



Arundel Bypass Neighbourhood Committee

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Response to A27 Arundel Bypass public consultation

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Executive Summary

1. The consultation has ignored the Climate and Biodiversity Crisis.

Transport produces a third of the UK's carbon emissions. Carbon emissions will be increased by each of the options (EAR, Chapter 14, Tables). There must soon be a shake-up of transport policy, including (as suggested by the head of Friends of the Earth) the scrapping of Highways England and the creation of an integrated transport body to replace it. This would mean the abandonment of schemes like the one at Arundel which severely damage biodiversity and increase carbon emissions.

Highways England have failed to include the Arundel Alternative in the consultation. This is a practical, much cheaper, wide single carriageway, short bypass scheme put forward by local people which would alleviate the occasional traffic jams at Arundel without causing more traffic and carbon emissions by an excessive increase of road capacity. ABNC supports this scheme which should be part of an integrated package of improvements to all forms of transport.

2. The consultation is faulty.

The consultation is biased in favour of the 'offline' options. The data contains errors which either confuse responders, or misleadingly make the online options seem more damaging than the offline options. The survey form is open to fraud. The survey form is confusing about which parts to fill in if you are filling it in on behalf of an organisation (only part D, or the whole form). There is no 'none of the above' option in many questions. The assumption that the Worthing-Lancing scheme is done means the BCR figures (giving much better scores than without the Worthing-Lancing scheme) are unrealistic. There is no clarity about the budget.

3. ABNC objects to all Highways England's options.

The history of the National Park boundary shows all the options are unacceptable. Landscape character guidelines such as the Landscape Character Assessment for the National Park and the landscape guidance of West Sussex County Council would be directly contradicted by a scheme such as Crimson, Magenta, Amber or Grey.

4. ABNC especially objects to the Magenta option.

It would devastate Binsted, a historic village partly in the National Park, which possesses all the National Park's Special Qualities. The data provided by Highways England have hidden the damage Magenta would do to Binsted.

This is an out-of-date, extremely damaging scheme which should be cancelled.

A. The consultation ignores the Climate and Biodiversity Crisis

1. The Climate Crisis

To be consistent with Paris agreement and the IPCC report we need to limit global warming to 1.5 degrees, or face catastrophic climate change. It is estimated that the UK will need to see a reduction in traffic volumes between 20 and 60 percent by 2030. Instead the government projects that traffic will increase by up to 50% by 2050 and plans to spend 30 billion of public money between 2020-2025 on roadbuilding to facilitate this.

Highways England are still doing nothing but 'plan for vehicles', using the outdated method of 'predict and provide'. Transport for the South-East, the local transport body, says quite rightly in its draft Strategy that planning for vehicles must stop and planning must be for people, with 'modal shift and an integrated transport policy'. Transport for the South East's new 'Strategic Goals' would be much better goals for Highways England to be aiming for:

'Economy: improve productivity and attract investment to grow our economy and better compete in the global marketplace. Society: improve health, safety, wellbeing, quality of life, and access to opportunities for everyone. Environment: protect and enhance the South East's unique natural and historic environment.'

The policy paper 'Getting the Department for Transport on the right track' by Friends of the Earth¹ points out that: 'Unfortunately since 2010 there has been a shift in UK transport policy goals away from reducing carbon. Currently, enhancing economic development and reducing congestion are primary goals of transport policy. There has been a move back to a policy of building more road infrastructure, in the belief that this will deliver on current goals. This belief persists despite scant evidence of benefit to local economies and a wealth of evidence stretching back nearly one hundred years that building more roads increases traffic.'

The structure and governance of Highways England by the Department for Transport are a legacy of this return to antiquated thinking. Highways England's purpose is to build roads. The CEO of Friends of the Earth, Craig Bennett, recently visited the Arundel area to see what the bypass plans would destroy. He said that Highways England ought to be scrapped and replaced by a body which would look at transport in the round.²

2. Misguided publicity ignores the Climate Crisis

Highways England's publicity for the Arundel scheme includes two films called 'Arundel and the A27' – an animation and a video of interviews – which demonstrate HE's antiquated 'predict and provide' policy.

For instance, they say 'Local businesses are losing out on millions of pounds a year due to congestion. It impacts productivity, causing unreliable deliveries, unreliable journey times, and the

¹ <https://policy.friendsoftheearth.uk/insight/getting-department-transport-right-track>

² <https://www.littlehamptongazette.co.uk/news/people/arundel-bypass-global-environmental-group-calls-for-highways-england-to-be-scrapped-1-9100367>.

perception that the region is hard to get to.’ New roads do not solve congestion. Traffic increases and congestion eventually returns. Chichester and Worthing remain congested. Their congestion would be made worse with an increase of traffic at Arundel.

We have checked the ‘millions of pounds’ statement with the West Sussex Growers Association. It is based on a misuse of their data.

One interviewee says tourists can’t see all the attractions of the area (beaches, Goodwood, Arundel Castle, sailing and watersports, hotels, bars) in one day. Calling for investment in road infrastructure to enable this kind of visitor behaviour is unrealistic and oblivious of the declared climate and biodiversity emergencies. This kind of all-in-one-day tourism destroys the very things people come to see.

HE say the scheme will bring four key benefits. The first is economic growth. But economic growth must be sustainable, i.e. not involve ruining the environment by building damaging new roads.

The films also contain blatant untruths. Another key benefit is stated to be that the road will ‘limit air and light pollution, protecting our local environment.’ On the contrary - any new dual carriageway at Arundel would severely damage ‘our local environment’, damaging the National Park, villages, woodland, historic countryside, and the Arun valley. Air and light pollution across the area would increase.

3. The Biodiversity Crisis

The UK is one of the most nature-depleted countries in the world. See the State of Nature Report 2016 (page 6, <https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/state-of-nature/state-of-nature-uk-report-2016.pdf>).

Highways England itself states that ‘The loss of biodiversity is a widespread national and international issue - with a number of species becoming extinct in the UK in recent years’: <https://www.gov.uk/government/publications/biodiversity-plan>. Highways England also acknowledges that roads contribute to declining biodiversity.

Highways England’s solution to the crisis is this: ‘We know, from Government data, we’re likely to have a historic trend of declining biodiversity on our network. Our objective is to slow the rate of biodiversity loss in Roads Period 1, moving to a neutral position in Roads Period 2 (where we’re maintaining the biodiversity value of the network at a steady level). Ultimately we want to be improving the biodiversity value of the network.’ This is too little, too weak, and too late. The emergency is now.

Their own data show that the effects on biodiversity of the Amber and Magenta routes (the old Preferred Route, and the route Local Authorities have misguidedly supported) are from Large Adverse to Very Large Adverse (brochure, p.25). Highways England will not be announcing any detailed mitigation plans for any of the options at this stage.

This means the biodiversity impact of all options is unknown (Approach to Consultation, page 12), and respondents have been unable to rank the options in this crucial impact. The mention of ‘value engineering’ as a way of making the high cost options practicable means that options such as ‘green bridges’ and animal culverts would be stripped out of the plan as too expensive.

4. Biodiversity data incomplete

The levels of impact on biodiversity are now well documented for the original 3 route Options in the 2017 consultation. But HE have included the new options (Magenta and Grey) within the EIA without surveys for protected species and habitats. For instance, the hedgerow corridors and foraging areas extending to the west from the woodland area have not been surveyed. Impacts are therefore 'assumed' rather than 'assessed'. It is one of these options, Magenta, which Local Authorities are now supporting, without sufficient data on loss of biodiversity.

There is a lack of information on two key aspects:

- the fundamental requirement (by many species) of a number of different habitats in order to survive, requiring movement across the landscape; and
- the exceptionally high biodiversity value of the area.

This part of the South Downs National Park (i.e. the woodland) is the 'heart' of the surrounding landscape with arteries (in the form of numerous corridors) radiating out. They are functionally linked and the severance of these linkages will have a high negative impact on a wide range of Biodiversity Action Plan and legally protected species that suggested mitigation will provide ineffective compensation for.

