



The countryside charity
Sussex

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Dear National Highways Route Strategies team,

Consultation response: Vision for route strategies - Planning for the future of our roads

This is the formal response of CPRE Sussex – the Sussex Countryside Charity - to the above consultation. 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. CPRE Sussex is a member of the South Downs Network and supports the points and thrust of their response and makes the following points about significant weaknesses in the documentation. We would ask for a fundamental rethink of the national transport strategy. The comments made apply equally to another document which raises serious concerns: “Planning ahead for the Strategic Road Network: Developing the third Road Investment Strategy”.

Both the “Vision” and “Planning Ahead” give insufficient weight to environmental and social aspects of decision-making, and therefore fail to promote innovative thinking about the planet’s resources and our relationship to them. This is a missed opportunity that could easily be corrected. An incomplete approach will have consequences that no-one can afford, including road users. Revision for and in the following reasons and ways is needed:

- The document is flawed as it gives little or no acknowledgement to the central need to ensure that all programmes, plans and projects are based on a consideration of sustainable development i.e. development that accounts for intergenerational equity by ensuring the resources in the environment are protected and enhanced. This is a long-term policy of successive UK Governments and the document fails to acknowledge that. It must do .
- The documents represent an old-fashioned single-issue approach to transport where the basic idea is that building more roads is a good thing and, although there might be a need to bring in environmental groups, as for the environment itself, well, that is not something that National Highways needs to think about. This needs correction.
- The challenge National Highways must face is that if the environment were considered very different conclusions and approaches are highly likely to emerge. This innovation opportunity needs to be recognised as the positive influence it would be.
- Key environment policy factors that need to be accounted for at this strategic level and that need to be part of the “Vision” are:
 1. Climate Change – this includes the need to use fewer resources for construction and operations as well as decarbonizing the transport fleet and, under the COP26 agreement, includes attention to issues linked to forests, land use and biodiversity to say nothing of the impacts of sea-level rise in coastal regions and areas that will be at risk of flooding consequentially (such as the Thames estuary and areas of the coastal

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plains in Sussex). The documents give scant attention to this topic despite its urgency. As a minimum, some phrasing such as: “National Highways recognises the UK Government Climate Change goals. Our vision for all new roads is to achieve net zero emission construction by 2030 and to be near fossil free by 2033.” is needed.

2. Biodiversity Net Gain – Biodiversity is valuable as the Dasgupta review for the Treasury makes clear. Because road projects generally cause a loss of biodiversity simply by the amount of tree felling that takes place (even for “sustainable” transport schemes) the vision needs to recognise the need for less tree felling as the biodiversity lost cannot easily be replaced for many decades (or longer). This is consistent with the government’s views on the importance of “beauty”.
3. Local Nature Recovery Networks – as road schemes have an obvious impact on connectivity across the landscape strategic steps are needed to protect them and this should be recognised.
4. Protected Landscapes such as National Parks, Areas of Outstanding Natural Beauty and Green Belts – as these are of great importance to national and local wellbeing including that of road users and major schemes affecting their character and setting must be avoided so recognition of this should form part of the Vision.
5. Water – as road schemes can exacerbate flooding and otherwise interfere with catchment functionality and because the road networks own functionality fails when insufficient account has been taken of water its importance needs explicit recognition
6. Noise and Dark Skies – as transport schemes always generate noise and light that pollutes the environment in ways that reduce wellbeing and affect wildlife – the need to reduce noise and light pollution should be part of the “Vision” to improve the sector’s performance and to provide opportunities for innovation.
7. Air quality – as road schemes spread pollution in the forms of gaseous emissions and particulates from exhausts as well as particulates from tyres and vehicle wear and decay – a need to help improve air quality should be part of the “Vision” to improve the sector’s performance and provide opportunities for innovation.
8. Natural Capital and Ecosystem Services – resources that are embedded in the land and that are often lost when concreted over need to be actively considered in all strategic documents. These concepts need to be included in the “Vision” because without them decisions will be weaker and the outcomes poorer and less sustainable than they could have been.

Public awareness and opinion on the damaging effects of climate change and air pollution are at an all-time high. Highways are a very real and visible contributor to these critical problems. The vision for National Highways needs to show that the public benefits of any new road development take a balanced view of the benefits vs harm of road building and road usage. No one can afford a strategy that is incomplete. It is time to do better. To have a more complete vision of the future. We cannot afford to ignore nature or keep taking bites out of it because if we do, as we can already see, nature bites back.

Yours sincerely,



Dan Osborn
Chair, CPRE Sussex