



Submitted by email to: A27ArundelBypass@highwaysengland.co.uk

Response to statutory consultation for the A27 Arundel Bypass

March 2022

1. The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all. We are a national charity and work closely with the local Park Societies that operate in the individual National Parks to protect, enhance and promote these unique and special places.
2. The proposed route for the A27 Arundel Bypass runs very close to the South Downs National Park and the existing A27 runs through the National Park at this point. In determining the most appropriate option for this location, Highways England must take full account of the additional planning protections that apply in National Parks and their settings. This means that far more consideration should be given to the role that improved public transport and support for other sustainable transport measures could play in addressing the existing issues on this part of the A27 and greater priority should be given to improving facilities for walking and cycling and providing better public transport services in the area in order to reduce the need for roadbuilding. This should include improved local bus services and public transport links at Arundel and better walking and cycling routes to other local stations.
3. Campaign for National Parks **objects** to this proposal as it will cause substantial harm to the National Park and its setting and will damage the wildlife, habitats and special qualities of this area. Insufficient consideration has been given to developing options other than dualling when considering proposals for the A27 Arundel Bypass. We support the Arundel Alternative, a wide 40mph single carriageway which would run between Ford Road roundabout and Crossbush junction. By excluding less damaging alternatives to dualling and failing to place more emphasis on sustainable transport options Highways England is failing to take appropriate account of the extra planning protection which applies in National Parks and their settings; the long-established presumption against significant road widening or the building of new roads in National Parks; and its statutory duty to take account of the potential effect of their decisions and activities on National Park purposes. We are also concerned

that National Highways has completely ignored the need to meet net zero targets in its decision-making on this project. For these reasons we believe that the scheme is not yet ready to enter the Development Consent Order process.

4. Our response focuses particularly on the issues we have highlighted above and given the nature of our response we have chosen not to use the form supplied. We do not wish our response to be treated in confidence.
5. National Parks are our finest landscapes with the highest level of protection. They contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for recreation. They also deliver key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy of England through tourism, farming, and other related businesses.
6. There is evidence that road schemes justified on the basis of reduced journey times fail to deliver the promised economic benefits¹. Roadbuilding in areas in or close to National Parks are even less likely to deliver economic benefits as the economy in these areas is heavily dependent on a high-quality environment.
7. There is a long-established presumption against significant road widening or the building of new roads in National Parks. This is clearly set out in paragraph 5.152 of the *National Policy Statement for National Networks*² published in 2014, which 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**.” (our emphasis)
8. In addition, paragraphs 5.150 and 5.151 of the National Policy Statement reiterate the more general presumption against major development in National Parks, which is also set out in paragraph 176 of the National Planning Policy Framework (NPPF)³. This paragraph of the NPPF was updated in July 2021 to include protection for the setting of National Parks, and the new text states that development within these areas “should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”. This update to the NPPF was introduced since National Highways announced its preferred route for the Arundel Bypass in October 2020 so that decision should now be reviewed to take account of this additional protection which makes the proposal even more incompatible with national planning policy.

¹<https://www.cpre.org.uk/resources/transport/roads/item/4542-the-impact-of-road-projects-in-england>

² <https://www.gov.uk/government/publications/national-policy-statement-for-national-networks>