The net biodiversity value of the 'integrated' Mid Arun Valley (i.e. inside and outside the NP) is exceptionally high. Surveys have shown that it has both high species diversity (from bats to invertebrates) and high populations within some of those species. It includes a high proportion of groups and species known to be in terminal decline – i.e. farmland birds, Water Vole, Hedgehog, Harvest Mouse – many of which rely on habitat connectivity and the ability to disperse.

This is a 'working' landscape which is able to function as it has for centuries and retain its high wildlife value, due to good quality habitats throughout – i.e. diverse ancient woodland with veteran trees, floodplain grassland, wetlands, wildflower corridors and field margins - linked by corridors of species rich hedgerows (with veteran trees) and wet ditches and rifes. Both woodland and wetland biodiversity will be impoverished if these two habitat types and their connectivity corridors are severed.

A major carriageway severing the National Park woodland from its many arteries will have a high negative impact, gradually eroding the species richness and diversity both within and external to the NP and resulting in a significant net loss in biodiversity.

The biodiversity information given in the consultation, though including a lot of data, has not led Highways England, the MP or local councils to the right conclusions. The right conclusion would be that all the offline options are too damaging and should not be taken forward.

5. The 'Arundel Alternative'

Instead of building a long new dual carriageway which would increase carbon emissions, cause a significant net loss of biodiversity, and severely damage the environment, Highways England should be looking more closely at the more modest scheme put forward by local people, now called the 'Arundel Alternative'.³ The Arundel Alternative is a much shorter section of wide single carriageway

³ www.arundelalternative.org.

new road from the Crossbush roundabout to the Ford Road roundabout, with a 40mph speed limit. This is an acceptable road-building solution which would enable traffic to flow better by cutting out five of the six pinch points along the present A27 east of Ford Road, without damaging the very high quality countryside to the south and west.

Highways England has summarily rejected this scheme in the consultation, not by name, but with a one-page statement that a single carriageway would not be acceptable because it does not provide a large enough increase in capacity for their predicted increase in traffic. As Craig Bennett of Friends of the Earth put it on his visit to the HE display at Arundel: 'That's the whole point.' Increases in capacity bring more traffic and increases in carbon emissions.

ABNC supports the Arundel Alternative, which should be part of an integrated scheme of transport improvements including walking, cycling, better access over major roads, and improvements to public transport.

B. Faults in the consultation

1. Pro-offline bypass bias of the consultation

The consultation is clearly biased against a near-online solution. The Cyan and Beige options, now at 50-70 mph where the previous consultations had 40mph, are designed to be unacceptable, and are clearly not reasonable in the location. An elevated road (Cyan) or an 8-13 lane junction at Ford roundabout (Beige) would be eyesores in the centre of Arundel. These were clearly designed to generate fear and therefore to make people go for an offline option.

A similar bias was demonstrated at the 2017 consultation with the ludicrous walking and cycling 'bridge' at the Ford junction, which everyone focused on - as they knew people would. The bias is also shown in the publicity accompanying the consultation, the erroneous, and highly misleading, figures for woodland impact, and in the problems with naming the routes and errors of naming.

2. Pro-offline bypass bias in the scheme's publicity

The Consent Order signed by HE in 2018 required the further consultation to be full and open and carried out lawfully and in compliance with the laws of procedural fairness.

Highways England produced two videos as publicity for the consultation. Both are called 'The A27 at Arundel'. One is an animation, the other consists of interviews. The filmed interviews include speakers from OneArundel, but no other community groups are represented, and no environmental groups. OneArundel is a pro-offline-bypass pressure group which claimed 600 members in 2017. Its aim is to move the A27 far away from Arundel regardless of the consequences. It does not represent the range of opinion in Arundel, or the communities such as Walberton, Binsted and Tortington which would be affected by a new bypass. As a company funded by the taxpayer, Highways England should be non-partisan and accountable to all.

According to the Highways England website, 132 key stakeholders sent in written responses to the 2017 consultation. Only 5 were invited to contribute to this video. This is highly unbalanced.

3. Pro-offline bypass bias shown by error in the woodland figures

The crude figures given by HE of woodland 'impacted' are much larger for the online routes (Cyan and Beige) than for Magenta, Amber and Grey. The woodland figures given (highlighted, with space around, with a 'logo' of a hand holding a leaf, in italics to catch the eye) include: Beige 7.44ha; Cyan 8.37ha; Magenta 3.51ha. Absurdly, this has been taken by Arundel Town Council and others to mean they are more damaging to the environment than Magenta.

These woodland figures are incorrect. The maps for woodland lost to Cyan and Beige (Figures 2-1 and 2-2 of the EAR, Appendix 7.3) show an area of woodland where the junction would be built, but the similar maps for the four offline options show it as open land. It was once woodland, but was cleared some years ago and is now pasture. The other diagrams reveal that HE were fully aware that this field is not woodland. When it was woodland, it was not 'ordinary woodland', but an abandoned remnant of a plantation of ornamental trees which had been grown there to be lifted for commercial sale.

The figures of woodland impact for Cyan and Beige should be considerably lower and almost the same as those for Magenta. By putting these erroneous figures in a prominent position in the brochure, implying that Cyan and Beige are more environmentally damaging than Magenta, HE have misled the public.

See Appendix 1 for a more detailed comment on the too-large figures of woodland impacted for Cyan and Beige.

4. Pro-offline bypass shown by crude comparison of woodland and SDNP figures

Aside from this major error, to compare the online and offline routes simply by the crude figures of how much woodland or SDNP area is taken (as in the consultation brochure) is highly misleading. The crude figures give no weight to the difference between

- The very damaging impact of a new road and its effect on woodland and on areas in and near the SDNP where, at present, there is no road, and
- The much lesser impact of taking already degraded woodland and SDNP area alongside the existing A27.

All the Special Qualities are present in abundance in all the areas, both inside and outside the SDNP, at present pristine and intact, which Crimson, Amber, Magenta and Grey would go through.

The Special Qualities of the National Park hardly exist by the side of a major road such as the A27 west of Ford Road roundabout, which would be widened by Cyan and Beige. It is therefore extremely misleading to calculate the impact of the routes simply by the hectareage of the area of the National Park that would be destroyed, as is done in the consultation brochure, especially as the incorrect hectare estimates given imply wrongly that the offline routes are less damaging than the online routes.

5. Pro-offline bypass bias shown by route names confusion and errors

The decision not to use the colour names for the routes in the SAR and EAR, but names such as 4/5AV1 for Magenta and 4/5AV2 for Amber, appears to be deliberate obfuscation to hide the large

amount of information in these documents which makes the true damaging nature of the options, especially the offline options, clear.

Naming errors noted in the EAR, Appendix 7.1 (Landscape Effects Schedule), and EAR, Appendix 1.1 (Effects on the Special Qualities of the National Park), raise questions about the accessibility of the whole EAR to the consulted public, and the motives of Highways England in making the naming so confusing. See Appendix 2 for a list of the errors. So many errors in just two Appendices checked for consistency suggest there may be many more. In both Appendices, some of the descriptions given for Magenta are incorrect for Magenta but correct for Amber, and vice versa.

A reply received from Highways England on 14.10.19 to some of these points says that in several cases 'Binsted Park was used as a point reference instead of Binsted'. This is unacceptable, as Amber goes through Binsted Park, while Magenta does not – but both go through Binsted village. It is also not a convincing explanation, because Binsted Park is not a point location, but a park; correctly named on many maps in common use, it is the curved field area surrounded by woodland which was created in about 1800 as a 'pocket park' to be viewed from Binsted House, defined as 'Historic Parkland' by Historic England.⁴

6. Inclusion of Worthing-Lancing scheme affects the Cost Benefit Analysis figures

HE says that the traffic volumes and journey times at Arundel are similar with and without the Worthing-Lancing scheme. However, the inclusion of the "paused" scheme in the do-minimum network has a large impact on the economic return to the Arundel scheme. Without the Worthing-Lancing scheme, BCRs would range from 1.78 for Cyan to 1.46 for Amber and Grey. These two schemes would be classed as having a Low return, and would not normally be approved. If the Worthing-Lancing scheme is included, benefits would be increased by between 21% and 42%, and BCRs would be increased to between 1.95 and 2.16. Only Grey would have a BCR less than High.

