

Report to	South Downs National Park Authority
Date	29 November 2016
By	Countryside and Policy Manager – Wealden Heaths
Title of Report	A27 East of Lewes Consultation Response

Recommendation: The Authority is asked to;

- 1) Agree that Members and appropriate officers continue to be engaged with the specific consultation and technical groups that HE have set up, to ensure NP purposes are fully represented and the need for a strategic approach for the development of transportation routes in the South East was made.**
- 2) Note the evidence base provided on the impacts of the proposed A27 works on the Special Qualities**
- 3) Recommend that, on the basis of the Highways England evidence so far presented and our analysis of it,**
 - **All Selmeston options, 1,4 and 6 are unacceptable, for reasons set out in the supporting evidence**
 - **The provision of an east to west non-motorised user path is supported**
 - **As currently presented that the junction proposals within the National Park would have significant adverse impacts so the SDNPA will on a case by case basis call for better design led solutions for mitigation,**
 - **Urge Highways England to look more comprehensively at other, lower impact, measures that could improve the route in terms of traffic flow and safety**
 - **Work with HE to ensure their nationally designated funds are also utilised for maximum benefit locally**
- 4) Delegate to the Director of Countryside Policy and Management - in consultation with the Chair of the P&P Committee and the Authority Chair - to submit a response to the Highways England Consultation**
- 5) Call for a more strategic consideration by all authorities and agencies to the cumulative long-term impacts of proposed infrastructure developments on the Special Qualities of the National Park and its setting.**

I. Summary and Background

- I.1 Members will recall the background and discussions which led to the adoption of the SDNPA 'Position Statement' as the basis for responding to proposed road schemes for the A27 (Arundel, Chichester, Worthing & Lancing, East of Lewes) at the 23 September 2014 SDNPA meeting, see **Appendix I**. The approach agreed is to assess the impacts (positive and negative) of any scheme on the Special Qualities of the National Park when compared to the present situation.
- I.2 Members will also recall that at the Part II discussions of the SDNPA meeting of 1 December 2015 an approach was agreed to collect information on the impacts on the

Special Qualities to inform our response to the consultation by Highways England (HE) and their consultants.

- 1.3 The pre P&P members session on the 1 November 2016 heard from officers who gathered evidence and commissioned research which is contained or linked within the appendices with regards to the proposed scheme east of Lewes to Polegate to help Members form a view and assess the impacts.
- 1.4 Members also had the opportunity to listen to Highways England and WS Atkins, their consultant engineers, and be reminded of the officers' evidence at a site visit and workshop on the 17 November 2016 at Firle/Selmeston where the afternoon's session centred on the recommendations for this report.
- 1.5 Members also requested at their December 2015 NPA meeting that the impacts of the four schemes at Chichester, Arundel, Worthing and east of Lewes should be assessed as to their cumulative impact on the rural economy of the SDNP at a high level.
- 1.6 The subsequently commissioned economic report by Steer Davies Gleave is due in mid December.

2. Current Situation

Highways England Consultative/Steering group structure

- 2.1 Throughout the process HE and their consultants have engaged with stakeholders in a variety of ways. This includes talking to key stakeholders behind the scenes, formal stakeholder events, and different levels of officer/member groups
- 2.2 This approach has sometimes appeared haphazard and without reasons for those involved. Timescales are often tight which has meant that some meetings have been missed. From HE's and their consultant's perspective this way of working makes absolute sense because key pieces of work come up for which they need further information or feedback. Meetings therefore happen in a rather apparently random fashion, with work not falling neatly into monthly or quarterly sections
- 2.3 The overall process is as prescribed in the Highways Design Manual for Roads and Bridges in which a sequence is followed where preliminary work is done, key stakeholders views are sought, amendments and further designs are brought forward and updates given regularly, before going on to submit a preferred option, which is then ratified, modified or refused, and then onto construction phase
- 2.4 The SDNPA involvement for the scheme east of Lewes has been limited through a number of channels, and has not followed the same model as at Chichester and proposed for Arundel and Worthing/Lancing, where;
 - a) A Senior Officers group on which the CEO has a seat
 - b) A Members Group for which the appropriate member will sit/be consulted
 - c) A Focus Group for officers and communications teams
 - d) A Technical Working Group for officers
 - e) An Environmental Group was formed (Chichester scheme only)
- 2.5 For the east of Lewes schemes, officers have met HE and Atkins as part of key stakeholder events and also had smaller meetings with a few partners present or on our own, the first Focus Group meeting did not take place until Oct 16.
- 2.6 As part of an unofficial meeting with ESCC and HE/Atkins in June 2016 officers were informed that public consultation for the proposed scheme east of Lewes to Polegate would be held in November 2016. Previously consultation was planned for Spring 2017, but this has been brought forward.
- 2.7 The SDNPA discussions with HE and consultants have focused on;
 - Junctions – turning off and onto the A27
 - Improving accessibility for non-motorised users alongside and across the A27

- Provision of laybys to allow stricken vehicles to be moved off the carriageway
- The proposals for a 2km and subsequently a 4km bypass for Selmeston, passing through the SDNP
- Journey time reliability, accident records and speed limits
- The overall impacts on the special qualities of the SDNP.

