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BY EMAIL TO:
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[redacted]
and
Adur Planning Committee

Councillor Carol Albury, Chair
Councillor Stephen Chipp
Councillor Dave Collins
Councillor Tania Edwards
Councillor Jeremy Gardner
Councillor Paul Mansfield
Councillor Steve Neocleous
Councillor Carol O'Neal

13 July 2021

Planning Application for 4th arm to A27 roundabout and closure of Coombes Road - OBJECTION

AWDM/1906/20 | Highway works comprising; (1) construction of a highway (a Fourth Arm) from the approved New Monks Farm A27 roundabout to Coombes Road (west) along with associated hard and soft landscaping, and; (2) closure of the existing Coombes Road (east) junction with the A27 and its replacement with landscaping. The application is accompanied by an Environmental Statement. | Land And New Roundabout Northern Boundary Of A27 To East And West Of Coombes Road Old Shoreham Road Lancing West Sussex

Dear Adur Planning Committee,

Cycling UK's Cycle Advocacy Network (CAN) brings together people with a shared interest in creating the conditions that enable more people to cycle, including better infrastructure for cycling and safer roads.

We are objecting to this application because adding the proposed 4th arm to the roundabout, combined with the closure of the junction of Coombes Road with the A27, will result in a greater negative effect on non-motorised users than the previously approved 3-arm design.

Highways England previously approved the 3-arm design with the "left in/left out" arrangement at Coombes Road, so will have no objection if this 4th arm is rejected by Adur Planning Committee.

We are also surprised that you are considering this application so soon after Ikea has pulled out meaning that the revised plans for the New Monks Farm site are still unclear.

Coombes Road is currently a quieter route used for cycling. It forms a vital part of various cycle routes going via the Old Toll Bridge, Coombes, Botolphs, Annington, Steyning, Bramber and points further afield such as Brighton and Worthing. Increased motor traffic will have a very negative impact on anyone cycling, walking, wheeling or riding in this area.

Coombes Road is a narrow single carriageway road without a verge or pavement, and people walking or cycling will be much more at risk from more and faster traffic if this 4th arm is built. Motorised traffic would be encouraged into Coombes Road from the A27 and from Steyning. It will be more attractive to drivers than using the roundabout east of the River Adur and the A283. A proportion of this motor traffic, having come off the A27 or simply "rat running" from A to B will inevitably be travelling dangerously fast.

The Road Safety Audit (RSA) says: "This iteration of audit sees the removal of the 20mph zone and traffic scheme as South Downs National Park would prefer to have the new link road to maintain a rural route in keeping with their 'Roads in the South Downs' design guide." But this SDNPA document is from 2015 and needs updating: https://www.southdowns.gov.uk/wp-content/uploads/2015/09/Roads-in-the-South-Downs.pdf

The removal of traffic calming was assessed as a "benefit to cyclists" by the designer (according to Road Safety Audit Stage1), but we need the correct form of infrastructure which does not impede cycling or walking whilst effectively controlling driving behaviour.

It is optimistic to believe that a posted speed limit ensures safe driver behaviour or prevents speeding in a quiet lane. No effective infrastructure or measures are being put in place to ensure that drivers of motor vehicles do not endanger people or exceed 20mph in the proximity of vulnerable road users.

Traffic reduction, not increases in motor vehicle traffic, would benefit non-motorised users of Coombes Road. Motor vehicles could use the A283 instead. Coombes Road could become a "Quiet Lane" designated formally by the Local Authority.

The Road Safety Audit says *"During the site visit a moderate and consistent number of leisure cyclists were observed on Coombes Road"* confirming that Coombes Road is a popular cycle route. Whether the people observed were taking essential exercise for health and wellbeing, cycling to work, going shopping or visiting family members, government guidance is clear that infrastructure should enable many more people to cycle.

Good design needs to ensure that someone who takes their child to school or nursery by cycle e.g. by cargo bike, will have a safe, continuous journey, there and back, protected from motor vehicles by the correct infrastructure. See: **Gear Change, "A bold vision for cycling and walking, Department for Transport" July 2020** [1] and **Cycle Infrastructure Design (LTN 1/20) "Guidance for local authorities on designing high-quality, safe cycle infrastructure" July 2020** [2] These documents provide up to date guidance on modern cycle infrastructure which is lacking in this proposal and the overall scheme.

The Road Safety Audit describes new additional collision risks for people cycling, resulting from motor vehicles going to or from the new 4th arm. We know that collisions are more likely and the consequences more serious at greater speeds, and we see no measures in this scheme that will prevent the drivers attracted into Coombes Road due to the new 4th arm, from going too fast.

The Road Safety Audit refers to the dazzling of drivers due to headlights. Cyclists and walkers are also very vulnerable to dazzling by car headlights and this needs to be taken into account when designing infrastructure.

DMH Stallard write: "The 4th arm, which we are seeking in this application, will make it easier, not harder, for cars, cyclists and pedestrians to access the SDNP." But easier journeys for cars into the SDNP via Coombes Road will mean that journeys by other more sustainable modes become more risky and problematic.

The design in this 4th arm scheme prioritises and encourages motor vehicle transport. We need to see a reduction in motor vehicle traffic for many urgent health and environmental reasons e.g. to assist the government's Decarbonisation Strategy and the need to avoid Covid infection from travelling in enclosed cars and other vehicles.

We urge you not to approve this application. Please ensure that everyone involved in this decision is familiar with Gear Change and LTN1/20.

Yours sincerely,

[redacted]

Becky Reynolds
Local Representative in Cycling UK's Cycle Advocacy Network, Brighton and Hove
Regional Co-ordinator, Cycle Advocacy Network - South East England
[redacted]

1. Gear Change https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf
2. Cycle Infrastructure Design (LTN 1/20) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycle-infrastructure-design-ltn-1-20.pdf