The Magenta route would have a BCR of 1.54 without the Worthing-Lancing scheme, and a BCR of 2.02 with it. This increase in benefits is hard to understand. See Appendix 3 for more details of the contradiction between these figures.

7. Lack of clarity about the budget

There is considerable concern about the mixed messages that have been received from HE about the affordability of the options.

Only one option is within the budget of £250m – Beige. The Cyan option is almost affordable. The others are well over budget. But opinions are being sought on all the options. The brochure says 'The cost ranges published within this consultation are early estimates based on work done to date and do not represent out final costs for the project' (p. 56). Even so, the question in the survey

⁴ The error of trying to use Binsted Park as a point location may be connected to errors in the consultation documents that hide the true location of Binsted Park – as in the 2017 consultation. The name 'Binsted Park' appears in a label on a consultation map (Scheme Assessment Report, Appendix A, Fig. 8.4) but the label's arrow points to the site of Binsted Manor (the new house on the site of Binsted House), not to Binsted Park.

form asking people to choose between Cyan and Beige in the event that none of the other options is affordable implies that none of the other routes may be affordable.

HE representatives have been assuring people that all the options are affordable. The consultation literature does not indicate this, but makes it seem unlikely by giving in a footnote (survey form, Question B1) ways in which the unaffordable options might be made affordable: 'Through securing additional funding, value engineering and contractual efficiencies.' 'Securing additional funding' is too vague to give a clear indication of whether the over-budget routes are affordable. Additional funding from where, from whom, how much, and if it is promised why was it not included in the budget?

'Value engineering' is a euphemism meaning 'cutting corners'. 'Contractual efficiencies' is much the same. For instance, embankments might be made steeper so as to use less earth. Green bridges and animal culverts might be left out. Such 'engineering' would make for an even more damaging scheme in this very sensitive area.

8. The survey form is open to fraud

Since the paper form is anonymous, and only asks for a postcode, it would be very easy for one person to fill in multiple forms. The online form could also be filled in multiple times by the same person. No names are asked for and although an email address can be given it is not required.

The form includes a long statement about GDPR and how Highways England will not misuse your personal information. But no personal information is asked for. GDPR has been used by HE as an excuse for not requiring unique identification (e.g. name and address or phone number) for each response. However this is not a valid excuse. HE has a sufficient organisational reason to require personal information, i.e. to avoid fraud.

In a consultation about a project of this magnitude, which will affect so many people's lives if it goes ahead, it should have been possible to design a process where each respondent was identifiable and their personal information was protected.

9. The form is confusing about filling it in for an organisation

The form offers a part A-C for a personal response and a part D for a response from an organisation. It says (A1) 'The first part of this questionnaire is for you to provide your personal views. If you are responding on behalf of a local business, charity or community organisation, represent a statutory body or are an elected representative, please ensure you also complete section D of the response form.'

It won't be possible, when analysing the forms, to tell whether, if part D has been filled in, parts A-C also represent the views of the organisation, or are the personal answers of the person filling it in for that organisation. It would have been far better to say 'If responding for an organisation please complete a separate form from your personal one, and complete all sections A-D on behalf of the organisation'.

This means the personal views of people who fill in a whole form for an organisation may not have been received.

10. The form gives no 'none of the above' answer in multiple choice questions

In the multiple choice questions, the only option other than ticking a route is to tick 'Don't know' or 'Do nothing'. It is severely restricting not to have a 'None of the above' option, and not to have an 'Other' option and a text box in which to state the 'Other'.

There are three free comment boxes where they could say what they really want, but it is not clear that a response will be counted if the multiple choice questions are left unanswered. It is possible that they would just be ignored, i.e. not counted, but they should really be scored as a 'none of the above'.

These faults, added together, give no confidence that Highways England's interpretation of the consultation will be 'fair and open', as they undertook the consultation should be in the Consent Order signed in 2018.

C. ABNC objects to all Highways England's options, especially the offline options

The new Arundel Bypass consultation threatens a large amount of beautiful countryside. The history of the National Park boundary shows why no option is acceptable. More recent landscape planning guidance shows that any of the offline routes would so comprehensively conflict with the guidance that it might as well be torn up.

1. The first SDNP boundary proposed included all the areas the bypass could go through

When the proposals for a South Downs National Park were first examined in February 2001, the Countryside Agency's consultants, Landscape Design Associates (LDA), said the following areas met the 'natural beauty' and 'excellent opportunities for recreation' criteria, and recommended them for inclusion in the new National Park:⁵

- Arundel Town,
- the watermeadows down to the railway,
- all the woodland south-west of Arundel, and
- the area 'between Walberton and the Arun valley', i.e. Binsted and Tortington villages south of the woods.

The woods at Binsted and Tortington were recommended for inclusion in a section called 'Central Wooded Chalk Uplands', and LDA noted that they were better for recreation than the woods north of the A27. The area 'from Walberton to the Arun' was recommended for inclusion in a section

⁵ This report, Core Document 36 in the SDNP Public Inquiry, has disappeared from DEFRA's archives, though it is listed in the catalogue. Did the Countryside Agency, or another agency, suppress that document because it showed that disinterested consultants thought a much larger area met the criteria for the National Park than that included in the draft and designated boundaries?

called 'Coastal Lowlands'. It is thus crystal clear that it is the countryside south of the woodland at Binsted and Tortington that is being recommended for inclusion.

The recommendations can be found in 'Area of Search for the South Downs National Park', Landscape Design Associates, February 2001. No southern boundary was suggested for 'Walberton to the Arun valley', but as the railway was suggested as the boundary at Arundel, it would also have made a strong boundary at Binsted and Tortington.

LDA also commented that it was 'especially desirable to designate' the areas they had recommended for inclusion, for five reasons, including their closeness to conurbations, their ability to act as 'gateways' to the National Park, their accessibility, and the fact that this would take pressure off more remote areas further into the Park.

2. Bypass consultants influenced the more restricted draft boundary chosen

A paper for the Countryside Agency by Marian Spain (titled AP 01/04), dated 2001, repeated LDA's recommendations. But the 'draft boundary' (July 2001) included only included the main block of Binsted Woods and five fields – although all of Binsted Woods was an SNCI. At Tortington it only included the whole of Tortington Common.

The Government's Bypass consultants Halcrow said in their Progress Note, May 2002, that they had been looking at bypass routes 'south of Binsted Woods'. They said: 'A series of alternative alignments south of Binsted Woods are being examined as part of the Strategy Development Plan. These avoid the National Park but may impact upon SNCI areas.' Halcrow were going by the 'contracted' draft boundary of 2001. The boundary appears to have been 'contracted' at Tortington and Binsted to allow bypass routes such as those suggested by Halcrow (similar to today's Magenta and Amber) to be outside the Park. The National Park had not yet been created. The bypass routes proposed by Halcrow had no official existence. This was a major planning mistake.

LDA commented in the February 2001 report that the boundary in this area required 'particular scrutiny and refinement' because of the bypass plans. At the time the Preferred Route was what is now the Crimson Route. Excluding recommended areas, that are 'especially desirable to designate', apparently to allow for a different bypass route does not amount to 'particular scrutiny and refinement'.