2.8 **Planning Considerations**

- 2.9 It is relevant to look at Government policy with respect to major development as set out in the National Planning Policy Framework (NPPF)
- 2.10 Paragraph 17 sets out the broad planning principles in plan and decision making. These encourage the delivery of multiple benefits from land use in both rural and urban areas including reference to ecosystem service functions such as flood mitigation, carbon storage and provisioning services such as food and fuel.
- 2.11 Paragraph 109 recognises that value and wider benefits of ecosystem services and requires that the planning system contribute to their enhancement and protection.
- 2.12 Paragraph 114 requires that Local Plans should take a strategic approach and plan positively for the creation, protection, enhancement and management of networks for biodiversity and green infrastructure.
- 2.13 Paragraph 115 of this document states that great weight should be given to conserving landscape and scenic beauty, wildlife and cultural heritage in National Parks, the Broads and Areas of Outstanding National Beauty
- 2.14 Paragraph 116 then goes on to say that planning permission should be refused for major development except in exceptional circumstances and where it can be demonstrated to be in the public interest
- 2.15 Paragraph 117 also states that planning policies should contribute to the promotion of coherent ecological networks.
- 2.16 The construction of a major trunk road around Selmeston would clearly trigger the “major development test” as set out in paragraph 116 of the NPPF as follows:
- 1) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - 2) The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - 3) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

3. **Impacts on the Special Qualities of the SDNP**

- 3.1 To fully understand the impacts on the special qualities of the SDNP, information was needed to assess the following key areas
- Landscape impact, visually, tranquillity, accessibility
 - Biodiversity
 - Archaeological/Cultural heritage
 - Transport modelling
 - Economy
 - Ecosystem Services
- 3.2 It has not been possible to commission any work for traffic modelling as data has not been made available from Atkins or HE, but the types of impacts the SDNPA would be looking to ensure are taken into account are
- a) Understanding the balance between local and through traffic and what that means both now and in the future

- b) The effects of changing traffic route patterns, mix of traffic (HGVs, car, bus etc.) and volumes on the local roads into and from the SDNP, to assess whether these local road networks have sufficient capacity to accommodate changes and the effects on the communities through which they pass
- c) The impacts of traffic volumes at neighbouring pinch points at Lewes and around Polegate/Hailsham/Eastbourne, to understand the extent to which any potential journey time savings would be lost in increased waiting times elsewhere on the route.

4. Headlines from Landscape, Access and Visual Impact analysis (including, Tranquility) (Full report linked at **Appendix 2)**

Summary Conclusions of Landscape Assessment

Description

4.1 SDNP have appointed consultants to undertake an assessment of the Landscape and Visual impacts of the route options for the A27 East of Lewes. This work is being carried out in advance of the public consultation for the proposals in order that the authority is well informed about the likely effects of the various options as the schemes are developed in more detail. At this stage our consultants have been working on outline design drawings which are not full scheme designs. Therefore these are to be regarded as interim conclusions based on the information available at this time.

4.2 The following report outlines the conclusions of the assessment process at this stage and can be read in conjunction with the scheme drawings and mapped information provided by SDNP GIS team.

Background information

4.3 The existing route of the A27 between Lewes and Polegate is of some age - the existing route is clear on the 1870 edition OS. The Sussex historic landscape character assessment shows field patterns of consistent age surrounding the route. What these maps tell us is that the route has been largely unchanged for roughly 130 years. The surrounding field patterns, boundary hedgerows and trees which line the route, land use, noticeably undulating topography and the existence of mature hedgerows, woodland and water courses also contribute to the sense of intactness, rurality and containment.

Landscape planning policy

4.4 The route options fall within two planning areas – Wealden District Council and Lewes District Council, both of which share Joint Core Strategies with SDNP. The Joint core strategies will be superseded by the SDNP Local Plan in the future, the emerging policies of which carry little weight. Both WDC and LDC Joint Core Strategies have strategic policies relating to the protection of the landscape of the South Downs National Park and the conservation of its character. In addition the saved policies of both previous Local Plans set this out in more detail in relation to specific types of development.

4.5 It is understood that the preferred route for the A27 improvement scheme, will be progressed through the Infrastructure planning procedure, rather than through the local authority planning process. The proposals will be submitted to the Planning Inspectorate for approval of a Development Consent Order (DCO) on the grounds of national interest. It is not known how much weight is given to local plan policy in the DCO process.

4.6 Clearly the proposals would fall into the category of major development and in terms of the NPPF would need to satisfy the tests in paragraphs 115 and 116.

Landscape Character description

4.7 This length of the A27 is within the Scarp Footslopes Landscape character area according to the South Downs Integrated Landscape Character Assessment (SDILCA). It comprises the lowland shelf that lies at the foot of the steep northern scarp of the South Downs east of the Arun Valley. The landscape type is dominated by the chalk scarp which forms a dramatic backdrop. The footslopes themselves form a transition between the steep chalk scarp to the south and the low weald to the north. The SDILCA describes the area as having complex geology giving rise to a locally undulating landform. The mosaic of farmland and woodland with irregular fields of arable and pasture bounded by an intact network of thick hedgerows

with hedgerow oaks and woodland. Streams arising from springs at the foot of the chalk flow northwards in narrow hidden stream valleys, some enshrouded in woodland. Underhill lanes, often surviving as rural lanes or rough tracks, indicate the course of ancient coaching lanes at the scarp foot. Impressive panoramic views onto the footslopes from the adjacent scarp and downs reveal a balanced woodland and farmland mosaic.

