

From: Dr Mike Davis  
Walberton, West Sussex (by email)

To: Andrew Jackson, National Highways

Copies: Cllr Suzanne Clark, Walberton Parish Council  
Cllr Grant Roberts, Arun District Council  
Cllr Trevor Bence, West Sussex County Council  
Cllr Gary Markwell, West Sussex County Council  
Andrew Griffiths MP

14 February 2022

Dear Mr Jackson

Whatever other attributes it may or may not possess, the A27 Arundel Bypass is a scheme that increases journey times at Fontwell for users of both the A27 and A29. In so doing, it will divert traffic away from the SRN into the heart of semi-rural communities including Walberton. This appalling dis-benefit was not reported during previous public consultations which led stakeholders to expect a reduction in traffic.

It also creates new costs, incurred to address the new problems created at Fontwell. It seems that these are to be transferred to future schemes that are as yet unspecified and have no budget or delivery date. However, even with this separation of benefits from all of the associated costs, the Arundel scheme is expected to deliver Low VfM.

The published materials do not address these issues adequately or fairly. For example, the Consultation Brochure states that the A27 Arundel Bypass would "reduce rat-running on local roads". This is at best a highly misleading half-truth, because:

- The additional 1,300 vehicles/day through Walberton are on a rat-run even if National Highways refuse to call it by its name in the Brochure.
- Increased delays through the Fontwell roundabouts are ascribed to the "attractiveness of the A27 corridor and re-routing of traffic from other local roads". However, National Highways leaves out that The Street and other nearby local roads are made even more attractive than the A27 as a means of escaping those very same delays.
- If this traffic does not rat-run Walberton, it will rat-run somewhere else. This is a problem that will persist and get progressively worse for as long as the Fontwell junctions are left operating above their design capacity by National Highways which is indefinitely. This is not explained to stakeholders.

The increase in traffic through Walberton is characterised as being spread evenly throughout the day and in both directions. This further disguises its nature as a rat-run. Traffic flow in The Street is also treated as uniform between Yapton and Barnham Lanes

which it is not. All these assumptions are untrue and they cause the real impact of the Scheme to be understated and mis-represented, especially to non-residents.

In reality, the rat-run would NOT be experienced as an average increase of 42% but as a concentrated and much larger spike in traffic arriving during the PM peak period and all entering the village from Yapton Lane heading west. The intensity of the rat-run and its devastating effect on Walberton are left out of the Consultation Brochure.

Furthermore, National Highways appears indifferent to the existing highway and traffic conditions on to which this surge in traffic would be superimposed. These are not favourable (see below). Among all of the consultation materials, there is not a single photo of Walberton to provide such context for those unfamiliar with the area.



Similarly, the rat-run would increase noise contours in the Walberton Village Conservation Area to the same intensity as the SRN (Fig 11-3, PEIR Volume 3). Whereas the Consultation Brochure refers to noise improvements in Arundel, it leaves out the adverse impact to Walberton.

During Stage 2, National Highways excluded Walberton from its advocacy campaign and promoted the traffic, noise and quality of life benefits of the scheme from the perspective of other communities (eg, Ref 1). The issue of rat running was visited with sophisticated marketing techniques. That unequal treatment is well documented and is seen to be ongoing in Stage 3.

If the Statutory Consultation is to observe the principles it proclaims, at least four things need to happen. These are:

- a) an Addendum to the Consultation Brochure putting in what was left out

- b) further quality assurance of the traffic model to guarantee its accuracy and reliability in assessing the local road network
- c) a period of further public consultation with residents and stakeholders on proposals to design out rat-running in all of the western villages
- d) publication of a traffic assessment that takes variable demand into account and with sufficient detail to allow intelligent consideration of proposals while the scheme is at a formative stage and before a DCO application is submitted

Further information in support of my remarks is included below in an Appendix. In the absence of any response to my letter of 14 January 2022, this incorporates discussions with your traffic modelling team at consultation events in Walberton, Arundel (White Swan), Yapton, and Slindon. I would be glad to take into account any relevant information that has not yet been given.

I will submit a formal consultation response in due course and when I have received a reply to my outstanding questions.

Kind regards

Dr Mike Davis  
Walberton, West Sussex

## **APPENDIX**

### **1. Baseline Data**

Baseline data for the Stage 3 traffic assessment were obtained from the A27 Arundel Bypass Western tie-in: local roads study (Ref 2).

Traffic counts for The Street were obtained in July 2019 at ATC Site 4 which was situated west of Tye Lane (Ref 3). However, the measured vehicle flow was incorrectly reported as being east of Tye Lane (ibid, Fig 2.7.5). This baseline has been carried forward to Stage 3 and treated as uniform in The Street for its entire length between Yapton Lane and Barnham Lane.

The baseline disregards the actual arrangement of local roads. There are 2 sections of The Street east and west of Tye Lane. Traffic counts in The Street east of Tye Lane are circa 33% lower than west of Tye Lane (Ref 4). Therefore, east of Tye Lane, the impact of 1,300 additional vehicles/day is not a 42% increase in daily vehicles as shown in the Consultation Brochure but circa 67%.