Some adjustments were made to this contracted boundary, but only a small addition was made. Arundel town and the watermeadows were omitted. Tortington common was in, then out, then in again due to bypass decisions. At Binsted, an addition consisting of the left-out parts of the SNCI woodland and five more fields was accepted by the Inquiry Inspector, but this was far less than LDA had recommended for inclusion and stated was 'especially desirable' to designate.

This whole sequence of events makes the new consultation seem slightly absurd, and possibly a waste of time. Highways England are trying to push through a bypass partly in a National Park, or if just outside it (most of Magenta, Grey) massively affecting its setting, when all the countryside the bypass would go through – including Arundel, the watermeadows, the woodland, and Tortington and Binsted villages - is of National Park quality. This high quality, if properly acknowledged, should prevent an offline bypass getting through the planning process.

Even worse, the Magenta route, which is arguably the most damaging to Binsted village, passing through it from one end to the other very close to 5 listed properties and leaving what would become a 'ghost village', was created by the National Park boundary. Because of the existence of the National Park designation, Magenta attempts to skirt the National Park, avoiding most of the woodland but severely impacting the village itself, which is interspersed with the woodland in a way that is typical of very old, intact countryside.

If the Magenta route is built Binsted village will have been destroyed by the National Park boundary – surely not the intention of those who proposed National Parks and developed the legislation protecting them.

3. Recent landscape guidance: reasons to reject Crimson, Amber, Magenta and Grey

Recent planning guidance on landscape supports the need to conserve, enhance and protect countryside at Binsted and Tortington, both inside and outside the National Park, and therefore to reject Crimson, Amber, Magenta and Grey routes.

3.1: SDNP Local Plan

The Autumn 2015 SDNP Draft Local Plan seeks to 'ensure that development **outside the National Park** does not have a detrimental impact on its **setting** or otherwise prejudice the achievement of the National Park purposes' (Chapter 5).

3.2: South Downs Integrated Landscape Character Assessment ⁶

The South Downs Integrated Landscape Character Assessment (SDILCA) states: '**Changes beyond the final boundary**...all contribute to change within the South Downs. ...It is vital that all local, regional and national policies consider the implications of change beyond the National Park boundary on its distinctive character and qualities.'

The SDILCA classifies the SDNP's included land at Binsted and Tortington as part of Landscape Type B, 'Wooded Estate Downland'. Almost all the features claimed to be typical of this type of landscape are present in Binsted and Tortington both inside and outside the National Park.⁷ Crimson, Amber, Magenta and Grey routes would directly contradict all the management objective for this Landscape Character Type: 'The overall management objective should be to conserve the large-scale landscape mosaic of woodland ... and farmland, and the deeply rural secluded character.' This is a very good description of Binsted and Tortington both inside and outside the National Park.

Under this 'Objective' are 'Landscape Management Considerations' which include: 'Conserve the large scale mosaic of ... ancient woodlands and hedgerows that enclose open arable fields, all of which creates a bold, distinctive identity.' 'Conserve and manage the intact hedgerow network with hedgerow trees which are of biodiversity interest and create a strong landscape pattern linking into

⁶ <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Technical-Document.pdf>.

The SDILCA was first drafted in 2005, during the planning period for the South Downs National Park, and revised in 2011. It is intended to guide change and development 'so that it does not damage the characteristics or value of the landscape'.

⁷ The only exception is tall brick or stone estate walls.

the woodland as well as contributing to seclusion and enclosure.’ ‘Avoid ‘improvements’ that would alter the rural character of the unmarked lanes.’ ‘Conserve historic designed landscapes, and their settings, encouraging the management/ restoration of permanent pasture, parkland trees, avenues and clumps of trees.’ ‘Conserve the very low density of settlement and road access, and consequent strong sense of remoteness associated with the Wooded Estate Downland.’
Crimson, Amber, Magenta or Grey directly conflict with these guidelines.

3.3 West Sussex Landscape Management Guidelines and Strategy

The West Sussex Landscape Management Guidelines were updated in May 2019.⁸ The area including Binsted and Tortington is called SC8. Their aims include (my numbering):

1. ‘Conserve and enhance the undeveloped rural character of the area.’
2. ‘Maintain and enhance the historic character of the area, including historic parks, earthworks, and historic field patterns.’
3. ‘Conserve and enhance the character and setting of small villages and hamlets.’
4. ‘Conserve hedgerows and allow for growth of hedgerow trees.’
5. ‘Conserve the rural character of the Binsted Valley to the east [of the SC8 area].’
6. ‘Conserve and enhance the historic features of Binsted, especially in the vicinity of the golf course.’
7. ‘Conserve and enhance the streams and their sides in the Binsted Valley.’

1, 2 and 3 would be contradicted by all the offline routes. On point 6, the ‘historic features of Binsted...in the vicinity of the golf course’ include St Mary’s church, Church Farmhouse and Quince Cottage (all listed Grade 2), also the Old Rectory and Stable Cottage (‘buildings and structures of character’), all very close to the Magenta route. The Black Horse Pub, a thriving local business next to the golf course, would be right next to the Magenta route and also an access road to it.

The Grey route would have the worst effect on aims 4, 5 and 7 and would also destroy part of the golf course. The Binsted Valley includes a wooded, steep-sided portion to the north of the golf course which would be severely damaged by Magenta.

The Guidelines are to be read in conjunction with the Strategy for the West Sussex Landscape, 2005. This starts with a ‘Landscape Vision’, which states in the present tense those ‘action points’ which WSCC claims to be putting into effect. They include (my numbering):

1. ‘Character and local distinctiveness are recognised, valued and celebrated.’
2. ‘Diverse character of landscape is nurtured, conserved and enhanced as part of a thriving economy.’
3. ‘Change is accommodated in ways which reinforce and restore character.’
4. ‘The rich diversity of wildlife habitats and national heritage of woodland, trees and hedges...are being conserved and enhanced.’
5. ‘Protection and conservation of historic landscape features and archaeological sites continues. Well managed historic landscapes provide continuity with the past.’
6. ‘There is a high degree of accessibility to the countryside which is enjoyed by all social groups.’

⁸ http://www2.westsussex.gov.uk/environment/heritage/SC6_UpperCoastal.pdf.

After the Vision for the whole county come Visions for the five National Character Areas. The Vision for the South Downs character area includes:

7. 'Where Down meets Town to the south, the setting of the South Downs remains unaffected by new development.'
8. 'Areas presently noted for their tranquillity are surviving, because the intrusive effects of ...transport infrastructure have been minimised.'
9. 'The landscape is managed as a major resource for informal recreation, but without loss of tranquillity.'
10. 'Highly distinctive features of the chalk downland, such as...historic parklands...and other historic and archaeological monuments and their settings, continue to be protected and are conserved.'

Crimson, Amber, Magenta and Grey routes conflict massively with these guidelines.

3.4 The National Park Statutory Purposes and Special Qualities

The Statutory Purposes of the South Downs National Park are: 'Purpose 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park. Purpose 2. To promote opportunities for the understanding and enjoyment of its special qualities.' These must be taken into account by Highways England in designing road schemes. The SDNPA's Position Statement of July 2014 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'.

Far from improving them, the offline routes would severely damage the National Park's Special Qualities. See Section D below for more details.

D. ABNC especially objects to the Magenta route

Amber, Grey and Magenta routes would all ruin Binsted village. Our MP, Arundel Town Council, Arun District Council and West Sussex County Council are all supporting Magenta. This is the worst of the three for the village. Amber cuts through its northern part, Grey through the southern part, and Magenta through the middle.

