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Mr James Appleton: case officer AWDM/0961/17
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13 September, 2018

Dear James,

Objection to New Monks Farm planning application (AWDM/0961/17)

We are extremely concerned with the information presented to the planning committee on the 18 July 2018 about the New Monks Farm application. Brighton & Hove Friends of the Earth submitted a substantial objection and detailed critique of the provision for walkers, cyclists and equestrians that was signed by many other organisations. **This was not reported to the planning committee in the addendum report and neither were many of the points contained within it.**

Yet the additional report stated:

*“Since the report was written a further 20 letters of objection have been received **raising a number of points already summarised in the main report.** The majority raise concerns about the width of the proposed bridleway under the A27 and refer to the significant numbers of cyclists that use the route and conflict with pedestrians and horse riders (with reference to an effective width of 2 metres).” [our emphasis]*

While the statement highlighted in bold might be true; that some of the points raised had been covered in the main report, **many points raised in our objection were not.** As such, **the additional report was highly misleading,** giving the impression that nothing new had been said. Many of these major deficiencies with the development, raised in our original objection, are outlined again in Appendix 1.

The additional report also failed to mention that the South Downs Local Access Forum had objected and that its preference was for a grade separated crossing at the Sussex Pad. A body with its status should clearly have been acknowledged and its comments reported in detail.

The main committee report contained a great many unsubstantiated assertions and opinions, particularly with regards to the use and safety of the Sussex Pad crossing and the proposed alternatives. In addition, the misleading and inaccurate information presented to the committee by the developers in their aural presentation was left uncorrected despite the presence of West Sussex County Council, as the local highways authority, and Highways England.

The evidence provided in the following appendices demonstrates why the plans do not meet minimum design standards, particularly with regards to any alternative to the Sussex Pad crossing. It also shows that what is proposed would actually reduce the quality of the connection to the National Park through the extra distance people would have to travel, the delay this and the crossings at the roundabout would introduce, and the unsafe nature of the new bridleway alongside the River Adur:

1. The major sustainable transport deficiencies (in the development)
2. Why the development is contrary to local & national planning policy
3. Sussex Pad Crossing – the facts
4. The new bridleway – why it will make things worse
5. Myths, assertions and overlooked facts
6. Diversions and time delays
7. Sussex Pad alternative path widths (along River Adur) compared to minimum standards
8. Sustrans' Design Guide (2014)
9. Design Manual for Road and Bridges (DMRB) specifications

It is worth noting that the Sussex Pad crossing is the best, flat, direct, high capacity road crossing of the A27 for cyclists for miles around, a fact not reported to the committee. That is why there is so much distress and anger at these plans.

In order to address our concerns, we would like to see:

1. A direct, grade separated crossing provided at the Sussex Pad junction
2. The main pedestrian / cycle route from the housing development east 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 improved
4. The country park paths and bridges widened to allow cycling
5. Relocation of the school to minimise travel and exposure to air and noise pollution
6. The bus stop for the Ikea located directly outside its main entrance with attractive covered waiting areas supplied with real time information (see Appendix 1 for more details)

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

Without these issues being addressed, it is difficult to see how the development will promote active travel and sustainable transport in any meaningful way. Therefore, it is contrary to Local Plan Policy 5 and the revised National Planning Policy Framework (NPPF) and **these are clear grounds for refusal**. The revised NPPF should have resulted in a full review of the proposals. However, given the rushed nature of the process we do not see how there has been time for this and the absence of any new plans suggests that this has not occurred in any meaningful way. The development would result in increased congestion, pollution and carbon emissions and the current layout would undermine any travel plans. It would result in an unhealthy and degraded environment and a lower quality of life.

We trust that this objection and all of the points contained within it will be reported to the planning committee this time. Councillors need to understand just how bad this proposal would be for walking, cycling and horse-riding.

