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Mr Jonathan Sharrock
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3 September, 2018

Dear Jonathan,

Opportunity to reappraise the New Monks Farm development

We understand that the developers for New Monks Farm, if they haven't already, will shortly be making an application for further public funding from the LEP. This provides the LEP the opportunity to reassess the development against its own sustainable economic and transport objectives, which we believe the project fails to meet in its current form.

We are concerned that the information previously provided by the developers was severely misleading, particularly with regards to sustainable transport. This letter sets out why we feel the developers should not receive further funding unless major improvements are forthcoming, such as:

1. A direct, grade separated crossing is provided at the Sussex Pad junction
2. The main pedestrian / cycle route from the housing development east is switched from the north to the south of the access road and widened to a 4m usable path width.
3. Cycle parking within the development is improved
4. The country park paths and bridges are widened to allow cycling
5. The bus stop for the Ikea is located directly outside its main entrance with attractive covered waiting areas supplied with real time information (see Appendix 1 for more details)

Without these issues being addressed, it is difficult to see how the development will promote active travel and sustainable transport in any meaningful way. The current proposals will result in increased traffic congestion, pollution and carbon emissions but will also lead to a poor quality environment and a less healthy community, impacting on NHS costs and employee absenteeism.

While some of these elements will add to costs, we believe that savings could be made by omitting some of the currently proposed infrastructure which serves little or no useful purpose, such as the four-stage crossing of the A27 roundabout.

The attached appendices demonstrate why the proposals do not even come close to meeting the various design standards, particularly with regards to any alternative to the Sussex Pad crossing (see Appendix 2) which is the best, flat, high capacity road crossing of the A27 for cyclists for miles around.

Should you require any further clarification, or you would like us to present this information to the LEP, please do not hesitate to get in touch.

Yours sincerely,

Bricycles, Brighton & Hove Friends of the Earth, Brighton Excelsior Cycling Club, Brighton Mitre Cycling Club, Cycling UK Volunteer representatives, GS Stella, Horsham Cycling Club, Horsham District Cycling Forum, Shoreham-By-Cycle, Sussex Ramblers, Sustrans Worthing Co-ordinator, VC Jubilee Cycling Club, West Sussex Cycle Forum, Worthing Cycle Forum

Appendix 1

Major issues with sustainable transport

This appendix briefly outlines the main concerns with the development regarding sustainable transport which go beyond the loss of the Sussex Pad crossing and includes the poor level of sustainable infrastructure within the development:

1. The Sussex Pad crossing is on the desire line from the east (Shoreham), from the south (through the airport) and from the west (Lancing) for cyclists, pedestrians and equestrians wanting to access Coombes Road and the bridleway at Lancing College. Providing crossings elsewhere not only inconveniences users, it will also deter people from taking up active travel. There could also be safety issues at the Sussex Pad if users continue to try and cross there (it being the most direct route).

2. The main pedestrian / cycle route from the housing development east to Ikea and to Shoreham is poor. It is located to the north of the access road, which forces it to then cross the access road into Ikea and the busy access road from the A27 all on uncontrolled and inadequately sized crossing points. It also passes through a bus stop. This was flagged up by West Sussex County Council but like many of its representations on non-motorised users (NMUs) appears not to have been pursued further. All this could be avoided by switching the path to the southern side of the access road and preferably making it 4 metres wide.

3. The cycle parking within the development is poor, with little or no provision near the front of houses or relies on garages that are too narrow.

4. The paths within the country park are too narrow for cycle use at only 2 metres wide (West Sussex County Council made this point but again didn't pursue). They should be at least 3 metres wide clear of any obstacles and the bridges need to be doubled in width to provide a 3 metre clear path across them to accommodate cycle use. As currently proposed they are only 2 metres wide which means they only have a 1 metre usable path width and will create conflict between cyclists and pedestrians.

5. The bus stop for Ikea, is currently located outside the retail development like some undesirable element. It will require bus passengers having to brave the weather to stand in a cycle path waiting for a bus. If they take trolleys from the store to the bus stop, as some undoubtedly will, these could end up blocking the path for pedestrians and cyclists. In addition, without real time information provided at the store customers and employees won't know when the bus is arriving and this will undermine their confidence in using the service.

