of the SDNP, is even more damaging in many ways as it bisects a beautiful village (Binsted), which is partially in the National Park, and cuts through part of Walberton (the next-door, larger village). It also conflicts with the National Park's twin Purposes and the 'Position Statement' of July 2014.
- Both options damage severely many of the 'special qualities' listed in the National Park Authority's 2012 'State of the National Park' report. Option B, through Binsted, damages even more of these than Option A.
- The Department for Transport's Option E is at present defined as a combination of online work and sustainable transport initiatives (see section 7). The consultants have recommended not researching Options C and D further. An expanded version of Option E, possibly including some sections of new road, is the only option for work on the A27 that the SDNPA can support without compromising its Purposes and severely damaging the countryside.

## **2. Option A: Damage to Tortington Common**

Although supported by wildlife and environmental bodies in the 1990s as the least damaging route, Option A would now be extremely destructive. The reasons for this are the changed nature of Tortington Common, and growing appreciation of it, now reflected in its status. It has been transformed by re-growing after hurricane damage in 1987. In 2003, when Alastair Darling rejected a bypass across Tortington Common (the present Option A) as too damaging, it was added to the Binsted Woods Complex SNCI. In 2009 both Tortington Common and Binsted Woods were included in the National Park.

Tortington Common is still often dismissed (by those who wish for a bypass across it) as 'ancient replanted' woodland and therefore as of lesser value than the 'ancient semi-natural' woodland of Binsted Woods. But both 'ancient replanted' and 'ancient semi-natural' woodland are types of Ancient Woodland and as such they both have statutory protection. In addition, Tortington Common is now defined overall as 'ancient semi-natural' woodland, not 'ancient replanted'. When Tortington Common was added to the Binsted Woods Complex SNCI in 2003 the description called it 'ancient semi-natural woodland' with areas of conifer plantation.

Even in 2003, Tortington Common was very rich in species. The SNCI description continued: 'The woodland ground flora is very diverse... The paths and rides are especially species rich.' Some replanted woodlands, such as the replanted areas of Tortington Common, retain much of their semi-natural component under the replanted canopy and are as rich, or can be restored to be as rich, as semi-natural Ancient Woodland (according to a recent statement by Tony Whitbread, Chief Executive of the Sussex Wildlife Trust). The woodland is now being restored. All the woodland, including the replanted areas, has recently been sold off in small parcels to conservation-aware owners who are endeavouring to increase the provision of valuable habitats and wildlife corridors.

A bypass across Tortington Common would destroy much of this woodland, and would almost bisect the Binsted Woods Complex SNCI, a very large (420 acre), very varied, very high quality area of woodland within the National Park.

## **3. Option B: Damage to Binsted and Walberton**

Option B would split the village of Binsted in two. Binsted is a spread-out, but unified, village of 35 houses intricately linked to its surroundings. A U-shaped lane joins the settlement together. Its history as an isolated, self-sufficient farming parish (until 1937) can be seen in its landscape, with woods and streams enclosing the farming land. The South Downs National Park Inspector's report of 31 March 2006 said 'The delicate topography and secrecy of the Binsted area is vital to the setting of Arundel' (7.857, p. 301).