Experiential and cultural qualities

- 4.8 The SDILCA identifies the scarp footslopes as a deeply rural landscape with a low incidence of built intrusion. The over-riding sense of tranquillity is locally eroded by the A27 and the railway. The scarp footslopes are also noted for being the home of writers and artists colonies, most notably being the Bloomsbury set whose summer retreat was Charleston Farmhouse, to the south west of Selmeston.

Landscape Sensitivity and forces for change

- 4.9 All of these characteristics are identified as being vulnerable to change, particularly from the cumulative effect of piecemeal changes. Whilst the wooded and hedgerow'd character provides opportunities to absorb some landscape change; the area is highly visible from the adjacent scarp, which increases its visual sensitivity to large scale change. The scarp is a large area of open access land which is criss-crossed by the PROW network, lanes and tracks (many of which are historic) which provides opportunities for access in the SDNP to the large population of Eastbourne to the east.
- 4.10 The SDILCA identifies the 'progressive upgrading of the A27(T) as a force for change in the landscape.

Landscape impacts for the route options

- 4.11 Route options 1 and 4 for the A27 improvements East of Lewes both include the formation of a by-pass for the village of Selmeston, cutting a new alignment through greenfield land. Route option 1 (the southern off-line option) would be a total of 3.9km long, and route option 4 (the near off-line option) would be a total of 1.7km long. Both of these options would involve converting the existing route of the A27 into a single track road with shared-use path alongside, and in the case Option 1 some sections of the existing route would be converted to a footway and cycle way, but closed to vehicular traffic. Route option 6 involves improvements to a 4km long section of the A27 mostly on its existing footprint in the Selmeston Area, but with a short section between Selmeston and Alciston where an existing bend in the road would be smoothed out by creating a wider curve, cutting a track into the adjacent fields.
- 4.12 All 3 options would involve significant vegetation loss, including hedgerows, tree-belts and parts of woodlands. Similarly, all 3 options involve considerable earthworks, with the creation of cuttings and embankments to smooth out the vertical alignment of the A27 route. In particular, Routes 1 and 4 include proposals to dig a substantial cutting through Mill Hill (south-west of Selmeston), with an elevated section on its approach. All 3 options include proposals to create an elevated section over the local valley between Selmeston and Alciston (albeit in different positions for each option, with differences in the proposed vertical elevations). In relation to Option 6, in order for these earthworks to be undertaken traffic would need to be taken away from the existing road and onto temporary construction roads stretching between Middle Farm and Molehill Shaw, and also on the tree-line incline to Selmeston from the west.
- 4.13 The 2 by-pass options would cause issues of severance, cutting across routes of current public rights of way. Route option 1 would likely require the stopping-up of public footpaths 2, 5a, 6, 7 and 8, and Route option 4 would likely require the stopping-up of public footpaths 2 and 14. In addition both route options would cut across existing farmland, dividing fields in two and in places leaving remnant parcels of land which are small and may not be a viable opportunity for continued agricultural use. The on-line road improvement option has the advantage of not causing an increase in severance.
- 4.14 Aside from the direct physical and landform effects of all 3 options for the route at Selmeston, each option would have implications for the wider landscape and visual amenity. In particular, both by-pass options would have significant implications for users of Bridleway

- 4, 1a, 3 (from Charleston Farm to Bo-Peep Lane). From here, the sequence of cut and fill earthworks would be visible, particularly the substantial cutting through Mill Hill and the elevated section leading up to it. Vehicle movements are likely to be more apparent, and the road noise is likely to increase. This would have considerable implications for the pleasant pastoral scene / visual amenity and its field edge vegetation.
- 4.15 Similarly, both by-pass options would have significant implications for users of Bo-Peep Lane and Common Lane, with the section of raised carriageway tracking a route across the local valley between Selmeston and Alciston being a notable visual and landscape change. Again, vehicle movements are likely to be more apparent, the road noise is likely to increase and there would be considerable implications for the pleasant rural scene / visual amenity. Furthermore, the proposed road would cross over Bo-Peep Lane, and the sense of being in an enclosed rural lane would be comprehensively erased.
- 4.16 Both by-pass options would have significant implications for users of public footpaths 4, 5a, and 14 (i.e. the route from Alciston village to Selmeston village). Again, the section of raised carriageway tracking a route across the local valley between Selmeston and Alciston would be notable visual and landscape change, with similar implications as those described above.
- 4.17 Each of these landscape or visual effects are likely to have adverse implications for the SDNPA's statutory purposes, in particular the promotion of opportunities for the understanding and enjoyment of the park's special qualities. From the high ground (such as along the nearby Downs ridge, and at Wendover Hill to the south-east, and Mount Caburn to the north-west, the road-realignment may to some extent affect enjoyment of the breath-taking views. Elsewhere (particularly on the network of Public Rights of Way on the scarp footslopes, nearer to the proposed A27 route) the proposed road improvements may erode the tranquillity and perceived un-spoilt qualities of the landscape. Wherever the road improvement proposals would cause truncation of the existing landscape experience (by cutting a route through it / severing a Public Right of Way) this would be contrary to the SDNPA's statutory purposes of conserving and enhancing the natural beauty, wildlife and cultural heritage, and the promotion and enjoyment of all 7 special qualities.
- 4.18 In some respects, the proposed Selmeston road improvement Option 4 would cause lesser landscape and visual effects than Option 1. In particular, it is not thought likely that effects would be felt along bridleway 2, 13 and 13a (from the Downs ridge to Charleston Farm) as the proposed road re-alignment route is not likely to be apparent in the overall scene, with Tilton Wood curtailing interconnectivity with the receptor route on the scarp slope, and close-range vegetation curtailing interconnectivity on with the receptor route on the scarp footslopes. Similarly, it is not thought likely that the section of road re-alignment proposed by Option 4 would be discernible in the overall scene from Mount Caburn (whereas the length of road stretching further west in Option 1 would be apparent).
- 4.19 The Selmeston road improvement Option 6 would have the least implications for the wider landscape and visual amenity. However, the implications it would have should not be underestimated. In order to facilitate the re-profiling of the road's vertical alignment, and in particular the smoothing of the bend over the local valley between Selmeston and Alciston village, temporary roads would need to be constructed. A substantial amount of vegetation clearance, currently running alongside the A27 would need to be cleared. This would have the effect of making the road and the effects of traffic much more noticeable than it currently is, as the visual and acoustic screening qualities of the vegetation would be absent.
- Separate Junction improvement options
- 4.20 In addition to the proposed road improvements at Selmeston, the proposed improvements of the route between Lewes and Polegate includes proposals at Drusilla's roundabout, Wilmington and Polegate. All of these proposals would have direct physical implications for the landscape amenity, inasmuch as they would require the clearance of some roadside vegetation. In many cases this would also expose nearby receptors to views of the highway, along with movement of vehicles across the scene and an increase in road noise. This would therefore erode the sense of tranquillity within the SDNP, and the experience of the setting of the national park along routes of entry into it.

