



A27 ARUNDEL BYPASS IMPROVEMENT SCHEME
PUBLIC CONSULTATION
by Highways England

WALBERTON PARISH COUNCIL

Response 9th October 2017

Walberton Parish Council (WPC) is grateful for the opportunity to respond to Highways England (H.E.) as a Consultee on the Do Nothing, online and two offline options set out in the A27 Arundel Bypass Public Consultation document.

The two offline routes directly affect this parish, Options 3 and 5A. Binsted village, one of the three villages in this rural parish's area, would be impinged by Option 3 but would be savaged by Option 5A. Both these routes also impact adversely on traffic conditions, amenity and the environment more widely across the parish, particularly in the case of Option 5A.

WPC Traffic Background

As our key East-West route for access and commuting, as a physical barrier to the north, as an entrance to the South Down National Park, and as the artery from which several lanes run southwards into our residential areas, the A27 is an integral part of the WPC community fabric. Its presence looms large in parish life and any changes will be noticed and will be important for parishioners.

The A29 lies outside the parish boundary and is one of three North - South routes that are used by residents and those commuting through our Parish. The least used is West Walberton Lane, but the most used parish road is Yapton Lane. These three routes and the connecting lanes between them are critical because to the south is another physical barrier - the railway. Through-traffic will automatically find its way northwards from either of the two relevant rail crossing points and on towards the least congested A27 access point it can find, criss-crossing the local lanes to do so, and visa-versa from the A27 southwards. How this articulates depends on whether that traffic approaches from the east or west and if its destination is east or west. Morning and evening rush-hours have reversing flows naturally, but not symmetrically. Folk do not retrace their route because of the one-way accesses onto the A27. Additionally, not all routes are open to HGVs.

Yapton Lane (B2132), the most-used parish North - South route, serves only two other public roads in its length between the A27 and the junction with Lake Lane and its railway level crossing on the parish's southern boundary. These two roads are Binsted Lane, leading eastwards into Binsted village and back to the A27 only, a virtual dead-end, and The Street, which leads westwards through the two conservation areas of Walberton village where in

places it is single lane (given necessary street parking). Because neither Binsted Lane nor The Street is suitable for through traffic, Yapton Lane is heavily limited by its level crossing, described in Appendix 1 as having nearly 300 trains a day and used by 7,900 vehicles a day. Given the funnelling effects on through-traffic flow imposed by the railway and the A27 access and exit points described above, it will be appreciated how important and sensitive the whole parish is to changes in Yapton Lane, a “B” class road whose upgrading has not been costed into the Bypass works totals nor its disbenefits allowed for in BCR ratios. Yapton Lane is too narrow in places for two HGVs to pass abreast.

Although the traffic models could include planning changes, it is unclear to us that *any* of the options fully account for the 2,500 houses planned at Eastergate on the A29 or the 600 houses resolved to be built in WPC’s own community, and the economic and housing developments at Littlehampton and Bognor; Arun D.C. plans 1,000 houses each year for the foreseeable future which do not seem to be reflected in much increase in traffic between now and 2041 for when H.E. data is given. In sum WPC contend that all its local lanes including Yapton Lane will have become close to capacity before 2041 but H.E. data seem to allow for little change in the intervening 24 years.

WPC Response to Consultation

Walberton Parish Council’s comments on the Consultation document are as follows:

1. WPC’s Neighbourhood Development Plan (NDP) made in 2017 is now part of the Local Development Plan for the Arun DC area. Several of its policies are relevant to the A27 and its improvement, and the policies are in the public domain. The most relevant policies are attached as Appendix 2. WPC NDP policies are severely in conflict with Option 5A, and also modestly in conflict with Option 3. There is no conflict with Option 1.
2. WPC is strongly opposed to Option 5A for this reason among others expanded on below.
3. WPC is willing to compromise and accept Option 3 because it recognises the advantages for regional traffic of some improvement works to the A27. If proper mitigation measures and other concerns of WPC noted below are dealt with, WPC would be willing to take a supportive position on Option 3. However WPC in correspondence with H.E. has realised that these concerns might not be met so our support is reliant on successful further correspondence and discussions. Meanwhile, a viable alternative is available in Option 1.
4. WPC is in principle supportive of A27 improvement works and this is made clear in its NDP. It follows that WPC is in favour of choosing one of the options rather than doing nothing. WPC is able to commend Option 1 at this stage, subject to further discussions and again subject to our local concerns being recognised.
5. Overall, WPC’s concerns are fivefold:

- i. Traffic impact: the generation of significant additional traffic flows on local roads, with visual impact, noise and disturbance, loss of air quality and amenity, and the imposition of traffic delays on parish roads used by WPC residents. These are clearly worst under Option 5A and least under Option 1. According to H.E. data:
 - a. Option 1: increases WPC's local road traffic by 2,900 AADT
 - b. Option 3: increases WPC's local road traffic by 4,500 AADT
 - c. Option 5A: increases WPC's local road traffic by 8,300 AADT

According to supposedly reliable H.E. data, the A27 traffic increase under Option 5A compared with the Do Nothing scenario at the Fontwell FP is just 4,400 AADT, whereas the local traffic increase in Walberton parish area is 8,300 AADT (See Appendix 3). This is a poor return on an investment of £250 million when the parish disbenefits are taken into account. Appendix 3 also comments on the relative and absolute levels of BCR and potential problems with their computations.
- ii. Community impact: the severe negative of splitting the parish community (Option 5A) and the diminution in community cohesion and sense of place. This extends to the loss of amenity for private and residential and commercial and agricultural properties directly and indirectly affected, with parishioners' landholdings divided. This is clearly of least concern under Option 1.
- iii. Environmental impact: the harm and the ecological damage caused to ancient woodland areas and to other irreplaceable and important habitats and species, and the loss of open space and wooded amenity for walkers, horse riders, cyclists and others. Professional surveys by MAVES show an exceptional biodiversity and habitats network in the wider affected landscape in the Binsted and Tortington areas, which is greater for Option 5A than for either Option 3 or Option 1. This extends to damage to parish infrastructure and its landscape with visual impact, noise and disturbance, and loss of air quality and amenity. In environmental terms Option 1 has the least negative impact and Option 5A the greatest negative impact. Some of the ecological impacts are in respect of issues with which parish councillors are not fully conversant, and WPC takes its lead from MAVES' technical studies. MAVES data is to be submitted to H.E. separately and we believe the greatest harm comes from Option 5A and the least from Option 1.

One little remarked-upon feature is that Option 5A is largely an embankment scheme, in some places at up to roof height, whereas Option 3 is a scheme that uses cuttings and is therefore visually much less intrusive and is a potentially quieter scheme.
- iv. NDP impact: WPC consulted widely on its local policies and at referendum these were supported by 96% on one of the highest turnouts in the country, being

made by Arun D.C. in March this year. Its policies, core objectives and its vision clearly conflict with Option 5A, and have modest conflict with Option 3 also. As mentioned above, the Do Nothing option is one that is in conflict with WPC's NDP. Option 1 however accords with NDP policies in general, which are supportive of sustainable development and economic progression, so, on the basis of NDP policies, WPC is potentially able to support this option.