1. What would be lost at Binsted

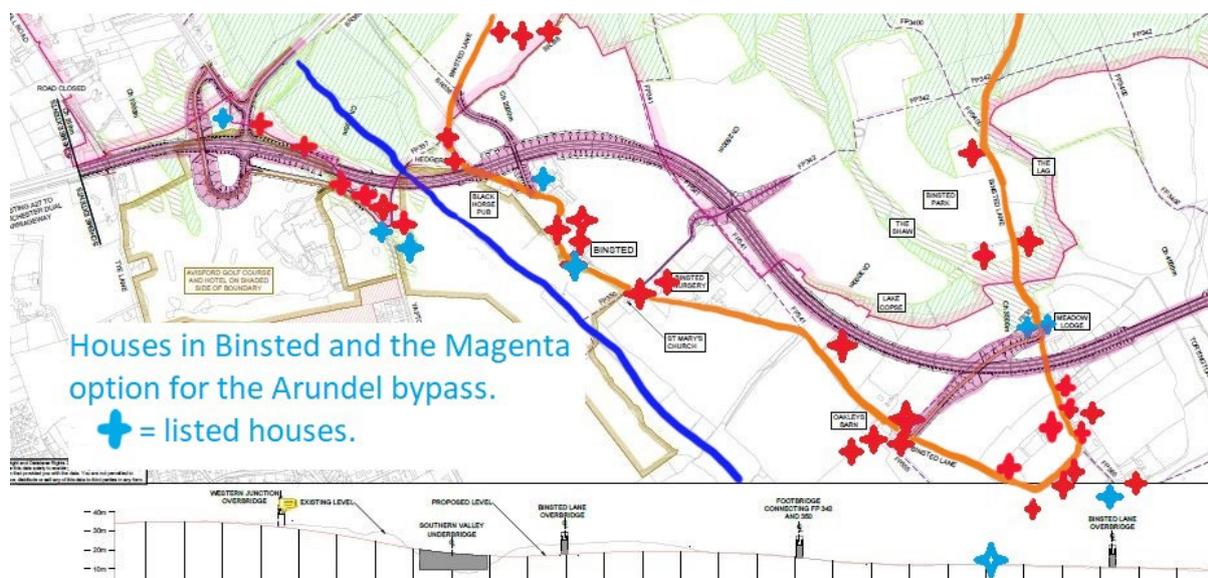
A resident's description of Binsted gives an idea of what would be lost there if Magenta was built: 'Binsted is a place lost in time and a rare haven of peace in the Arun coastal plain. Everyone who lives here does so because they enjoy the tranquillity and relative isolation which also attracts many visitors from around the county. Its 38 houses are scattered along a U-shaped lane that adjoins the existing A27 at both ends. This configuration may give the impression that our village has no hub

but it has a strong community spirit, bonded ever closer in recent years as we unite to fight the appalling threat that the Arundel Bypass has imposed on all of us.

'We have an arts festival and three community events each year - the Strawberry Fair held in and around the Flint Barn, which raises funds for local charities and the upkeep of the church, the Harvest Supper also held at the Barn and a village Christmas party. The Magenta route goes straight through the Strawberry Fair field next to the barn. It also slices through both sides of the U, dividing the village in three, and cutting off the only road between Binsted and Walberton. Access along the rest of Binsted Lane would be a ridiculously contorted affair and the three bridges over the dual carriageway would provide the only connection with our neighbours and the National Park. Our wildlife would not have that choice.'

Binsted's U-shaped lane partly explains its feeling of being 'lost in time'. The lane's shape, which does not connect with the outside world except to the north, is a result of its historic isolation as a parish cut off on three sides by brooks and marshes. The parish contained all that was needed – pasture, meadow, water, rich agricultural land in the centre, and massive woods to the north, west and east.

Figure 1: West end of Magenta and Binsted village



Many villages 'nucleated' or rearranged themselves with a central built-up area in the 7th to 9th centuries. Binsted never did this. Its layout dates back to Anglo-Saxon times. The Victoria County History points out that its woodland (the 100ha of Binsted Woods) have been in 'much the same places' since the Domesday Book. The small fields in southern Binsted, and the intricate edge of the woods with copses and shaws radiating into the fields, are characteristic of very old, historic countryside. Two small fields surrounded by woodland are 'assarts' – fields claimed from the woodland in mediaeval times. Binsted Park is a gentleman's part from the 18th century. Magenta would destroy this ancient countryside.

2. Misleading presentation of data

Highways England have hidden the damage Magenta would do to Binsted by their presentation of data. As a Binsted resident writes, 'The maps and description of the route in the latest SAR by Highways England are misleading - there is no mention that Magenta actually passes through the middle of Binsted, weaving in and around some houses and passing through others. It just merely says that it crosses Binsted Lane....and passes behind some residential properties.'

A resident writes: 'The Highways England maps and materials presented by Highways England do not show Binsted as the thriving community we are.' Another resident writes: 'The maps that Highways England have published name only 3 random houses, our 12th century church, Binsted Nursery and the pub. The other 35 homes, small holdings, businesses and Community Barn are nowhere to be seen and Binsted Lane, which defines and ties our scattered settlement together, is barely discernible.'

Another sees the omissions as deliberate: 'If the MP and Arundel Town Council have made their decision regarding their support of the very controversial Magenta option based on the information supplied by Highways England then they need to look again. The information given is both inaccurate and very deliberately misleading. After the judicial review of 2017 we now all know that Highways England are not above omitting relevant information and facts. The maps I have seen at many of the local meetings do not show the many houses and businesses affected.'

Deep in an obscure Appendix, hidden by using number and letter names instead of the colour names of the routes, there are summaries of the effects on individual listed houses.⁹ But they are absurd, and state damage would be minor when life in the house neighbouring the road would be unliveable – and a major change from the present situation where the house is part of a historic village in beautiful countryside partly in the National Park.

3. Damage to Slindon and Walberton ignored

Another resident points out the damage Magenta would cause to Slindon and Walberton. 'One of the justifications for the offline routes is to reduce the rat running through downland villages. In promoting Magenta, it is quite clear that Highways England, Nick Herbert and others, have forgotten about Slindon, a downland village which is a conservation area with numerous listed buildings, largely owned by the National Trust and within the South Downs National Park. Part of Slindon will become the north-south corridor to the A27, Yapton Lane and further south, damaging Walberton village and causing rat-running in its Conservation Area. The junction at Slindon on the A29 will become a death trap.'

⁹ EAR, Appendix 6-2, 1222201: 1274878, says of options 4/5V1 (Magenta) and 4/5V2 (Amber) that the result of the road will be Neutral for Church Farm and Glebe Cottage – both listed grade 2, both at present set in idyllic farmland backed by huge woods. Church Farm would be right next to Magenta with an access road up another side of the property. 1221993: the effect of Magenta on Morleys Croft and Meadow Lodge is said to be 'Moderate Adverse' – both are listed Grade 2, in an idyllic setting right on the edge of the National Park and woodland, and both would be right next to the overbridge for Binsted Lane for Magenta.

4. Incorrect figures quoted in brochure

As well as misleading maps, Highways England have hidden the damage to Binsted and also Tortington by merely quoting in the brochure the crude amounts in hectares of woodland or National Park land that the various routes would take. Higher amounts are given for Cyan and Beige routes than for Magenta. Those extraordinary woodland figures are wrong (see Section B3 above). They include taking 4 hectares of woodland to make a new junction on Cyan and Beige for the Arundel Hospital. But that area – the Arundel Arboretum – was cleared years ago and is now pasture. If those illusionary four hectares are deducted, the woodland impact of Beige, Cyan and Magenta comes out the same. See Appendix 1 for a fuller note on this woodland error.

The truth is that a new dual carriageway through the countryside would do incalculably more damage to woodland and the National Park than widening the existing A27. The woodland by the present A27 is already degraded and the National Park Special Qualities are not present. In the areas the offline routes would go through, pristine woodland would be damaged and vital wildlife corridors would be severed.

5. Binsted, Tortington and the National Park Special Qualities

As for the National Park Special Qualities, Binsted and Tortington – initially recommended to be within the National Park in their entirety - have all these and more. They would be severely damaged by Magenta.

