



STARTING FROM THE WRONG PLACE

**The flawed case for a new dual carriageway
between the East Sussex towns
of Lewes and Polegate**





Landscape photography specially commissioned from Derry Robinson: www.derryrobinson.co.uk

Above: The view east from Bostal Hill

Cover: Top: Map from Highways England's SOBC, p29, showing "Offline Corridor Interventions Considered"

Bottom: The view southeast from Mount Caburn

SCATE East Sussex is a member of the wider South Coast Alliance for Transport and the Environment, a network of like-minded individuals and independent organisations. Its four objectives are to...

- promote sustainable transport solutions (for personal travel and freight)
- seek better land use, infrastructure and transport planning to reduce the need to travel and dependence on the private car
- oppose damaging road-building schemes along the south coast corridor
- ensure that the environment is properly valued (for its contribution to the economy and human health) and that full consideration in particular is given to impacts on landscape, biodiversity and climate change in all decision-making.

You can find out more at

scateeastsussex.com and scate.org.uk

If you'd like to support our cause, you can donate to our fighting fund at

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Written by Bill Rogers and published by SCATE East Sussex, Church Farmhouse, Selmeston, BN26 6TZ, May 2020

INTRODUCTION



This leaflet is a critique of current plans to build a new dual carriageway between Lewes and Polegate. It examines the Strategic Outline Business Case (SOBC): A27 East of Lewes Office Study, prepared by consultants WSP for Highways England, which was submitted to the Department for Transport in September 2018. The case was finally made public after a series of refused Freedom of Information enquiries, on 20th March 2020, nine days after the 2020 Budget.

In that Budget, the case was rejected as part of the Government's Road Investment Strategy 2, but the 'A27 Lewes to Polegate' is included in a list of possible developments in the 'RIS3 Pipeline' - the planned next tranche of investment in the Strategic Road Network, for delivery 2025-2030.

SUMMARY

Members of SCATE East Sussex have studied the 68-page Strategic Outline Business Case (SOBC) from Highways England, and those supporting documents that have been released. What follows is a commentary on the major elements in the SOBC.

Our conclusion: The A27 East of Lewes Off-line Study is flawed, with issues that have been skimmed over, left uncoded and hidden from proper public scrutiny. The report says "The SOBC is phase one of the decision-making process, where subsequent business cases build upon the last". Using this unsound SOBC as a basis for moving forward to any decision about transport planning will produce the wrong results; it is starting in the wrong place.

STORY SO FAR	<i>Schemes to dual this road have been rejected five times in 25 years, quite rightly, on grounds of cost or damage to the environment</i>
RULES OF THE GAME	<i>The consultants were told not to consider bus or rail travel and not to talk to the public</i>
STRATEGIC CASE	<i>The A27 is used mainly by commuters on short journeys; a dual carriageway will attract more. This is not a strategic route</i>
ECONOMIC CASE	<i>The report puts a big cash value on speed, which is no guarantee of economic growth; and doesn't cost damage to the environment</i>
ENVIRONMENT	<i>There's no calculation on greenhouse gases, and an admission of a large adverse impact on landscape and biodiversity</i>
SECRET NEW TOWN	<i>Council officers and consultants have been talking about a large development west of the A22, without any form of public debate</i>
MEGA-JUNCTIONS	<i>There's no explanation of how a new dual carriageway will end traffic jams at Southerham, Beddingham and around Eastbourne</i>
EMBANKMENTS & BRIDGES	<i>This road will despoil our historic landscape, with embankments and eight to twelve major bridges; no planting scheme can hide it</i>



The Department for Transport says "projects that will be promised in RIS3 need to enter development between now and 2025...."

The SOBC recommends that a decision on which option to choose is made within a year, rather than the two properly required, to get this project prepared for a draft Development Consent Order. If the DfT and Highways England follow this route, they should be warned - their Business Case is the wrong place to start, and they will be challenged every inch of the way.

THE STORY SO FAR....

There have been numerous proposals brought forward to dual the A27 between Lewes and Polegate. All, so far, have been rejected, on grounds of either poor value for money or environmental damage.