- v. Cost and Benefits: All three options are considered by H.E. to meet its six objectives including the alleviation of the traffic problems at Arundel and all three therefore qualify for inclusion in the consultation process, alongside the Do Nothing option.
 - a. As to Costs, Option 1 is well within the set budget and is likely to be delivered, potentially with modest improvements that derive from the consultation; it allows for an additive process. Conversely, Options 3 and 5A are at or over budget, and have no room for improvements but on the contrary, will probably look for savings in traffic, community, environmental or other disbenefits so as to become affordable. WPC takes the pragmatic approach that choosing an option that is already at the limit of affordability before detailed work has begun is a recipe for eventual failure and would tend therefore to discount both Options 5A and 3 on cost grounds.
 - b. As to Benefits, WPC faces the effects that the offline options have on the parish, in particular 5A with its parish traffic impact, and considers these modestly (Option 3) or significantly (Option 5A) outweigh the listed or supposed benefits, including impacts on Arundel; this is especially true of the Option 5A traffic problems that would hit the WPC area. It notes the significant benefit included in discussions and in the consultation of ending the use of the Storrington route through the SDNP under Option 5A. But WPC is unpersuaded by the supporting traffic and BCR data and its reasoning is set out in Appendix 3. This factor clearly places Option 3 above Option 5A in benefit terms. In sum, Option 5A has a poorer BCR than Option 3 and Option 1 has a better BCR than either.
6. The "old pink / blue" route is one that WPC previously supported. The closest route to this is now Option 3. Some supporters are potentially moving away from this route due to the increase in costs associated with revised layout and the environmental mitigation of the ancient soils. There are also suggestions of a cut and cover tunnel through the woods and we would support this solution if it was found to be beneficial to cost and environmental mitigation.

With changes to the layout of the Northern junction, which is heavily over specified, and with the addition of a link from Ford Road, we believe it would regain its previous widespread support and therefore likely to achieve H.E. preferred option status.

Meanwhile, Option 5A is anathema to WPC:

- a. It destroys Binsted village - quite unnecessarily so in our view when Option 1 exists - and has negative effects on traffic flows on local rural lanes and negative effects such as noise and disturbance, visual impact, loss of air quality, loss of amenity, and the imposition of traffic delays on better-used parish roads.
- b. It does the greatest harm to the environment, and causes the most ecological damage to ancient woodland areas and the loss of open space and wooded amenity for walkers, horse riders, cyclists and our successors living in this place.
- c. It damages our community cohesion and sense of place by splitting the parish in two.
- d. It is significantly more intrusive, and noisy and light-polluting than other options.
- e. WPC is not in a position to contest the point, but it seems to us that Option 5A and Option 3 fall foul of the NNNPS, as H.E. highlight in the Consultation document.
- f. Having studied the data, WPC does not believe that it benefits the SDNP and the alternate Storrington route, and therefore it has the worst BCR of the options on offer. Given its starting cost, it also seems unlikely to be a pragmatic choice because of the likelihood of its being over-budget once the full cost of mitigation is taken into account.

WPC Proposal and Conclusion

In view of its total opposition to Option 5A WPC makes no positive proposals for it.

On Option 3, WPC feels the Havenwood junction is heavily over-specified, needing only a single flyover westwards serving the old A27 and not requiring the dumbbell roundabouts or the Havenwood access road. This lowers costs.

On Option 1, WPC confines itself to mentioning only one item and that is the wider benefit of a more comprehensive and complete treatment of the A27 junction with Ford Road; it would support further detailed traffic flow and design work on this aspect.

Option 3 is our preferred offline route and is a proposal on which we are willing to offer support under certain circumstances. But in the possible absence of sufficient funding for Option 3, Option 1 is our preference.

Many parishioners support Option 3, with some supporting Option 1 but are all absolutely against 5A.

Appendix 1

ABC Railway Guide Crossing Data

- **Name:** Yapton
- **Crossing Type:** Public Highway
Automatic Half Barriers
- **Location:** Yapton CP
- **Postcode:** BN180DN
- **Route:** Sussex
- **ELR:** TBH2
- **Distance:** 20 miles 79 chains
- **Individual risk rating:** **D (High)**
- **Collective risk rating:** **2 (Very High)**
- **Last assessment:** September 2015
- **Next assessment due:** December 2016
- **Types of trains:** Passenger & Freight
- **Line speed:** 30 mph
- **Trains per day:** 290
- **Usage:**
 - 7884 Vehicles
 - 54 Pedestrians or Cyclists

Notes: **Individual Risk Rating** is the risk to individual users of the crossing. It is presented as a single letter, with A being the highest risk and M being the lowest. **Collective Risk Rating** is the overall risk of any incident involving any person or vehicle on the crossing, including train staff and passengers as well as users of the crossing. It is presented as a number, with 1 being the highest risk and 13 being the lowest. This is the most important rating when prioritising safety measures at level crossings.

