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Tim Slaney  
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5 July, 2018

Dear Tim,

**Call to defer the SDNP/18/00434/FUL River Adur to Coombes Road Non Motorised Users Route planning application**

On behalf of Brighton & Hove Friends of the Earth (BHFOE) I would like to express my deep concern with the report on this application. There are a number of important omissions and statements that could be misinterpreted, which we feel are significant enough for this application to be deferred.

1. Firstly, the report claims that this development is being considered in its own right and separate to any decision on the closure of the Sussex Pad. However, this diversion is being publicly promoted as an alternative route to the Sussex Pad crossing so it is not credible to claim that the two applications can be considered in complete isolation to one another. Equally there is no reason to create a bridleway in this location without the prospect of the Sussex Pad junction being closed, not least as it goes nowhere.
2. Secondly, the report claims that the usage of the route would not be high volume. This is only likely to be true if the Sussex Pad junction remains open and only pedestrians can use this short new section of bridleway. There is no basis for this claim otherwise.

In the absence of a non-motorised users (NMU) count at the Sussex Pad junction we organised, in conjunction with many other local groups, a weekend survey of the junction on the weekend of 30 June / 1 July, 2018. This showed that there were 862 cycle, 125 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. Many of these movements, both pedestrian and cycle were being done in groups, some quite large. In one quarter hour period, for example there were 40 cyclists, 3 horses and 2 runners. At other times, there were large groups of cyclists and walkers in close proximity.

The report also fails to mention the suppressed demand from equestrians. With 100 horses stabled within 5 miles of this area, the creation of a bridleway could see many more horses using this path, with the potential for conflict in such a tight space.

Far from showing low usage, this shows that the crossing is very popular and with the potential to become even more popular with the growth in the local population and suppressed equestrian demand. Therefore, the path is likely to be well-used too. Usage of this nature requires a minimum of a 4m path in a 5m clear corridor (Sustrans guidance), yet this is not even discussed within the report because it is said it has to be done without reference to the closure of the Sussex Pad or the new development. This does not make sense and does not allow the proper consideration as to what is desirable or needed in this location.

3. There are also other inaccuracies regarding minimum standards. For example, IAN 195/16 is not an advisory note for Highways England (HE) developments and as this path will be adopted by HE it carries far greater weight. It stipulates that where there is an upstand of more than 600mm, then an additional width of 0.5m adjacent to the path needs to be provided. This is because otherwise cyclists (and horse riders) cannot use the full width of the path for fear of getting snagged on the adjacent obstacle. Therefore, taking this into account the path width is really only 2.5m (due to sub-standard clearance).

Incidentally, these widths are minimums for cycle tracks. They are not desirable widths when there is a mix of users and likely bunching of users as happens regularly here. As stated in point 2 above, Sustrans guidance is for a 4m wide path in this type of situation.

4. On equalities, there is no mention of the fact that other aspects of IAN 195/16 standards are being ignored such as with regards to the excessive gradient ramping up to the footpath, the larger than necessary crossfall, or that disabled cyclists or those on non-standard bikes, or pulling trailers, or tag-alongs, will find it awkward and off-putting to use this path, particularly getting on and off it at Coombes Road and negotiating the unnecessarily tight bends. Therefore, there must be doubt as to whether the report has properly considered the full range of equalities issues and therefore whether the Park Authority can be said to have discharged its duties under the Equalities Act 2010.

5. The fact that this path is most likely going to replace a very popular and well used road link: the best, flat, high capacity road link out into the South Downs (and beyond to the Low Weald) in the whole Brighton & Hove, Shoreham conurbation, from Worthing to Lewes and potentially beyond, is completely ignored. Only off-road access into the National Park is talked about. As a result, when considering the design of the path, this on-road aspect, a major component of the use of this junction, is being overlooked and another potential reason why the design of the junction with Coombes Road is so awkward. This link is not your usual bridleway and to ignore this is a major oversight and represents a degradation in NMU provision as currently designed.
6. Another aspect ignored is that this new path (with the Sussex Pad closed) would represent a 350m diversion for users coming from the east and a 1.1km diversion for users from the west. It can hardly be described as an improvement in those circumstances.

In conclusion, the claim that this bridleway can only be considered in isolation to the closure of the Sussex Pad junction is prejudicing the determination of this application as it is denying consideration of important aspects of this application which would have a material influence on the outcome. There is misleading and omitted information on standards and usage and little or no consideration appears to have been given to the impact on disabled users of the sub-standard design.

Finally, the report claims that this will be a “highly beneficial extension to the public rights of way network” but without providing any evidence to justify this claim. The fact that the bridleway goes nowhere as it only connects to a footpath means it isn’t much of an addition. This claim could only stand up to scrutiny if it was being considered with the proposed footpath conversion included in the New Monks Farm application. However, there are two problems with this:

1. Firstly, the report stresses more than once that this application is coming forward independently of the New Monks Farm application and that it is not considering the closure of the Sussex Pad junction or the appropriateness of this new bridleway as an alternative in access or safety terms. Yet to even start to make the claim about this being a “highly beneficial extension to the public rights of way network” it must be considering these aspects.
2. The link to the Old Shoreham Toll Bridge, along the river bank, is proposed to be even narrower than this sub-standard link, with an effective path width of only 2m in an area of even greater pedestrian usage. So even if the SDNPA did consider the upgrading of the footpath to a bridleway, such a sub-standard provision cannot be reasonably claimed to be a “highly beneficial extension”.

Consequently, it is doubtful whether this proposal conforms to planning policy to improve access to the National Park or to promote sustainable transport. Many will see this as a severe degradation, even if they are no longer having to cross the A27.

We would therefore request that the South Downs National Park Authority defers the application until after the New Monks Farm application has been decided and to allow more time for greater consideration of the many issues that have been overlooked. The claim that this application needs to go ahead before New Monks Farm can be determined is questionable, but it further highlights how the two applications are linked and cannot be considered in isolation.

It is also worthy to note that the South Downs Local Access Forum wish to retain a crossing at the Sussex Pad but if it is removed do not consider that the current proposals are of sufficient quality (or capacity) to cater for the likely use.

Yours sincerely,

A handwritten signature in black ink that reads "Chris Todd". The signature is written in a cursive style and is underlined with a single horizontal line.

Chris Todd

Planning & Transport Campaigner

c.c. Margaret Paren, Chair, South Downs National Park Authority  
Trevor Beattie, Chief Executive Officer, South Downs National Park Authority  
Vicki Colwell, Planning Officer  
Allison Thorpe, Strategy Lead Access and Recreation, South Downs National Park Authority