

## Response to Arundel Bypass Supplementary Consultation 2022

from [-----], local resident, of [-----]

Submitted 14<sup>th</sup> December 2022 by email.

I am unable to complete the Feedback form. Question 1's heading is "Scheme design changes to reduce the impact of traffic in and around Walberton" but the question is "Do you think that this proposal improves the previous traffic impact situation at Walberton". As a Fontwell resident I find this mildly shocking and artfully exclusionary, given that the greatest negative impact of the consultation proposals is not at Walberton but at Fontwell. I therefore write in freeform to counter this deliberate and obvious National Highways' sleight of hand.

### Question 1

Nobody can answer this question except dishonestly, because the answer cannot be divined from the information given. I explain this below under **Question 1 Comments**. My quest for the necessary information from the A27 team, dated 22<sup>nd</sup> November 2022, has gone unanswered.

### Question 2

I suggest following the NAO advice and lessons learned from "Improving the A303 between Amesbury and Berwick Down" Key Findings 10 – 14. The Arundel project is misconceived as a standalone project and public funds are and will thereby be wasted.

### Question 3 and 4

I am neutral on question 3 but overlapping into question 4 would consider that full compliance with Natural England proposals at each step would be a minimum expectation.

### Question 5 and 6

I am opposed in principle to the loss of this local leisure / sports facility (and its social capital) which I expect to see monetised as a disbenefit in the Scheme Costs or reflected in the risks and disbenefits section of your DCO. I would prefer to see the Club suffer amputation rather than be killed.

### Question 7 and 8

I am neutral. Having heard in 2017 that a dumbbell solution was the most likely eventuality, I am now inclined to think that National Highways is just four years behind the curve. We heard at the same time four years ago that an online solution of some sort was the most likely practical and affordable solution so one wonders if the Grey option is impractical as well as unaffordable. Seemingly only National Highways is surprised by the Lyminster bypass traffic induction that it had forecast itself in 2019, assuming the Lyminster bypass can cope with it.

### Question 9

By way of further comment and suggestion, I wish to expand on my answer to question 1 with Question 1 Comments.

## Question 1 Comments:

- The data provided to the public is wholly inadequate for their “intelligent consideration” of this issue. The Supplementary Consultation fails the test of competence since no conclusions can be drawn from the information provided, despite the carefully cultivated misapprehension that the documentation is thorough.
- Only half the Variable Demand Model (VDM) data that is needed is actually given, and it is given for dates unmatched to previous VDM data with which it therefore cannot be compared.
- The half of the data that is given proves to be clearly inadequate or wrong, with the model that is being used unable to be more accurate than + / - 1,000 AADT or worse on key routes, when its Walberton mitigation objective is to resolve a problem of 1,300 AADT. In other words, the VDM model as specified and used by National Highways in this Supplementary Consultation is not fit for its purpose.

This can be deconstructed as follows:

### 1. Missing data:

1. It is delays that cause rat running. The Scheme Objectives - principally - require the proposals to reduce congestion and travel times and improve journey time reliability along the A27. And this requires a traffic model that can satisfactorily forecast delays where they occur. In the 2017 consultation, delay / journey time data was provided from a Fixed Demand Model (FDM), not a VDM, and then the Preferred Route was falsely chosen off VDM data not in the public domain (see Outline Business Case 2020 para 1.3). The judicial review application on that was allowed. In 2019, VDM data was used, but National Highways chose a preferred route off the basis of legal advice that was not known to it and was not in the public domain at the time of the Further Consultation (OBC para 1.3).
2. Journey time delays have not been given to the public from a VDM since 2019 but the 2019 PCF Stage 2 model was proportionately less detailed and did not show up the Fontwell delay problem that the public had been making a fuss about since 2017; National Highway’s proposals would move delay from Arundel to Fontwell and Worthing, and induced traffic would balance out journey time saved, for little overall gain in corridor journey times or safety.
3. The size of the Fontwell delay problem is not disclosed and the proposals for mitigation do not indicate how effective they are. No journey time data is given from the new and updated VDM, with or without the proposed measures individually or in combination.
4. In short, vital data about delays is missing from the Supplementary Consultation documentation that prevents any intelligent consideration of the proposed mitigation works that the new VDM has revealed to be necessary. No one was surprised by the revelation of Fontwell delays except National Highways, in a replay of the Crossbush design discomfiture (see questions 7 and 8).

