

Mr J Hones  
A27 Arundel Project Manager  
Highways England  
Bridge House  
1 Walnut Tree Close  
Guildford Surrey GU1 4LZ

24<sup>th</sup> October 2019

Dear Mr Hones

### **A27 Arundel Improvement Scheme Consultation response**

I am writing on behalf of the South Downs National Park Authority with the SDNPA response to the consultation for the six schemes that have been proposed.

The Authority considered the schemes at its meeting on 1<sup>st</sup> October 2019.

The SDNPA considers that the conditions of the withdrawal of the Judicial Review have been met, with the new options brought forward all being worked up to the same extent and including a route outside of the NP, but wishes to register a holding objection to the proposals on the basis that;

- As presented, all the routes, including the route outside the SDNP (grey route), impact negatively on the SDNP and its setting. To varying degrees all would cause significant harm to the biodiversity, cultural heritage, access, recreation potential and landscape character of the SDNP
- In the absence of both a detailed scheme plan that includes funded proposals for mitigation and any necessary compensation, it is not currently possible to rank the options in terms of their impacts on the SDNP.
- SDNPA urge Highways England to address, as a priority, the shared concerns raised in the Single Voice letter sent by the DEFRA family, which i) highlighted the issues of an embankment as compared with a viaduct – which conflict with HE assessments – ii) the issue of connectivity and also iii) the issue of environmental net gain

The Appendix gives more detail on why it was not considered possible to rank the routes. In summary, the mainly on-line Cyan and Beige routes, though potentially the least damaging for most of the Special Qualities of the SDNP, would have very significant unmitigated/compensated impacts on Ancient Semi Natural Woodland, and the townscape. By contrast the Crimson, Magenta, Amber and Grey routes – although they lie mainly or wholly outside the SDNP – still have significant impacts on the SDNP special qualities and would have major impacts on its setting.

The SDNPA stands ready to continue working with HE to find common ground as s HE consider their choice for the preferred route in early 2020.

Yours



**Margaret Paren OBE**  
Chair  
South Downs National Park Authority

Appendix 1  
Appendix 11 Single Voice Letter

## Appendix I

### SDNPA Comments on the Impacts on the Special Qualities

#### Access

- Although one of HEs scheme objectives is to improve accessibility for all users, it is noted that HEs own assessment is that all the schemes would have a negative impact. So far as we are aware no assessment has been made on the effects on non-motorised users. This should be addressed.
- We can see no evidence that opportunities have been taken to address historic issues of severance on the A27 caused by previous schemes, nor to upgrade existing rights of way to enable more use by a greater range of users
- As presented, the (mainly on-line) schemes, cyan and beige are considered to be the least impactful on rights of way as they have the fewest additional severances and diversions

#### Cultural Heritage

- It is recognised that designated and non-designated heritage assets will be impacted by any road scheme and may be destroyed.
- A Preservation by Record process should include a high quality, robust, well-designed and considered archaeological mitigation and heritage strategy, which takes into account:
  - Consideration of research outputs such as the South East Research Framework for Archaeology, delivering where practical on its priority research areas.
  - Post-project archiving – provision and investment in infrastructure given the scale of finds likely to be produced by Preservation by Record.
  - Public engagement – both through the archaeological mitigation process and post-project.
  - Enhancement of remaining heritage assets in situ

#### Biodiversity

##### Trees and Woodland

- There is a lack of clarity over the extent of the scheme footprint. Since for all options the DCO could be as much as 400m wide, clarification is necessary to make proper estimates of the loss of woodland and individual trees
- As presented, the Crimson route would have a significant adverse detrimental impact on the entire ancient woodland network in this part of the National Park, and is the most damaging of all options
- The Cyan and Beige routes have the second highest impact on overall woodland loss after the Crimson route.
- The Amber route would have many of the same adverse impacts as the Magenta route, but with even greater direct loss of ancient woodland and woodland overall, veteran trees, loss of wood pasture and parkland and even greater adverse impact on bats, including the rare *Barbastelle* and *Alcathoe*, which is *newly discovered breeding in the UK at this location*
- As presented, the Magenta route results in less direct loss of ancient woodland, but still causes significant harm to the National Park and species that rely on these irreplaceable habitats, including veteran trees
- The Grey route, though outside the National Park, is only around 300m from the main block of ancient woodland, and will still cause harm by causing permanent severance of all of the north south green corridors (hedges and veteran trees) that are used extensively by the species whose habitat is the ancient woodland, particularly bats and dormice. This option also has the second highest impact on veteran trees

