251, Pagham Road, Bognor Regis,
West Sussex. PO21 3QB

Planning Department,
Arun District Council,
Arun Civic Centre,
Maltravers Road,
Littlehampton,
West Sussex BN17 5LF

BY E-MAIL

7th August 2015

Dear Sirs,

Re Land at Summer Lane - P/58/15/OUT

The Hanbury plan to develop 90 houses on land at Summer Lane is laudable as Arun District Council is desperately short of new housing, like the rest of southeast England, but for the reasons set out below, the road is wholly inadequate to serve these new houses and the developer's proposed improvements to it do not overcome these limitations.

I therefore object to the application unless alternative access is proposed.

Yours faithfully,

Richard Hadden

1) Proposed road width does not meet required standards and is therefore hazardous

The proposed Hanbury development would connect to Summer Lane at two separate points. Summer Lane is a narrow, dead-end residential street from its junction with Pagham Road to the end of the currently adopted section. It is made narrower by cars parked along its northern side for its length but, as it currently serves only a handful of properties, this is not an issue for the current users.

The planning application acknowledges this but, even with its major proposed revisions to the adopted road, it fails to deliver the minimum road width of 4.8m to enable two cars to pass for a significant distance of c.100m before the first (eastern) access road to the proposed development. Both access roads to the Hanbury development would therefore lie beyond the narrowest section of the road, the section of Summer Lane from Pagham Road to the proposed eastern entrance to the site. The traffic from a hundred houses (including the existing ones with Hanbury) would be required to use an access road that is barely fit for the current dozen houses.

The narrowest section of the road is where the eastern access joins Summer Lane, at only 4.1m (as claimed in the proposal; 3.8m when a 300mm stand-off is provided). The developer proposes that this section should be subject to a parking restriction for 40m. However, the the road from this point to the junction with Pagham Road is almost as narrow at 4.8m-5.5m (4.5m-5.2m allowing for a stand-off) and is currently used as parking along its northern side by the residents, narrowing it still further. As no parking restriction is proposed here, the entire parking demand of the existing houses bordering Summer Lane will be concentrated here and the effective width of this section of road will be much less than is claimed.

The result is that the only access route for the hundred-plus houses of the Hanbury development and the existing houses Road will be far narrower than the minimum required for some 100m from the junction with Pagham. Cars will not be able to pass each other, creating a nuisance. Traffic will be forced over the verges and footways, creating a hazard for pedestrians and property, or into the first access road or into oncoming traffic, creating a highway hazard.

Even if the parking restriction is extended to Pagham Road, the proposed access to the entire Hanbury development will still be hazardous for a 50m-60m length.

2) Loss of stand-off is an unjustifiable loss of amenity

Furthermore, even to achieve its proposed road width of 4.1m (at the narrowest point), the Hanbury proposal relies on removing the footway from the south side of Summer Lane and relocating it to the north, reducing the stand-off from properties to the south, for a 40m stretch of Summer Lane either side of the first access to the Hanbury site, to 0mm.

The WSCC response to the application states that the "absolute minimum stand-off from an existing feature" should be 300mm (WSCC Strategic Planning Consultation, 28/07/15, Ian Geldhill, p2 paragraph 6 onward; “SPC”). Presented in line with WSCC guidance, the

Hanbury proposal is actually for a road of between 3.8m-4.5m, considerably narrower than the minimum required for two cars to pass safely even at low speed.

The proposed removal of the stand-off to the houses to the south of Summer Lane will result in a significant loss of amenity to these dwellings. Without a stand-off, there is a risk of excursions of traffic from the highway (e.g. as cars try to pass), either over-running their gardens or colliding with their boundary structures. There is also a loss of visibility at their driveways, as exiting drivers will not be able to creep out safely as far, to improve their sightline. For one property, the developer's own Road Safety Audit says that "visibility to the right of the drive will be made much worse due to the shift in kerb-line such that a car could exit the drive and conflict with a westbound vehicle".

The loss of amenity proposed would be significant at existing traffic volumes; it is unacceptable given the proposed tenfold increase in traffic.

3) Loss of parking is a further loss of amenity

Currently residents enjoy off-street parking for the length of the northern side of Summer Lane. Even to deliver its sub-standard 4.1m road width, the application proposes a parking restriction for 40m in the vicinity of the first access road to the site but, as discussed above, the parking restriction would need to start at the junction of Pagham Road or the first 50m-60m of Summer Lane will also fail to meet the minimum width standard in practice.

The loss of 100m of street parking is a further loss of amenity for the residents of Summer Lane.

The Road Safety Audit also recommends parking restrictions on the eastern side of Pagham Road at the junction with Summer Lane, to reduce the risk of traffic conflict on Pagham Road in the light of the developer's proposed revisions to the junction with Summer Lane. If imposed, these would further reduce the amenity of residents.

4) Revisions to Summer Lane cannot be delivered as proposed

As the SPC notes, the minimum width can only be delivered with the relocation of the footway to the north of Summer Lane but the new footway will be significantly above the current level of the driveways of the houses on the north side. There are neither plans nor agreements disclosed that enable the developer to deliver this.

5) Hazards at the junction of Summer Lane and Pagham Road

In order to provide adequate visibility for vehicles emerging from Summer Lane, the developer proposes revisions to the junction with Pagham Road, building out the kerb and narrowing Pagham Road. These revisions in turn create a hazard to traffic on Pagham Road, according to the Road Safety Audit, which would require parking restrictions on Pagham Road.

The Road Safety Audit also notes that the removal of the footway on the southern side of Summer Lane reduces the inter-visibility of northbound pedestrians on Pagham Road and traffic exiting Summer Lane and thus creates a hazard to pedestrians. However, the recommendation of the Road Safety Audit and the SPC to retain a footway around the southern side of the junction, would reduce the width of the junction from 6.3m to 4.5m, assuming a footway of 1.8m minimum specification. Thus, given the its constraints, the junction cannot meet the required standards for pedestrian safety and minimum traffic clearance dimensions at the same time. One or other hazard will always be present.

6) Alternative access

The Design and Access Statement ("DAS") from Hanbury shows a potential internal link between the eastern and western access roads (at the north of the site) and a proposed link to the adjacent Orchard Homes development (at the north-west of the site). The Orchard Homes application itself shows full and unrestricted access from that site to Pagham Road.

If built as shown in the DAS, the two link roads would enable an alternative access scheme, in which Summer Lane is designated one-way, for entry only, with exit from the scheme via via the Orchard Homes development, with significant benefits for both the Hanbury site and existing dwellings:

a) An entry-only restriction at the junction of Summer Lane with Pagham Road would remove the need for the developer's proposed revisions to this junction and thus the hazards and loss amenity posed by them. Narrowing of Pagham Road, and the need for parking restrictions on its eastern carriageway, would be unnecessary and the southern footway could be retained along with an adequate junction mouth width, preventing the creation of a hazard for pedestrians.

b) A one-way flow would enable the existing parking on the northern side of Summer Lane and the footway and stand-off on the southern side of Summer Lane to be retained, avoiding any loss of amenity to existing dwellings.

c) An internal link between the two arms of the Hanbury site would rationalise the design and provide redundancy of access in the event of an obstruction, major incident or roadworks.