Special Quality 1: ‘Diverse, inspirational landscapes and breathtaking views.’ Both Binsted and Tortington are diverse and inspirational landscapes. The National Park boundary includes mainly their wooded areas (and ten fields in Binsted). Woods, shaws, hedges, streams, ponds, ditches, and fields, with many listed houses and the varied and intricate woodland edge, make the areas outside the National Park more diverse than the areas within it.

Special Quality 2: ‘Tranquil and unspoilt places.’ Landscape historian Simon Jenkins’ book on landscape said the English countryside made him ‘marvel at how much that is varied remains varied, informal, unmistakably old. There are places where England looks as it has for centuries and where people...gather to find and declare it beautiful.’ Binsted and Tortington are two of those places – tranquil, unspoilt, and all the more appreciated for being so close to populous areas.

Special Quality 3: ‘A rich variety of wildlife and habitats including rare and nationally important species.’ This is true of both Binsted and Tortington, both inside and outside the National Park. The ongoing environmental surveys by MAVES (Mid Arun Valley Environmental Surveys, www.maves.org.uk) show that the biodiversity of the area is extremely rich. Protected species such as bats, dormice and water voles move freely between the wooded areas within the National Park, and the other habitats such as hedges, ditches, ponds, fields and shaws in the countryside outside the woods. Crimson, Amber, Magenta and Grey routes would sever the foraging habitats of the area’s wildlife and cause local species extinctions. We are in the midst of a biodiversity crisis and a mass extinction event.

Special Quality 4: ‘An environment shaped by centuries of farming and embracing new enterprise.’ Both Binsted and Tortington have an environment shaped by centuries of farming. Binsted’s

mediaeval farming layout round a U-shaped lane, with the largest fields in the centre of the parish where the mediaeval 'open fields' were, is still evident today. Both have land-based contemporary businesses: Binsted has horticulture, a pub, kennels, shepherding, and small businesses in the Church Farm buildings; in Binsted woods there is an archery club, and bushcraft and nature experience courses. Tortington has a retreat centre at Brookwood, a conference centre at Tortington Priory, and an equine hospital.

Binsted's and Tortington's enterprises would be devastated by Magenta. In Tortington, retreats could not take place next to a busy dual carriageway. In Binsted, the Black Horse pub would be hemmed in on two sides by the Magenta route and an access road on an overbridge. The kennels business would have to close and its owner says: 'We have built our family business up over the last 35 years, my late father-in-laws legacy to be handed down to my own daughter. This is not a business that can be moved to another premises, we would lose everything, our home, our business, our own employment and that of our staff.' One resident sums up: 'At the moment, I am finding it very difficult to believe that anyone could have the lack of humanity to support a scheme which will have such a shattering impact on people's lives.'

Special Quality 5: 'Great opportunities for recreational activities and learning experiences.' Both Tortington and Binsted supply these with their many footpaths and bridle paths through changing scenes and habitats, both inside and outside the wooded areas. These would be disrupted by Crimson, Amber, Magenta and Grey routes. Access might remain but the pleasure of the recreational activities in this quiet, unspoilt area would be lost. MAVES (now part of the Arun Countryside Trust) runs guided walks, bat detector sessions, volunteer activities such as hedge laying and pond clearance, and training as a licensed dormouse surveyor, in both Binsted and Tortington. These would cease if a dual carriageway was built through the area.

Special Quality 6: 'Well-conserved historical features and a rich cultural heritage.' Binsted and Tortington are rich in history and well-conserved listed buildings, including both 12th-century churches. An Anglo-Saxon Moot Mound, where Binsted Hundred met, was identified in Binsted in 2017.¹⁰ Moot mounds, where they still exist, are of national importance (HER, 'Alstoe Moot Mound'). Together with Scotland Lane, the eastern access track to the Moot Mound, and the 'hollow way' leading to it from the west, these discoveries form a 'landscape of governance'.¹¹ The Moot Mound is within the South Downs National Park and Scotland Lane forms part of the boundary. This 'landscape of governance' would be partially destroyed by Magenta, Amber and Grey routes.

Two mediaeval tile kilns in Binsted have been excavated, one in the 1960s and one in 2005.¹² One is within the National Park, one just outside it. One would probably be destroyed by the Magenta route and the other is very close to both Amber and Magenta routes. Together they show Binsted is a historic 'industrial landscape' and these should be preserved. Amber, Magenta and Grey routes would mean a stop to the Binsted Arts Festival which is in its fifth year.

¹⁰ Emma Tristram, 'Identifying the meeting place of Binsted Hundred near Arundel, West Sussex', Sussex Archaeological Collections, 155, 2017, pp. 97-102.

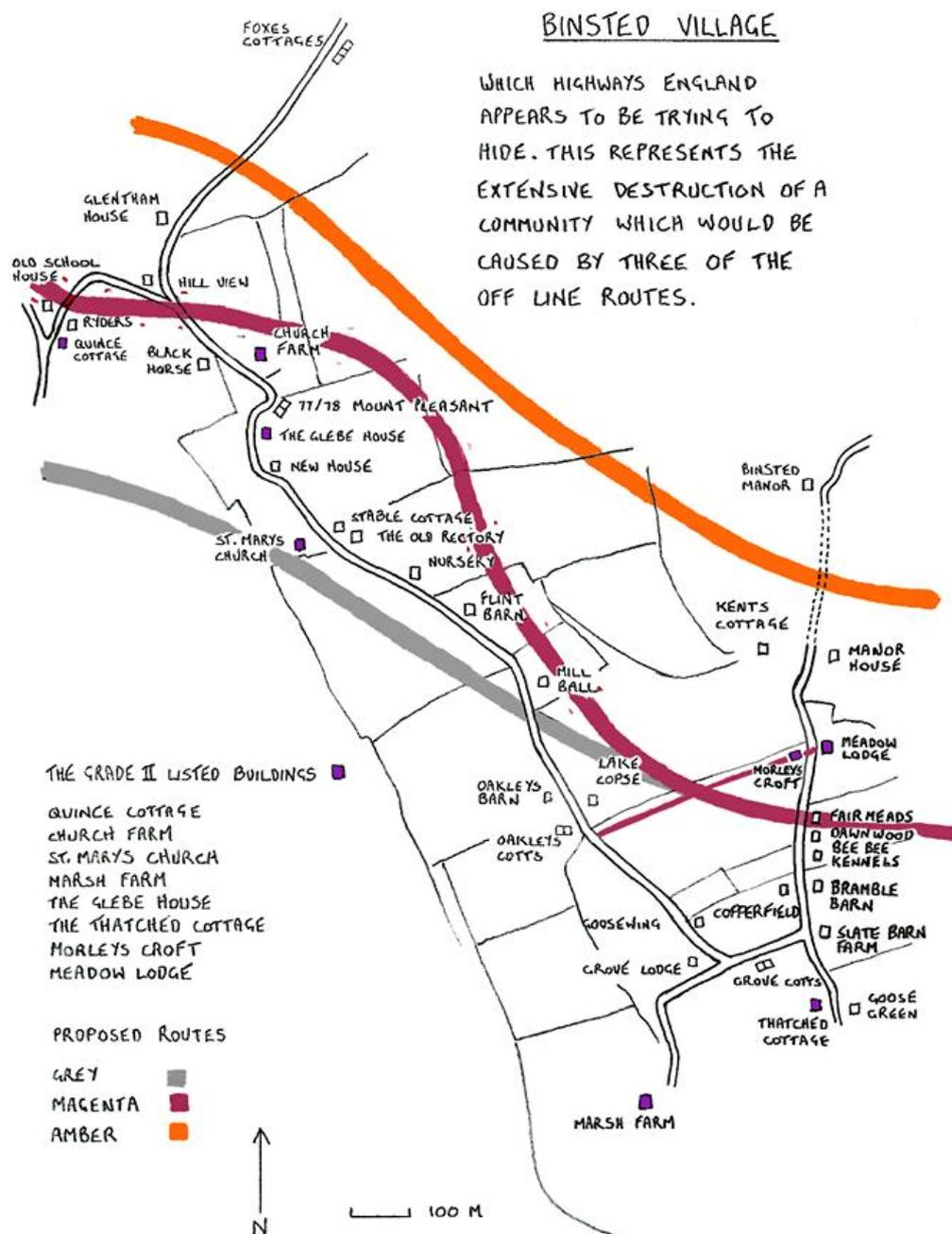
¹¹ <https://www.ucl.ac.uk/archaeology/research/landscapes-governance>

¹² The 2005 excavation is described in Worthing Archaeological Society's Journal, summer 2005.