- 4.2.1 The junction re-configurations are also generally impede connections to the wider PRoW network within and providing access into the SDNP. Whilst the road improvements have endeavoured to provide an NMU route alongside the A27, in an east-west direction, few opportunities have been exploited for providing NMU connections in north-south directions, and little provision has been made for NMU's to turn off the east-west route in order to access the SDNP or the setting of the SDNP to the north. The road improvements therefore would arguably have an adverse effect the SDNP's accessibility and PRoW severance.

5. Headlines for the Access element of Landscape, Access and Visual Impact Report (Potential effects on the Public Rights of Way (PRoW) network and connectivity to the SDNP)

Summary of points

- 5.1 There is some provision for Non-Motorised Users (NMUs) along the A27 existing and proposed alignments and in general this is to be welcomed as it facilitates east – west movement and is an extension of existing provision. However, the overall impression is that non-motorised users will be disadvantaged by the proposed schemes. In particular north/south access across the A27 is severely impacted.

PRoW network impacts

- 5.2 A number of footpaths and bridleways are completely severed by the proposed route options including the long distance promoted paths: the Vanguard Way and Weald Way.
- 5.3 Provision for Non-Motorised Users is frequently on the northern side of the carriageway with few opportunities for users to access the South Downs National Park.
- 5.4 A recurring concern is the provision of pedestrian refuges to facilitate crossing the A27. Where these are provided no provision is made for cyclists and equestrians to also cross the carriageway. This is particularly disappointing where it can be reasonably assumed that horse-riders and cyclists would be using rural lanes and the bridleway network either side of the A27.

Connectivity to villages and key destinations

- 5.5 Access to Charleston Farmhouse, a notable cultural destination, will be impeded by the proposals which appear to include the removal of the vehicle turning facility in the centre of the A27 carriageway. No provision is made for NMU's to cross the carriageway and access Charleston or the wider PRoW network.
- 5.6 Access to Alciston and the wider SDNP, particularly for horse-riders and cyclists, would be severely impeded by proposals to realign the A27.
- 5.7 There is an opportunity to improve connectivity for cyclists between Berwick railway station and Berwick village. However, the proposed improvements fail to address this issue and make no connection with either the existing promoted cycle route or the Vanguard Way long distance walking route.
- 5.8 At Wilmington, the proposed NMU subway is one of only two places where the proposed A27 improvements provide for pedestrians, cyclists and horse-riders to cross the A27 (the other place being the Pegasus Crossing at Drusilla's Roundabout). Its inclusion would benefit the PRoW network and enhance connectivity to the SDNP (notwithstanding concerns regarding landscape and visual effects). Additional footpaths to enable access to the proposed subway have not been detailed in the current drawings and would be required.

Conclusions

- 5.9 In conclusion, the road improvement options with the least adverse landscape and visual, and access connectivity effects would be the Selmeston option 6 (on-line option), Wilmington junction option 1 (although it should be noted that option 2 has some benefits which option 1 does not have, particularly the retention of more woody vegetation which would be beneficial for containing the visual and landscape experiential effects), and either Polegate junction option 10 or 12 (but not Polegate junction option 13). However, the highway designs to-date have not provided any detail of landscape mitigation measures.

Opportunities to undertake appropriate planting alongside the road improvements are considered to be imperative. Although planting would take time to establish, in the longer-term the adverse effects of the road improvements could be considerably reduced, with woody / native vegetation helping to 'settle' the road within its rural setting, containing views (i.e. reducing any significant visual effects to close-range viewpoints), making vehicle movement and noise less apparent in the overall scene.

