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From: Heather Godsmark [REDACTED]
Sent: 06 October 2021 13:35
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Application AL/113/21/OUT

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Attn Arun Planning.

Objection: Heather Godsmark, Swallowfield, Eastergate Lane, Eastergate, PO20 3SJ

I won't focus on the extent to which this application fails against Arun's own Protection of Countryside policies since Arun will be fully aware. However, I do wish to highlight the neglect to address the ever increasing road safety risks along Fontwell Avenue. Particularly, I refer to the ever increasing risks for increasing numbers of pedestrians, cyclists and the vulnerable arising from increased traffic from the many new un-planned for housing developments, all feeding on to the upper length of Fontwell Avenue. This is set against a low standard of road design in respect of protecting the safety needs of children and vulnerable users crossing our local roads to footpaths.

Last year, Arun approved application BN/50/20/PL for 42 housing units, its access feeding out on to Fontwell Avenue, opposite Wandleys Lane, ... in the knowledge that the traffic rates along this section of the A29 were already well above the limit for children to cross a single carriageway roads without a controlled crossing. Ever rising housing numbers and increasing traffic congestion, must surely require that the minimum sized pedestrian sanctuary island, proposed under Application BN/50/20/PL, be proven to be adequate to serve the extra pedestrian and other NUM traffic usage which will arise from this new application AL/113/21/ OUT for 72 housing units (over and above that arising from B/50/20/PL) against all A29 predicted increased traffic volumes. All pedestrians and most cyclists will need to cross Fontwell Avenue from both the 42 and the 72 housing developments (if latter is

approved) as there is no footpath along the west side of Fontwell Avenue. Additionally, and the east side footpath is narrow, below current minimum standard for a road side footpath and cannot fully provide for increasing pedestrians, never mind cyclists, seeking to use it for safety.

In the Littlehampton Gazette report of 5th August, was the article:

'Failing' Arun local plan 'is like watching a car crash in slow motion'

Several of Arun's Independent councillors have written to the government asking it to intervene in what they call a 'shambles' of a local plan.

'In a representation to the planning committee, Highways England said: "The junctions and associated agreed mitigations are highly unlikely to be suitable for the traffic demands placed upon them as a result of the significant increase in housing numbers."

So, Highways England is of the opinion that our local road design proposals are inadequate to meet increasing housing numbers and predicted road congestion.

<https://www.bognor.co.uk/news/politics/failing-arun-local-plan-is-like-watching-a-car-crash-in-slow-motion-3335895>

As this application site AL/113/21/OUT will feed extra pedestrians, cyclists and vehicles out on to Fontwell Avenue, I think it relevant that the Highway England concerns about our local road safety be taken into account and known future increases be addressed in determining applications and not just the immediately current situation. The forthcoming A29 Road Realignment Scheme and its associated 'Arun planned housing developments' will increase the safety risks to pedestrians, cyclists and the vulnerable. The Fontwell Avenue Roundabout design falls short of meeting the DMRB statutory standards current at the time of its approval and it will push cyclists on to the footpath in the way of pedestrians and the Designed roundabout arm crossing safety island are confirmed by WSCC to be of minimum standard.

From my recently received FOI response from WSCC, in respect to road safety associated with the A29 New Realignment road design, I highlight significant safety issue extracts in blue and my comments in purple.
(The full WSCC response is inserted below).

WSCC: DMRB HD 42/17 Walking, Cycling and Horse-Riding Assessment and Review (WCHAR) was used to inform the design

..... So not the current standard GG142 which was in force at the time of submitting the A29 New Road Realignment application.

WSCC : The WCHAR did not undertake site surveys due to the time of year (December 2019) which would likely have yielded low counts.

..... So the most significant part of the superseded standard HD 42/17 was deliberately ignored resulting in no accounting for the exceptional need for vulnerable in our area arising from the Care Village on Eastergate Lane and many others in our area. The Vulnerable could have been picked up by other research means had there been the will maybe consulting through Arun DC.

WSCC: The scope of the WCHAR was an internal discussion between the Consultant, WSP, and the WSCC Project Manager and did not involve Arun DC.

.....Why no input from our local Arun authority particularly important since WSCC failed to undertake any meaningful WCHAR surveys?

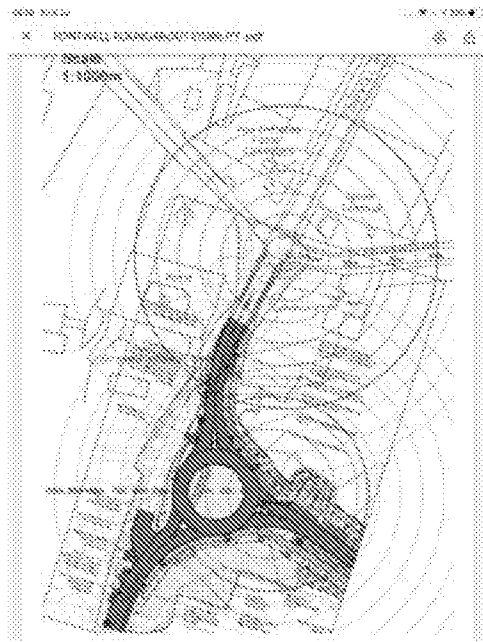
WSCC: At Fontwell Avenue Rbt the scheme layout allows for cyclists to leave the carriageway and join the shared route along the A29 without negotiating the proposed roundabout. When

cyclists wish to continue their journey going north from the A29 cyclist can cross the northern arm and re-join after the roundabout. Cyclist will be expected to stop to check for a safe gap to join.

.... So the proposed new roundabout on Fontwell Avenue is not safe for cyclist to continue staying on the carriageway? This was an issue was raised by councillors at the WSCC as important at the WSCC road planning approval meeting but those councillors were ignored.

