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A29 Realignment
West Sussex County Council Highways and Transport
Chichester
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By email: A29Realignment@westsussex.gov.uk

24th April 2019

Dear Sir or Madam,

A29 Realignment Consultation 2019

<https://www.westsussex.gov.uk/roads-and-travel/roadworks-and-projects/road-projects/a29-realignment-scheme>

This is the formal response of the Arun group of CPRE Sussex – the Sussex Countryside Charity - to the above proposals. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

CPRE Arun recognises that the principle of a A29 'bypass' together with Strategic Housing Allocation have been approved through Arun's Local Plan. The principle of this road has therefore been established, however we would like to raise some significant concerns;

Impact on Biodiversity / the natural environment

The West Sussex County Council, A29 REALIGNMENT, Transport Business Case, WSP, Jan 2019 ('The Business case') states that 'An Environmental Scoping Report has been produced for the Phase 1 (North) section of the scheme.' Has a report been produced for phase 2? This does not seem to be available as part of the consultation and is very significant. Without this the business case would appear to be flawed.

The business case presented does not accurately cover the issue of increased noise and air pollution. Para 4.8.5 states that 'The introduction of traffic to the area following the opening of the scheme will result in an increase in noise levels, but at this stage they are anticipated to be non-significant.' We question the validity of this statement. Paras 4.8.6.1 (Air Quality) and 4.8.7.1 (Greenhouse gases) very briefly reference a 'redistribution of traffic' and this is very misleading. More traffic will be generated by the new housing and induced by the new road. This is not merely a 'redistribution.'

Air quality impacts are a key consideration due to the proximity of the new road to housing. The southern end of the proposed bypass reconnects with the current A29 south of the Lidsey Bends taking traffic through the village of Shripney rather than connecting directly to the Bognor by Pass. This potentially undermines the logic of an A29 bypass, however we recognise that moving the road south could impact on the village of Flansham. We believe that the proposed new road will lead to an increase in air pollution in Shripney, which will be detrimental to the local community.

The scheme will introduce linear infrastructure to a currently rural environment on the periphery of the South Downs National Park. However, within the business case it is not very clear how severe the landscape impacts of the new road will be? We are concerned that the area hosts aquifers with permeable strata capable of supporting local water supplies, in some cases forming an important source of base flows to rivers.

In the business case it is recognised, *somewhat briefly*, that a variety of managed and semi-natural habitats within the area and a range of protected and notable species and sensitive ecological features could be adversely affected either during the construction or the operation of the new infrastructure. We believe that the proposed route would pass through a biodiversity / green corridor which has considerable landscape and recreational value as identified in the Aldingbourne Neighbourhood Plan.

Funding, phasing and selection of the preferred route

We have concerns that the reliance on private sector finance for phase 2 will mean that the road is constructed in a piecemeal manner leading to increased congestion, disruption, and air pollution. What options are being explored to manage this risk?

Reduction in car dependency and climate change impacts

Unless a more ambitious strategy is developed to reduce car dependency in the area, this road will quickly become congested. The South Coast Alliance for Transport and the Environment has produced a report (www.scate.org.uk) which argues that we need to move to a 'vision and validate' approach to mobility, instead of the historic 'predict and provide' which reinforces existing patterns of car use. Proposals for the A29 should be considered within the context of a wider multi-modal strategy for the area. The Committee for Climate Change (CCC) has recently warned that transport emissions are significantly off target: <https://www.theccc.org.uk/wp-content/uploads/2018/06/CCC-2018-Progress-Report-to-Parliament.pdf> and that more must be done to support low carbon mobility.

Transport for New Homes has produced an excellent report about reducing car dependency in new developments (<http://www.transportfornewhomes.org.uk/>) and we would welcome the opportunity to work with you and Arun District Council to explore how the new housing proposed alongside this road can be designed to reflect their findings.

We welcome your commitment to improved facilities for walking and cycling. These could however be more ambitious, for example by;

- Avoiding shared paths for walking and cycling - while this proposal might be rural at present and consequently pedestrian flows are low, once the development comes that is likely to change and this will effectively become an urban area - higher flows of people walking dramatically reduces the attractiveness of a route for cycling. Shared paths discriminate against people with

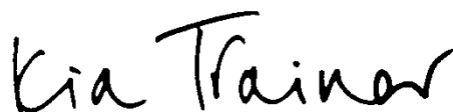
disabilities (especially hearing and visual) and put people who want to walk and cycle in potential conflict - this will only increase as more people have electric bikes, i.e. go faster.

- Giving more thought to how people can walk and cycle across and around the many roundabouts - Dutch style roundabouts should be the norm for a new development, allowing people cycling to have a continuous route without interruption (to maximise amount of cycling and to minimise car use).
- Separate cycle paths should be built to IAN 195/16 (part of the DMRB - Design Manual for Roads and Bridges) - (with sealed surfaces)
- The illustrative images show sub-standard facilities with obstacles being unnecessarily placed in the path causing it to be narrowed further - again refer to IAN 195/16
- The path in section C should not be immediately adjacent the road if at all possible and certainly not if it is going to have road signs, lamp columns and other obstacles placed within it
- The pedestrian and cycle bridge should have separate demarcation/facilities for people walking and cycling and should be at least 5m wide (wall to wall) to allow a 4m clear path through, preferably wider if it is likely to have high flows of pedestrians.
- No information is provided on new bus routes which will only be viable if development is dense enough and designed for buses and discourages car use - otherwise these will be empty promises.

Yours sincerely,



Michael Warden, Chair CPRE Arun



Kia Trainor, Director, CPRE Sussex