6. **Headlines from Biodiversity** (full report in **Appendix 3**)

Preliminary Headlines for Biodiversity

- 6.1 The SDNPA commissioned Hampshire County Council to carry out an ecological desk-based assessment for the proposed routes, which has yet to be received, but from our own desk top exercise we would have the following comments to make.
- 6.2 Both offline bypass routes would be likely to have a significant negative impact on biodiversity: protected sites, semi-natural habitat extent, quality and connectivity, and populations of native species.
- 6.3 The proposal likely to have the least adverse ecological impact is the largely online route, though potential significant negative impacts remain.

Designated sites: National.

- 6.4 The Firle escarpment Site of Special Scientific Interest is within 1km of the proposed bypass routes. Designated for the area of extensive lowland chalk grassland with rare and unusual plant species. All the proposed routes fall within SSSI impact zones.

Designated sites: Local

- 6.5 Tilton Wood Site of Nature Conservation Importance is designated for its ancient semi-natural woodland which sits on clay soils over the chalk and is damp in nature. The most southerly proposal passes very close to the wood.

Protected Species

- 6.6 A significant number of protected and notable species occur within the 2km search radius for the proposed routes. These include various species of bats, dormice, water vole, reptiles, and great crested newt. Other protected species may be present which are representative of an area that is characterised by a mosaic of habitats such as woodlands, hedges, watercourses, arable and pasture land. These may be affected by the works, either directly or indirectly by unmitigated impacts.
- 6.7 Badger records are confidential and are not included in the report, however the citation for Tilton Wood does identify badger setts and therefore a full badger survey will need to be carried out in advance of any works.
- 6.8 There is a concern that the routes will sever extensive areas of habitat reducing connectivity and feeding corridors for species such as bats and dormice. Five species of bats have been recorded with feeding and maternity roosts in Tilton Wood and Selmeston and so it is likely that bats are commuting between the two areas.
- 6.9 These impacts will need to be fully assessed based on robust baseline information and field surveys; if this is not available for the initial route selection however, a precautionary approach to potential impacts is recommended which should first seek to avoid ecological impacts.

Priority habitats

- 6.10 The off line routes may impact on known areas of Ancient woodland, hedgerows which are key to providing connectivity, open water features and two chalk streams.

Invasive non-native species

- 6.11 The highway route options pass through areas where a number of non-native and invasive species have been recorded. In the majority, these relate to plant species and garden escapees, but include plants listed on Schedule 9 of the Wildlife and Countryside Act in England and Wales (including plants which are an offence to plant or otherwise cause to grow in the wild and plants that are illegal to sell) such as Japanese Knotweed.

- 6.12 Controlling the spread of these species is important but, especially in the case of Schedule 9 plants, construction projects can contribute to the spread of invasive species. The exact location of invasive species will need to be targeted for managed removal prior to any clearance or construction work. Based on the evidence reviewed to date there is considered to be **high potential** for non-native and invasive species to be present on all route options.

Ecological Enhancement

- 6.13 Natural Environment and Rural Communities Act 2006 encourages the incorporation of ecological enhancements into proposals. It is recommended that initial ecological surveys and reporting seek opportunities to contribute to biodiversity enhancement of adjacent habitats and contribute to existing initiatives.

Hydrological issues

- 6.14 The proposed routes cut through an area where clay soils cap the underlying chalk at the base of the Seaford chalk block. This area of chalk is a natural aquifer and the proposals will be adjacent to the natural spinglines, many of which are seasonal. Two chalk streams cross the proposed route. Any engineering works that cut into the chalk may expose the route to seasonal groundwater flooding.

- 6.15 The aquifer is also susceptible to contamination and the use of soak away drainage on highways has been shown to have a negative impact on the groundwater quality

7. Headlines from Archaeology/Cultural Heritage (Full report at Appendix 4)

- 7.1 South Downs National Park Authority commissioned Hampshire Services to carry out a Desk-Based Preliminary Assessment (DBPA) of cultural heritage issues relating to the proposed new section of the A27 trunk road located between 5.5 and 9.5 km to the south east of Lewes, West Sussex. That assessment has studied the cultural heritage resource within a 500 metre wide study area that contains the likely route of the new road. This assessment has concluded that:
- 7.2 The construction of the new road will have a material impact upon the SDNP
- a) The potential impacts upon the settings of the SDNP, other Scheduled Monuments and Conservation Areas will require more detailed investigation, leading to mitigation measures
- 7.3 The precise level of impacts on Built Heritage along the route will need to be determined once the final route of the proposed development has been agreed, however, the new road may possibly impact upon the setting of and views from 57 Alciston Street, Alciston (Listed building number I353261) New Barn Farmhouse (1043362) Tilton House (1043058) and a cottage at Tilton Farm (1353395) and Middle Farmhouse (1217627) and the remains of the Wayside Cross (1352993). The settings of and views from all three of these houses may be impacted by the creation of a new road. Charleston House (1043946) is located on the south western edge of the Study Area, is now an important cultural heritage destination within the SDNP and so any potential impact of the development upon this structure is not just on the setting of and views from a Listed Building, but also upon the setting of this arts and heritage visitor destination.
- 7.4 The route crosses a number of hedgerows that can be defined as 'important' under the hedgerows Regulations of 1997 as in Part II: Criteria: archaeology and history: Section I. The construction of the new road and its associated interchanges will create gaps in hedgerows surviving from the 1840s and will therefore have a material impact upon them
- 7.5 This report has concluded that the proposed development is likely to have a significant and extensive impact upon any as yet unrecorded archaeological features and/or deposits located within the proposed route of the new road. The rich potential of the Study Area indicates that this archaeology would be likely to date from anytime between the prehistoric and later medieval periods. The development will also be likely to impact upon previously recorded heritage assets such as the probable routes of the Newhaven to Selmeston and Arlington to Ouse Valley Roman Roads. It may also impact upon the peripheries of the Romano-British settlement sites adjacent to Firlie Park / Wick Street and at Hare Field. The study of Environment Agency lidar data established the possible presence of as yet unrecorded and

undated earthworks within woodland at Molehill Shaw and land immediately to the north of that wood. It is likely that road construction will cross these earthworks