WSCC: The scheme has undergone Road Safety Audit which was examined at Planning Committee and no comments were raised with respect to the junction with Eastergate Lane. I raised road safety at Eastergate Lane at that meeting but as a member of the public, I didn't count in the same way the Councillors concerned about cycling safety didn't count. Plus, I note that the Road Safety Auditor was WSP, same company as road designers, and I note the RSA made no comment on safety impacts at Eastergate Lane junction even though visibility southwards from that junction will be substantially reduced by the proposed Fontwell Avenue Roundabout being offset eastwards of the existing road alignment.

WSCC: We would also highlight that the new crossings are within the 30mph area and all have good visibility, in accordance with the current design standards, to oncoming traffic in all directions.



My analysis of visibility at the new Fontwell Avenue roundabout, noted on inserted Pdf indicates that visibility northwards up Fontwell Avenue for non motorised users towards Eastergate Lane junction to be very limited.

Now, our Government is proposing out to consultation on a New Highway Code.

....New Highway Code To Rule That Motorists Should Cede Priority To

Pedestrians And Cyclists. There are 3 main changes that are being proposed through this consultation:

- introducing a hierarchy of road users which ensures that those road users who can do the greatest harm have the greatest responsibility to reduce the danger or threat they may pose to others.
- clarifying existing rules on pedestrian priority on pavements and that drivers and riders should give way to pedestrians crossing or waiting to cross the road.
- establishing guidance on safe passing distances and speeds when overtaking cyclists or horse riders, and ensuring that they have priority at junctions when travelling straight ahead.

In determining this application AL/113/21/OUT, I challenge Arun to be duly diligent in looking at road safety implications for the vulnerable, no motorised users, unaccounted for by WSCC, not just at the access point for this proposed additional 'un-planned for' housing development but for their ongoing safety along Fontwell Avenue, and with appreciation of the implications that the new highway code will bring to users priorities along Fontwell Avenue.

Yours sincerely,
Heather Godsmark

WSCC FOI Response
Our Ref: FOI/2600

On 07/07/2021 you made the following request for information, which has been dealt with in accordance with the provisions of the Freedom of Information Act 2000.

Request for information regarding the extent of compliance with DMRB GG 142 Non Motorised Users and Access Audits that was exercised and used to inform the final road design.

We have now completed a search for the information which you requested and confirm that this Authority holds data relevant to your request.

The Response to your request is as follows:

The WCHAR for the A29 scheme was included in the Environmental Statement submitted to Planning in 2020 and is included in Appendix 8.2. The WCHAR outlines that it was started before GG142 came into operation and so DMRB HD 42/17 Walking, Cycling and Horse-Riding Assessment and Review (WCHAR) was followed, albeit the WCHAR did not undertake site surveys due to the time of year (December 2019) which would likely have yielded low counts.

The scope of the WCHAR was an internal discussion between the Consultant, WSP, and the WSCC Project Manager and did not involve Arun DC, section 2.5 of the WCHAR set out where consultation responses raised a number of non-motorised user related issues.

The County Council holds no correspondence that relates to GG142 between any design parties, as this was not the basis for the non-motorised user review at the time of appointment.

Design consideration have been based on DMRB and the expertise of the design consultant for the Contractor (Jackson Civil Engineering / Capita) as evidenced in the Reg 25 application and the road safety audit presented as part of the application. To clarify:

At Fontwell Avenue Rbt the scheme layout allows for cyclists to leave the carriageway and join the shared route along the A29 without negotiating the proposed roundabout. When cyclists wish to continue their journey going north from the A29 cyclist can cross the northern arm and re-join after the roundabout. Cyclist will be expected to stop to check for a safe gap to join.

At Barnham Road Rbt, there are similar arrangements for cyclist to leave and join the carriageway from the eastbound and westbound directions. Pedestrian and cyclist on the A29 shared use will be able to use the refuge island on the western arm to

continue going south when the phase 2 is implemented. There is future proofing for a controlled crossing on the northern arm when the expected traffic numbers increase.

All the crossing facilities include dropped kerbs so it would be unnecessary in any event to dismount to traverse these junctions.

In accordance with DMRB CD 143 the roundabout refuge islands provide the absolute minimum depth of 2.5m for a shared use and 2.8m width this is due to the compact nature of the area within which we have to construct the junction, these were deemed sufficient to be approved at planning.

The new shared use facilities have to terminate at the roundabouts to tie-into the existing footway facilities until future phases.

The scheme has undergone Road Safety Audit which was examined at Planning Committee and no comments were raised with respect to the junction with Eastergate Lane. The scheme has undergone Road Safety Audit which was examined at Planning Committee and no comments were raised with respect to the junction with Eastergate Lane.

We would also highlight that the new crossings are within the 30mph area and all have good visibility, in accordance with the current design standards, to oncoming traffic in all directions.

We are aware that you have referenced an accident that occurred at the junction of the Fontwell Avenue and Eastergate Lane just before planning committee, for which details were not available at the time. We have subsequently checked with colleagues in the safety team and details have now been submitted by the Police which indicate that the incident was caused by driver error in pulling out of the side turning into the path of a southbound car and causing an interaction with a northbound car. No vulnerable users were involved. We would add that a review of the last five years accidents statistics (1st July 2016 to 30th June 2021) for the Fontwell Ave / Eastergate Lane junction and within 200m of the junction only recorded three accidents, generating five slight and one serious casualties all of which were motorised vehicle drivers. WSCC undertake annual assessment of accident clusters at junctions and on routes across the County and, looking back to 2005, we cannot see the junction as having appeared in any of these annual searches requiring alteration to the highway layout.

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