DROPPED

In 1996, John Watts, Transport Minister, dropped proposals to dual the existing road because of cost and adverse impact on the environment. Even the consultants on the scheme, Bullens, noted "If Southerham Roundabout is upgraded in the future to become grade separated, the existing severe intrusion at Southerham would become even worse. The traffic would continue to cross the slope of Ranscombe Hill visible from the floodplain and Mount Caburn. The route would be raised on embankment across Glynde Reach causing high intrusion to the view from Mount Caburn."

DROPPED

In 2002, the South Coast Multi-Modal Study decided there was little justification for a strategic south coast route between Southampton and Ramsgate. Bypasses at Selmeaton and Wilmington were proposed, but identified as adversely impacting on the Sussex Downs Area of Outstanding Natural Beauty and surrounding landscape and biodiversity. Transport Secretary Alistair Darling rejected them in June 2003 on the grounds of "significant environmental impact".

DROPPED

In 2004, the Highways Agency went back to consultants Bullens for another go. They proposed a Northern bypass east of Middle Farm and/or Southern bypass of Selmeaton, and a link from Cophall to A27 west of Folkington road, including grade separation at the Cophall roundabout where re-joining A27.



The replacement of the level crossing between Southerham and Beddingham was completed in 2008. It was originally proposed by the East Sussex County Council as a dual carriageway, but after a public inquiry in 2005 and in the light of the emerging National Park (the land was designated an Area of Outstanding Natural Beauty before National Park designation) the current three lane arrangement with a bridge over the Lewes-Eastbourne railway was preferred as much less damaging to the environment.

DROPPED

The A27 Corridor Feasibility Study, commissioned in November 2013 and delivered in Autumn 2014 from consultants Parsons Brinckerhoff, proposed a new offline route to the north of the existing A27. It was "a good strategic fit with the intervention specific objectives" but poor value for money, with adverse impacts on landscape and biodiversity, and failed to make it into the list of schemes announced for RIS1 funding in December 2014.

The Department for Transport eventually found £75m for a package of improvements along the A27, as an addendum to Road Investment Strategy 1, signed off by Transport Secretary Chris Grayling.



On 18th May 2017, Maria Caulfield and Caroline Ansell, both campaigning in the impending General Election, announced with Chris Grayling, that £3m would be set aside to study dualling options yet again.

THE RULES OF THE GAME....

A27 Reference Group Meeting

Monday 26 February, 11pm – 1pm
Room N, 1 Parliament Street,
London, SW1A 0AA

ATTENDANCE LIST

- Maria Caulfield MP (Chair)
- [REDACTED] Senior Researcher, Eastbourne & Willingdon, (sub for Stephen Lloyd MP)
- [REDACTED] Stephen Lloyd MP's Office
- [REDACTED] Parliamentary Assistant, Wealden, (sub for Nusrat Ghani MP)
- [REDACTED] Director of Communities, Economy and Transport, East Sussex County Council
- [REDACTED] Team Manager, Strategic Economic Infrastructure, East Sussex County Council

Part of the Agenda for an A27 Reference Group meeting, released by East Sussex County Council

The A27 Reference Group, a self-selecting group of local MPs and politicians and their advisors, drove the next stage of the process. They met four times, once in County Hall, Lewes and three times in Westminster. Maria Caulfield, MP for Lewes, sent her husband, Steve Bell to deputise at the first meeting. At one stage, Rupert Clubb, of East Sussex County Council, said ESCC would pay for a new economic assessment of the case for the road. The drive was to improve the calculation of the Benefit Cost Ratio for a new dual carriageway

Highways England issued a tender for a six month exercise to look again at the options. There was to be no public consultation, and no consideration of other modes of transport. The race was on to get a scheme ready for Road Investment Strategy 2, running from 2020 to 2025. WSP won the contract and made a start in early 2018, supervised on a weekly basis by an unnamed officer of Highways England. The first draft was complete by the end of April 2018. By the middle of June, the Options Appraisal was complete. The second and final revision was signed off by Mahmood Azam of Highways England in September 2018. Representatives of East Sussex Council attended monthly Project Board meetings through the report's delivery.



A WSP project from their website

Maria Caulfield said it was "a strong case". Not strong enough, though to win a place in the second 5-year road investment plan, RIS2, running from now til 2025. But, thanks to Transport Secretary Grant Shapps, it is now on life-support waiting for possible inclusion in major road projects to be funded from 2025 to 2030.

What's missing....

