



**WALBERTON PARISH COUNCIL
INCLUDING FONTWELL AND BINSTED**

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Highways England
A27 Arundel Bypass Team

By email

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1st March 2020

Dear Sirs

A27 Arundel Bypass: Further Review Period 2020

With reference to the Further Review Period 2020 that ends 1 March 2020, Walberton Parish Council (WPC) considered its response on 25 February 2020 and agreed the following:

WPC Executive Summary

- WPC resolved to support option 1v5 Cyan, option 1v9 Beige and also 3v 1 Crimson.
- WPC considers that currently divided communities could be united behind 3v 1 Crimson if concerted mitigating factors were clearly presented.
- WPC considers the 2019 and 2020 consultations inadequate and misleading with damaging mistakes that repeat many of the failings experienced in 2017.

WPC Response to the Further Review Period 2020

This 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 to seek a positive way forward.

As noted in our response to the A27 Arundel Bypass Further Consultation 2019, WPC published a set of principles to which it expected stakeholders and Highways England to adhere. This response is informed by those principles.

WPC Response to the Six Consultation Options

WPC supported option 1v5 Cyan, option 1v9 Beige but also supports 3v 1 Crimson.

WPC continues to find much support for option 3v1 Crimson among its parishioners. There is a widespread view that, currently divided local communities could and would find consensus in this option, especially if more concerted engineering and design efforts were made to mitigate its environmental impacts. The Crimson route also has negligible impact on houses – none will need to be purchased by HE or be destroyed, unlike other routes.

WPC notes that similar efforts have been made on other highways schemes in other environmentally sensitive areas. We believe that the outstanding landscape, natural and cultural heritage of the area justifies and demands such an approach at Arundel. We are concerned that opportunities to create an exemplar scheme may be prematurely rejected by Highways England and other parties in favour of options with heavy community and other social impacts that cannot be mitigated.

Limitations of the Further Review Period 2020

WPC has previously set out its reasons for believing that the Further Consultation 2019 may have been run in a materially unfair manner. The Further Review Period 2020 does nothing to mitigate the issues raised and, instead, creates further concerns, as follows:

WPC is aware of many residents who are confused, overwhelmed and prevented from responding by the chosen method of presenting evidence which is to issue updates to updates that at each step have removed some errors while retaining others. There is no comparative analysis of the latest evidence against the original consultation brochure which was critical in creating core opinion, but which was withdrawn during the first consultation period. The chosen format appears, therefore, to be informed by the requirements of disclosure rather than by the principles of clear and effective communication. As such, it shows disregard for an accessible consultation process and, in consequence, appalling treatment of residents in the area through which Highways England plans to construct a new road. Furthermore, WPC considers it likely that further errors will be discovered before and/or after a Preferred Route Announcement is made but, based on past experience, these may never be published. For these reasons and others that are well documented, WPC considers the overall consultation to be chaotic, fundamentally flawed and inadequate.

WPC is also concerned that the design of the new questionnaire introduces further opportunities for so-minded responders to artificially influence the outcome of the consultation by submitting false and untraceable responses. Highways England will be aware of the divisions its chosen method of consultation has already created yet it has succeeded in providing a further mechanism to encourage communities to emphasise their differences.

Highways England have presented the latest evidence as a “housekeeping” exercise backed up by a publicity campaign directing stakeholders that “the corrections do not change the overall conclusions of our assessment of the various options presented in

the consultation materials". The outcome of the Further Review Period 2020 therefore appears pre-determined and its purpose cosmetic.

Notwithstanding the appearance of a pre-determined and cosmetic Further Review Period, it is disappointing that Highways England again chose to exclude Walberton parish from the distribution of printed materials.

Although Highways England undertakes "to give people the best possible information to help them have their say on options for improving the A27 near Arundel", its latest documentation includes known errors. For example, WPC objects to numerous instances of the false description of the existing A27 as single carriageway between Crossbush and Walberton/Yapton Lane as it excludes three options from meeting the scope of RIS1 scheme at Arundel. WPC notes that the original Approach to Consultation was based on the same false description as were briefing packs issued to elected representatives throughout the pre-consultation period. All instances are cumulatively prejudicial to our parishioners.

Two of the three options excluded by promoting a false description of the existing A27 (Cyan and Beige), were also misrepresented in terms of their impact on woodland. This misrepresentation appears deliberate as it included the use of cartography known to be out of date at the time it was chosen and the marking of woodland on maps where Highways England's own up to date surveys show that none exists. This approach served to inflate woodland loss associated with Cyan and Beige and made these options look more environmentally damaging than they are, both in absolute terms and rank order of magnitude. Alarming, in its latest documentation, Highways England is unable to recognise that use of out of date and inaccurate data itself constitutes an error and reveals an attitude that will raise broader questions about transparency, quality assurance and corporate governance. Finally, the updated areas of woodland loss given in the Further Review Period documentation are themselves contested and may require further correction.

Furthermore, WPC notes that the misrepresentation of key environmental data is a recurring issue. In the 2017 Non-Statutory Public Consultation, unidentified software errors caused a large miscalculation of Ancient Woodland loss areas that Highways England withheld from the public. Highways England appears to have learned no lessons from this episode, causing WPC to be concerned that the methodology used to assess woodland loss is systematically unreliable, selective and partial in its presentation of information.

The same concern affects other areas of the consultation. For example, impact assessments for each of the options on 175 new homes currently under construction in Walberton have either been left out or not undertaken.

The consultation also continues to take inadequate account of developments adjacent to the scheme area, for example the planned installation of traffic lights at Fontwell. The inevitability of congestion being displaced from Arundel to Fontwell is obvious and widely acknowledged. Some of the options, most significantly Magenta, would offer vehicle users multiple opportunities to access new rat runs through Walberton and adjoining parishes. However, the relative performance of the options in their effect on rat running is assessed for Storrington but not other communities. We believe this to be selective, short-sighted and unfair.

Finally, the Further Review Period 2020 is limited by its failure to address other previously reported issues including local traffic flows and impacts in Walberton, Storrington, Fontwell, and Crossbush; the dependency on a Worthing-Lancing scheme that was declared delayed to at least RIS2 by the Chief Executive in November 2018; widespread confusion over option viability and affordability; absence of embedded and costed mitigation measures; and a Value for Money business case dependent on including benefits without their associated costs.

WPC will continue to press Highways England for adequate responses since, in their ongoing absence, our reasonable expectations of a fair and adequate consultation based on the best possible information remain unmet.

Conclusion

- 2019 - an inadequate and misleading consultation brochure and processes, with damaging mistakes that repeat many of the failings experienced in 2017.
- 2020 - impenetrable documentation, still misleading, general public no better informed, extremely difficult to understand. Online survey open to abuse
- WPC also continues to find much support for option 3v1 Crimson among its parishioners. There is a widespread view that currently divided local communities could and would find consensus in this option

Yours faithfully

[Unsigned – sent by email](#)

Suzanne Clark
Chairman – Walberton Parish Council