The Street east of Tye Lane possesses a primary school and a very constrained section of carriageway where vehicles cannot pass without using the adjacent footway which itself is very narrow. Private driveways provide the only refuge for pedestrians at such times. The Street east of Tye Lane is, therefore, the area of the village least able to cope with existing traffic and the most vulnerable to a large influx of rat runners avoiding Fontwell. It is also in the heart of the Walberton Village Conservation Area.

## 2. Time and direction of rat running traffic

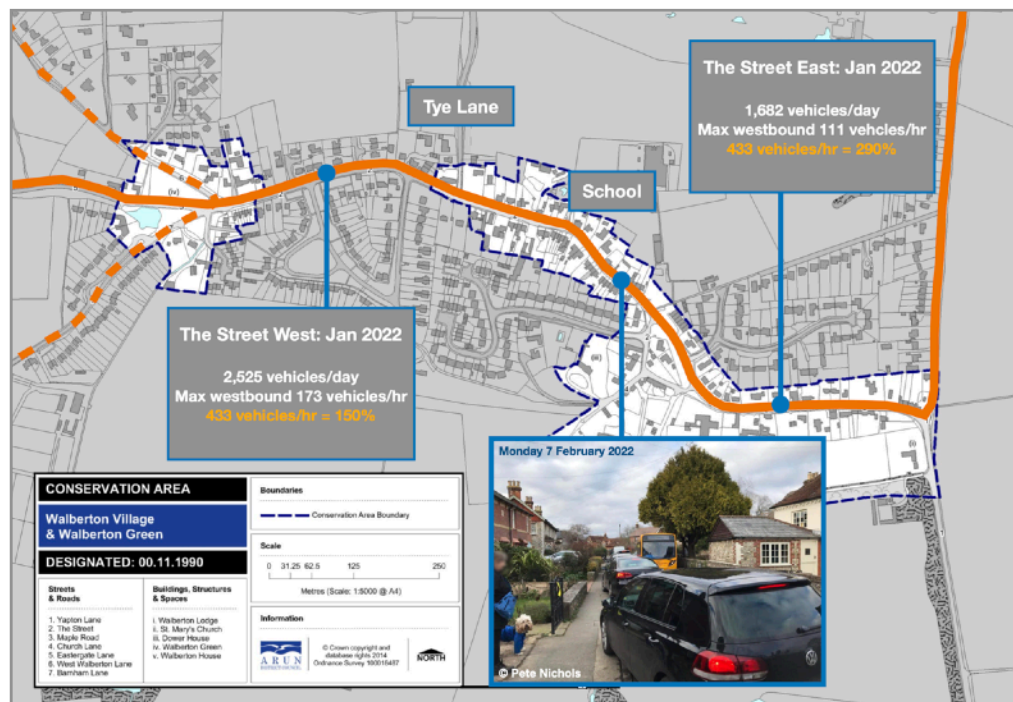
The Consultation Brochure states that The Street would “experience an increase of approximately 1,300 vehicles over a 24-hour period”.

However, it does not explain that this increase would NOT be evenly distributed during each 24-hour period and would NOT be evenly distributed in both directions. In fact, the additional flow is westbound and concentrated in the PM peak period (16:00-19:00). This critical information is not discoverable from published material.

An additional 1,300 vehicles/day distributed as above represents an increase of 433 vehicles/hr, all in the westbound direction. This is equivalent to 1 vehicle entering The Street from Yapton Lane every 8 seconds. In reality, PM peak flow is almost certainly not spread evenly but will likely occur in even more intense waves of traffic.

In 2019, National Highways reported the average PM peak westbound flow in The Street west of Tye Lane as 150 vehicles/hr (Ref 5). Rat running by 433 vehicles/hr represents a 188% increase. This is more than 4 times the figure reported in the Consultation Brochure which disguises the magnitude of the impact.

If the highest westbound traffic flows observed in The Street at any time of day are used to represent the current situation at its worst, the increase from rat running is in the range 150% to 290% (see below). Percentage impacts during quieter periods will be higher.