WSP were asked to provide diagrams in their report "to demonstrate where traffic is coming from and going to and hence build up a picture of the proportion of traffic that is long-distance (strategic) and the proportion that is short distance (local) on the A27 east of Lewes." There is no diagram. They were also asked for diagrams showing delays to traffic on roads joining the A27 at peak periods, and how that might change. There are no such diagrams.

Weight control

Highways England didn't like the results of the previous study in weighting the options, so changed the rules "The Consultant shall therefore refine the assessment of the identified corridor(s) using a spreadsheet-based approach that can apply different weights to achieving the scheme-specific objectives (and any other elements that may warrant a higher weighting).

In response to a 2018 Freedom of Information request about stakeholder engagement, Highways England told us WSP had conducted two workshops with the A27 Reference Group and given them one presentation. Otherwise they were relying on previous stakeholder engagement exercises, conducted in 2014 - but they weren't prepared to share much more than that.

2.3. Stakeholder Views for the Business Cases for A27 Corridor Feasibility Study (2014)

2.3.1. A number of stakeholder views for the Strategic Outline Business Case were received (and are included in Appendix B). Views supporting improvements to the A27 between Lewes and Polegate in the form of an offline route included:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Extract from a technical note released by Highways England in 2018, showing the SOBC's reliance on stakeholder engagement from 2014



STRATEGIC CASE

The opening line in the Executive Summary, Strategic Case in the SOBC (page 5) is that, as a single carriageway, the A27 East of Lewes is 'inconsistent' with dual carriageways at either end, and is the 'only strategic east-west link in the area'. This Napoleonic attitude could change the face of our countryside; all bits of dual carriageway must obviously be 'joined up'. The claim that this is some long-distance trade route has been rejected by all previous inquiries. On page 29 of the SOBC, a 'stakeholder' talks of linking up Newhaven and Dover; Newhaven is a port that continues daily ferries only through French subsidy. Previous studies have shown very little freight heads east from Newhaven at Beddingham.



Accelerating modal shift to public and active transport

- Help make public transport and active travel the natural first choice for daily activities
- Support fewer car trips through a coherent, convenient and cost-effective public network; and explore how we might use cars differently in future.
- Encourage cycling and walking for short journeys
- Explore how to best support the behaviour change required

The majority of journeys on the existing A27 east of Lewes are by commuters. The road lobby wants a new road for faster journeys by more commuters, in new houses in the South Wealden Growth Area not sustained by new jobs in that area. This is completely at odds with the strategy outlined by Transport Secretary Grant Shapps in "De-Carbonising Transport", (left) launched in March 2020.

WSP dismiss the idea that there could be more investment in rail services. This was ahead of Maria Caulfield, Lewes MP, campaigning for a re-opening of the Lewes to Uckfield link.

WSP throughout this document are also dismissive of the improvements underway along the existing A27 (first suggested by WSP) in terms of improving 'capacity'. SCATE's view is that these RIS1 improvements (now part of RIS2) will make things better. That was also the view of Highways England, announcing in the scheme benefits (right) back in September 2017.

Scheme benefits

- Improve safety
- Improve journey time and reliability
- Support walking, cycling and other non-car travel
- Reduce community separation
- Improved connectivity to the South Downs National Park



Scenario1 with RIS1 Investment 2040
VC Ratio - AM Peak Period

- Severe Congestion
- Regular Congestion
- Moderate Congestion
- Occasional Congestion

From Transport for the South East's Economic Connectivity review: Strategic and major road network stress map for 2040 with all road investment strategy 2015-2020 schemes delivered

And Transport for the South East have produced their own forecast, Scenario 1 with RIS1 Investment 2040 (left), showing that open stretches of the existing A27 do not need replacement (while clearly something is needed to alleviate jams at Lewes and Polegate).

Transport for the South East's new strategy (TfSE October 2019) undermines the Business Case's assertion that a new dual carriageway is in their top twelve schemes seeking RIS funding. It is clear Transport for the South East no longer supports Highways England's proposals, and now seeks regional consensus and a multi-modal approach.

(WSP is one of consultancy groups advising Transport for the South East on their current strategy; Rupert Clubb is TfSE's Chief Officer.)