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100575/9/NPPF_July_2021.pdf

9. The Government has also emphasised the additional planning protection for National Parks in various other key documents including the 25 Year Environment Plan⁴ (page 57) which provides strong support for greater enhancement of protected landscapes. The recent Government response to the Glover Review⁵ again acknowledges the special role that protected landscapes hold within the planning system and commits to exploring opportunities for developing this role further, alongside a series of commitments to ensure that protected landscapes are delivering more for nature, people and climate, including amending the statutory purposes of protected landscapes and strengthening the duty on other public bodies to ensure that they are doing more to further those purposes (paragraph 10 below includes details of the existing duty and purposes). Pressing ahead with this damaging road scheme would be completely incompatible with the delivery of these commitments and the Government's vision for the future of protected landscapes.
10. All public bodies have a duty to take account of the potential effect of their decisions and activities on National Park purposes, **including activities undertaken outside National Park boundaries which may affect land within them**⁶. National Parks' current statutory purposes as set out in the *Environment Act 1995* are:
- to conserve and enhance natural beauty, wildlife and cultural heritage; and
 - to promote opportunities for public enjoyment and understanding of their special qualities.
11. **This means that National Highways should be seeking to conserve and enhance National Parks and their settings through all of its activities.** High traffic levels already have a negative impact on the tranquillity and natural environment in this part of the National Park. It would be completely inappropriate, and contrary to both National Park purposes, to develop road proposals which increase the volume of traffic here. National Highways should be placing a much stronger emphasis on ensuring that the proposed solution protects and enhances the National Park and its setting instead.
12. We are very concerned that the proposals put forward in this consultation would be extremely damaging to the South Downs National Park and its setting, including through increased noise, light and air pollution. The proposed bypass would damage the Park's special qualities and have a negative impact on views into and out of the Park, the landscape character of this area and the setting of important cultural heritage assets such as Arundel Castle. It would also harm wildlife and biodiversity by severing the links between important habitats and would have a negative impact on users of public rights of way in this area. We do not believe that National Highways has taken sufficient account of the full scale of potential impacts on the National Park when developing these proposals. It is particularly disappointing that

⁴<https://www.gov.uk/government/publications/25-year-environment-plan>

⁵ <https://www.gov.uk/government/publications/landscapes-review-national-parks-and-aonbs-government-response/landscapes-review-national-parks-and-aonbs-government-response>

⁶ This requirement is in Section 11A(2) of the *National Parks and Access to the Countryside Act 1949* as amended by Section 62(2) of the *Environment Act 1995* and is often referred to as 'the S62 duty'.

the emphasis is entirely on dualling and there has been far too little consideration given to smaller scale alternatives even though it is a statutory requirement under the Environmental Impact Assessment Regulations for alternative options to be properly assessed.

13. Finally, we are very concerned that National Highways has failed to take account of the UK's international and national commitments to reducing carbon emissions when developing these proposals. It is completely incompatible to be planning for increased road capacity which will generate more traffic and increase emissions at a time when the focus must be on tackling the climate emergency. The consultation document suggests that "no potential significant effects are anticipated" with regard to climate impacts for both the construction and operational phases of the project. This seems very optimistic for a project which would increase road capacity and thus generate more traffic, travelling more quickly. However, even if it is the case that the scheme would not generate any additional carbon emissions, that does not go far enough. National Highways should now be designing proposals which do not merely maintain the current situation but which support a reduction in emissions given the scale of the climate emergency and the need to reduce emissions by 78% by 2035 in order to meet the sixth carbon budget.
14. The UK has a statutory requirement to meet net zero emissions by 2050 and it is very clear that consistent reductions in carbon emissions will need to be delivered across the whole economy, including in transport, in order to meet this target. The South Downs National Park Authority (SDNPA)'s response to this consultation⁷ highlights that "the scheme would...cancel out any work the SDNPA could achieve on travel footprint of the National Park" demonstrating just how vital it is to ensure that new development is contributing to, rather than working against, net zero targets.
15. Furthermore, in its most recent Progress Report to Parliament⁸, the Climate Change Committee (CCC) makes it absolutely clear that we cannot continue with business as usual when it comes to roadbuilding. The CCC states that "Decisions on investment in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero" and calls on the Government to "Ensure all departmental policy decisions, and procurement decisions, are consistent with the Net Zero goal". National Highways must, therefore, now withdraw the proposals for the A27 Arundel Bypass and develop new proposals which are consistent with helping achieve net-zero, as well as protecting the National Park.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk)

⁷ <https://www.southdowns.gov.uk/wp-content/uploads/2022/02/20220303-Agenda-Item-8-A27-Arundel-Bypass-Consultation.pdf>

⁸ <https://www.theccc.org.uk/wp-content/uploads/2021/06/Progress-in-reducing-emissions-2021-Report-to-Parliament.pdf>