Yours sincerely,

Chris Todd

On behalf of: Bricycles, Brighton & Hove Friends of the Earth, Brighton Excelsior Cycling Club, Brighton Mitre Cycling Club, CTC local representatives, Horsham District Cycle Forum, Hovelo, Shoreham by Cycle, Sustrans Worthing Co-ordinator, VC Jubilee, West Sussex Cycle Forum, Worthing Cycle Forum

Appendix 1

Major sustainable transport deficiencies (in the development)

This appendix briefly outlines our main concerns with the development regarding sustainable transport which go beyond the loss of the Sussex Pad crossing and include 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 using them. 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 onto Shoreham is unsafe. It is located to the north of the main access road, which forces it to then cross the road into Ikea and the busy link road from the A27, all on uncontrolled and inadequately sized crossings. This was raised by West Sussex County Council but not addressed. It also passes through a bus stop. 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. (A 3m wide garage is not enough for a car, a bike, clearance from the walls, which may have other things stored on or against them, and space to open the car door and get in and out of it comfortably).
4. The paths within the country park are too narrow for cycle use at only 2 metres wide (West Sussex County Council said they should be 3m wide to accommodate cycling but this was not addressed). The bridges also need to be doubled in width to provide a 3 metre clear path across them. As currently proposed they are only 2 metres wide resulting in a 1 metre usable path width which will create conflict between cyclists and pedestrians.
5. The primary school should be located at the heart of the development away from the A27 to minimise travel to the school and to minimise children's exposure to air and noise pollution.
6. 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 the shared path waiting for a bus. If they take trolleys from the store to the bus stop, as some will, these could end up blocking the path. In addition, the lack of real time information at the store will undermine customers' and employees' 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 along with real time information, both at the bus stop and within any café that is part of the retail development. This would help maximise bus use and reduce car use.

All of these failures are contrary to Local Plan Policy 5 and the revised National Planning Policy Framework. They are all sound reasons for refusal. It is worth noting that no recognised assessment has been carried out to justify the claims made by the committee report about the standards and level of provision for sustainable transport.

Appendix 2

Why the development is contrary to local & national planning policy

Adur Local Plan Policy 5

*“Paragraph 2.51 It will be essential to ensure that **safe and improved** pedestrian, cycle and equestrian access across the A27 to the South Downs National Park is provided...”*

Policy 5: New Monks Farm, Lancing: Land at New Monks Farm (as shown on the Policies Map) will be allocated for mixed use development comprising:

...

• **Provision of sustainable transport infrastructure including *improved public transport and cycle, pedestrian and equestrian links* to Lancing, Shoreham-by-Sea and the South Downs National Park.**

• **Site-specific travel behaviour initiatives which encourage sustainable modes of transport.** (This should include a package of travel behaviour initiatives such as residential and workplace travel plans).

...

Improved access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians must be provided.”

Paragraph 2.51 states that safe and improved access across the A27 should be provided. As you will know from this and other objections, many organisations do not believe that such a narrow path alongside the River Adur would be safe with the mix and volume of users. Equally, the delays and diversions of the proposed alternatives means they cannot be classified as improvements. Therefore, unless the application is changed to provide **improved access** across the A27 and to Lancing and Shoreham, then the development does not conform to Local Plan Policy 5 and is **grounds for refusal**.

Revised National Planning Policy Framework (July 2018)

Paragraph 103: *“...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and **offering a genuine choice of transport modes**. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making **and decision-making**.”*

This has changed from paragraph 29 in the original National Planning Policy Framework (NPPF) in a number of ways but most critically it clearly relates to decision-making, whereas previously paragraph 29 and its following paragraphs were just referring to policies and plan-making.

Therefore, this paragraph now needs to be considered in relation to New Monks Farm. Critically, it stipulates that developments should offer a **genuine choice** of transport modes. The delays, diversions and danger in using the proposed infrastructure will put off many people from walking and cycling for many journeys. Also, the bus stop serving Ikea is not in a location that will encourage public transport use when it is so far from the main entrance, outside of the retail development. Given the issues raised in our previous objection, and in part reiterated here, the current proposals clearly do not offer a genuine choice of transport modes. Therefore, **this is grounds for refusal**.