## Other biodiversity comments not covered

- The impact on river habitats has been undervalued and is in conflict with HE assessment in the Water chapter
- Overall species impacts will be least along the existing road alignment (largely Cyan and Beige) as disturbance and connectivity are already present
- The assessment of impact on water voles is flawed as it relies on relocation in an area where there is an existing population

## Water

- Impacts on groundwater have not been fully assessed
- The need for floodplain mitigation on the offline schemes (Crimson, Magenta, Amber and Grey) has been greatly underestimated.
- There are no assessments made for the risks of tidal flooding
- The Cyan and Beige options are considered the least damaging to the water environment
- The impact of silt and construction run off on the chalk stream rifes has been underestimated.

## Carbon

- There has been no assessment of the current carbon budget of the A27 as is, nor for the net impacts of carbon emissions from the various options. This is imperative given the scale of woodland loss and the drive for carbon net zero by 2050

## Landscape

- The interconnected network of habitats, landscape types, cultural heritage and aquatic environment inside and within the setting of the SDNP is quite exceptional and noted as a vulnerable key feature in its own right.
- All options require a modern dual carriageway structure to cross the Arun river floodplain within the setting of the SDNP, and the views and landscape character from both within and beyond the boundary of the SDNP would be detrimentally affected and severed to a significant degree
- The raised carriageway across the river flood plain would introduce vehicular movement, noise and visual intrusion into a currently tranquil landscape over up to 2km, and would incur the loss of distinctive historic landscape character features – Sussex medieval ‘Innings’ or water meadows amongst others
- The Defra single voice letter advocates for the benefits of a viaduct over the impacts of an embankment across the river valley. However, it is important to note that the ability of a viaduct to moderate these impacts (noted above) would depend on how it is designed
- The assessment process has not been informed by a local landscape assessment as recommended by best practice (GLVIA). Despite being a highly sensitive landscape, the upper coastal plain has not been appropriately assessed
- The duration and extent of views has not been assessed in the report. This is considered to be a significant omission
- As presented the Cyan and Beige options have marginally less landscape and visual impact due to the existing baseline being compromised by the presence of the existing road. However, from a townscape perspective, the current designs for Cyan and Beige routes appear to be highly intrusive in the setting of the SDNP and to the town itself. Given the reduced costs of these route options compared with the offline routes there would appear to be some headroom to improve the design of these proposals through design mitigation and other mitigation over and above the current situation for those people already impacted

## Dark Night Skies

- General principle would be to use mainly existing route (Cyan or Beige) to maintain sky quality levels and not introduce 'additional' lighting sources which could reduce darkness and have further landscape impact
- Lighting design should have regard for DNS as required in BS 5489-1:2013 Section 4.3.5 (Code for practice for the design of road lighting).
- Lighting should only be installed provided there are clear safety concerns. Automatic presumption of lighting on carriageway should not be considered
- Lighting should comply with ILP installations for E1a zone as minimum. E0 should be sought (which requires use of part night lighting schemes)
- Maximum Colour Temp of **3000K** should be used as to minimize white light penetration and comply with IDA guidelines for IDSR Reserve. (This could be an enhancement for the area)



13<sup>th</sup> 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)<sup>1</sup>. 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.

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<sup>1</sup> <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”<sup>2</sup>.

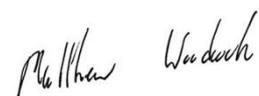
Please note this letter provides our collective view on key issues where we have shared responsibilities and interest.

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*

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