Question 8. Please add any other comments that you may have regarding existing issues:

- The existing road already severs irreplaceable habitat and causes light, noise and vibration pollution. In a time of ecological and climate emergency as declared by the Government (May 2019), Highways England (HE) should be looking to address this rather than make the situation worse by destroying and severing even more habitat.

- The Sussex Wildlife Trust is concerned that the questions and options presented throughout the consultation do not address the current impact on biodiversity, for example it is not included as an issue of concern in question 7. This is representative of the entire consultation process that has provided biodiversity information, but has fail to allow adequate scrutiny of that information through the consultation format.

- It is clear there are existing issues regarding access, particularly for non-motorised users. Whilst this is noted in the consultation brochure and question 7, an increase in the use of sustainable transport is then dismissed as unlikely to solve the problems of queuing and congestion at Arundel. This is at odds with the Sustainable Transport Hierarchy, introduced by the Sustainable Development Commission and adopted by the Department for Transport. This consultation should have provided clear information of how the hierarchy has been worked through. HE must operate within Government Policy and therefore must ensure that all reasonable options to minimise demand, widen travel choices and improve efficiency have been considered before moving to the final option of increasing capacity through the provision of new infrastructure schemes.

- We would like to highlight that whilst we have selected do nothing for questions 4 and 5, this is purely due to the restricted options available. Our preference would be the consideration of the Arundel Alternative, a wide single carriageway, 40 mph road. Whilst this would follow a similar route to the Beige and Cyan options we cannot support these as they involve permanent loss of irreplaceable habitats.

- In relation to question 6 Sussex Wildlife Trust do agree that improvements are required to the A27 around Arundel, however this relates to the need to improve connectivity for habitats that are already severed by the road, in line with HE Environment Strategy.

Question 13. Please add any other comments about the proposed options:

- Having viewed the available information on the 2019 consultation webpage, the Sussex Wildlife Trust does not believe that the process has considered all options available to improve access around Arundel and the wider A27 network. It is clear that there has been no consideration of the Transport Hierarchy and the requirement to consider all reasonable options to minimise demand, widen travel choices and improve efficiency before moving to new infrastructure schemes.

- All of the schemes proposed are reliant on additional schemes on the A27 coming forward, such as the Lancing to Worthing scheme, which is currently on hold. We therefore do not feel it is justified to plough ahead regardless without a holistic approach to access being identified. Looking at this patch of road in isolation of other sustainable transport needs and the wider trends for the whole of the A27 is short sighted.
• HE must explore the option of the Arundel Alternative, a shorter, 40mph wide single carriageway which addresses pinch points and improves flow. This appears to be far less damaging when compared to the huge environmental impacts of the schemes currently in the consultation.

• All six options fail to address the Government’s commitment to a legally binding net zero emissions targets by 2050. None of the proposed schemes do anything to address the fact that transport emissions are vastly lagging behind other sectors when it comes to emissions.

• The Sussex Wildlife Trust does not see that the suggested benefits of the options justify the severe environmental damage. The schemes objective to minimise harm to the environment is not being met when all proposals put forward lead to the destruction or severance of habitats. Table 8-9 within Chapter 8 of the Environmental Assessment Report (EAR) clearly shows the devastating extent of the habitat severance and loss as a result of the proposed schemes. HE needs to consider the impacts of the loss both financially in terms of the compensation requirements and the services and unquantified benefits delivered by those habitats to the community.

• It is unduly restrictive for question 12 to only allow the selection of one option. All six options currently have unacceptable impacts on biodiversity and people. As we speak for wildlife, the Sussex Wildlife Trust have to select the Crimson route, as it will result in the destruction of over 20 hectares of ancient woodland. However we question how useful this question is to HE when all the options are bad.

• The schemes are unacceptable given that the National Planning Policy Framework is clear that pursuing sustainable development involves measurable net gains for biodiversity. In addition, the Government expects HE to support the objectives of Biodiversity 2020 as stated in Highways England’s Biodiversity Plan. The EAR admits that net gains are not possible for the majority of options as the loss of ancient woodland cannot be compensated (Appendix 8-25, section 4.1.1.1).

• The Sussex Wildlife Trust is appalled that the scheme options have failed to adequately understand and prioritise the importance of the landscape connectivity and functioning. This is apparent from the scheme options proposed and the subsequent impacts on bat species, as highlight in EAR Chapter 8, section 8.9.2.25: The construction and operation of the Scheme are likely to have a number of residual significant adverse effects on the conservation status of bats. These effects are generated by the fact that the success of roost replacement measures and measures to ensure bats can safely cross the operational scheme are part experimental. Disruption to the complex habitat use patterns by different bat species cannot be fully predicted and thus uncertainty remains over mitigation efficacy.

• At the moment the different disciplines in this project appeared to be in siloes leading to conflicts between different objectives and scheme requirements. We ask HE to justify why it has failed to address the importance of landscape functionality for this scheme when in contrast, the HE scheme for the A147 in Gloucestershire uses a landscape-led approach.