Special Quality 7: 'Distinctive towns and villages, and communities with real pride in their area.'

Both Binsted and Tortington are distinctive villages. Binsted has produced its own 'village book', 'Binsted and Beyond' (2002), and website, www.binsted.org, where there are more details of its artistic life. Tortington had an Augustinian priory, subject of 'Tortington and the Black Canons', by Boxgrove History Group and John Luffingham, Phillimore, 2002.

Figure 2: Binsted village and Grey, Amber and Magenta routes, drawn by a local resident



Both have strong communities with real pride in their area. Friends of Binsted Church have been running the Binsted Strawberry Fair for 32 years to raise money for charities and the fabric of the church, with over 1000 visitors each year. Magenta destroys the fields where the event takes place. Friends of Tortington Church also run events to help preserve the fabric of their church. Crimson, Magenta, Grey and Amber routes would mean these events could no longer happen.

This major damage to the National Park Special Qualities cannot be conveyed simply by giving the hectareage of the area of National Park destroyed by each route.

Conclusion

Roman roads were notable for striding through the countryside in a straight line, completely ignoring local features such as Celtic fields. So much so, that if ancient field systems are cut through by a Roman road it helps to date them as before the Roman invasion. The Magenta route, now chosen by Local Authorities, would trample the surrounding villages and countryside in a similarly brutal manner – but with much more devastating impact on people, landscape and wildlife due to modern scale, noise, speed, and light and air pollution.

Magenta makes a slight deviation at Binsted to put more distance between it and 900-year-old Binsted Church. But this would make absolutely no difference to the fact that the Magenta route would, as one West Sussex County Councillor put it, ‘eviscerate’ Binsted.

Up to 20 homes would be compulsorily purchased, according to Jason Hones, the HE project manager (radio interview, 22 October). The heart of the village would be gone and its strong community and generations-old culture would be dispersed and destroyed.

Its history as a unified, isolated parish, cut off by watercourses on three sides and with its U-shaped lane connecting its three farms so that all had access to woodland, meadow, pasture and arable land, would no longer be visible in its layout and a source of the opportunity to ‘look back in time’.

Its hidden history as a historic industrial area, with two and probably many more mediaeval tile kilns and a plantation of 800-year-old coppiced ash trees at Hundred House copse nearby to provide fuel, would be lost, with probable destruction of one or even both tile kilns and the extraordinary ash trees.

Its recently discovered visible history as the centre and meeting-place of ‘Binsted Hundred’, a unit of Anglo-Saxon local government, with its moot mound or ‘Hundred House’ next to the eponymous copse, and its access road via the mediaeval track of Scotland Lane, would disappear and be lost to future research. Moot mounds, where they remain, are of national importance.¹³

Houses would also be compulsorily purchased at Tortington and its historic village ruined. Walberton and Slindon villages would suffer increased noise and traffic because drivers would be attracted to the new four-way junction at the west end (Magenta). Yapton Lane (B2132), already overloaded and with long queues caused by the new full level crossing, would be packed solid.

This could be the scheme which causes the demise of Highways England by being a national focus for ‘how not to do it’. HE is already under investigation by the National Audit Office for its conduct in

¹³ Historic England, entry for Alstoe Moot Mound.

the 2017 consultation and for not observing the Nolan Principles of Public Life. To attempt to push through a maximally damaging scheme such as this when there is global recognition of the Climate Crisis and the need to reduce emissions will cause activism on a large scale and, hopefully, the long-needed change to a more sensible way of doing things and an integrated transport policy.¹⁴

Many areas in London, such as Covent Garden, were saved at the last minute from a destructive road scheme in the 1970s and the capital is now unthinkable without them. ABNC hopes the inevitable change of policy will come in time to save Binsted and Tortington, two historic, flourishing villages, and the superb wildlife area of which they form a part.

The brutal and destructive Magenta route should not be built and will not be built. Something needs to be done, and the Arundel Alternative scheme could provide it.

Appendix 1: Misleading Entry in Brochure about Impact on Trees

The Consultation Brochure contains a table (p. 17) that gives the impact of the six options on woodland. The impact on Cyan is put at 8.37ha and that of Beige at 7.44ha. These figures are about double the stated impact of Magenta and 50% more than Amber, and therefore give the impression that the two on-line options do much more damage to woodland than the two main off-line options.

Cyan and Beige follow the line of the existing A27 from Ford Road westwards to the present dual carriageway. For much of this distance the road is lined with Ancient Woodland, and widening the road would remove a strip of woodland. Detailed tables showing the area, and number of trees, affected by each option are given in an appendix. They show that 1.09ha of Ancient Woodland would be taken by Beige and 1.95ha by Cyan, which includes a new road from Binsted Lane East to the junction west of the White Swan and a new entrance to Arundel Hospital.

In addition to the Ancient Woodland taken by these roadworks, 3ha of ordinary woodland is said to be removed to construct the compact interchange at the western end of the options. A hectare of buffer zone 15 metres wide is added, giving a total take of 4ha of woodland for this junction. A buffer zone is also placed along the road where it runs through Ancient Woodland, adding 2.32ha to the area of AW affected by Beige and 2.42ha to the area affected by Cyan. The areas of woodland taken by each option are shown on Figures 2-1 to 2-6 of Appendix 7.3, and the woodland affected is marked in yellow.

The patch of yellow that indicates the woodland taken by the western junction of Beige and Cyan appears, however, to be superimposed on an area of open land on the map Figures 2-1 and 2-2. Figures 2-3 to 2-6 confirm that this is open land. It was once used for raising commercial ornamental tree varieties for transplanting, but the remaining unsold ornamental trees were felled some years ago and it is now pasture.

It appears, therefore, that the land on which the western junction would be built is not woodland at all. It is difficult to understand how an indication of an area of woodland to be felled could be

¹⁴ See <https://www.littlehamptongazette.co.uk/news/politics/magenta-route-for-arundel-bypass-backed-after-die-in-protest-1-9115186>.

printed where a map shows open ground. The result of this action is that the area of woodland affected by Beige and Cyan has been over-stated by 4ha in the Consultation Brochure. This error will have discouraged consultees from choosing the on-line options. It may therefore have had a significant effect on the consultation process.

Appendix 2: Naming errors in two documents in the EAR

Colour names are inserted in brackets in Appendix 2 for clarity, but do not appear in the original documents.

a) Mistakes in Appendix 7.1

Appendix 7.1 is a table, called 'Landscape Effects Schedule', which analyses the landscape effects of the routes in different LCAs (Landscape Character Areas). Wood name errors are also included.

Error 1

In the second section of the Table, under 'LCA2: Fontwell Upper Coastal Plain', in the section on 4/5VA1 (Magenta) the following is incorrect: '...the option would continue across a well contained section of fieldscape towards Binsted Manor, while modifications would be screened from the wider receiving environment by the surrounding woodland and mature field boundary vegetation.'

Magenta does not 'continue across a well contained section of fieldscape towards Binsted Manor'. This is a correct description of Amber, not Magenta. Magenta would be entirely outside the woods after the section across Hedgers Hill (which is correctly described). The comment about screening is therefore inapplicable.

