

To:

Lee Harris, Executive Director for Place Services,  
West Sussex County Council

Matt Davey, Director, Highways, Transport and  
Planning, West Sussex County Council

By email:

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Dear Messrs Lee Harris and Matt Davey,

Date: 11<sup>th</sup> Jan 2021

### **Re National Highways - A27 Arundel Bypass – Grey Route Proposal**

National Highways are commencing their formal consultation on their proposals for an 8km stretch of 'motorway style' dual carriageway south of the existing A27 across the Arun River valley and close to the National Park area.

At the outset of the consultation please consider our overarching comments on the following pages.

#### **[About the South Downs Network \(SDN\)](#)**

The SDN was formed to campaign for the formation of the South Downs National Park and the protection of the environment. The SDN is made up of over 40 independent groups and charities across the South Downs National Park including organisations such as CPRE and the Wildlife Trusts in Hampshire & Sussex.

We share information and campaign for the best possible environment to protect the beauty and landscape of the National Park and its environs in East Sussex, West Sussex and Hampshire with the aim of a sustainable future and meeting the carbon challenge.

Thank you for the opportunity to share these concerns in this round of public consultations

Acknowledgements: Research by Harry Robson, MLitt., BA Hons.,

Yours faithfully

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## Re National Highways - A27 Arundel Bypass – Grey route Proposal

National Highways are commencing their formal consultation on their proposals for an 8km stretch of 'motorway style' dual carriageway south of the existing A27 across the beautiful Arun River valley and close to the National Park area.

In considering such schemes, it is important that existing government policies on climate change, land use and biodiversity are followed so that the UK stands the best chance possible of avoiding the worst effects of the climate change and biodiversity crises. We need to bequeath to future generations the thriving environment that could result from the COP26 vision on these topics being fully realised.

The South Downs Network asks you to advise your elected representatives to act in accordance with these policies in relation to the Grey Route proposal that seems to be favoured by National Highways. We ask you to act on the points we set out below so that:

1. Your authority requires that this project be compliant with National Highways own climate change policy document. see: <https://nationalhighways.co.uk/media/eispcjem/net-zero-highways-our-2030-2040-2050-plan.pdf>
2. You request that National Highways delay this project so that it can be reviewed following the publication of the Strategic Investment Plan by Transport for the South East (TfSE). We understand that this plan is under development and will be published early in 2023.
3. You request that National Highways delay this project so that it can be reviewed against a) National Highways own commitment to 'modal shift', b) improving bus, cycling and walking on the SRN<sup>1</sup> c) review with sub-national transport bodies; as contained in National Highways own climate change policy document. see page 25 in: <https://nationalhighways.co.uk/media/eispcjem/net-zero-highways-our-2030-2040-2050-plan.pdf>
4. National Highways be asked to ensure that this project is included within the remit of National Highways 'Environmental Sustainability Division' which has just been formed. See the UK Government announcement of 7th January 2022: <https://www.gov.uk/government/news/national-highways-announce-new-environmental-sustainability-division-as-it-targets-net-zero> The Government says this action has been taken to raise the profile of environment within the organisation.
5. As the implementation of this project is very unlikely to commence this year and at least not until 2023 or 2024 you emphasise the particular importance you attach to National Highways ensuring that this project is subject to the biodiversity 'net gain' requirements of the Environment Act 2021.

In addition, we ask you to take the following into account when reaching any decision on this scheme:

*It is the common goal of the UK Government, the Department for Transport, National Highways, and Transport for the South East to implement a bold net zero vision for 2050. This vision recognises that the transport sector must accelerate its shift towards multimodal forms of freight and transport. The South Downs Network believes that the proposed Grey Route does not align with the principles of this vision and proposes that it is revised, collaboratively, by National Highways, Transport for the South East and local-level groups.*

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<sup>1</sup> Nation Highways say "Improve public transport operations on the SRN, together with promotion of walking and cycling"