Appendix 2

Paragraph 108: *“In assessing... specific applications for development, it should be **ensured** that:*

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.” [our emphasis]*

This has stronger wording than the original NPPF: this previously only required decisions **to take account of** these or similar issues. The new wording says it should be **ensured** that these issues are addressed.

Given the concerns raised here and previously, the appropriate opportunities to promote sustainable transport have not been taken up – merely building a path does not mean walking and cycling would be promoted if that path is badly designed and would feel unsafe. Appropriate opportunities have not been taken to address these issues, such as moving the bus stop out of the path and putting it in front of the store and placing the main path from the development on the southern side of the access road, to avoid the need to cross busy roads, on sub-standard crossings. This also relates to part b which talks about safe and suitable access to the site being achieved for all users. It is clear that the walking and cycle provision east towards Shoreham is neither safe nor suitable and needs revisiting.

Part c talks of mitigation in relation to highway safety. In relation to the path towards Shoreham, it would be relatively straightforward to swap the path from the north to the south of the access road without undue cost.

Therefore, **this is grounds for refusal** unless the plans are substantially revised.

Paragraph 109: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

Paragraph 110: *“Within this context, applications for development should:*

- a) **give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas**; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities **and reduced mobility** in relation to all modes of transport;*
- c) **create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles**, avoid unnecessary street clutter, and respond to local character and design standards...” [our emphasis]*

These two paragraphs, to some extent, were already in the previous NPPF, but the key difference is that a development can now be refused on highway safety grounds. The wording is also stronger around giving priority to walking and cycling. Previously, the old NPPF only required this ‘where practical’ but now there is no caveat and now priority should be given first to pedestrian and cycle movements. This clearly hasn’t been the case to date and needs rectifying.

Appendix 2

Part b now places a requirement to address the needs of people with reduced mobility as well as those classified as disabled. This could be people who are less stable on their feet, who for example could be put off at having to use the narrow new bridleway in conjunction with horses and groups of cyclists. Consideration also needs to be given to an aging population which will result in more people using mobility scooters which will add to the pressures on the walking and cycling infrastructure.

Disabled people also use bikes and some can only use tandems because they require to be accompanied, such as blind veterans. These types of users are potentially being discriminated against with the new bridleway because it would be very difficult for a tandem (which is longer and has a bigger turning circle) to turn into and out of the new bridleway.

Part c is similar to the previous NPPF but it includes the need to 'minimise the scope for conflicts between pedestrians, cyclists and vehicles.' This brings in a new consideration to minimise the scope for conflict between pedestrians and cyclists, whereas the previous NPPF only considered the conflict between vehicles and cyclists and vehicles and pedestrians. This is a significant change and one that requires a rethink of the walking and cycling infrastructure throughout the whole development, as well as the new bridleway alongside the River Adur. The new bridleway, the Ikea bus stop and narrow country paths are all likely to increase the scope for conflicts between pedestrians and cyclists and therefore these issues need to be addressed in light of this new wording.

Like part a, parts b and c are also strengthened by the removal of the caveat 'where practical' so it is now expected that these elements should be considered as a matter of course.

Conclusion

Clearly the quality of both the new diversionary, four stage crossing at the roundabout and the lengthy, narrow and unsafe bridleway fail to meet the Local Plan requirement to improve access to the National Park, while links to Shoreham are also poor. **These are clear grounds for refusal.**

It is also clear that the new NPPF is much stronger in its requirements for pedestrians and cyclists with various caveats being removed and wording strengthened and expanded to bring in new considerations. This should trigger a full review of the provision for pedestrians and cyclists in this development with significant improvements being demanded of the developer to prioritise walking and cycling to make connections attractive, direct, convenient and safe. There is a need to accommodate disabled and reduced mobility users and to reduce conflict between pedestrians and cyclists as well as between these two modes and motor vehicles.