Misuse history: Nil incidents in year prior to assessment date (Sep-2015), -
Nil incidents since.

Near-miss history: Nil incidents in year prior to assessment date (Sep-2015), -
Nil incidents since.

Accident history: Nil incidents in year prior to assessment date (Sep-2015), -
Nil incidents since.

Key risk factors:

- Large Numbers of users
- Blocking Back
- Frequent Trains
- Large Numbers of HGVs

Current protection arrangements:

- Half barrier equipment
- Road traffic light signals
- Audible alarm
- Signage

Appendix 2

WPC Neighbourhood Development Plan Policies

measures where possible. In relation to the A29, this will be true for the Walberton Green Conservation areas, as detailed by WSCC in traffic modelling, but affects Arundel Road and West Walberton Lane in particular.

Depending on the A27 proposals, the same supportive, policy stance may be required for the northern end of Yaption Lane. This is because the possible signalisation will produce greater A27 delays and therefore an increased preference for shortcutting at Yaption Lane and Arundel Road, and the consequent extra volumes (especially HGV and other professional drivers) in both Fontwell and Walberton villages.

Depending on the A29 proposals, the same supportive, policy stance and need for ameliorating work may be required in respect of junctions with Barnham Road and Eastergate Lane and Wandleys Lane.

Policy GA 7 A27 Arundel Bypass

The Arundel Bypass is supported in principle but only when taking the route that causes the least damage to the countryside to the north of Binsted village within the Parish's boundary.

Reason: The area to the north of Binsted includes countryside that is cherished by parishioners for some of the most attractive and – in ecological terms – most valuable in the Parish. The policy is important for delivering on the Vision and Core Objectives and reflects Survey results and comments.

infrastructure properly. The PC will maintain support for the provision of cycle racks where appropriate.

Policy GA 4 School Transport

Proposals will be supported that improve transport facilities, especially for local school children.

Reason: The community has expressed, in its Survey comments, a real concern for the safety of all residents but children in particular on the Parish's narrow and unpaved lanes. There is a need for a network of cycleways in addition to improved public transport for those, children in particular, who need to go beyond the village confines.

Policy GA 5 Traffic Management

Proposals that significantly increase the level of traffic within the villages will be resisted particularly in the case of HGV movements.

Reason: It is part of the vision for the Parish that through traffic and especially HGV and other commercial traffic shall be kept to a minimum because of the size and design and construction of the local lanes, the pinch points involved and the residential nature of the roads and lanes affected by rat-running. It diminishes the quality of the housing and the well-being of residents, as well as being threatening to pedestrians, cyclists and riders since the lanes are mostly unlit and unpaved. The through traffic issue is a major recurring theme in the Survey. In planning terms it is also a significant planning constraint in respect of the sustainable development of both housing and employment space.

Policy GA 6 A27/A29 Junction West, and Other Strategic Junctions

Proposals for the upgrading and remodelling of this junction and others that lie outside the Parish will be supported where these works will result in an improvement to the traffic environment on the residential roads through Fontwell and Walberton.

Reason: The A27 traffic hotspot is the key trunk route junction within or at the edge of the Parish and is especially relevant to parishioners. Through traffic uses Yaption Lane, West Walberton Lane, The Street, Arundel Road, Wandleys Lane and Eastergate Lane as shortcuts. In line with the Vision and Core Objectives, it will be Plan policy to reduce through traffic with effective mediation

5.5 Getting Around

Key Transport Aims:

1. Provide more sustainable transport links
2. Endeavour to solve current congestion and "rat running" problems
3. Address parking issues
4. Avoid increasing access by HGVs

Policy GA 1 Open Access and Permissive Paths

Support will be given to proposals which provide open and permissive footpaths, bridleways and cycle paths within the Parish.