### 2. Wrong data:

1. The Arundel Bypass Scheme Objectives also make plain that local communities, the safety of local roads, local economic growth, and local access are to be considered. These all require a traffic model that can satisfactorily forecast for local roads. Any traffic forecasting model that failed to do so would be unfit for the Scheme Objectives’ purposes. Just such a model was used however, at PCF Stage 2 and again at Stage 3 and currently for this Supplementary Consultation. It may be both calibrated and validated to

the strategic road network but it is inadequate for the local requirements of the Scheme Objectives; this is especially so given the need to identify and redesign to eliminate rat running which is associated with local roads in particular.

2. The rat running on local roads is caused by the unknown delays at Fontwell. It is not revealed in the Supplementary Consultation Brochure, but this rat running is only detailed in the Walberton Mitigation Assessment. There, it refers to the Grey proposals causing the 1,300 AADT increase in road traffic in The Street, Walberton, one of four local roads shown out of 13 listed in the Statutory Consultation. Of those four local roads with increases but no base given in the Statutory Consultation, three appear in the Walberton Mitigation Assessment; one road is split to give two separate measures, and two are combined into one measure, such that there is no read-across possible to any single local road on any consistent PCF Stage 3 VDM or FDM basis.
3. However, Walberton Parish Council instructed Obtrada Ltd to produce AADT data for two local roads in 2022 and Network Rail and National Highways give us measures for the other two. We can therefore benchmark the Supplementary Consultation brochure data, and it reveals the + / - 1,000 AADT margins of error referenced above.

<i>All AADT</i>	<b>Nat High 2027 VDM Do Min</b>	<b>Nat High 2015 base</b>	<b>Obtrada Jan 2022 Traffic Count</b>	<b>Network Rail 2015</b>	<b>Nat High Mitigation Sch Forecast</b>
<b>Arundel Rd</b>	400	-	1,520	-	640
<b>The Street</b>	4,000	-	- W 2,500	- -	E 2,600 W 4,800
<b>Yapton Lane</b>	2,300	3,400	-	(7,900)	800
1/ Network Rail measure point is south of The Street and another local lane, Lake Lane whereas the National Highways measure is north of The Street. 2/ The Street is latterly split East and West of Tye Lane					

4. The explanation given by National Highways is simply that the model is inadequate for providing any better local roads data. The model has no actual traffic count data inputs for any local roads and is designed, validated and calibrated for strategic roads network forecasting.
5. As a result, its VDM is technically incompetent to make a forecast of adequate, practicable accuracy to assess future road traffic volume and delay. The mitigation needed from the Supplementary Consultation proposals for The Street East is 1,300 AADT, so the margin of error is approaching the same size as the change sought - producing a meaningless answer to a wasteful exercise. The same is true for Arundel Road, for example, shown with an increase of 240 AADT, + / - 1,000 AADT or more, on a residential street that serves as access to the SDNP for horse-riders, cyclists and walkers.

In this way it can be seen that lack of any reliable originating or forecast data makes intelligent comment impossible on the impact of the proposals to open Tye Lane to southbound vehicles and opening Arundel Road to westbound vehicles. And even if the data had been accurate, the public still would have no clear idea about the delays involved and therefore whether the proposals do satisfactorily resolve the rat running problem caused by the ongoing Fontwell delays.

The Gunning Principles relating to public consultation have been breached. The Supplementary Consultation is potentially invalid, joining the 2019 Further Consultation in that fate as above. Arguably the Preferred Route choice is also invalid, in line with the attached paper , "December 2022 A27 Arundel Bypass Propositions on the Inadequate Further Consultation".