This means the narrow bridleway needs to be scrapped and a better solution sought. Equally, the path and bridge widths in the Country Park need widening to reduce the scope for conflict. If these are not forthcoming then **there are good grounds to refuse the application for being contrary to the revised NPPF.**

Viability is not an excuse for improvements not being sought. Savings could be made by omitting proposed infrastructure that serves no useful purpose. Equally, some changes would not incur extra cost. However, it should not be forgotten that the development is only considered viable because it is receiving a large public subsidy. Therefore, it should either seek further funding to address these short-comings or it should not proceed. Viability should not be an excuse to allow a sub-standard development to go-ahead, only for the public to pick up an even bigger bill to rectify its short-comings at a later date.

Appendix 3

Sussex Pad Crossing – The Facts

Why is this crossing so important?

The Sussex Pad crossing is the best, flat, direct, high capacity road crossing of the A27 for cyclists for miles around. It pretty much lies on the most direct route from all compass directions, out into the National Park and back again, 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 crossing if necessary) it is actually very easy and safe to use, with only two injuries to cyclists in nearly 20 years. Delays are minimal – 60 seconds on average.

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



Appendix 3

Clarifying the levels of usage

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 community counts 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 highly unlikely that many other cycle routes or paths in Sussex have this level of usage. So while this 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 any new path or crossing should be able to accommodate 214 cyclists per hour, twice the current peak hour rate of 107 cyclists per hour.

Appendix 4

The new bridleway – why it will make things worse

Rebutting the claims made by the developers about the new bridleway

The developers made a number of unsubstantiated claims (in their presentation to the planning committee) about the new bridleway which would replace the Sussex Pad junction, such as:

1. The path would 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 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. Even then it is misleading as it doesn't represent the usable path width, which is a maximum of 2 metres and often less given the narrow width of the river bank. This is best shown by the accompanying diagram (see Appendix 7) 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 failed to include.

In relation to point 2, having done a survey measuring the size of the top of the bank in seven places 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. With the trees there is even less room. 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 even minimum design 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.

Design 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 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 (plus any required clearances), with encouragement given to separation and wider paths for higher volumes of use.

Sustrans' standards (April 2014) (appendix 8)

From Table H.8 you can see the various recommended widths for unsegregated shared use. To try and categorise the area as being rural, or that it is a lesser route, as reported in the committee report, is clearly wrong. Sustrans has expressed concern about the suggestion that a 2 metre path was suitable here and that it was taken out of context. They strongly object to this proposal.

Sustrans has confirmed 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 and that it is a main cycle route / major access path. This has a minimum 3 metres width requirement.

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)

Appendix 4

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 also walk two or more abreast and with the route being used by horses, a 4m usable path is desirable (in a 5m corridor).

Design Manual for Roads and Bridges (DMRB) (October 2016) (appendix 9)

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 usable 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 (in a 5m clear corridor) 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.

British Horse Society standards

The British Horse Society has made a further submission to make its position absolutely clear and to express its concern at the way its advice has been taken out of context in the previous main committee report. It also strongly rebuts the assertion that a 2 metre path is acceptable in this situation and that the proposed diversion along FP2049 clearly fails the requirement to improve access to the South Downs National Park. It would like to see a grade separated crossing at the Sussex Pad.

Conclusions

Whatever you think about the new bridleway it is clear that it is a sub-standard facility and likely to create conflict between users. It would add significant extra distance onto peoples' journeys, especially from the south, and take people longer to access the National Park.