Reason: On several levels, the policy seeks to achieve the Vision and Core Objectives by bringing sustainability and health and well-being into the everyday life of the community and foster and support progressive approaches to transport and movement.

Policy GA 2 Footpath Bridleway and Cycle Path Network

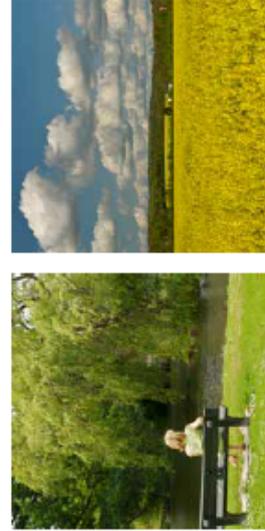
Support will be given to proposals that improve and extend the existing footpath, bridleway and cycle path network, allowing easier and safer access to the local amenities and services, to green spaces, to any new housing and to the open countryside. The loss of existing footpaths, bridleways and cycle paths will be resisted.

Reason: To achieve over the longer term an improved lifestyle for residents of all ages, embedded into the social fabric as a matter of course, while also improving safe and sustainable links around the Parish and with other communities.

Policy GA 3 Car Parking

Proposals which remove existing parking in the vicinity of existing retail and commercial premises will not be supported. Proposals which reduce existing available parking in the Parish will be resisted.

Reason: The Parish has limited public transport and therefore a practical reliance on car-borne shopping, though it suffers also from narrow streets and lanes that make on-street parking unacceptable. It is therefore necessary to cater for the economic and social



Appendix 3

Traffic Data and Traffic Impact

H.E. has adopted WSCC's County Transport Model to assess the performance of the options. The Model was used by H.E.'s consultants, WSP, to produce the modelled flows that provide the data in the Consultation document. Along with other consultees we rely on that document's figures, but having pointed out the impact on parish local roads, we were kindly provided by H.E. with the background modelled flows that support each option. In those we found significant discrepancies. The most significant was traffic on Yapton Lane, the most relevant to our consideration of the options. WSP modelling here works on the basis of an AADT of 2,800 under Do Nothing in 2041 for the southern end of Yapton Lane. This is to be inclusive of traffic from the building of 20,000 houses and matching commercial and industrial space that is to be developed between now and 2041. However, a reliable source states that prior to any development and any traffic growth up till 2041, the *current* Yapton Lane flow at the same location is 7,900 AADT, several times higher than the future WSP baseline. WPC's own SpeedWatch volunteers conclude that at the northern end of Yapton Lane *current* traffic is at least 5,250 – 6,300, some three times that shown in the H.E. / WSP Do Nothing 2041 model, and might have been higher if not "anchored" by knowing the H.E. / WSP figure!

This and many other examples, such as allocating 1,000 AADT to a short unmade track in our parish serving seven houses, led us to re-evaluate and question the Consultation document's data. In correspondence with WSCC and H.E., we realised that the data provided in the Consultation document were extremely rudimentary and that they were not suitable for the purpose to which they were being put in respect of anything other than very specifically dealing with East-West traffic on the A27 *only* and then *only* between the Fontwell FP and Crossbush / Poling. In particular the modelling by WSP was not explanatory of or reliable for North - South traffic data, such as that of the A29, Yapton Lane etc. Thus, in certain respects the data is reliable but in others it cannot be relied on in any serious degree, mainly when the direction of travel is North - South, where we are able to show error rates of 300% quite easily, multiple times.

More detailed modelling for these aspects is dependent on further detailed study, by which time the preferred route will have already been chosen using unreliable data. The reliable data for the model will only be available when the key choice has been made and cannot be used to choose the route. This seems to be a process-driven nonsense. To that extent WPC considers that a proper case has not been made for any option, save possibly for Option 1.