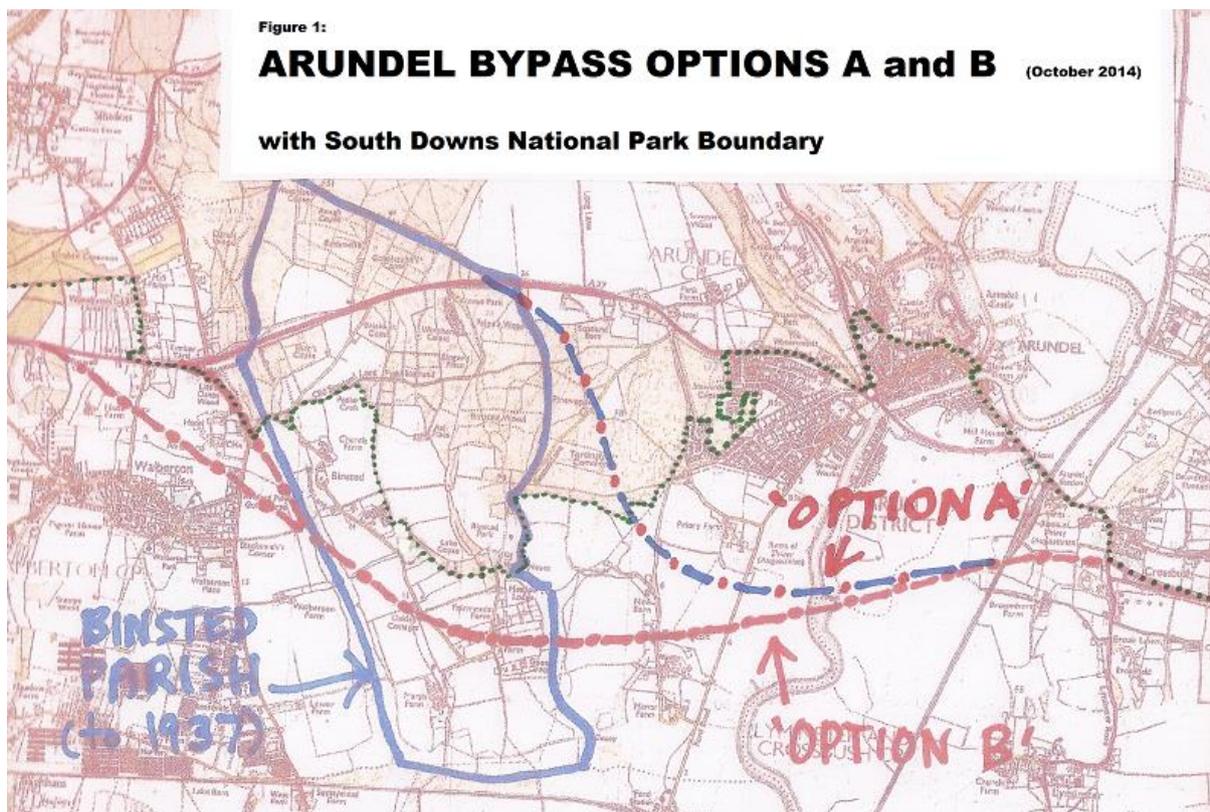
The land in the route of Option B at Binsted was suggested for inclusion in the National Park by CPRE, who recommended the inclusion of the whole of Binsted in the Park, down to

the railway line. The final boundary included all of Binsted Woods, and 10 fields and 8 houses within the woods, but not the rest of Binsted. About half of the old Binsted parish is within the National Park. The land Option B would destroy is very good, near-National-Park standard countryside, all of a piece with the northern part of Binsted which is within the National Park.

Binsted's unity and isolation would be destroyed by Option B, which crosses both arms of the lane, leaving 8 houses to the south of it. Option B would then cross the Binsted rife valley (whose stream is the old parish boundary), damaging its rare 'flushed fen' habitat.

The north end of Option B would damage Walberton, the larger neighbouring village. Both versions of its northern end would demolish houses in Walberton, destroy the Hilton Hotel's golf course, sever Walberton from the National Park, and bring traffic noise nearer to the centre of Walberton village.

Figure 1 shows Option A, Option B (indicative route from the report of the CPRE representative at the 27 August meeting), the National Park boundary, and the boundary of the old parish of Binsted:



#### **4. Both Option A and Option B conflict with the twin Purposes of the National Park as defined in the Environment Act of 1995<sup>1</sup>**

##### **a) Damaging natural beauty, wildlife and cultural heritage (against Purpose 1)**

Option A would have a severely damaging effect on the natural beauty and wildlife of Tortington Common, rather than conserving and enhancing it.

Option B, a new dual carriageway through the parish of Binsted, a large part of which is in the Park, would have a severely damaging effect on its natural beauty, wildlife and cultural heritage, rather than conserving and enhancing it.

##### **b) Severance (against Purpose 2)**

To remove, because of severance, the many present opportunities for good access to the Park on foot or horseback would reduce the public's 'understanding and enjoyment', not promote it.

Option A would sever many important footpaths on Tortington Common, even if one or two were maintained via underpasses. This would damage the opportunities for recreation for the large number of people who walk in the woods from Arundel.

Option B would sever the good network of rights of way, which do not cross any major roads, linking Binsted and other local communities to the west and south (Walberton, Yapton, Barnham, and places further afield via Ford station) to the National Park.

#### **5. Options A and B also conflict with points 2.1 and 2.3 of the SDNPA's Position Statement**

Option A across Tortington Common would be directly contrary to the SDNPA's Position Statement of July 2014 which stated (2.1) that 'Any proposed schemes must take into consideration all potential impacts on the special qualities of the National Park and look to improve rather than damage the special qualities'. Option A ignores those impacts and damages those special qualities by severance, noise, land take within the National Park, and destroying footpath links. Option B damages them by severance, noise, land take just outside the National Park, and destroying footpath links.