When considering the suitability of the new bridleway, it is important to remember the wording in Local Plan Policy 5 which states that **improved access** to the National Park **must** be provided. Removing a direct, safe and popular crossing and replacing it with a path narrower than minimum standards and with all the other issues associated with it, cannot, in any way, be considered to meet this test. **These are grounds for refusing the application.**

Appendix 5

Myths, assertions and overlooked facts

This list isn't exhaustive but gives a flavour of our concerns about the committee report:

Myth 1 – The current (Sussex Pad) crossing isn't safe

The committee report stated: *"From the east, the applicant acknowledges that the removal of the Sussex Pad junction will increase journey distances for NMUs. However, the relevant Highway Authorities recognise that this needs to be balanced against the current need for NMUs to cross the A27 at the Sussex Pad junction with associated delays and safety implications..."* (p185/6)

"...Certainly, the provision of an underpass allowing NMUs to cross the A27 without conflicting with high speed traffic would be a safer and more comfortable route improving accessibility between Shoreham and the National Park." (p186)

Yet no evidence was provided to back up these claims and when crash records for the Sussex Pad are examined, despite the thousands of people using it every week, no pedestrian casualties have been recorded in nearly 20 years. For cyclists, there have been only two injuries, over the same time period: a serious injury on Old Shoreham Road, and one slight injury on the crossing which took place in the middle of the night, due to a collision with a motorcyclist.

So while the crossing might at first appear daunting to users, it is actually very safe as this crash record highlights.

There is an issue with rear end shunts for motor vehicles on the A27, mainly as a result of having the lights on a 70mph stretch of road. This is unlikely to be allowed nowadays, and a simple solution would be to reduce the speed limit to 50mph along here. However, this is a separate issue and is not what was being inferred by the committee report.

Myth 2 – A bridge at Sussex Pad would not be any more direct (than the new bridleway)

The committee report made another statement without any evidence to support it: *"Some cycle groups and the West Sussex Access Forum have indicated that if Sussex Pad crossing is removed, it should be replaced by a bridge. It should be noted, however, that if a bridge were to be provided, it would not be any more direct as long ramps would be required at both ends similar to the pedestrian bridge at Upper Boundstone Lane..."* (p186)

If the bridge was well designed it should be possible to minimise or remove any diversions caused by the ramps, so until a design has been produced and tested it is impossible for this claim to be credible. There is no reason it has to be designed in the same way as the bridge at Upper Boundstone Lane which has been squeezed in as an afterthought, not designed in to a development from the start.

Myth 3 – There is no diversion from the west

The committee report claims that: *"...There would be no diversion required when travelling to and from the west..."* (p185)

This is not true. The four stage crossing of the roundabout, not only adds a time delay but it also results in a 150m diversion for pedestrians and cyclists coming along the A27 path because of the convoluted nature of the crossings.

For cyclists this is likely to add at least another 42 seconds delay and for pedestrians an extra 107 seconds delay (in addition to the delays caused by waiting at the four stage crossing).

See Appendix 6 for details of diversion and delays.

Appendix 5

Myth 4 – The new roundabout crossing would be quicker than the Sussex Pad

The committee report stated: *“...The new dedicated crossing would also have a much shorter signal cycle time at the roundabout (60 seconds compared to over 120 seconds at Sussex Pad) which would result in an overall reduced crossing time...” (p185)*

No evidence was provided to substantiate this claim. It might have a shorter signal cycle time, but it will take four stages to cross, compared to the single stage at the Sussex Pad. On average, most cyclists cross at the Sussex Pad in around 79 seconds (halfway between best case scenario, turn up and lights go green and worst when they've just gone red, plus the time to cross).

The new roundabout crossing, with four stages could take over 4 minutes to cross (over 240 seconds) depending on how the phasing works, but without this information it is impossible to be certain. Given the new roundabout crossing would also entail a 150m diversion, with four stages of waiting, the new crossing would be much slower: an estimated 83 – 245 seconds slower for cyclists and 96 seconds slower for pedestrians. (It is not suitable for equestrians).

See Appendix 6 for details of diversion and delays.