Build a consensus on a way forward for the M27/A27/A259 East Coastway/West Coastway Corridor based on a multi-modal approach that seeks to reduce conflicts between different users on this corridor

TfSE October 2019



Business Case by wordcount

88 economic
83 growth
37 value
37 environment
10 speed
3 biodiversity
3 greenhouse gas
0 climate change

ECONOMIC CASE

In the opening paragraph of the detailed economic case in the SOBC comes the jaw-dropping admission. Highways England have done no work on costing the environmental impacts of their various options, and they fully expect them to reduce the Benefit Cost Ratio that they have put in front of Ministers and MPs to make the case for a new road. (For more on WSP and Highways England avoiding the environmental issues, see the following page)



Part of an uncredited map on page 20 of the SOBC. The South Downs National Park may have views on the casual drawing of 'growth corridors' over their land. Equally, the villages along the current A27 may be puzzled to find themselves marked down for growth.

Environmental impacts have not been monetised at this stage which would need to be done at a future stage as the landscape impacts would reduce the BCR.

Page 27, SOBC

How much lower will the Benefit Cost Ratio go? Highways England's preferred dual carriageway options offer a best BCR of 2.5. Even that is only achieved by ignoring the cost of grade separated junctions at each end of the road. Below 2.00, the Department for Transport describes value as 'medium'. And that's before you cost the environmental impact - the vital third pillar of any assessment of public value, as defined by Government in their decision-making process.

2.3 Public value is defined as the total well-being of the UK public as a whole³. In a transport context, this covers all the **economic (e.g. travel time, vehicle costs, tax revenues); **social** (e.g. health, safety, accessibility); and **environmental** (e.g. noise, air quality, landscape) impacts of a proposal.**

Page 8, Value for Money Framework, Moving Britain Ahead, Department for Transport 2015

The business case puts a cash value on speed, but little else. The claim is it could save some drivers 9 minutes in 2030, but there's no traffic mapping included, mapping which would undoubtedly show continuing jams at roundabouts at Southerham, Beddingham and Polegate or Stone Cross.



Why is saving 9 minutes important? The Government's consultants on road congestion for freight and business are, yes, WSP. They also work for Transport for the South East, who say that a minute of delay on roads between Southampton and Eastbourne, for each kilometre, 'costs' £534k. By 2041, that figure, they say, will rise to £1.2m. So 9 minutes becomes 'cash' that sustains this 'business case'. And yet, when lorries and vans have whizzed over their new 16km of tarmac in 2030, they will end up in the unpredictable jams of Eastbourne, Brighton, Lewes, Newhaven, Uckfield, Hastings etc. If you applied the same analysis to our capital city, no-one would do business there, ever. Yet London, the UK's economic driver, is about to adopt 20mph limits on roads within the congestion zone. Road speed has no guaranteed relationship with economic success.

Business Case wordcount

20 businesses
14 vehicle/car
8 landscape
8 residents
6 cycle
2 wildlife
1 birds
0 trees
0 hedges

Why would anyone sign off an incomplete report like this?

BENEFIT	INTERVENTION 1	INTERVENTION 2	INTERVENTION 3	INTERVENTION 4	INTERVENTION 5	INTERVENTION 6	INTERVENTION 7	INTERVENTION 8	INTERVENTION 9
Noise	-	-	-	-	-	-	-	-	-
Local Air Quality	-	-	-	-	-	-	-	-	-
Greenhouse Gases	-	-	-	-	-	-	-	-	-
Journey Quality	-	-	-	-	-	-	-	-	-
Physical Activity	-	-	-	-	-	-	-	-	-

SOBC Table 3.3: Analysis of Monetised Costs and Benefits (AMCB) Summary

The scheme would have a negligible impact on supporting the national economy and spreading growth across the country.

Page 32, SOBC

THE ENVIRONMENT

A qualitative assessment of the anticipated environmental impacts of the A27 east of Lewes off-line scheme interventions was undertaken and concluded that there would likely be a large adverse impact on landscape for all interventions, and moderate adverse impacts on noise, historic environment and biodiversity.

Page 7, SOBC

The words "greenhouse gas" appear only three times in the SOBC, once followed by the phrase "neutral impact". The reality comes later: they haven't made a calculation. Perhaps we should forgive WSP for this; after all, these global transport consultants were writing their report in 2018.

That's only ten years after the UK government set a target of reducing emissions by 80%.

Or two years after Foreign Secretary Boris Johnson ratified the Paris Climate Change Agreement in 2016.