Neither Option A nor Option B would 'improve air quality, the landscape, biodiversity and the lives of those who live, work and visit the SDNP' (SDNPA Position Statement, 2.3). Both schemes damage the landscape, reduce biodiversity, and have an adverse effect on the lives of all those who visit the National Park woodland of Tortington Common and Binsted Woods for recreation, by severely degrading the exceptional opportunities for public enjoyment of the area.

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<sup>1</sup>The twin Purposes are: 1. Conserve and enhance natural beauty, wildlife and cultural heritage. 2. Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.

## **6. Options A and B also damage the ‘special qualities’ of the National Park**

Tortington Common, being within the National Park, might be expected to show more obviously the ‘special qualities’ defined in the SDNPA’s ‘State of the South Downs National Park’ report of 2012, since Binsted is only partially within the Park. But in fact Binsted fulfils more of the ‘special qualities’ than Tortington Common.

*6.1: Diverse, inspirational landscapes and breathtaking views.* Tortington Common, being entirely woodland, has no views. Binsted has many wonderful views of the changing pattern of Binsted Woods and their integrated fields; it is also a ‘diverse and inspirational landscape’. In this respect Option B is more damaging.

*6.2: Tranquil and unspoilt places.* Both Tortington Common and Binsted are tranquil and unspoilt places. Options A and B are equally damaging.

*6.3: A rich variety of wildlife and habitats including rare and nationally important species.* This certainly applies to Tortington Common – even more to Binsted Woods, adjacent to the west. Both are in the Binsted Woods Complex SNCI which is within the Park. There are fewer habitats in the landscape traversed by Option B, though the countryside outside the woods and linked to it is important as a habitat too. In this respect Option A is more damaging than Option B.

*6.4: An environment shaped by centuries of farming.* This does not apply to Option A since Tortington Common is woodland, not farmland. But it does apply very much to Option B since Binsted is a mediaeval parish shaped by centuries of farming. This history gives it its sense of enclosure and isolation. In this respect Option B is more damaging than Option A.

*6.5: Great opportunities for recreational activities and learning experiences.* Both Tortington Common and Binsted supply these with their many footpaths through changing scenes and habitats. Both Option A and Option B are equally damaging.

*6.6: Well-conserved historical features and a rich cultural heritage.* While this does not apply to Tortington Common, Binsted amply fulfils it. In addition to its 12<sup>th</sup>-century church, lovingly looked after, and its 8 listed buildings, it has rich archaeological heritage: two mediaeval tile kilns have been excavated here, one just inside the National Park, one just outside it. Artists and writers have found a refuge in Binsted, as described in *Binsted and Beyond*, and still do. Option B is far more damaging than Option A to this special quality.

6.7: *Distinctive towns and villages, and communities with real pride in their area.* This applies only slightly to Tortington Common. Is it not a town or village, though the new woodland owners there have a real pride in their stewardship. But Binsted is a distinctive village with real pride in its area. Its vibrant community runs a fund-raising event each year (the Strawberry Fair) to raise money to look after the fabric of its 12<sup>th</sup>-century church. The village published its own 'Millennium book', *Binsted and Beyond*, in 2002, funded with a Heritage Lottery grant. Option B is far more damaging to this special quality than Option A.

***Overall, Option B is even more damaging to the 'special qualities' of the SDNP and its immediate environs than Option A.***

## **7. Option E (modified) as the only option possible for the SDNP to support**

The Department for Transport's consultants have recommended only taking Options A, B and E forward. The options A-D shown were:

- Option A, 'Offline, the former 'pink blue line'';
- Option B, 'Offline, minimising the impact on the National Park' (the route through Binsted);
- Option C, 'Offline close to Arundel (a section of new road south of the station)'; and
- Option D, 'On-line with a 250m tunnel'.

It is unclear whether sections of new road can be included in the Department for Transport's Option E. The minutes of the 27 August meeting of the Reference Group of the A27 Study described Option E as: '*Sustainable Travel Improvements (included in Options A-D)*'. But the Chair of the A27 Study, Eike Ndiweni-Müller, in a later email to Chris Todd, of the Campaign for Better Transport (who had requested clarification), described Option E as: '*Online and Sustainable Travel Improvements*'.

If the SDNP wishes to press for sections of new road that are near-online, it should now press for a better definition of Option E. It should also ask for 'online improvements' to include options that were not among the ones presented by the consultants. For instance, on-line widening was not one of the options shown, nor was a combination of widening with the short section of new road suggested in Option C.