Myth 5 – The new bridleway would be quicker than the Sussex Pad for cyclists

The committee report stated: *“...However, if the delays at the Sussex pad junction are taken into account, there would be a reduction in travel time for cyclists...” (p185)*

From appendix 6, it can be seen that taking a more realistic speed of 8mph for cyclists using the new bridleway (the path is not designed for cyclists travelling at 12mph with the poor access, tight bends and all the other users on such a narrow path) then the Sussex Pad is the fastest route by 13 seconds. The speed used in the report to calculate any delay is too high and could place other users in danger.

Another concern is that the report only looks at journeys from the east. It ignores riders from the south, coming up through the airport, of which there are quite a number. The delay to them would be 59 – 128 secs (1 – 2 minutes). (The delays to pedestrians and equestrians are even worse).

Myth 6 – The Sussex Pad requires two stages to cross

The committee report stated: *“...The existing Sussex Pad junction does have its limitations. There are effectively two separate crossings with guard rails provided within the central reservation to stop NMUs crossing in one movement...” (p186)*

The report misrepresents how most cyclists cross the A27 at the Sussex Pad and that is to stay on the road and cross in one go. Even on the pedestrian crossing, where there are guard rails, it is perfectly possible to safely cross over in one stage, both as a cyclist and pedestrian.

Overlooked Facts

The importance of the Sussex Pad junction for cyclists - The importance and role of the Sussex Pad junction for cyclists (see appendix 3), and pedestrians to a lesser extent, is completely ignored in the committee report.

Existing east-west route along the A27 would be made longer (worse) - The committee report failed to mention that walkers and cyclists who currently travel along the A27 to the Sussex Pad crossing, or to head south through the airport, or east over the Tollbridge, would be faced with a 60m diversion and two new crossings, causing a significant delay over the current arrangements. This is a result of the new link road severing their route.

Appendix 6 - Diversions and time delays

Cycling	Diversion (metres) / time to use by cyclists (seconds)			Meets standards?	Capacity	Safe	Grade separated?
	From west (Lancing)	From south (airport)	From east (Tollbridge)				
Sussex Pad on road (1 stage)	0m / av 79 secs	0m / av 79 secs	0m / av 79 secs	Yes	High	Yes	No
Sussex Pad crossing (2 stages – but possible to cross in one)	0m / av 79 secs	0m / av 79 secs	0m / av 79 secs	Yes	Med	Yes	No
New bridleway alongside river	1,160m / 213 – 324 secs* (with an improved path from the housing this would be an option)	740m / 138 -207 secs*	330m / 62 secs (unlikely) – 92 secs (realistic)*	No	Low	No	Yes
Roundabout (4 stage crossing)	150m / 42 secs** for diversion & up to 240 secs for four crossings (assumed 120 secs crossing delay)	Unlikely to be used	Unlikely to be used	No	Med	Yes (unless riders get frustrated at waiting)	No
Fastest route (by how much)	Sussex Pad (by approx. 83 – 245 secs)	Sussex Pad (by 59 – 128 secs)	Sussex Pad (by 13 secs)				