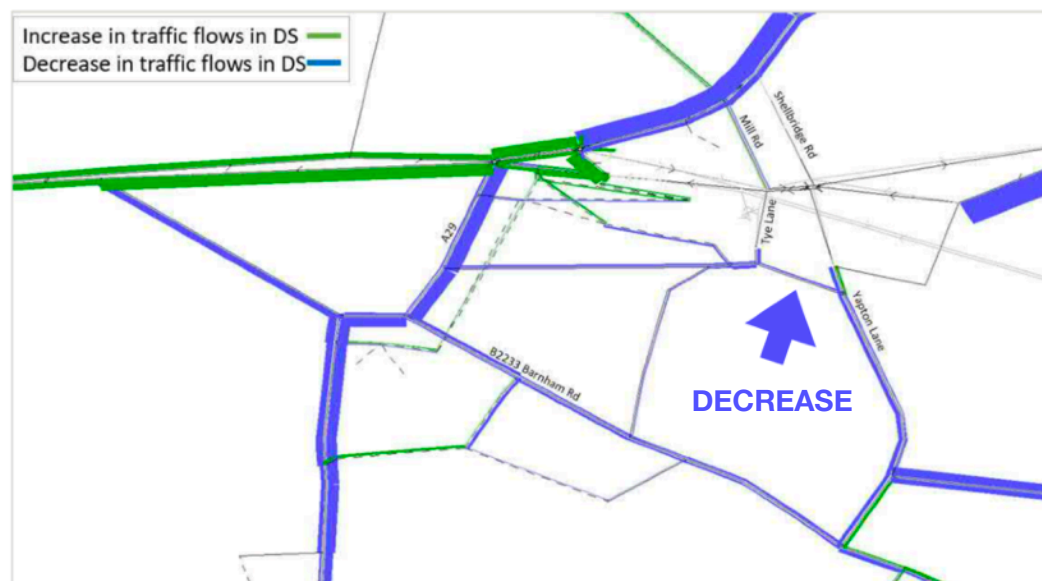
Not only are these impacts up to 7 times higher than shown in the Consultation Brochure, they would be experienced over a much longer period than at present.

### 3. Comparison to Stage 2

Reported outcomes of the Stage 3 traffic model are radically different in effect and magnitude compared with the evidence on which option 5BV1 was selected as the preferred route.

The Stage 2 traffic model predicted a small DECREASE in PM traffic flow in The Street, not the huge INCREASE that is now predicted (Ref 2, below).

**Figure 3-14: Do Something (5BV1) – Do Minimum – 2041 PM**



This change cannot be accounted for by reversion to a fixed demand model for the Statutory Consultation. Indeed, when variable demand is re-introduced, traffic volumes will be higher, the incentive to rat-run will be greater and the impact on Walberton and other communities will be even worse. These factors will also increase over time but to a degree presently unknown as no updated Design Year forecasts have been published.

As shown, the critical issue of rat-running on local roads at the western end of the scheme was not addressed adequately by the Stage 2 traffic model. This makes transparent and well-evidenced consultation at Stage 3 essential, neither of which are currently forthcoming.

#### Notes

1. Spotlight on Storrington (below). National Highways 2019, hidden from view 2020.
2. PCF Stage 2 A27 Arundel Bypass Western tie-in: local roads study. National Highways 2019
3. *ibid*, Appendix B-1
4. Walberton Parish Council Traffic Survey. 19 - 25 January 2022.
5. Ref 1, Appendix B-2



## Spotlight on Storrington:

A sleepy village that is now wide awake

### Deep in the heart of West Sussex lies Storrington. Bordering the South Downs National Park, Storrington has one main high street and 4500 residents – but a traffic flow of up to 20,000 vehicles per day.

Look past the heavy flow of vehicles cutting through its centre, and Storrington is still the picturesque village it's always been. But according to data collected from Compare My Move, it has the greatest amount of air pollution anywhere in the south-east<sup>1</sup>.



**Darryl Hemmings**, Transport, Planning and Policy Manager at West Sussex County Council

"[Storrington] is one of the most regularly used rat-runs, where traffic travels through the centre of the village to avoid congestion at Arundel," **Darryl Hemmings**, Transport, Planning and Policy Manager at West Sussex County Council, says. "[The congestion] has led to the declaration of an air quality management area, as the air pollution exceeds the national standards for oxides and nitrogen. Air quality management areas are rare in such rural locations; we usually see them in urban areas. That's really down to the volume of traffic that uses the route to avoid congestion on the A27."

**Paul Marshall**, Cabinet Member for West Sussex County Council, has concerns about the air quality in Storrington as a "direct consequence of the diversionary traffic<sup>2</sup>"; frustrated drivers are continuing to rat-run through local villages on roads that are not built for the vast amounts of traffic that they currently experience.

According to City Population, a website that measures population statistics, over half Storrington's population comprises children or over 65s – both groups are particularly susceptible to air pollution.

As **Nick Fields** of local community group OneArundel, says, "[A27 congestion] does not just impact Arundel; the effects of congestion are widespread."

But there's light at the end of the tunnel with planned improvements in the pipeline, according to **Darryl**. "We expect improvements to the A27 Arundel Bypass to encourage more traffic to use the A27 rather than those

rural and residential routes. That should directly affect the people living in those areas, reducing the amount of noise and a number of air quality issues. It should also make West Sussex a more attractive place to live, to do business in and to visit, which is really key in supporting the economic vitality of the county."

A free-flowing route on the A27 at Arundel would provide the capacity to allow drivers to take a direct, free-flowing route to and from work, school, the shops or friends and family. This could draw traffic away from rat-runs on roads that were not built for such high volumes, providing the opportunity for places like Storrington to improve their air quality, and restore the tranquil quality of life they should be known for.

<sup>1</sup> Figure relates to particulate matter

<sup>2</sup> [www.littlehamptongazette.co.uk/news/politics/council-votes-to-protest-legal-challenge-to-a27-arundel-bypass-1-8626914](http://www.littlehamptongazette.co.uk/news/politics/council-votes-to-protest-legal-challenge-to-a27-arundel-bypass-1-8626914)