Now, the Government has committed to the UK becoming 'net zero' in greenhouse gases by 2050.

Heathrow third runway ruled illegal over climate change

Appeal court says decision to give go-ahead not consistent with Paris agreement



The Guardian Online,
26th February 2020

In February 2020, plans for a third runway at Heathrow airport were ruled illegal by the Court of Appeal because ministers did not adequately take into account the government's commitments to tackle the climate crisis. Surely no Transport Secretary would want to fall foul of the courts on that issue again?

In this scheme, the induced traffic (an overall increase in vehicle numbers) travelling at higher speeds and spending longer in traffic jams at either end of the proposed road will certainly significantly increase carbon dioxide and other noxious gas emissions, but the report does not address this issue. This cannot be legally sound following the Heathrow judgement.

SCATE East Sussex has warned regularly about the damage to our landscape, history and biodiversity that would result from this scheme, in brochures, websites, letters to politicians and public meetings. But then, so far, we are not 'stakeholders'. We argue that the SOBC woefully underestimates the impacts on noise,

Constraints and Interdependencies

The key constraints affecting off-line interventions are the following:

- The alignments would require widening of the A27 between Southerham roundabout and Beddingham roundabout which lies within the South Downs National Park. Further, a section of approximately 1.5km of any off-line intervention would lie within the South Downs National Park to the east of Beddingham roundabout.
- The rail line between Lewes and Eastbourne needs to be crossed, which requires approval from Network Rail, and would impact on the construction programme.
- The adjacent network is constrained, and further junction interventions may be required in order to maximise the benefit of a new off-line route.
- Arlington Reservoir which is a Site of Special Scientific Interest (SSSI) for wading birds. South East Water are considering extending the existing reservoir at Arlington north of the existing site and have consulted on this.
- Milton Gate Marsh SSSI for rare species of grasses.
- Wootton Manor Registered Park and Gardens.
- Visual impacts the South Downs National Park.
- Various flood zones throughout the route corridor.
- Listed buildings.
- Protected species along the route.
- Air quality and noise impact on sensitive receptors.

Page 26, SOBC

Business Case techniques

9 qualitative
1 quantitative

The word count in the Business Case tells you that WSP have made more assessments of opinion than fact. Qualitative research is based on interviews, surveys, stakeholder groups, etc. SCATE East Sussex believes that WSP have been engaged by, and with, a narrow group that simply does not give the full range and perspective of views across this part of East Sussex.

Landscape, Biodiversity: Large Adverse Impact

Page 48, SOBC



A SECRET NEW TOWN ?



Highways England's 'Indicative Corridors', released September 2018

Those looking at previous plans for an offline dual carriageway have always been puzzled by what consultants WSP call the Magenta Option. In this Strategic Outline Business Case, it has added an extra wobble or two. It now snakes across the low weald landscape, for close to 1.5 kilometres more than other options; drivers would lose valuable seconds on their journeys, and, because of the extra length, it performs worse in terms of accident reductions.

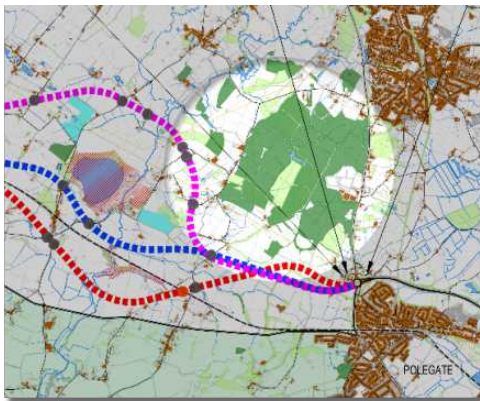


Map of Offline Corridor Interventions Considered, page 29, SOBC

Along the way, it requires four more 'major overbridges' than the Red and Yellow options. Unsurprisingly, at £500m, it costs more than the the basic dual carriageway Red and Blue options; around £60m in the Business Case tables. If you added the costs of full grade separation at Cophall, additional bike lanes and bridges to the Magenta Option, it would rise to £590m. WSP didn't think it necessary to put that in their tables.

Land to the west of Hailsham/A22 could potentially be unlocked by the northern of the off-line intervention via a new access road/junction.