## HM Government – Build Back Greener, Department for Transport – Decarbonising Transport

- At the national level, the UK government's plan to Build Back Greener states that the transport sector emits the largest share of UK greenhouse gases at 23%
- It expresses the need to 'accelerate the modal shift to public and active transport'
- This shift will include developing the transport of 'freight from road to more sustainable alternatives, such as rail, cargo bikes and inland waterways'
- The Department for Transport's Decarbonising Transport plan states that we cannot rely on 'the electrification of road transport', and that 'it will be essential to avoid a car-led recovery'
- **The Grey Route proposal is not aligned with the government's plan to avoid a 'car-led recovery', and does not help the UK government achieve its goal of a 'modal shift to public and active transport'**

## National Highways

- National Highways also recognises that travel on its road network represents the largest source of emissions in the UK
- National Highways' own roadmap for net zero emissions details its support for a modal shift, and seeks to 'publish a plan to improve public transport on the SRN in 2023'
- It agrees to 'work with sub-national transport bodies to agree priorities and actions to support delivery of our net zero strategies by 2022'
- **The Grey Route proposal is not the optimal choice for National Highways to fulfil its principle of a modal shift, nor is it consistent with its desire to work with sub-national transport bodies in the future – the bypass should not go ahead without a collaborative study with local transport groups in how transport can be improved in the area**

## Transport for the South East 2050 vision

- TFSE recognises that 'transport is the single biggest contributor to UK greenhouse gas emissions and the majority of those come from private cars'
- TFSE's vision for achieving a sustainable transport network states that 'where people still need to travel longer distances, better provision of sustainable transport options should be provided to reduce dependency on the private car'
- It specifically states that journeys made on the A27 should be based on a 'multi-modal approach'
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- **The Grey Route is inconsistent with the principles of this vision – more details are needed in how TFSE's principles should be implemented, and this process should take place in conjunction with National Highways and local groups**

Between the aforementioned transport bodies there is consensus that:

1. Transport on UK roads is the most pollutant sector
2. A multimodal shift is necessary for the sustainable development of transport
3. Use of public and active transport is favourable to private car use
4. Cooperation between different transport bodies is important

Therefore, the SDN is calling on National Highways to reconsider its Grey Route proposal until an alternative can be found which aligns the common net zero goals of transport bodies at the national, regional and local level. A decision of such gravity to the local community, at such a crucial juncture in the UK's 2050 net zero vision, and at such exceptional environmental and economic cost should not be taken lightly. It is important that options are reviewed carefully before irreversible steps are made.

#### National Parks and their 'Setting'

Para 5.152 of the National Policy Statement for National Networks published in 2014, states that "there is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty."

In addition, paragraphs 5.150 and 5.151 of the National Policy Statement reiterate the more general presumption against major development in National Parks.

Para 176 of the National Planning Policy Framework (NPPF) has also recently been updated to include protection for the setting of National Parks. In relation to the **setting** of National Parks and infrastructure it says: "should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas".

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Please see references on the next page

## References:

- a) HM Government, *Net Zero Strategy: Build Back Greener*, October 2021  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1033990/net-zero-strategy-beis.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf)
  - b) Department for Transport, *Decarbonising Transport: A Better, Greener Britain*, June 2021  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf)
  - c) Transport for the South East, *Transport Strategy for the South East*, June 2020  
<https://transportforthesoutheast.org.uk/app/uploads/2020/09/TfSE-transport-strategy.pdf>
  - d) National Highways, *Our 2030 / 2040 / 2050 Plan*, 2021  
<https://nationalhighways.co.uk/media/eispcjem/net-zero-highways-our-2030-2040-2050-plan.pdf>
  - e) Nature and Biodiversity: Environment Secretary - in June 2021 [The Guardian](#) quoted the Environment Secretary, George Eustice when he said: "If we want to realise the aspiration set out in Prof Dasgupta's landmark review to rebalance humanity's relationship with nature, then we need policies that will both protect and enhance the supply of our natural assets. "This is what lies at the heart of the Government's 25-year environment plan, and our new measures to embed biodiversity net gain further in the planning system for major infrastructure, through our landmark environment bill".
  - f) HM Treasury – The Economics of Biodiversity: [The Dasgupta Review](#)
  - g) National Infrastructure Commission: Design Principles National Infrastructure (March 2020): '[climate people places value](#)'
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