

NMPC Planning Committee:

Planning Application 24/01859/FUL

Transport Statement Review

Ref A: Transport Statement Rev D

HD0055-001 Feb 2025

Ref B: Construction Traffic Route Assessment

HD0055-001 P1 Feb 25

The most recent Transport Statement published by BNRG is Revision D (Ref A) – this fourth version simply demonstrates how difficult they are finding it to propose a safe and viable route for HGVs to access the proposed site. This new revision brings all the site traffic through the heart of North Mundham village and down single track country lanes to the 2 main site entrances in Runcton and Bowley Lanes.

There is no sensible option for setting up any traffic control measures in N Mundham, and their proposal to use STOP/GO boards as a suitable means simply demonstrates their complete lack of knowledge of the topography. Without this essential control of HGVs passing N and S along Church Rd it is considered to be unsafe to allow this route to be used for the additional volume of traffic involved in the construction of this solar installation. BNRG are also notably silent about the significant number of HGV movements required for mid life replacements of PV panels and inverters (at least once, if not twice in the life of the site) as well as a large volume of HGV etc traffic for decommissioning the site at 40 years - this problem lasts much longer/more regularly than the 6 – 8 months quoted. There is nowhere in N Mundham where queues can form at traffic lights (including HGVs) and have space for oncoming traffic (including HGVs) to pass. Taking the Post Office Lane traffic into account should require 3 way lights, with this Lane being even more constrained for queuing space which then, due to the extended red light periods involved, will only increase the length of queues being formed and potentially exacerbating the dangerous backing up of the queue onto the B2166 Lagness Rd.

South of the village the roads are substandard, lack width and refuge, have blind bends, suffer edge degradation and are used daily by vulnerable road users – including daily walkers, pushchairs, horse riders, cyclists and agricultural traffic. The whole route is very heavily constrained by the Highway Boundary width such that there are extremely limited opportunities for building suitable articulated/HGV passing places (see Annex). Without such regular passing places the local traffic will be forced to reverse long distances and/or drive still further onto the soft verges creating even greater damage than already exists.

All non motorised users (NMUs) will be forced onto the soft and muddy verges at regular intervals to escape the HGV traffic. Horse riders and trotters in particular will have an extremely difficult time avoiding the noise and proximity of these vehicles, and the regularly used National Cycle Network Routes 2 and 288 both pass down this proposed route from the Lagness Rd, through N Mundham and south to Fisher Common with Route 2 then continuing down Bowley Lane past the main site entrance. The safety of all these road users would be severely compromised by all of this construction traffic but the applicants give this major issue scant attention.

At least for the first 2 months of installation there would be an average of about 20 HGV movements per day (ie 10 x 2-way, as stated by applicant). Avoiding school times gives a daily HGV movement interval of 0930 – 1430, therefore on average about one movement every 15 minutes. It will take an HGV about 7 minutes to complete the route from the Lagness Rd to the site entrances, depending on traffic signal timings etc and, with natural variability in timings, each HGV would regularly meet another HGV while making the trip. Hence regular HGV/HGV passing places are an absolute necessity on this route but cannot be provided due to the physical road and verge limitations (see Annex).

The proposed removal of the long standing traffic island at the junction of Fisher Lane, Post Office Lane and Church Rd is considered to be a potentially major safety issues. This island was installed to prevent serious accidents (eg head-on collisions around a blind bend) and WSCC Highways need to carry out a safety assessment of this proposal.

Ever larger tractors and trailers now use these narrow lanes with wheel tracks that are wider than the carriageway which is causing continuous further breakdown of the verges. However the size of their tyres does reduce the point loading of each wheel in comparison with HGVs and they have the capability of driving over the soft verges without getting stuck, which they regularly do. A limited number of large lorries use these lanes during/after harvest to transport grain etc away from local farms. However the sum total of all these farm vehicles is far less than that proposed by the applicants for the construction plan, directly contrary to the misleading claims made in the application. The quantum of heavy vehicle movements proposed will undoubtedly cause further severe road surface and verge damage to these lanes and the Parish Council have grave reservations about the Section 59 agreement providing a full recovery of the situation.

The current state of the roads and verges is already poor. The general road width is 2.7m but with both edges badly broken down into muddy, deep potholes where vehicles have passed each other by driving over them. Light vehicles can be damaged by driving into these potholes:



Road width 2.7m; badly damaged verges with deep, muddy potholes

In some places the road edge is so badly damaged that the resulting potholes/trenches cause major suspension and tyre failures:



Large, deep trench on inside of bend 'hidden' by a long puddle

All this damage is off the metalled highway, but within the Highway Boundary, and is therefore not maintained by the normal pothole filling work. The passage of numerous HGVs will rapidly accelerate this damage, causing increased risk to all traffic.

