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Subject: FORMAL OBJECTION – AWDM/0628/26

To: planning@adur-worthing.gov.uk <planning@adur-worthing.gov.uk>

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Good Morning,

Please find attached my objection to AWDM/0628/26. I have attempted to upload it to the planning portal however receive an error message.

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FORMAL OBJECTION – AWDM/0628/26

Land Between Sword Street and Martlets Way, Worthing

I wish to object to planning application AWDM/0628/26, from this point onwards referred to as Elizabeth Square Phase 2, on the grounds that the proposal fails to comply with key policies in the Worthing Local Plan, the National Planning Policy Framework (NPPF), and statutory air-quality and environmental-health requirements. The development would result in unacceptable pollution impacts, unsafe traffic conditions, and significant harm to residential amenity during both the construction and operational phases. Within this response I have proposed suitable redesign and mitigations to reduce the impacts of this development on local residents and the environment.

A summary Requests for amendments and review of the current design of AWDM/0628/26 are listed below, alongside rational aligning to policies set out in the Worthing Borough Council Local Plan 2020-2036.

1. **Construction of Phase 2 of Elizabeth Square as set out in AWDM/0628/26 should not commence until Phase 1 Elizabeth square is completed. This is to prevent cumulative impacts on air quality, dust and noise and ensure acceptable levels of heavy plant traffic flow.** This amendment aligns to DM22 5.307 of the Worthing Local plan: *“Development should sustain compliance with and contribute towards Air Quality objectives for air pollutants, taking into account ... the cumulative impacts on air quality from individual sites.”*
2. **Phase 2 of Elizabeth Square as set out in AWDM/0628/26 should not take place at the same time as construction phase of Bridge house (NOTICE/0019/25), to prevent cumulative impacts for residents of phase 1 Elizabeth Square.** This amendment aligns to DM22 5.307 of the Worthing Local plan: *“Development should sustain*

compliance with and contribute towards Air Quality objectives for air pollutants, taking into account ... the cumulative impacts on air quality from individual sites."

3. **AWDM/0628/26 redesigns its construction proposals to reroute construction traffic. No construction traffic should utilise the new Elizabeth Square phase 1 estate. Sword street should not be used for heavy plant.** This aligns to the Worthing local plan DM 5.304: *"Development should not give rise to significant adverse impacts on health and quality of life such as through artificial light, odour or noise and areas of tranquillity should be protected."*
4. **Planning condition should be applied to AWDM/0628/26 to ensure that it does not use land on Elizabeth Square phase 1 for construction, storing heavy plant or waste materials. This include not using the land of the delayed and unbuilt flats on sword street.** This aligns to the Worthing local plan DM 5.304: *"Development should not give rise to significant adverse impacts on health and quality of life such as through artificial light, odour or noise and areas of tranquillity should be protected."*
5. **AWDM/0628/26 should redesign its road layout and traffic entry points for operational phase. Sword Street should not be used as the sole entry to all dwellings. Elizabeth Square Phase 1 and Phase 2 (Set out in AWDM/0628/26) should not be connected for road transport. Only access should be for active travel (walking, wheeling, cycling, scooting) alongside emergency service vehicles. This will Reduce the impact of traffic flows in Sword Street and dangerous access and egress at Shaftsbury Avenue.** This aligns to Worthing Local Plan DM5: *"include a layout and design which: take account of potential users of the site; create safe conditions for access, egress and active travel."*

Construction Phase Impacts

Dust, Air Quality and Public Health

The proposed development would extend construction activity in this area for several years. Residents living adjacent to Sword Street, Elizabeth Square phase 1 have already endured prolonged exposure to:

- airborne dust
- particulate matter (PM10 and PM2.5)
- diesel emissions from construction vehicles
- noise and vibration

Phase 1 of Elizabeth Square remains incomplete, meaning residents are already experiencing ongoing construction pollution. Extending construction into Phase 2 without completing Phase 1 creates a cumulative air-quality burden that has not been suitably assessed. Delivery of Phase 2 (set out in AWDM/0628/26) utilising the roads of Phase 1, extends the construction pollution (both from construction and the machinery access) for several years.

For a child residing on Elizabeth square, this could equate to over 5 years of construction traffic and dust in the early years of their lives.