- 7.6 It is recommended that a programme of archaeological fieldwork be carried out in order to contextualise the prehistoric, Roman, early and late medieval archaeological remains that are known to exist in the Study Area and which are likely to be disturbed by road construction. Fieldwork should establish whether further Mesolithic activity sites (in addition to those previously identified around Selmeston) exist along the route of the new road. It should also aim to date the origins of the field systems that cross the Study Area and uncover further evidence in order to plot the routes of the Arlington to Ouse Valley and Newhaven to Selmeston Roman roads and also to see if these roads follow earlier prehistoric routes. Fieldwork should aim to establish the presence of any further Romano-British settlement along the proposed new road and also aim to establish whether early medieval settlement is present to the south west of Selmeston and to the north of Alciston, in addition to the Anglo-Saxon settlement and cemeteries already recorded to the north east of the Study Area.
- 7.7 A programme of archaeological fieldwork consisting of field walking, geoarchaeological survey, geophysical survey and trial trench evaluation should be carried out to fully assess the potential of as yet unrecorded archaeology along the route. This programme should then be followed by an assessment statement that should set out the terms of further investigation and excavation, leading to the academic publication and public dissemination of all results.
- 7.8 Any archaeological work carried out within the South Downs National Park should include public engagement as part of any mitigation strategy with any records deposited in a publically accessible archive.

8. **Headlines for Ecosystem Services (including Water) (Maps at Appendix 5)**

Outputs from the EcoServ GIS Tool

- 8.1 The tool makes use of a Base map to generate its outputs. This base map overlays a wide range of environmental datasets, including soils, geology, wildlife and habitat data. From this the tool produces output maps that consider a range of Ecosystem Service functions.
- 8.2 In terms of the A27 route option, EcoServ maps have been produced for the following services. These were considered the most relevant in terms of the location and the options being presented.
- Air Purification
- 8.3 Plants and trees are central to the cycle oxygen and carbon dioxide in the atmosphere, they have an important role to play in regulating levels of air pollution. Air purification occurs where habitats help to intercept and absorb airborne pollutants produced from road traffic.
- Water Purification
- 8.4 Areas where vegetation provides benefits in terms of water purification effects near streams and water courses.
- Noise regulation
- 8.5 Areas where habitats provide benefits in terms of absorbing noise pollution.
- Pollination
- 8.6 The effective pollination of crops by Bees and other pollinators is vital to the life cycle of many plants. We rely on this 'natural service' for growing food crops as well as other plants and wildflowers. This highlights the ability of areas to support wild pollinators and deliver pollination services.
- 8.7 Other map outputs were also considered for the following Ecosystem Services;
- Accessible Nature
 - Green Travel
- 8.8 It was considered that they did not add value over and above the other assessments within this report - such as impacts on access and recreation opportunities.

- 8.9 It should be noted that many areas have potential to offer multiple benefits in terms of Ecosystem Services. This is certainly the case in terms of woodland and other semi-natural habitat types. In the interests of clarity, we have considered them individually in this case. There may be sites or features affected by the proposals that deliver a number of additional Ecosystem Services that provide public benefit or value.
- 8.10 In terms of other important cultural services that derive from our interaction with the natural environment, such as tranquillity, cultural heritage and recreational values, these are picked up in other assessments that support our submission.
- 8.11 For each service four output maps or ‘scenarios’ have been produced that show:
- Ecosystem service capacity:** The performance and capability of the natural environment to produce Ecosystem derived goods and services.
 - Service demand areas:** Areas where there is societal demand (need) for a service and/or the need for ecological regulation
 - Service delivery or benefitting areas:** Where capacity and demand coincide, this represents ‘benefiting areas’ or areas where it may be necessary to protect or enhance a specific Ecosystem Service.
 - Management areas:** Highlights areas where there are gaps in provision occur, and where opportunities may exist to improve ecosystem service function.
- 8.12 In terms of the potential impacts of the route proposals on the study area in terms of Ecosystem service function, based on our initial analysis we make the following comments
- Air Purification
- 8.13 There are a number of sites close to or adjoining the proposed route options that help to intercept or absorb pollutants from road traffic. In terms of the on-line and near off-line options the direct impacts upon these sites are likely to be less prominent. In terms of the Southern off-line option there will be direct impacts or loss of some of this capacity.
- 8.14 There is a cluster of prominent demand areas in relation to this function centred on the South of Selmeston, North of Alciston and at Berwick. These relate to the current line of the road. An on-line option would have a small effect on these, the near off-line and Southern Off-line options would move the proximity of the road towards two of these areas. This would increase the radius and distance of airborne particles and most likely increase pollution levels in proximity to the demand areas that sit close to the new routes.
- 8.15 Given that air purification is an important service function, and one that the current road relies on to regulate airborne pollutants from road traffic. The preferred option should be one that does not directly impact upon the capacity of the landscape to provide this function. The on-line and near off-line route have broadly similar levels of impact. The Southern Off-line option would be a very poor choice in this instance. The aim should be to enhance this capacity as far as is possible.
- Water Purification
- 8.16 There are a number of areas close to or adjoining the proposed route options that have a high capacity in terms of supporting the purification of water and have the ability to reduce impacts of pollutants before they reach watercourses. There are also a number of prominent watercourses in that location that rely on this service.
- 8.17 Most prominent are Compton Wood, Charleston Farm and Tilton Wood though there are other smaller areas in direct proximity to the current road alignment. In terms of an on-line or near Off-line option there is likely to be a direct impact on some of these areas. The Southern Off-line route will have a direct impact upon a large area of high capacity most notably Tilton Wood and Roseland Shaw. This would also suggest this route option would be a poor choice.
- Noise regulation
- 8.18 There is a strong correlation between the outputs from the tranquillity mapping and these results from the EcoServ mapping. The areas highlighted as having the least capacity, but highest demand map to those areas of lowest tranquillity. This supports the maps and

