ADUR DISTRICT CONSERVATION GROUP (ADCAG)

RESPONSE TO: EIA SCREENING OPINION Ref: EIAOPINION/0003/19

Redevelopment of land at Kingston Wharf Brighton Road, Shoreham

It is felt that an EIA should be carried out for all the environmental aspects in the Applicant's report without scoping out any of the elements therein. The Group's comments to support this are as follows:-

DRAINAGE: The site sits within an Environment Agency rating for surface water flooding of 3(a) high risk of flooding. The proposed rebuilt higher tidal walls will assist in mitigation to achieve a lower level of risk from a flood plain rating of 3(b) to a 3(a) which Adur D.C. accepts in regard to development purposes.

However, although not covered by the developer's report or the comments by Adur D.C.'s drainage engineer, ground water could be a major consideration for this development as the site sits within an area as identified by the Council's own groundwater flood risk map, as having a high level rating of greater than 50 up to greater than 75% risk of flooding from groundwater influences. It is felt that this requires a pre application examination.

To support this contention it is understood that the Free Wharf Development which is located in the same risk level area has commenced groundwork preparations & with the high level rainfall during the period December in to January, is experiencing high ground water levels resulting in the applicant applying to the Environment Agency to approve an extraction licence for 3,153,000 cub.metres of water per year to over pump into the river to enable drying of the site dry for the construction work required. This requirement was not evidenced in the approved application documents & has only become apparent with the recent weather. The question remains – does this development require the same mitigation, it is felt that an EIA assessment is thus required.

SEWERAGE: It is noted that the Adur Engineer has identified a main sewer run under the site, has Southern Water been approached for an EIA Report? Bearing in mind current situation with the Free Wharf site.

ENVIRONMENT/HERITAGE: During the 1960's the then Highways Agency declared that the A.259 was not fit for purpose & required extensive improvement. This factor was one of the major points raised at the Brighton Bypass Enquiry which, in turn became one of the deciding factors in the Minister's approval for the new bypass. However, regrettably by today's standards, the A.259 usage has quadrupled to the extent that motorists are using the residential roads in Southwick & Shoreham as rat runs during the rush hours which in turn is seriously impacting on property values & pedestrian safety.

Serious concern is expressed in regard to the size of this development, i.e. 255 residential units plus an enterprise centre, offices, Class BB self-storage units & a café

ENVIRONMENT/HERITAGE continued

Bearing in mind that whilst on the one hand the length of the site is capable of sustaining such a development, the width thereof, from kerbside to the water's edge is somewhat limited & which will undoubtedly contribute to the parking facility, plus of course, a cycle track, this does not allow any form of landscaping or green areas which the residents use.

As for parking provision, it is not clear how this is planned to be treated by the applicant when considering that over 150 spaces alone will be required for residential use plus the commercial element of the proposal will be far greater as there are certainly no areas within local vicinity for staff in the proposed offices & enterprise centre plus parking facilities for commercial vehicles who will undoubtedly be delivering etc. to the enterprise centre & storage facility.

As previously mentioned, the A.259 suffers from over capacity of traffic, particularly during the normal rush hours, thereby impacting on the adjacent towns where particularly in the Shoreham town centre where an AQMA (air quality management area) has been in operation with little mitigation to improve the problem.

Increased traffic will be generated by this site to exacerbate both the levels of traffic & that AQMA. It is felt that a pre application examination with an EIA needs to be done in consultation with either County/Adur plan to improve the performance of the A.259.

Whilst none of the policies in the Adur Local Plan 2017 are currently covering the Adur DC declaration a Climate Emergency for all council activities/assets, as that Council now has a Sustainability Officer who is working with the community to develop plans to improve the area & move towards carbon neutrality, will she be instructed to consider the aforementioned EIA request to submit options that any approved development at Kingston Wharf is designed to achieve a development is carbon neutral.

INFRASTRUCTURE: Bearing in mind, there will be 255 residential units, it is noted that there is no mention of the local infrastructure, particularly in regard to medical care. There is a limited number of G.P. practices in Shoreham & Southwick & as far as can be ascertained, most of their lists are full. It cannot be assumed that all the residential units will be acquired by local Adur residents. Indeed it has been proved time & time again that when housing associations become involved in regard to the "affordable" units, the tenants/co-purchasers come from areas throughout the U.K. This is an important factor when considering large residential developments such as this & it is suggested a closer liaison between local planners & the N.H.S.

CONSERVATION AREA: As the only conservation within the local vicinity, namely Kingston Buci, lies to the North of the site some considerable distance away, it is felt that it will not be affected by this application.

SUMMARY: ADCAG strongly believes that this proposed development should be advised by an EIA on all the matters covered in the planning agent's document.

Whilst this site is allocated within the Local Plan for the Shoreham Harbour regeneration programme, ADCAG members feel that this application will tend to add to the further over-development of Shoreham.

Beryl Ferrers-Guy

Chairman.