Considering the significant volume of infrastructure in the area we would encourage the planning authority to require the applicant to provide a robust Construction Environmental Management Plan (CEMP) demonstrating continuous dust monitoring, enforceable mitigation, real-time air-quality reporting and steps to protect existing residents.

To mitigate against this, AWDM/0628/26 should redesign its construction proposals to reroute construction traffic. No construction traffic should utilise the newly build Elizabeth Square phase 1 estate. Sword street should not be used for heavy plant.

2.2 Construction Traffic – Sword Street (DM15)

Sword Street is a narrow residential road and cannot safely accommodate additional construction vehicles. Phase 1 has already demonstrated:

- obstruction of emergency access due to narrow roads, single access and construction plant blocking routes.
- unsafe pedestrian conditions – unmarked crossings, narrow pavements which are not accessible, pavements lacking dropped curbs, and pathways that are not continuous, and instead have planters blocking the route.
- increased noise and vibration for residents
- idling HGVs generating pollution
- conflict with residential parking, children walking to west park school, Kamelia kids nursery, and the park on Elizabeth Square.
- Conflict with the park at Elizabeth square – the additional construction traffic on sword street adjacent to the park renders the park access and usage unsafe for children – construction traffic makes the roads dangerous to cross, and increased dust and emissions in the area.

The proposal fails to demonstrate safe routing, turning, or mitigation for construction traffic.

To mitigate against this, AWDM/0628/26 should redesign its construction proposals to reroute construction traffic. No construction traffic should utilise the newly build Elizabeth Square phase 1 estate. Sword street should not be used for heavy plant.

Cumulative Impact - Phase 1 Elizabeth Square not complete

Elizabeth Square Phase 1 remains unfinished, with residents still exposed to:

- construction noise

- dust
- incomplete landscaping
- ongoing vehicle movements

Beginning Phase 2 before Phase 1 is complete creates overlapping construction phases, resulting in extended pollution exposure and prolonged amenity harm. Utilising the Lan of Phase 1 to deliver phase 2 results in cumulative impact for current residents. This cumulative impact has not been assessed and is contrary to NPPF requirements to minimise pollution and protect residential amenity.

It is noted that planning is also approved for a site at bridge house (NOTICE/0019/25), adjacent to Elizabeth square to convert the office block to flats. This will also exacerbate the cumulative impact of construction.

Construction of Phase 2 of Elizabeth Square as set out in AWDM/0628/26 should not commence until Phase 1 Elizabeth square and the proposed construction of dwelling at Bridge house is completed. This is to prevent cumulative impacts on air quality, dust and noise and ensure acceptable levels of heavy plant traffic flow.

Operational Phase Impacts

Once occupied, the development will significantly increase traffic along Sword Street and Shaftesbury Avenue. Sword Street is already constrained and not designed to absorb additional vehicle movements from a major residential scheme.

Likely impacts include:

- Increased traffic for access to West Park school
- unsafe junction movements notably on the blind corner on the entrance at sword street and also at the main road on Shaftesbury Avenue.
- higher NO₂ and PM pollution
- reduced pedestrian safety
- increased congestion at peak times

The Transport Assessment does not adequately address these impacts or propose mitigation, contrary to the Worthing Brough Local Plan DM15.

To prevent Sword Street becoming a busy dangerous road, the development must include:

- 1. A second vehicular entrance on the north/west side of the site to distribute traffic safely.**
- 2. A blocked or restricted vehicular connection between the new development and the existing Elizabeth Square phase 1 access roads to prevent rat running.**

Without this, all traffic will funnel through Sword Street, creating unacceptable safety risks and significant pollution increases for existing residents.

This is contrary to DM15, which requires developments to provide safe access and avoid unacceptable impacts on the local road network.

Conclusion

For the reasons set out above, the proposal will result in significant harm to air quality, public health, traffic safety, and residential amenity during both construction and operation. The development does not comply with the Worthing Local Plan or the NPPE, and therefore should be refused unless substantial redesign and mitigation measures are implemented, including:

- a full air-quality and dust-mitigation strategy
- completion of Phase 1 before Phase 2 begins
- a second vehicular access on the north/west side
- Prevention of vehicular access between Phase 1 and Phase 2 Development
- a safe construction-traffic routing plan avoiding Sword Street