Page 32, SOBC



Detail from Offline Corridor Interventions Considered, page 29, SOBC, with our highlighted area

Throughout the SOBC there are references to Wealden Council's need to build more houses. On page 32 of the SOBC, we find proposals to 'unlock' land for development by building an additional junction on the Magenta Option, the most northerly route, somewhere between the proposed second Arlington Reservoir and Polegate. Wealden District Council are obliged to set out a 5-year-plan for housing and development, and have been attempting to keep the figures down in order to avoid transport pollution affecting the Ashdown Forest. At the end of last year, a Government-appointed Inspector told them they needed to build at least 1,200 houses a year, and possibly more, to help Eastbourne Council with its claimed shortfall. Between now and 2025, Wealden may have to find space for 7,500 new houses.

Imagine if 4,000 houses (16,000 people, 8,000 cars) plus infrastructure found a home here. You can probably say goodbye to Abbots Wood, once part of the great Saxon forest of Andredesweald. The woods were also known as Lindherse at the time of Henry I, who presented them to Battle Abbey - The Abbot oversaw them, hence the present name. It boasts three ponds - one of them restored by the Forestry Commission in 1964. We would lose an ancient woodland, enjoyed for recreation by thousands every year.

Then, this new strip of housing and industrial development would have to skirt Michelham Priory, on its west, and also have a link to the over-loaded and unimproved A22 at Boship Roundabout. All this land was marked as "Unsuitable for Development" in exercises ahead of Wealden's rejected Local Plan. Now it seems over £500m of taxpayer's money is needed to beat a path to Wealden's door - a new road to speed its new residents to jobs in Lewes and Brighton.

"It is recommended that all three corridor alignments be further investigated at the next stage as the consideration of dependent development may strengthen the case for pursuing the magenta alignment, which performs worst in terms of the economic case in PCF Stage 0."

Page 49, SOBC

THE MEGA-JUNCTIONS

All the options in the SOBC require the construction of at least three major interchanges. Without them, the proposed dual carriageway options will fail to make the journey time savings that WSP predict. The full cost of these junctions is then likely to reduce the claimed Benefit Cost Ratio to medium.



Accident frequency increases with the number of arms to a roundabout. Typically, over 70% of the accidents at roundabouts involved cars.

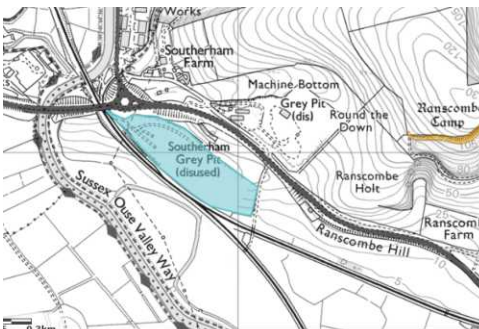
Beddingham

What's going to happen at Beddingham ? The minimum required by WSP's preferred Magenta and Blue dual carriageway options is an additional spur taking the dual carriageway eastbound through Glynde Reach and Laughton Levels. What's missing ? First, a calculation of the likely increase in accidents, which is always a function of an increase in exits/entrances from a roundabout.

Second, an estimate of the likely tailbacks. The am peak problem for traffic heading along the A27 from Eastbourne and Polegate to jobs in Greater Brighton and Gatwick/Crawley is the Beddingham roundabout. Priority traffic is already on the roundabout coming from Southerham, heading for Newhaven.

Because they have to give way, there are always 0800-0900 tailbacks for westbound traffic. That's going to be made worse, with two westbound streams of traffic, each of two lanes, trying to join the roundabout. That's without adding the induced traffic a new road brings - something that WSP say they have not modelled.

Unless, of course, the real long-term ambition is to create a grade-level separated junction, in a UNESCO biosphere, right inside the South Downs National Park and in the middle of one of the most sensitive landscapes in the south-east of England ? It seems the only possible way to deliver WSP's Red route dual carriageway - and, of course, is not costed.



OS Map showing SS1 Southerham Grey Pit

Southerham

Adding a lane to the A27 eastbound from Southerham is easy enough to do with a dotted line on a map. It was rejected after a lengthy public inquiry back in 2005. Even if you cared nothing about the landscape, the geological history and the special biodiversity of this couple of square miles, the technical challenges of construction in a narrow, exposed channel are clear. Look at the contours, the two immense chalk pits, and the plains, river and railway lines any new structure would have to cross, the next time you're passing.