• The failure to adequately understand the landscape function has resulted in the proposal of a bund across the Arun Valley, a functioning flood plain. This is clearly inappropriate and not futureproof. Severance of the landscape in the Arun Valley will lead to as yet unknown and uncertain impacts on the function of the flood plain. Given the incredibly sensitive nature of the landscape and potential impacts in relation to enabling maximum permeability for species and landscape function, in the event the scheme does proceed with a route across the Arun Valley, the only suitable approach must be a viaduct.

• The objectives of the scheme aim to address pollution issues. However there has been an oversight in that little consideration appears to have been given into how the habitats that will be affected by the schemes currently deliver ecosystem services such as carbon sequestration and absorption of particulates. A natural capital assessment is required and further to this, it is vital that wider pollution issues relating to light, noise and vibration are not downplayed.
• Sussex Wildlife Trust is concerned that all the options presented result in habitat severance. It is important to understand that many of the species present within the area require mobility through the entire area of woodland and connected habitat. The whole landscape represents roosting, feeding and foraging opportunities for bats and to interrupt this natural function with the uncertainty in the success of mitigation could lead to devastating impacts on the conservation status of populations.

• Within section 8.9.2.25 of EAR Chapter 8 it is made clear that the full implications of schemes on biodiversity, and particularly bats, are not fully understood and therefore confidence in the mitigation proposed cannot be ascertained.

• At the current stage it appears that the mitigation for the schemes is not costed out or included, this will have significant implication on deliverability given the budget limitations involved. It is also misleading to suggest that mitigation is sufficient when habitats such as ancient woodland and their soil are irreplaceable. We are clear that where mitigation is required, this must not be compromised to bring a scheme in on budget.

• Given that this project is classified as a nationally significant project, it is required to deliver Net Gain. Appendix 8.25 of the (EAR) Biodiversity Net Gain Assessment, looks to address this – We seek clarity on the suitability of the 6 step approach to calculating net gain and question whether it is successfully integrated with other disciplines within the scheme so that all opportunities to maximise net gain have been explored.

• All of the above points question the suitability of the options proposed. It is the Sussex Wildlife Trust’s position that none of the options proposed will result in a viable scheme that will resolve the matters of concern and protect and enhance the precious environmental resources at stake. No preferred route announcement should happen as a result of this consultation. HE need to do more work on alternative options.

Question 18. Do you have any other comments about the consultation process or materials?

• We raise concerns about the availability of information during the consultation process. The Sussex Wildlife Trust had to lodge requests for documents due to them not being available or because links were missing or incorrect. Additionally, documents have been revised over the period of the consultation due to inaccuracies in the information presented. We do not feel that this is an acceptable way to run a public consultation of this significance and it leaves us with doubts about the accuracy of the information.

• The Sussex Wildlife Trust does not feel that the consultation process and the questionnaire that has been used to capture the views on the proposed schemes conveys the significance of the biodiversity issues in relation to these proposals. While the process has put forward a large number of biodiversity related documents it has not enable sufficient scrutiny of this information when it has asked for public or organisational views. We are therefore concerned that biodiversity is not sufficiently represented and therefore will not be adequately consider in the evaluation of the schemes.

• Given the restrictive nature of the consultation questions we do not feel that respondents are given adequate opportunity to explain the nuance of the situation and how all the options presented have negative impacts for the environmental capacity of the area. For example, respondents are required to highlight one option as unacceptable in question 12 when all options proposed are unacceptable. Similarly in question 10, you are able to select ’none’ but there is no option for ‘all’. The Sussex Wildlife Trust would have selected ‘all’ for the question on which option would ‘be worst for your enjoyment of the local environment’ but this was not available to us.
Highways England needs to strongly consider the scheme suggested as the Arundel Alternative, which proposes significantly less land take and severance. Leaving out the option of the Arundel Alternative and in particular the use of slower, single wide carriageways has artificially restricted the consultation process.

The brochure for this consultation period makes it clear that there although an original budget for the scheme was set at £100-250 million (pg 5), the cost of the scheme options are unknown given the new information coming forward and the unknowns in terms of compensatory costs, construction cost and mitigation. Given this acknowledge uncertainty the Sussex Wildlife Trust does not have confidence that the options proposed can be cost effectively delivered against the back drop of such significant habitat loss.

A consultation of this scale should take a progressive approach when assessing its impact on the natural environment via the production of a Natural Capital Assessment. The Natural Capital Committee in January 2017 made a clear recommendation that the National Infrastructure Commission should incorporate natural capital, including its maintenance, restoration and recovery, into long term infrastructure plans. It also makes a direct recommendation that Local Authorities and major infrastructure providers should ensure that natural capital is protected and improved, consistent with the overall objective of the Defra 25 Year Environment Plan.

Question 25. Please provide more details of how current issues with the A27 around Arundel affect your organisation:

The Sussex Wildlife Trust work with the Arun Valley Vision Group and we are aware that the biggest threats facing this area are biodiversity and flood risk. We do not feel that proposals and the details currently provided adequately acknowledge these risk and in fact appear to exacerbate these problems.