Reliable East - West data comprise the eight A27 flowcount points. Two of these are at Fontwell and Havenwood. This table, with figures from the Consultation document, compares them:

	FONTWELL Flowcount point	HAVENWOOD Flowcount point/s	Flowcount point Difference	Cumulative Difference over
DO NOTHING	29,400	28,500	900 westward	-
OPTION 1	31,400	33,000	1,600 eastward	2,500
OPTION 3	31,800	35,400	3,600 eastward	4,500
OPTION 5A	33,800	41,200	7,400 eastward	8,300

Under the Do Nothing Option, the Fontwell flowcount point (FP) records a greater AADT than does Havenwood's FP, implying a 900 AADT loss of eastbound traffic into our local parish roads. We assume here that this eastbound loss into local roads is not affected by Arundel Bypass works, well to the east. The 900 AADT is only a quite small element in the whole total of traffic that joins or leaves the A27 at the north end of Yapton Lane; it is the amount by which the eastbound traffic over the course of a day (thus two rush-hours) exceeds the westbound traffic. The *base* level in the model remains unknown. This makes two points:

First that under Option 1, where the Havenwood FP reading is higher than Fontwell's the new westbound loss into local roads is additional to the eastbound loss, thereby adding a further loss into local roads of 1,600 for an *increase* of 2,500 AADT on top of the current unknown total level. Therefore according to H.E. / WSP we have

Option 1: increases WPC's local road traffic by 2,500 AADT

Option 3: increases WPC's local road traffic by 4,500 AADT

Option 5A: increases WPC's local road traffic by 8,300 AADT

Second, the Yapton junction is a very complex set of circumstances. Traffic exiting onto the A27 can go west on the A27 to Chichester, or west as far as the eastern Fontwell roundabout before circuiting 360 degrees to head back eastwards to Arundel, because the A27 is a dual carriageway. Or again, it can circuit the roundabout 270 degrees and take the A29 northwards; some of this will be rat-running traffic bound for Storrington, some not. Some traffic therefore passes the Fontwell FP twice. The same is not true in reverse because there is a cross-over for eastbound traffic seeking to join Yapton Lane from the A27, and regular commuters will take different routes out and back, utilising the southern A29 arm if heading south-westwards having avoided it when heading northwards because it is at over-capacity in rush-hours. Given that H.E. / WSP has no reliable model for any of these multiple scenarios as noted, because they all involve an unmodellable North - South journey, it is

quite incapable of supporting its model to show a staggering 26% reduction in traffic between Options 3 and 5A at the Madehurst FP on the A29 (4,200 AADT). After all, eastbound drivers at Fontwell have - under Option 3 - the benefit of going to Shoreham via the A27 along the Arundel bypass, so there is no logic to their deciding not to rat-run but to take the A27 just because it swoops through Binsted rather than Tortington - the difference in distance is insignificant in driving terms versus any additional congestion on that route. Although it is tempting to suggest that because all the Yapton Lane traffic under Option 5A can turn directly eastwards on the new junction and so the A29 is less used for rat-running, this cannot be the case according to H.E. / WSP: under 5A the model proposes a *drop* in Yapton Lane traffic to fewer than 1,000 AADT. It weakens the WPC stance only slightly to suggest that this figure (an 85% drop from *current* levels) is even more likely to be wrong than the A29 figure!

The figures in the table above only use the supposedly reliable East-West A27 data from the Consultation document, and we need to accept that they are correct; if even these are unreliable then the Consultation process itself is wholly pointless. Under the three improvement options the vast majority of the extra traffic put onto WPC roads, whose northern junctions with the A27 lie between the flowcount points, will be using the current main parish North-South route, the B2132 Yapton Lane. H.E. states that it has not costed in any works to upgrade Yapton Lane, which currently carries an estimated 7,900 vehicles a day at its southern end. Yapton Lane crosses the main South Coast rail lines at Lake Lane level crossing. Heavily used, with 300 trains a day, it is halting traffic when most trains are running - in rush hours.