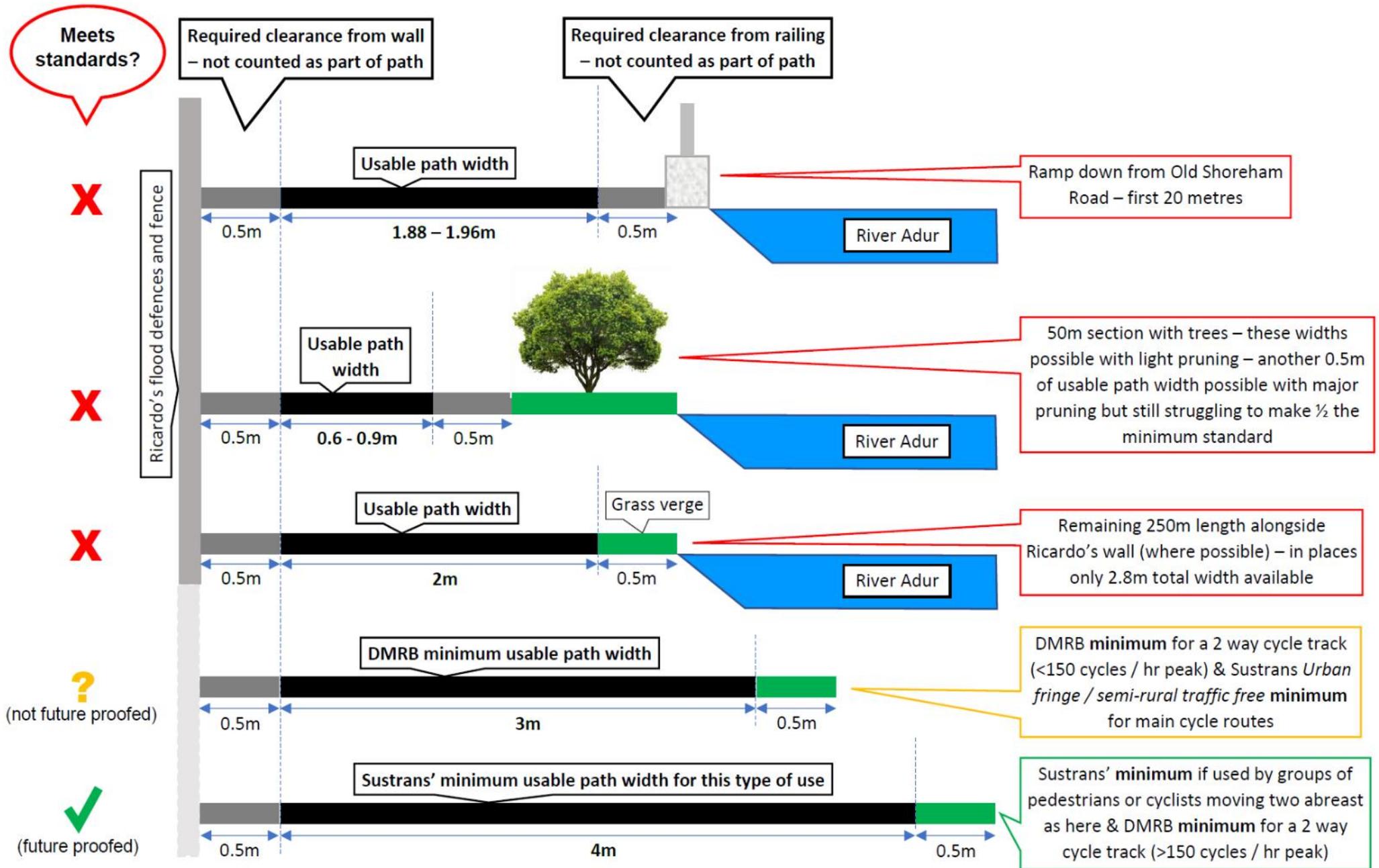
* It is unlikely cyclists would travel at 12mph on the new bridleway as there is a 90 degree tight turn onto it with bollards, its narrowness, tight bends plus other users, all of which would slow them down. They may also have to wait to join Coombes Road. Therefore, times are given for cycling at 8mph (the more realistic speed in this situation) as well as 12 mph (used by the consultants). More cautious and less confident cyclists would travel even slower than this.

** Calculated at 8mph as with all the stop – starts and tight bends unlikely cyclists could develop much speed here.

Walking	Diversion (metres) / time to use by pedestrians (seconds)			Meets standards?	Capacity	Safe	Grade separated?
	From west (Lancing)	From south (airport)	From east (Tollbridge)				
Sussex Pad crossing (2 stages – but possible to cross in one)	0 / av 131 secs	0 / av 131 secs	0 / av 131 secs	Yes	Med	Yes	No
New bridleway alongside river	Unlikely to be used	740m / 529 secs	330m / 236 secs	No	Low	No	Yes
Roundabout (4 stage crossing)	150m / 107 secs for diversion plus up to 240 secs for four crossings (assumed 120 secs crossing delay)	Unlikely to be used	Unlikely to be used	No	Med	Yes (unless get frustrated at waiting)	No
Fastest route (by how much)	Sussex Pad (by 96 secs)	Sussex Pad (by 398 secs)	Sussex Pad (by 105 secs)				

