



13th August 2019

Dear Highways England

A27 Arundel Bypass - Defra single voice letter

The proposed options for the A27 Arundel Bypass are all located in a landscape and environment of national importance which is within, or in the setting of, the South Downs National Park.

The Environment Agency, Forestry Commission, Natural England and South Downs National Park Authority have worked jointly to provide a single voice position on a range of key issues identified at this stage. This letter provides you with the principles that we would wish to see taken forward through the next consultation and as the scheme progresses.

As an overarching principle we have advised that any option for the bypass should be considered in an integrated way at a landscape scale. This will ensure that impacts on a complex and interconnected ecosystem, set within a wider hydrological catchment, are fully understood alongside any impacts on the historic landscape.

We have identified that the scale and nature of this scheme in this significant location requires a bespoke approach.

Specifically we are all in agreement that the following considerations should be taken forward by Highways England:

Severance:

The options presented introduce the permanent and significantly harmful severance of this sensitive landscape, cultural heritage and its biodiversity. We have advised that a scheme of this nature in this landscape will require a tailored approach to mitigation.

It is essential that landscape, biodiversity, hydrology and cultural heritage are considered together in an environmental masterplan in order to appropriately address severance and resilience and to avoid the potential for addressing one issue to the detriment of another (see below)¹. We recommend that a body or consultancy is appointed to undertake this specific high level and visioning role as a priority. We have advised that the Natural Capital assets of the area must be included in the assessment.

¹ <https://www.gov.uk/government/publications/the-road-to-good-design-highways-englands-design-vision-and-principles>

We have advised that in order to provide a sufficiently robust level of assessment that the scheme clearly follows the mitigation hierarchy, evaluates each option with reference to this and adopts a landscape-scale of assessment. This is necessary in order to appropriately consider severance and resilience within this special landscape.

The scheme contains a notable assemblage of irreplaceable and priority habitats with associated rare and protected species, including all three Annex II species of bat. The presence of these species indicates the quality of this area and the permeability of the landscape

It is clear that severance in this location is of particular concern, the effects of which are most profound in the offline options. Severance must be considered in terms of functionality of this landscape, and its biodiversity within all habitats affected. Assessments must include the severance of species such as bats from roosting and feeding areas and on habitats such as ancient woodland affecting their resilience and ability of habitats and species to adapt to climate change.

The use of multiple quality green bridges in optimal locations will be a minimum requirement for each option.

Consideration of a Viaduct crossing of the River Arun Floodplain:

It is expected that all options presented will cross the River Arun and to date are being considered through the use of embankments. We all consider that an embankment would have serious and significant negative impacts on hydrology, biodiversity, landscape and cultural heritage.

We have advised that both the impact of introducing an embankment into the floodplain, and the costs associated with compensatory flood storage and habitat creation will be considerable.

An embankment will permanently sever the floodplain, reduce connectivity of wetland habitats and associated species and change the way that the river and floodplain interact. It would also sever Arundel from its valley with associated significant landscape and cultural heritage impacts.

Introducing a structure across the River Arun floodplain in this historic landscape would clearly have several impacts. We have advised that a viaduct would be far more permeable for wildlife, water and people.

We urge Highways England to consider a viaduct in place of an embankment.

Environmental Net Gain:

We would advise you that in line with your organisation's own targets and license to operate, and in recognition of the particular significance of this area, that any scheme demonstrates a clear ability to deliver considerable net gain.

We would wish to see any scheme seek to provide a betterment from the existing baseline. Notably we have advised that we would wish to see improved connectivity of habitats across the existing A27 route.

It is our belief that through adopting a wider landscape scale approach and ensuring the key principles detailed above are taken forward you will be able you to meet your own objectives for this complex scheme. We advise that due to the nature and location of this scheme it is imperative that you deliver an exemplar road scheme in line with the aspirations of the Road Investment Strategy to deliver schemes that will be “trail-blazers for the future”².

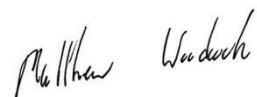
Please note this letter provides our collective view on key issues where we have shared responsibilities and interest.

The contents of this letter are given without prejudice to any further responses individual signatory organisations may provide on the breadth of their remits in the future.

Yours sincerely,



Colette Heggie, Environment Planning and Engagement Manager, Environment Agency



Partnership and Expertise Manager South East, Forestry Commission



Sue Beale, Kent & Sussex Manager, Natural England



Andrew Lee, Director Countryside and Policy, South Downs National Park Authority

² <https://www.gov.uk/government/speeches/beautiful-roads>