The continuing misinformation being promulgated by the applicant raises serious questions about the general veracity of their statements and images. For instance in para 3.4 of TS Part 1 the erroneous claim is made that there is a road access from S Mundham to Sidlesham: this fundamental navigation error has been pointed out by the Parish Council to the applicant more than once but it is still repeated again, demonstrating their lack of local knowledge and understanding. The image below shows what happens when HGVs and their commercial navigation tools think they know better and the resultant trashing of the grass verge is the third time that this has happened around S Mundham in the last 6 months. Page 18 of TS Part 2 has a photo straight out of a Giles cartoon - the image has been manipulated by expanding sideways to make the lane look wider than it actually is, but the two pedestrians have become severely obese in the process. This trick goes hand-in-glove with their oft repeated assertion about the widths of our lanes (ref TS Part 1 para 3.3) where the Parish Council have previously provided actual measurements to demonstrate the real position and the misleading information is repeated again at para 5.19 where the supposed 5m carriageway width would require you to drive on broken down, muddy and severely potholed verges on both sides of the <3m wide carriageway (see images above).



Sunday 23 March 2025 0800: articulated lorry stuck at S Mundham green

Junction of Honer Lane and Punches Lane

Fisher Lane is already shared on a daily basis by:

- Pedestrians, including pushchairs and children
- Horse riders and trotters
- Cyclists including on designated NCN Routes 2 and 288
- Agricultural vehicles of all sizes
- Regular light domestic traffic

Adding large, frequent HGV movements into this mix on a narrow country lane with no footpath, limited verge space and blind corners substantially increases the highway safety risks. The Parish Council have a duty to seek a safety review of these proposals by WSCC Highways.

Summary

There does not appear to be a satisfactory solution to either the necessary traffic control problem in N Mundham, or the HGV/HGV passing place issue on narrow and poorly maintained single track lanes. None of these lanes were ever designed to take the volume or weight of traffic being proposed by the applicants. NPPF 115 d) effectively actions WSCC Highways to ensure that these significant impacts from this proposed development on these single track lanes in terms of capacity, congestion and highway safety have been mitigated to an acceptable degree by the proposals in Ref A. Nowhere is there any form of 'vision' that substantiates the applicant's claim to have successfully proposed such mitigation. The planning officer should be required to action a full review of these proposals by WSCC Highways to divine what the actual position is, rather than what the applicant wishes it to be.

Until these requirements are met this application should be deferred.

Annex

An on-site route survey of Ref B raises the following critical issues.

Until the mid 1950s these country lanes were gravel surfaced for small vehicles and horse drawn carts etc. Tarmac was then laid on top of the gravel surface without any reinforcement and subsequently the maintenance regime has been just to lay more tarmac on top of old and spot fill potholes within the carriageway boundary as they arise. The load bearing capacity of these roads is limited as can be clearly seen by the shape of the surface: tyre tracks each side with a high camber in the middle.

These lanes were never constructed to meet any of the current UK Rural Road Design Criteria for single track roads (eg min width 3.5m, passing places at least every 200m, HGV passing places min 15m long with 5m taper at both ends). Fisher Lane narrows to 2.3m and there is currently only one possible HGV/HGV passing place in the 2.4km route. The proposed route in no way meets current safety requirements for a modern single track road and vulnerable road users are therefore already at higher risk than would be acceptable for a new lane. The applicants propose to add a stream of HGVs onto these roads, thereby further increasing the risks to other road users.

Taking the proposed passing places in turn (see amended Ref B diagram below):

A: 3 way traffic signals would be required to accommodate Post Office Lane traffic, probably starting around Fletcher/Palmer Place and ending beside the cemetery (300m). But no road length exists for traffic queues to form and there is a total lack of road width to allow cars/HGVs to pass waiting cars/HGVs, and queues to the N will quickly back up onto Lagness Rd. 10 houses, including Fletcher House (16 managed retirement apartments), the church and the cemetery car park all open onto the road between these traffic lights, some with blind accesses, and would be uncontrolled. The northern part of this segment of Church Rd is very busy with cars parked both sides, particularly during school times twice per day and church activities regularly require close vehicle access to the lych gate and thence the church which would prevent any HGV passage past the church.

B: Junction of Church Rd, Post Office Lane & Fisher Lane. This is a blind bend with a junction where a traffic island has been in place for many years for very good reasons – to avoid head-on collisions around this dangerous corner. Removal of this traffic island will substantially increase the safety risks at this junction and should not be allowed. There is nowhere for the 3-way traffic lights to be extended past this corner as the road thereafter is too narrow and cannot be widened sufficiently within the Highway Boundary.

C: This is a short passing place – vans/cars only.