   If this development is to promote sustainable transport it needs the bus stop to be right outside the main entrance with an attractive and sheltered waiting area provided with real time information, both at the bus stop and within any café that is part of the retail development. This will help maximise bus use and reduce car use.

Appendix 2

Sussex Pad Crossing

Why is this crossing so important?

The Sussex Pad crossing is the best, flat, high capacity road crossing of the A27 for miles around which is why it is so popular for road cyclists. It is used extensively by club cyclists, group rides and cycle events. To a lesser extent, it is also used by groups of mountain bikers accessing the bridleway at Lancing College or travelling deeper into the South Downs.

At the Sussex Pad, cyclists can cross the A27 in one movement straight onto Coombes Road and with the traffic lights they do not have to mix with vehicles on the A27. While it might look daunting for a novice (they can use the pedestrian two-stage crossing if necessary) it is actually very easy and safe to use, with only two injuries to cyclists in nearly 20 years. Delays are also fairly minimal.

This is why over 200 people demonstrated against its closure on 15 July, 2018 (see pictures below).

Clarifying the levels of usage

It is worth noting that the developers carried out **no surveys** of the crossing on a Sunday which is traditionally the most popular day for recreational cycling and when many rides are held. They have also misrepresented the counts that others have done and consistently downplayed the significance of the crossing.

In the absence of any developer surveys, these are the counts carried out by cycling and community groups:

Sunday, 23 April, 2017 - 258 cyclists used the crossing in just over a four-hour period.

Saturday, 30 June & Sunday, 1 July 2018

- 862 cycle, 96 pedestrian and 3 equestrian movements over the course of the weekend (8am – 7pm Saturday and 7.45am – 8pm Sunday) with a fairly regular 2-way cycle flow
- 340 cycle movements were on the Saturday
- 522 cycle movements were on the Sunday
- A peak hour rate of 107 cyclists between 11:30am and 12:30pm on the Sunday.

It is worth noting that it is highly unlikely that many other cycle routes or paths in Sussex have this level of usage. So while this level of cycling might not be high for a busy urban location, it is certainly not low as the developers claim and is likely to be high compared to most other rights of way.

Government aim to double cycling by 2025

The Government's aim is to double cycle activity by 2025 as set out in its Cycling and Walking Investment Strategy. This means we should be looking at accommodating twice the current peak hour rate of 107 cyclists per hour. Therefore, any new provision should be designed to cater for 214 cyclists per hour.

Rebutting the claims made by the developer about the replacement path

The developer has made a number of claims about the replacement path it is proposing to compensate for the loss of the Sussex Pad junction, such as:

1. The path will be 2.5 metres along its whole length
2. The path has a usable width of 3.5 metres along its whole length, apart from a short section adjacent to Ricardo's where its only 2.5 metres wide
3. Cycle counts at the Sussex Pad crossing (they did none themselves on a Sunday) show low usage
4. These widths meet all necessary standards - Sustrans' standards require a 2 metre path, as does the Design Manual for Roads and Bridges (DMRB).

Unfortunately, none of the above are true, apart from possibly the first one and even then that is misleading as it doesn't represent the usable path width, which is only 2 metres or less. This is best shown by the accompanying diagram (see Appendix 3) which illustrates the varying usable path widths against the two standards being quoted, including any mandatory clearances from walls and other obstacles which the developers have failed to take account of when making their claims.

In addition, in relation to point 2, having done a crude survey, measuring the width of the top of the bank in seven places spread out along the path, it is clear that the width available is mostly less than

3.5m and for a number of sections it is under 3 metres, down to as low as 2.8 metres. This demonstrates that with the required clearance from the wall and a safety buffer to the edge of the river, this path can never be wide enough to meet the necessary standards, unless there is a severe incursion into the River Adur and the Site of Special Scientific Interest, or a bridge / pontoon structure is built above the existing path and river.

Standards

We have reproduced the standards that are discussed here as appendices so that you can see for yourself the validity of what is being claimed. The developers have also tried to claim that wording on paths widths in an old 2005 DMRB document (TA90/05) is a standard when it is only commentary. In fact, TA90/05 states that the minimum usable width for shared use paths is 3m, with encouragement given to separation for higher volumes of use, which would require even greater width.