North - South H.E. data are not reliable and this includes not only Yapton Lane but also the A29. But a very significant part of the Option 5A BCR gains are created by H.E.'s supposed 26% reduction in traffic at the Madehurst FP under Option 5A which it assumes is due to the cessation of rat-running via Storrington. There are three things wrong with this:

1. The unreliability of AADT data and its mismatches
 2. The cause being the Arundel Bypass and not the Worthing-Lancing improvements
 3. The consequential BCR treatment of Option 5A in respect of 1. and 2.
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1. As noted above, there is no reliable data at all for the A29 at the Madehurst FP, and if there were we might be unsure what it signified given the highly complex circumstances. The proposal that it signifies less rat-running has been shown as illogical and very unlikely.
 2. As can be seen off the attached map of the Storrington rat-run, the Worthing / Lancing congestion is arguably a greater problem than the Arundel congestion. As drivers will acknowledge, five miles of clearer road to reach the next congestion area more quickly is only a modest advance, and probably saves no travel time. For the Storrington rat-run to fall into disuse, both Arundel and Worthing / Lancing

congestions have to be resolved. It is a worthy objective of the Arundel Bypass to be part of this resolution. But the scheme is declared to be “standalone”, meaning its outcomes are self-contained. It is unclear whether it has been truly judged in that way. If so, it is - once again - highly unlikely that the Arundel Bypass alone and without the Worthing / Lancing improvements can have the 26% positive effect on the A29 being (in our view quite unjustifiably) attributed to it. Once again, it defies logic. As WPC understands it, the Worthing - Lancing improvements are not decided upon and it is still perfectly feasible that they will not proceed, adding a further layer of doubt onto the BCR for the Arundel Bypass's Option 5A.

3. As a standalone scheme, the Arundel bypass cannot claim the Worthing / Lancing benefit of reduced congestion; it might one suppose claim half if half the cost was shared, and visa-versa. H.E. has not declared that this has been done because as a standalone scheme it could not be. Yet as we have seen, Option 5A has no special advantages, for the congestion-aware drivers, over Option 1 or Option 3 in ending the usefulness of the Storrington rat-run. As noted elsewhere, it is understood that progression of the Worthing - Lancing improvements are in any case not a foregone conclusion.

We are also concerned that the benefits in the BCR of Option 5A have risen in the last two years roughly twice as much as the benefits in the BCR of Option 3, although we know of no reason why any *relative* change in their benefits should occur, for reasons given in 2. above.

WPC therefore rejects the idea that Option 5A has the newly awarded benefit of a vastly improved BCR of 2.6. It is unsupported by evidence. It is based on provably unreliable modelled traffic flows and unsubstantiated and illogical assumptions. For us, the BCR from 2015 of 1.7 seems much more in line with the facts.

In reference to the BCR for all options, WPC notes that a significant part of the computation relies on journey times. While journey time savings measurements are taken from a point at Poling, to include the Crossbush junction, they treat the western end of the improvements differently by ending at Tye Lane rather than at Fontwell. The potential for delays at Fontwell east and west roundabouts - which are at capacity and are to be signalised under H.E. plans - would impact on journey times adversely, but if rat-running is an element in the BCR then the eastern roundabout at least needs to be included in the measurement distance. Preferably both Fontwell roundabouts need to be included so as to capture the southbound (A29) and westbound (A27) traffic that might no longer use the rat-run to or from Storrington.

Furthermore, the standalone basis of analysis on journey times removes the impact of delays and their potential resolutions at Chichester and Worthing / Lancing. Therefore

journey time savings scoring positively in the BCR are entirely theoretical when seen from the driving seat of a rat-running vehicle making a regional journey. In that regard any difference between the options is largely false in practical terms for vehicles. WPC considers the journey time element could have been falsely measured and may have been accorded an overlarge influence.



via A27	1 h 3 min 29.4 miles
Fastest route, despite the usual traffic	
DETAILS	
via A283	1 h 4 min 33.6 miles
Congestion causing 12-min delay	
via A283 and A285	1 h 18 min 38.3 miles
Congestion causing 12-min delay	