



WALBERTON PARISH COUNCIL
INCLUDING FONTWELL AND BINSTED

Parish Council Office, The Pavilion, The Street,
Walberton, Arundel, West Sussex, BN18 0PJ

Tel: 01243 554528

email: clerk@walbertonpc-pc.gov.uk

www.walberton-pc.gov.uk

Highways England
Bridge House
1 Walnut Tree Close
Guildford
GU1 4LZ

[By email](#)

24 October 2019

Dear Sirs,

A27 Arundel Bypass Consultation

With reference to the A27 Arundel Bypass Consultation which ends today 24 October 2019, Walberton Parish Council met on 21 October to consider its response and agreed the following:

WPC Consultation Response

This consultation response is informed by WPC's own members' knowledge and that of parishioners; WPC has listened closely to its residents and noted their reactions. WPC is potentially one of the most adversely affected stakeholders and it here responds on behalf of all its residents.

Prior to the consultation, WPC published a set of self-evidently required principles for the consultation, to which it would adhere and to which it expected HE and other stakeholders also to adhere. WPC supports the overall objective of improving traffic flow through the whole A27 corridor; any improvements should benefit all communities, safeguard traffic conditions on local roads and prevent the displacement of congestion and of severance from one place to another; fair and equal engagement and transparency; an evidence-based approach to option description and effectiveness; accounting for economic and environmental support and sustainability; costed mitigation; a realistic outlook for planning, value for money and affordability.

WPC is disappointed that HE has failed to run a consultation that meets these common-sense criteria. WPC will if necessary report to HE and other relevant bodies in that regard. However, some of these shortcomings affect our parishioners' and our own responses to the options. It is right therefore to mention them here as they qualify our views.

WPC Response to the Six Consultation Options

WPC notes that in respect of affordability, and as underlined by questionnaire item B2, only two options are around or below the budget maximum of £250 million. Of the over-budget options, option 3v1, Crimson, is the one that our parishioners could well favour, as in 2017. HE originally maintained this option had no realistic chance of gaining planning permission under a Development Consent Order, as it is not supported by the National Planning Policy Framework. WPC would wholeheartedly support this option without qualification or complaint if HE made positive moves to establish consensus for Crimson. See below.

Of the affordable options, WPC finds option 1v9, Beige, meets the principles outlined above and is otherwise satisfactory, but notes that it may not be effective in the longer term at resolving traffic issues. Option 1v5 also meets the principles WPC set itself, and is otherwise satisfactory. It does not have the future traffic issue but its shortcoming is that it allows no interchange with local traffic at Ford roundabout. The maximum budget and value for money criteria are met approximately equally by both options. HE describes the planning scenarios, economic benefits and environmental damage from both routes as similar. WPC believe that as to a low flyover or a throughabout at Ford, option 1v5 (Cyan) or option 1v9 (Beige), HE technical traffic engineering judgements should take precedence, together with whichever of the two options Arundel Town Council in its consultation response has preferred. **WPC is able therefore to support either option 1v5 Cyan or option 1v9 Beige, whichever at-budget option is selected.**

Limitations of 2019 Consultation

WPC believes that the Consultation may have been run in a materially unfair manner and that its outcome might therefore be open to challenge. The consultation does not accord with WPC principles in the following ways:

1. Arundel Alternative
WPC notes that there is debate as to whether HE was using a fair, transparent and evidence-based approach in rejecting a wide single carriageway option, put forward by Arundel's local residents with ASCATE. As of six weeks into this consultation, WPC's information is that this route would apparently meet traffic handling and economic benefit objectives and also be less costly, better value for money and less environmentally damaging than all options offered to the public.
2. Inclusion of Worthing and Lancing
The consultation documents and data assume this adjacent road scheme proposal has already been carried out. This fact is not made clear to the public, being referred to mostly in footnotes.

WPC notes that the Office of the Road and Rail Regulator has stated that “*only those schemes that have stakeholder support are taken forwards*” and of the Worthing Lancing proposal that it is “*under review and unlikely to go ahead in (its) current form*”. DfT says “*increasing the budget at Worthing still doesn't give Highways England a viable scheme*” The proposal was rejected by 70% of stakeholders and 76% of the public. Alternative proposals were rejected by HE as not being value for money or being over-budget. Although the current Worthing Lancing proposal will not be going ahead, this Arundel consultation makes its completion a key assumption. WPC thinks this is not fair, transparent or evidence-based, with a consequent risk to scheme delivery.

3. Over-Budget Options

In the questionnaire, on the matter of a Department for Transport maximum budget limit, question B2 is clear that the offline options cannot be afforded but many other questions presuppose that they can be afforded even though these are up to 50% above the DfT's top figure of £250 million. The Have Your Say brochure makes no mention at all of the budget being flexible. WPC notes the option costs already have a worryingly large £118 million (46%) average range; it is hard to believe that these freshly estimated costs with even that very broad range in accuracy might still be way out. WPC and its residents, like many others are wholly confused as to whether there is a budget figure or just a vague DfT negotiating figure, and further, what the most likely costs are supposed to be. This complete lack of clarity and credibility, intensified by a biased questionnaire, will undoubtedly skew public voting patterns and undermine the validity of the consultation outcome. A consultation report will not therefore be truly reflective of public opinion. WPC thinks this is not fair or evidence-based, with a risk to delivery.

4. Option 3v1 - Crimson

As above, at our parish meeting this option was well-supported. It has historically - from *well before 2017* - been the preferred compromise route of local communities. WPC members were swayed by comments made to them by HE and by our MP and others in both 2017 and 2019 saying it was unattainable. In the last few weeks we have written confirmation from HE that the Crimson option is in fact “viable” and that there is no clear planning reason for them to indicate a negative planning outcome. As best it can WPC has confirmed this is legally correct. Therefore on this ground it considers the consultation has lacked transparency and fairness. and been unsatisfactorily muddled and divisive. An attempt at the end of the consultation period to build stakeholder and public consensus for Crimson was unsuccessful

5. Misleading Benefit : Cost Ratios

The total of benefits allowed in the BCR ratio should be restricted to those that result from the expended costs used in the ratio – in this case, benefits accruing only from the cost of the Arundel Bypass scheme itself. Benefits that flow from the Worthing proposal therefore have to be excluded. But for the Arundel public consultation document, these Worthing Lancing benefits were not excluded. This gives a very misleading impression of the options' value for money. There are further unexplained data queries regarding benefits that have been included. WPC thinks this is not fair, transparent or evidence-based, with a risk to delivery.

6. Misleading Traffic Data

In several instances, the HE traffic data is clearly challengeable, for example the A283 at Storrington and at Yapton Lane. These are repetitions of errors in the first consultation, whose data the High Court said were arguably clearly and radically wrong. Other traffic data are also questionable, for example the A27 Fontwell and Crossbush growth in traffic and the Lyminster Bypass data; these impact on local traffic outcomes and on the benefits from the options, which largely rely on traffic growth and journey time calculations. These missing or inexplicable data cast an aura of doubt over the computer traffic model outputs and the derived BCR ratios as a whole, potentially undermining the validity of the consultation's outcome.

7. General

WPC notes a widespread unfairness in the consultation process with many questionable issues not satisfactorily answered or not published in a timely manner by HE in time for the public to have the necessary information to respond as it would wish. These are not covered here but taken cumulatively with the shortcomings outlined above, WPC must reserve its position on whether there has been a material impact on its residents' and others' voting intentions.

Yours sincerely,

(sent unsigned by email)

Andy Peppler
Parish Clerk