Appendix 7

New bridleway path widths (along River Adur) compared to minimum standards



Appendix 8 – Sustrans’ Design Guide (2014)

Traffic free routes 2

Path construction

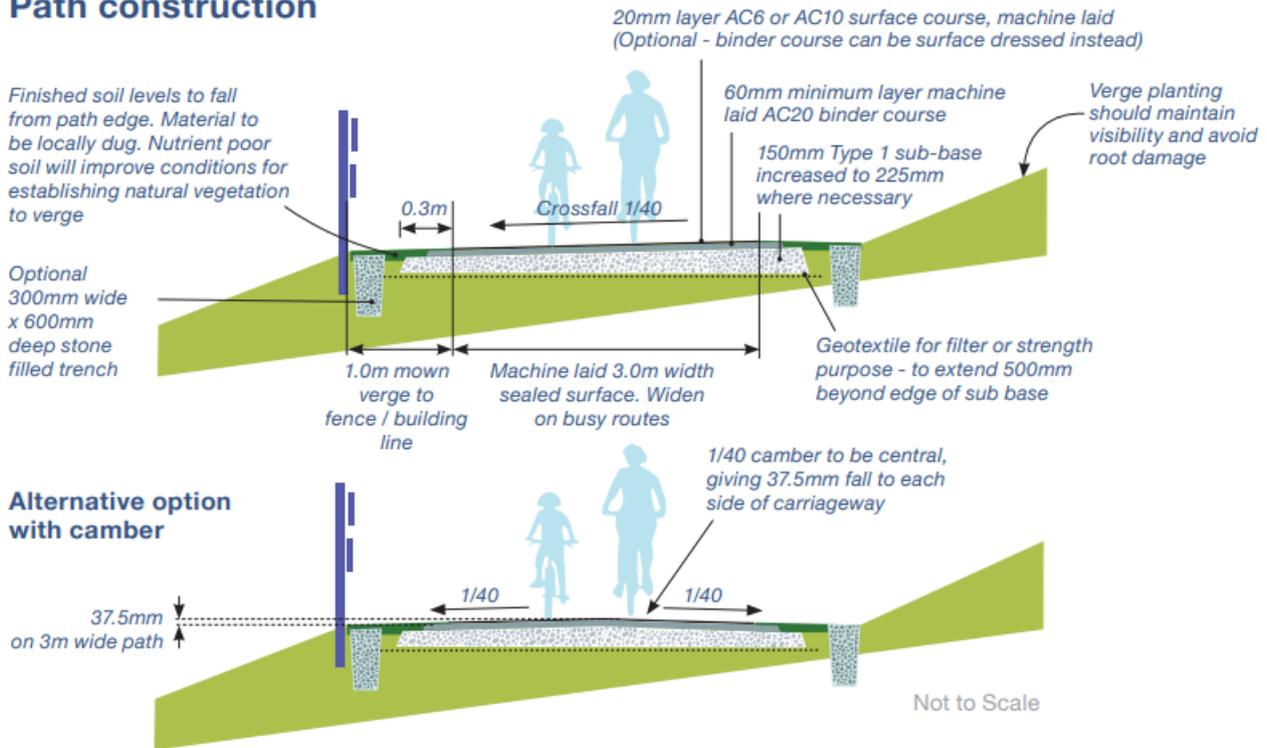


Table H.8 Path construction requirements, unsegregated shared use

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: <ul style="list-style-type: none"> • 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 9 – DMRB specifications

Interim Advice Note 195/16
Cycle Traffic and the Strategic Road Network

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.