

# South Downs

## Local Access Forum

To: Mr James Appleton  
Development Management,  
Adur & Worthing District Councils,  
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Cc: Vicki Colwell, *Senior Planner Development Management, South Downs National Park Authority.*  
Alistair Linton-Crook, *Cycling Project Officer, South Downs National Park Authority.*

Date: 5 July 2018

Dear Mr Appleton

**Subject: Planning Application AWDM/0961/17: Land West of New Monks Farm, Lancing, West Sussex**

*The South Downs Local Access Forum (SDLAF) is the statutory forum for the South Downs National Park under the Countryside and Rights of Way Act 2000. SDLAF is an independent body which aims to give balanced advice about countryside access based on the wide range of views of its members who represent farmers, landowners, user groups, conservationists and those with disabilities.*

*SDLAF's Terms of Reference (under "Purposes") include "Impact of proposed development on access" and our Reference Area is "The South Downs National Park, and areas adjacent to the SDNP with issues which will impact it."*

SDLAF's specific concern here is access for non-motorised users (NMUs) to the Park from the South Coast conurbation, and the impact of the proposed development on such access. We note that the Adur Local Plan adopted December 2017, Policy 28, p.90, Transport & Connectivity, commits Adur & Worthing District Councils to:

*"Encourage proposals to extend the existing cycle network and secure a network of cycle, pedestrian and bridleway facilities linking urban areas, key sites, open space, countryside and coast. These will include new and improved rights of way (suitable for a range of users, including those with mobility difficulties, where appropriate) as well as improved access across the A27."*

As part of the very extensive proposed development west of Shoreham (Brighton City) Airport, Planning Application AWDM/0961/17 seeks to close the Sussex Pad crossing of the A27 (as it is locally known) and replace it with an alternative off-road route. The A27 between Portsmouth and Lewes is widely recognised to be one of the busiest trunk roads in the UK. As such, it forms a significant barrier between the suburban South Coast settlements and the National Park. The Sussex Pad crossing currently forms the quietest, flattest, most direct, high-capacity road route from the whole of the Brighton/Worthing conurbation into the National Park and beyond. It is, however, controlled by traffic lights meaning that NMUs may incur a significant delay in waiting for the “green light” allowing them to cross. Clearly, there is an opportunity here to provide future facilities for NMUs that would transform connectivity between the SDNP and the Coastal Plain, and authorities should be ensuring this is done to the highest standards. Missed opportunities at this stage will not be easily rectified later.

The Applicants’ current plans seek to replace the existing Sussex Pad crossing with an alternative bridleway route from Old Shoreham Bridge along the west bank of the River Adur and then north of the A27 to join Coombes Lane. Unfortunately, we do not feel that the current plans represent an *improvement* in access for NMUs as encouraged in the Adur Local Plan but are more in the nature of a mitigation. Our strongly preferred alternative is for either an overpass or underpass close to the current crossing. We are disappointed that this option has not been adequately considered. Transport planning specialists Vectos, who have been commissioned by the Applicants to assist with AWDM/0961/17, give the following reasons against provision of a bridge/underpass in their Response to Objections, May 2018, Item 5.12:

- The new proposed route would be quicker. We can see no obvious reason or justification for this assertion. The new route is slightly further (approximately 0.35 km) and is off-road.
- The new route will be safer. Again, this is an unsupported assertion. There is no stated reason why there should be more danger to NMUs on a well-designed and constructed bridge or underpass separated from the A27 traffic than on a dedicated off-road route.
- Provision of such facilities would result in unnecessary environmental impacts overall. This objection barely applies to an underpass and can only be referring to the over-bridge option. However, the visual impact of an over-bridge could be largely mitigated by appropriate and sensitive design. In any event, the visual impact of a bridge for NMUs pales into insignificance alongside that of the heavily-trafficked A27 itself and the proposed large-scale commercial development.

Taken together, we view these remarks as dismissive rather than as coherent and reasonable arguments. This impression of summary dismissal is reinforced by Vectos’ wording: “In conclusion, there is no justification for the provision of such facilities”.

Should there turn out to be good reasons (although we have not yet heard them) why a bridge/underpass cannot be provided, we would support the proposed new route, but only provided it was of adequate width and separation from the river (and A27) throughout. Vectos refer repeatedly to a “rural” location (with the kind of volume of usage that that implies) as justification for a width of 2.5 metres with 0.5 metres separation. However, we believe this is misleading; this is not a truly “rural” location but is in reality the transition between the suburban South Coast conurbation and the more rural National Park. We believe that (by virtue of the times chosen by the Applicant’s consultants to monitor flows) there is a strong likelihood that the potential usage by NMUs has been underestimated and that additional work needs to be done by the Applicants to establish more credible usage estimates.

Given the aspiration for improved access across the A27, we are disappointed that the present proposals fall short of promising that. Accordingly, and as a relevant interested party, SDLAF wishes to **object formally** to the closing of the existing Sussex Pad crossing. We call on AWDC to require the Applicants to give serious consideration to an over-bridge or under-pass at or close to the existing Sussex Pad crossing, including comparative costings. Should this be shown not to be feasible for good reasons, the alternative bridleway route should be an absolute minimum of 3.0 metres wide with 0.5 metres on either side in accordance with *Sustrans Design Manual: Handbook for Cycle-friendly Design*, April 2014, p.23, for urban-fringe and semi-rural traffic-free routes. It should preferably be 4.0 metres wide (plus 0.5 metres on either side) as far as practical in view of the shared use by cyclists and equestrians, the potential volume of usage, and the likely demand to ride two-abreast.

Yours sincerely



Prof Bob Damper  
Chair, South Downs Local Access Forum

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For more information about the South Downs Local Access Forum:  
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