The SOBC options do nothing to solve the real cause of congestion - traffic leaving and entering Lewes via the Cuilfail Tunnel. Unless, of course, Highways England has another plan for a grade-separated junction.

Polegate

It's all very well speeding up the traffic flow along the A27, either soaring over, or dug out under the Cophall roundabout, but the consequences for peaktime traffic on the existing dual carriageways around the east of Eastbourne, and those along the A22, will be awful. Even the SOBC acknowledges the risk:

"Benefits may be reduced due to congestion on the adjacent local road network."

EMBANKMENTS, DITCHES AND BRIDGES

The risk section of the SOBC admits that any new road between Lewes and Polegate faces construction challenges. A glance at the Government's Flood Risk map for the area explains the problem. Even if it is safe to build a dual carriageway across this low land, it will have to be on an embankment, or possibly large piles and stilts near Glynde. There will be no chance of concealing this highway in a ditch. And the impact of 15 to 17kms of new tarmac on existing, vulnerable and ancient drainage systems is highly unpredictable.

Unforeseen ground conditions could impact on the delivery of a scheme, representing additional cost in delivering technical solutions and costs resulting from delays

Page 60, SOBC

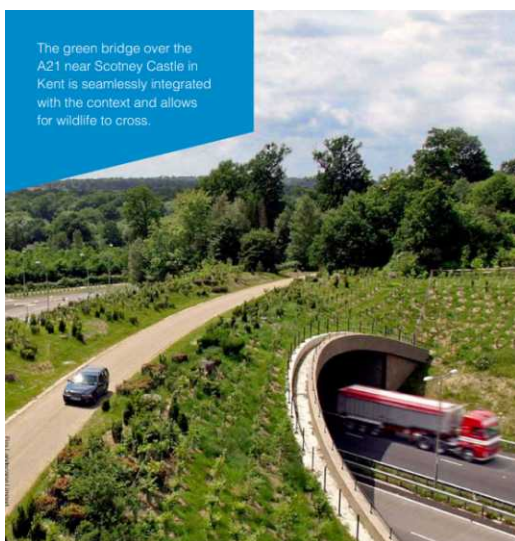


From the latest Government 'Flood Map for Planning'

Light blue is Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding

Dark blue is Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding

Say the dual carriageway is lifted just 2 metres above the surrounding fields and hedges. The 8 or 12 "major overbridges" required will require a rise of close to 10 metres to carry our rural lanes safely across. With an appropriate gradient, at 3% for all vehicles, farm traffic and cyclists, each side will require an approach of at least 300 metres, making a total new road length around 665m. Apply that to Lacy's Hill, the turning for Glynde off the A27, and it takes you right to Glynde Station. WSP say it can all be sorted out by environmental mitigation.



In future stages the cumulative environmental impact of all the schemes along the A27 may need to be considered, in terms of impacts on the South Downs National Park. It will be important to consider environmental mitigation measures at an early stage. The guidance in the Highways England document "The road to good design" (2018) needs to be applied.

Page 48, SOBC

Highways England's current exemplar of good design. The 'seamlessly integrated' bridge over the A21 at Scotney. There's no evidence that WSP have priced for eight or twelve of this sort of bridge in their report.

The introduction of new extensive areas of hard-standing in areas of high flood risk has the potential to influence flood dynamics, flood storage, and surface water flows.

Final Appraisal Summary Tables, SOBC

If you agree with the South Coast Alliance for Transport and the Environment, you might like to share your own views with the Transport Secretary, Grant Shapps. This is how we'd put our message to him.

Your address

**Date: As soon
as possible**

**The Transport Secretary
Great Minster House
33 Horseferry Road
London
SW1P 4DR**

Dear Mr Shapps

We welcome your commitment to reducing car use and making public transport and active travel our first choice for daily activities.

This drive to reduce greenhouse gas emissions and stop climate change should now be put front and centre of transport planning in our part of the world. This year's events have put a real premium on the natural world, our rich biodiversity and our historic landscapes.

Highway England's Business Case for a new road between Lewes and Polegate doesn't make any sense. Please announce now that it has been dropped from your future plans. The way forward requires a new, regional consensus that involves all forms of transport, and takes full account of what's happening so quickly to our environment.

Thank you