Sustrans' standards (April 2014) (appendix 4) – From Table H.8 you can see the various recommended widths for unsegregated shared use. We believe that the category that this route falls into is *urban fringe / semi-rural traffic free* given its location adjacent to industrial units by the airport and in close proximity to Lancing and Shoreham. To try and categorise the area as being rural, or that it is a lesser route, as the developers have attempted, is clearly wrong. Sustrans has confirmed this.

The *urban fringe / semi-rural traffic free* category has a 3 metres width requirement for main cycle routes and major access paths which this route clearly is.

It is worth noting the footnotes to the table which:

1. Highlight the additional width required for edge constraints
2. State that a 1 metre wide verge is preferred, not the minimum 0.5 metres
3. Greater width required where the route is used by horses (which this would be)

In addition, we feel it is relevant to point to the statement in the category above which says that: *"Where high usage is expected, or significant demand to ride two abreast, a width of 4m is preferred…"*

This crossing is used by a lot of cyclists travelling in groups. Many road cyclists often ride two abreast or more and demand for this will be high here. Equally, groups of walkers will also walk two abreast and with the route being used by horses, a 4m usable path is desirable.

Design Manual for Roads and Bridges (DMRB) (October 2016) (appendix 5) – Despite its name, the Interim Advice Note 195/16 forms part of the suite of documents that make up the Design Manual for Roads and Bridges (DMRB). It contains the latest standards on cycle track design and whilst similar to the Sustrans' standards, it is more up to date.

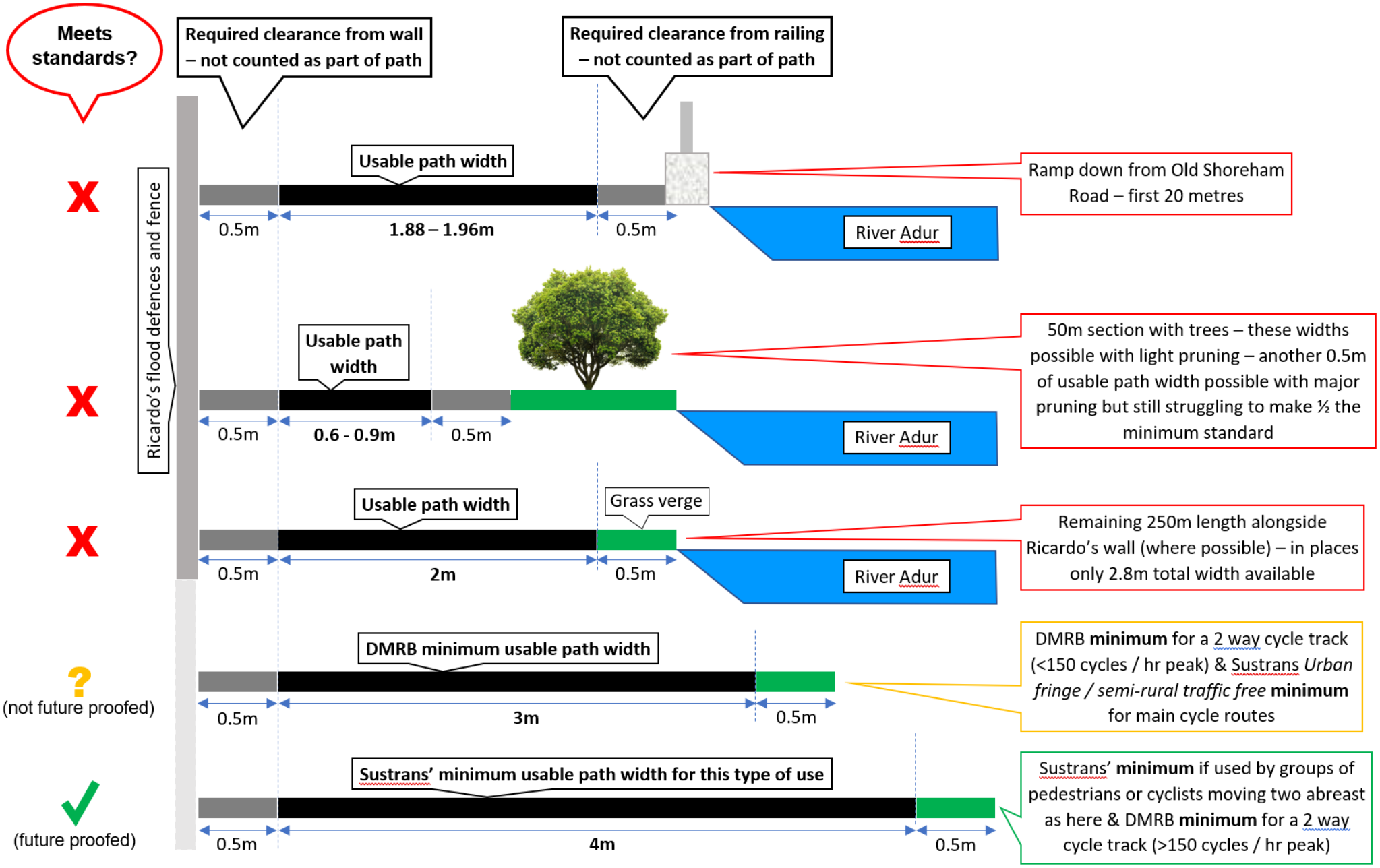
Table 2.2.11 recommends a minimum width for a 2-way cycle track of 3 metres for a peak flow of less than 150 cycles an hour. Like Sustrans' standards, Table 2.2.11.1 outlines the additional path width that is required to provide clearance of any obstacles to maintain the 3 metre usable path width.