Error 2

The same section incorrectly states of 4/5VA1 (Magenta): 'Continuing eastwards from Binsted Park the route returns to cutting passing under Tortington Lane.' Magenta does not pass through Binsted Park so it cannot 'continue eastwards from Binsted Park'. This is a correct description of Amber, not Magenta. The previous paragraph in the section is a correct description of Magenta.

Error 3

In the second section of the Table, under 'LCA2: Fontwell Upper Coastal Plain', the section on 4/5VA2 (Amber) states: 'This option would be located in the central and eastern area of this character area, cutting a diagonal swathe through the north-west section of Binsted Wood and skirting south of its southern section. It would pass diagonally between the extensive and connected ancient woodlands of Paine's Wood and Tortington Common and the fieldscape and woodland of [sic] crossing Binsted Park on its approach to the Arun river floodplain.'

Amber does not 'skirt south of Binsted Woods' southern section'. This is a description of Magenta.

Error 4: Wood name error in Magenta section

In the section on Magenta, 'The south west corner of Binsted Wood would be removed in a diagonal swathe' (of Magenta) is incorrect. Magenta skirts the southernmost parts of Binsted Woods. The correct wood name, 'Little Dane's Wood', is used earlier in the paragraph.

HE now appear to use 'Binsted Wood' to describe Binsted Woods (the group of 18 named woods within Walberton Parish, i.e. the western part of the Binsted Woods Complex LWS, the part that is not Tortington Common).

This is confusing, because one of the 18 named woods in Binsted Woods is called Binsted Wood (north of Binsted Manor) and it is not affected by any of the bypass routes. The error may stem from OS maps where 'Binsted Wood' appears over the correctly named wood, but seems to have been taken to refer to the whole of Binsted Woods. 'Binsted Wood' sometimes appears to be used incorrectly where the correct wood name should be used, as here.

Error 5: Wood name error in Amber section

Amber would not 'pass diagonally between the extensive and connected ancient woodlands of Paine's Wood and Tortington Common'. Paine's wood is a small wood adjacent to the A27. The only route that passes between Paine's Wood and Tortington Common is the Crimson route.

b) Mistakes in EAR Appendix 1.1, 'Special qualities of the South Downs National Park' (final document in the EAR)

Error 6: Description error in Table 3.3

Table 3.3 summarizes the effects of each option on Special Quality 1, 'Inspirational landscapes and breathtaking views'.

The section summarizing the effects of 4/5AV1 (Magenta) states: 'Exerts greatest influence on user experience of the landscape...where it intrudes into the SDNP boundary at Hedger's Hill and Binsted Park'. Magenta does not 'intrude into the SDNP boundary at Binsted Park' – Amber does.

The same mistake is made lower down in the same section where it states: 'Significant adverse effects ...including within the SDNP at Hedger's Hill and Binsted Park'. Magenta is not within the SDNP at Binsted Park. Amber is. Magenta does intrude into the SDNP at Hedger's Hill, so these statements appear to be a conflation of the effects of Magenta and Amber.

Error 7: Description error in Table 4.2

The section on Special Quality 2, 'A rich variety of wildlife and habitats', in the same document includes Table 4.2, which is about the effects on bats. It states that Option 4/5AV2 (Amber) will 'sever hedgerows and woodland used as flight paths south of the Binsted Wood Complex LWS, severing the LWS from farmland south of the Field Survey Area which is used by multiple species for foraging'. But Amber passes through the Binsted Wood Complex LWS, not south of it. It fragments Binsted Park, woodlands the Lag and the Shaw, and cutting off Lake Copse. This statement about Amber is true of Magenta (which skirts the woodland), but not Amber.

Error 8: Description error in Chapter 5, on Special Quality 3, 'Tranquil and unspoilt places'

Chapter 5, at para 5.8.2.21, states Option 4/5AV1 (Magenta) would 'introduce a new source of light...around Hedgers' Hill, and in Binsted Park'. But Magenta does not go through Binsted Park. Amber does. The reference to Hedger's Hill is correct for Magenta, so this sentence appears to confuse the two routes.

Error 9: Description error in Chapter 5

Para 5.8.2.34 states that Option 4/5AV1 (Magenta) ‘would create a significant new component within the SDNP at Binsted’. This is a correct description of Amber, not Magenta.

Error 10: Description error in Chapter 5

Para 5.8.2.35 states that Option 4/5AV2 (Amber) ‘would create a new, elevated component in a small section of the SDNP at Hedger’s Hill’. This is a correct description of Magenta, not Amber.

Error 11: Description error in Chapter 5

Para 5.9.1.3 states that Option 4/5AV1 (Magenta) ‘intrudes into’ the SDNP boundary at Binsted Park. It doesn’t. Amber does.

Error 12: Description error in summary table of Chapter 5

Describing Option 4/5AV1 (Magenta), the summary it says it ‘intrudes into the SDNP boundary at ... Binsted Park’. Magenta does not intrude into Binsted Park. Amber does.

Appendix 3: Inclusion of Worthing-Lancing Scheme in Do-Minimum Network

The present appraisal of the six options for the Arundel bypass includes the improvements at Worthing and Lancing, proposed in 2017, in the do-minimum network in which the Arundel schemes are evaluated. This change was made possible by HE altering internal guidance in 2018, so that schemes which were included in a published Road Investment Strategy should normally be considered “more than likely” to be built and included in any do-minimum network (Revised Traffic Forecasting Guidance, Transport Planning Group, 7 January 2018).

However, HE’s proposals for improvements at Worthing-Lancing have effectively been abandoned, though HE prefers to say they have been “paused”. A letter from Jim O’Donnell, chief executive of HE, to Sir Peter Bottomley MP and Tim Loughton MP of November 8 2018 reveals that HE and the Department for Transport have been instructed by the Minister for Roads to prepare a new scheme for Worthing-Lancing which integrates improvements to the A27 with improvements to the local road network. The “paused” scheme was included in the Roads Investment Strategy (RIS) 1; the new scheme may be included in the RIS2, but it will have to compete with other proposals, in other places, for inclusion. Nothing has yet been published about the new scheme for Worthing-Lancing, and the RIS2 programme itself has not been published. It is therefore uncertain whether any scheme for Worthing-Lancing will be accepted for RIS2 and the constituents of such a scheme are unknown. But if it is accepted as part of the roads programme, it will be part of the so far unpublished RIS2.

The abandoned Worthing-Lancing scheme should not therefore form part of the do-minimum network at Arundel. The HE guidance indeed states “We should not include RIS2 schemes until such point as they become published in RIS2”. The network for Arundel cannot contain any proposals for Worthing-Lancing unless and until they are published in RIS2. Its publication is expected later this year; if it includes the new Worthing-Lancing scheme, HE would have to revise its model for Arundel if it wanted to incorporate it in the network. The new Worthing-Lancing scheme is likely to differ significantly from the old one.

The inclusion of the “paused” scheme in the do-minimum network has a large impact on the economic return to the Arundel scheme. Without the Worthing-Lancing scheme, BCRs would range from 1.78 for Cyan to 1.46 for Amber and Grey. These two schemes would be classed as having a Low return, and would not normally be approved. If the Worthing-Lancing scheme is included, benefits would be increased by between 21% and 42%, and BCRs would be increased to between 1.95 and 2.16. Only Grey would have a BCR less than High. The Magenta route would have a BCR of 1.54 without the Worthing-Lancing scheme, and a BCR of 2.02 with it.

The large effect on benefits is surprising, because HE says that the Arundel scheme would have a broadly similar effect on traffic volume and journey times throughout the network, with or without the Worthing-Lancing scheme. HE has been asked to explain this contradiction and to explain how the large increase in benefits is generated. Their reply lacks detail, and merely states that the exclusion of the Worthing-Lancing scheme results in greater capacity constraints on the adjacent strategic road network, resulting in poorer road network performance. It is surprising that this effect produces so large an increase in benefits.

It seems that the Worthing-Lancing scheme should not have been included and consultees have been misled by exaggerated BCR figures.