provides and element of ground-truthing. This is also supported by the site surveys that were conducted at location near the proposed route options in 2015.

- 8.19 Again, there are a number of areas close to or adjoining the proposed route options that have a high capacity in terms of providing noise regulation services. Again these are Compton Wood, Tilton Wood and Roseland Shaw. This demonstrates the capacity of trees and woodland to deliver multiple benefits.
- 8.20 The demand for these services again focus on the population in the nearby settlements of Selmeston, Alciston and Berwick. In terms of an on-line or near Off-line route there is smaller impact. In terms of the Southern Off-line route there is likely to be a direct impact in terms of capacity and also effect in terms of Alciston particularly. In terms of management zones, the settlements are areas that require that these services are maintained or enhanced, and not reduced. So again, the Southern Off-line option would be the least desirable in this case.

Pollination

- 8.21 There are a number of core areas close to or adjoining the proposed routes that have very high capacity scores in terms of pollination. This relates to habitats, grassland and linear features that exist near to the current road alignment. There are also areas of high demand that demonstrate a need for strong service flows. Both the near off-line and the Southern off-line routes will have an impact upon this capacity. Though the Southern off-line route will have the greatest adverse impact upon benefiting areas and on functional links/buffer areas.

9. Early Economic impacts

- 9.1 The economic report is due in mid December 2016.

10. Maps of Schemes

- 10.1 Maps for the scheme are attached at **Appendix 6** onwards

11. P&P Committee / NPA Considerations

- 11.1 Members will recall the background and discussions which led to the adoption of the SDNPA 'Position Statement' as the basis for responding to proposed road schemes for the A27 (Arundel, Chichester, Worthing & Lancing, East of Lewes) at the 23 September 2014 SDNPA meeting
- 11.2 Subsequently the A27 has been the subject of workshops and further discussions at the Member workshop on 1 December 2015, which took the decision to gather economic evidence for the impacts on the SDNP. There was also a pre P&P tour and presentation by HE and Mott MacDonald, and the Goodwood Estate at Goodwood, on 26 January 2016
- 11.3 This was followed by a pre P&P workshop March 2016 discussing the evidence on the impacts on the Special Qualities, and the P&P meeting where the decision 'to recommend to HE that taking either northern route option forward would lead to unacceptable and irreversible damage to the SDNP' was adopted
- 11.4 Finally, at the NPA meeting on 24 March 2016 it was decided that, following the last minute dropping of the northern route options, the Chair would write to HE expressing the view that HE had made the right decision in dropping the routes, and that the SDNPA would have vigorously defended the SDNP should either have come forward. It is clear that the successful outcome of this process in defending the National Park from a sudden, unexpected and serious threat was based upon detailed evidence of the impacts produced from across SDNPA, early Member level discussion, a clear strategic assessment, good officer relations with HE and strong partnership working across the National Park. The SDNPA will take the same approach for each new HE consultation but it is worth noting that this process is costly, taking up a large amount of officer time across the organisation which will have knock on effects in other areas

12. Other Implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No
Does the proposal raise any Resource implications?	Yes - Officer time to respond to information and subsequently once the preferred route is announced to comment on and influence the decisions made
How does the proposal represent Value for Money?	No VfM issues
Are there any Social Value implications arising from the proposal?	No
Has due regard has been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Yes, and there are no implications noted
Are there any Human Rights implications arising from the proposal?	No
Are there any Crime & Disorder implications arising from the proposal?	No
Are there any Health & Safety implications arising from the proposal?	No
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy: 1. Living within environmental limits 2. Ensuring a strong healthy and just society 3. Achieving a sustainable economy 4. Promoting good governance 5. Using sound science responsibly	Improving journey time reliability may - encourage people to live further from their work - to use their vehicle more often - become more dependent on their vehicle, and the technology and fuel that drives it

13. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
Opposing any bypass is seen as stifling economic development opportunities	Likely	Not significant	The economic study may provide evidence to support our call for a whole regional transport plan

ANDY BEATTIE
Countryside Policy and Management – Wealden Heaths
South Downs National Park Authority