When the peak hour rate is above 150 cycles an hour, then Table 2.2.11 states that a 4 metre minimum width is required. Therefore, to allow for further growth in cycle use in line with the Government's ambition to double cycling by 2025, the path should be built to accommodate 214 cycle per hour (peak use). This means that a 4 metre path (usable width) should be used as a replacement for the Sussex Pad crossing.

This corresponds with the width preferred by Sustrans when there is a high demand for riding or walking two abreast as there is here, and for a greater width where horses will use the route.

Appendix 3

Sussex Pad alternative path widths (along River Adur) compared to minimum standards



Appendix 4 – Sustrans' Design Manual

Traffic free routes 2

Path construction

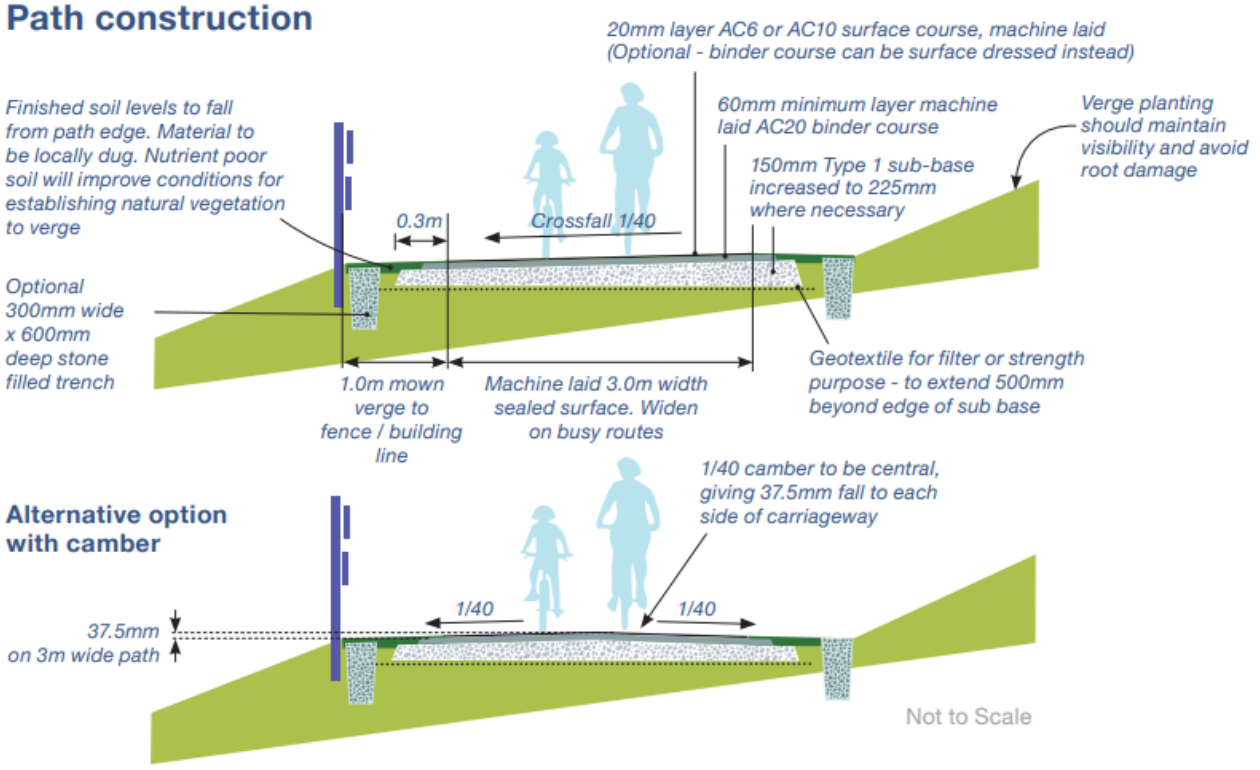


Table H.8 **Path construction requirements,** unsegregated shared use

Nature of route	Min. effective path width (see Note 1)	Type of surface
Urban traffic free	3.0m on all main cycle routes, secondary cycle routes, major access paths and school links; wider on curves and steep gradients. Where high usage is expected, or significant demand to ride two abreast, a width of 4m is preferred and segregation between cyclists and pedestrians considered. 2.5m possible on access routes and links with low use	Sealed surface imperative Surface dressed top to bitumen base course may be appropriate
Urban fringe / semi rural traffic free	3.0m on all main cycle routes, major access paths and school links 2.5m possible on lesser secondary cycle routes and access links	Sealed surface imperative Surface dressed top to bitumen base course may be appropriate
Rural traffic free	2.5m on all main routes, major access paths and school links 2.0m possible on lesser routes and links	Sealed surface required on any route within 5km of urban area or 2km of village environment Sealed surface required on routes linking villages where school traffic or other utility trips will benefit. Surface dressed top to bitumen base course may be appropriate Use of unsealed surface requires a rigid maintenance plan Use of unsealed surface not recommended on paths: • with gradient steeper than 1 in 20 • shared with equestrians • where significant run off expected