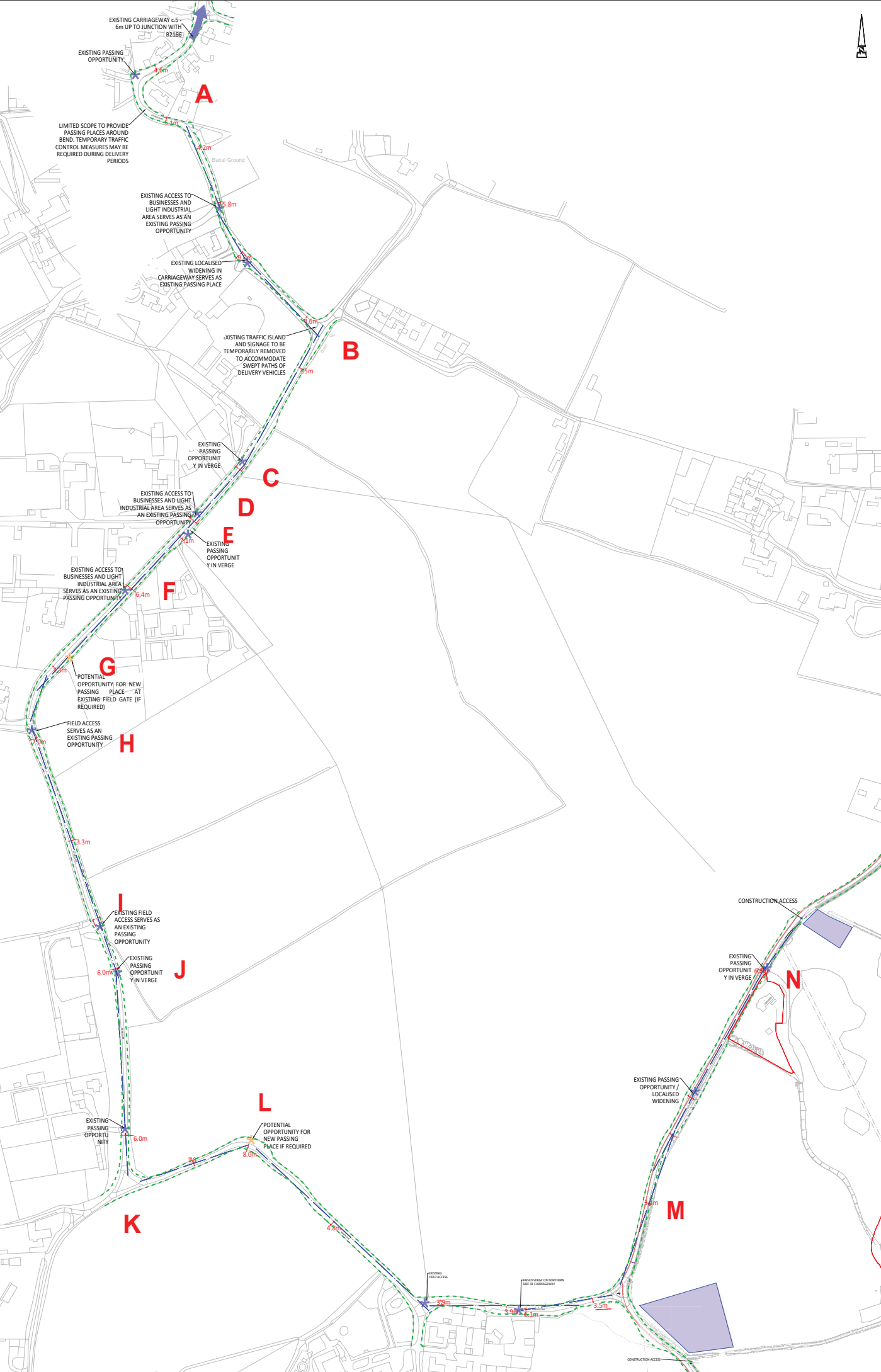
- D:** Larger potential passing place which could accommodate a small lorry if the access was extended within the Highway Boundary.
- E:** Rough layby/access, could be rebuilt to accommodate articulated & HGVs.
- F:** Short potential passing place – vans/cars only.
- G:** Virgin green verge, not suitable for passing place.
- H:** The 7m width measurement goes deep into the field access and is misleading: short passing place only for small lorries.
- I:** Very short passing place – cars only.
- J:** Rough mud verge, could be rebuilt to accommodate small lorries but overhanging tree branch (tree has a TPO) will limit height.
- K:** Junction of Fisher/Manor Lanes: road requires widening and reinforcing to take the sweep turn of HGVs etc.
- L:** Green verge – could be built into passing place with widening/reinforcing.
- M:** Rough/potholed verge – limited width, only suitable for cars/vans.
- N:** Short, rough passing place – cars/vans only.

For the proposed route to be both safe and viable there needs to be:

- a) regular passing places for HGV/HGV or else there will be chaos as they either try to reverse back to a suitable place or drive over the verges and potentially end up capsizing into the ditches.
- b) A viable way to control the traffic through the N Mundham village double bends with space for HGV/HGV passing in the queues.



- KEY**
- APPLICATION BOUNDARY
 - HIGHWAY BOUNDARY
 - * EXISTING PASSING OPPORTUNITY (SUITABLE FOR A CAR TO PASS A LARGE ONCOMING VEHICLE)
 - * POTENTIAL NEW PASSING OPPORTUNITY
 - INDICATIVE CONSTRUCTION COMPOUND
 - INTERVISIBILITY SPRAY
 - APPROXIMATE ROAD WIDTH AVAILABLE (BASED ON OS BASE)



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FOR INFORMATION

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