Contact Officer:	Andy Beattie
Tel:	01730 819242
email:	Andy.beattie@southdowns.gov.uk
Appendices	<ol style="list-style-type: none"> 1. NPA Position Statement 2. Landscape Report (including access and visual impact) 3. Biodiversity Report 4. Cultural Heritage Report 5. EcoServe Maps 6. Scheme maps contained in HE consultation document
SDNPA Consultees	Chief Executive Officer; Director of Countryside Policy and Management; Director of Planning; Chief Finance Officer; Monitoring Officer; Legal Services, Cultural Heritage Lead, Landscape and Biodiversity Lead (Water), Landscape and Biodiversity Lead (Chalk), Landscape Officer, Access and Recreation Lead, Planning Policy Manager
External Consultees	None
Background Documents	NPA March 2016 P&P Committee November 2016, Appendix 3. Appendix 5. Appendix 6. Appendix 7

SOUTH DOWNS NATIONAL PARK AUTHORITY

Position Statement on A27 route corridor:



1. The approach set out below will be consistently applied by the Authority in the case of any future transport infrastructure projects – road, rail, airport or port related – which may come forward. In relation to roads in particular, Defra guidance in ‘English National Parks and the Broads - UK Government Vision and Circular 2010’, states:
‘there is a strong presumption against any significant road widening or the building of new roads through a (National) Park unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs significantly. Any investment in trunk roads should be directed to developing routes for long distance traffic which avoids the Parks’.
2. In responding to any general proposals or specific schemes for upgrading sections of the A27, the South Downs National Park Authority will frame its views according to the statutory Purposes of National Parks as laid down by Parliament:
Purpose 1 is to conserve and enhance the natural beauty, wildlife and cultural heritage of the NP
Purpose 2 is to promote opportunities for the understanding and enjoyment of its special qualities
3. In bringing forward schemes, and in the detailed design of any chosen options, the Highways Agency has a statutory duty under Section 62 (1) of the Environment Act (1995) “to have regard to the twin purposes of the National Park”.
4. There is a corresponding Duty on the Authority “to seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of the two Purposes”. This Duty is important and also relates to all of the Special Qualities.
5. The use of the term impact in this document follows the approach set out in EU Environmental Impact Assessment (EIA) legislation, ie such impacts may be positive or negative, direct or secondary, and will be considered relative to the impacts of the current situation.
6. In considering any proposals the South Downs National Park Authority will be mindful that the current state of congestion on sections of the A27 creates secondary impacts on routes within the National Park and its communities – for example pollution from stationary queuing vehicles or diversion of traffic onto smaller roads within the boundary. Where feasible, the primary impacts of any new schemes must therefore be objectively assessed alongside the potential secondary impacts.
7. In assessing the specific impacts of any detailed options the South Downs National Park Authority will ask the Highways Agency to use the framework of the seven Special Qualities of the National Park (see Note). These are listed below, and a full description is in **Annex A** . Under each SQ are described the types of impacts which proposed schemes might have on it and which the South Downs National Park Authority would expect to see objectively assessed:
 - 1) Diverse, inspirational landscapes and breath-taking views. (impacts to be assessed should include: effects on landscape character, experience of the landscape and long, uninterrupted views)
 - 2) Tranquil and unspoilt places. (impacts to be assessed should include: noise, lighting, effects on dark night skies; reduction of disturbance from some existing roads)
 - 3) A rich variety of wildlife and habitats including rare and internationally important species (impacts to be assessed should include; effects on internationally, nationally and locally designated and protected habitats and species, fragmentation and connectivity issues)

- 4) An environment shaped by centuries of farming and embracing new enterprise. (impacts to be assessed should include; effects on the farming economy and diversification and the ability of new enterprises to set up and develop sustainable businesses)
 - 5) Great opportunities for recreational activities and learning experiences. (impacts to be assessed should include; effects on rights of way and other access routes, the effects on sustainable transport schemes, severance of the NP from coastal communities)
 - 6) Well-conserved historical features and a rich cultural heritage. (impacts to be assessed should include; positive and negative effects on historic and protected monuments, historic villages and communities)
 - 7) Distinctive towns and villages, and communities with real pride in their area. (impacts to be assessed should include; positive and negative effects of any direct or indirect changes in traffic volumes and speeds, and access to local services)
8. The Authority expects that any schemes which are ultimately proposed will:
 - Demonstrate that there is no alternative which would have avoided or had a lesser impact on the seven Special Qualities for which the National Park is nationally designated
 - Set out clearly, based on robust evidence, the nature and scale of these impacts
 - Demonstrate how these impacts would be mitigated or compensated for, bearing in mind that a National Park landscape is of national importance.
 9. In considering the impacts of any such schemes, and any alternatives, the DfT travel hierarchy is also therefore vital in ensuring that all reasonable options have been fully considered alongside proposals for new infrastructure schemes, i.e. measures which:
 - Reduce the need to travel
 - Enable switching to more sustainable modes of transport
 - Improve management of existing networks
 10. Clearly, a balance needs to be struck - nationally - between the need for accessibility and mobility and the need to safeguard the National Park landscapes and communities. This balance must be struck by Government based on robust evidence on both.

Annex A

All NPAs are required by Defra to set out and describe the Special Qualities (SQs) for which the particular NP landscape was designated and given national protected status. In the South Downs National Park these SQs were published in and formed the basis for the State of the National Park report 2012, informed the Partnership Management Plan 2014 and are informing the development of the Local Plan.