1. Refer to Table H.2 for additional width required for various edge constraints
2. Minimum acceptable verge width is 0.5m, 1.0m preferred
3. Greater width required where route is used by horses
4. For widths on segregated routes see Table H.9

Appendix 5 – DMRB specifications

Table 2.2.11 Minimum Widths of Cycle Tracks and Cycle Lanes

Cycle Route Type	Peak hour cycle flow (either 1-way or 2-way depending on Cycle Route Type)	Desirable Minimum Width	Absolute Minimum Width (for sections up to 100m)
Cycle Lane	<150	2.0m	1.5m
Cycle lanes with light segregation	<150	2.5m	1.5m
1-way cycle track (including stepped cycle track)	<150	2.5m	1.5m
	150-750	3.0m	2.5m
	>750	4.0m	3.5m
2-way cycle track	<150	3.0m	2.5m
	>150	4.0m	3.5m

Note: Table 2.2.11.1 describes additional clearances to maintain effective widths for cyclists on cycle tracks and in cycle lanes with light segregation.

Minimum additional width requirements on cycle tracks to make allowance for fixed objects adjacent to or within the cycle track shall be as described in Table 2.2.11.1. These shall be added to the dimensions given in Table 2.2.11. Where an object is present on both sides of the cycle route, then allowance for both objects shall be made.

Table 2.2.11.1 Additional width to maintain effective widths for cyclists on cycle tracks

Type of edge constraint	Additional width required to maintain effective width of cycle track (mm)
Flush or near-flush surface	No additional width needed
Kerb up to 150mm high	Add 200
Vertical feature from 150 to 600 mm high	Add 250
Vertical feature above 600 mm high	Add 500
Drainage Gullies	Width of Drainage Gully

2.2.12. Personal security on cycle routes

The following design characteristics improve the personal security of users on cycle routes:

- Cycle routes within the view of passing people and passing traffic.
- Lighting (reference Section 2.3.7).
- Underbridges that provide cross-sections wider than the specified values with flared wing-walls, good lighting and good sight lines.
- Vegetation that is a low growing variety (up to 0.8m) on underbridge approaches and adjacent to entries.