

July 21,2025

To: Stephen Cantwell

From: AREA, Barb O'Kelly

Subject: AWDM/0738/25 Kwik Fit

Dear Stephen,

We have some questions and comments about the Kwik Fit development which we hope you will consider.

1.The noise from the car wash - could that give rise to complaints as was anticipated at the Duke of Wellington with the live music and what can be done in terms of additional clauses to protect the operation of the car wash.

2.Should there not be more concern about the access arrangements for the car wash, air pollution and detail about the amount of traffic accessing the car wash via the back Lane due to the canyon effect of the trapped pollution? What will be the frequency of traffic? There will likely be very little air circulation due to the proximity and height of the buildings. How will that affect residents of Free Wharf and the Kwik Fit site?

3.Under **Transport Assessment 3.11.19** it is stated that at Ropetackle roundabout there are no material delays at PM peak!!! but that there are at AM peak, with considerable queues. That doesn't tie in with the observable queue, particularly at PM. Nor does it tie in with comments in the Parsons Brinckerhoff report of 2014 that stated (4.3.12) that both approaches to the roundabout are above capacity in both the morning and pm peak.(4.2) Collective impacts from all developments are significant. The developer mentions plans for increasing the size of the roundabout to mitigate traffic queues, but those plans have been around for 11 years and nothing has happened.

4.Do you estimate that the increased volumes of traffic from all the new developments if/ when they are occupied will increase air pollution, especially PM2.5? Car ownership is increasing according to government data, so, while NO2 is decreasing due to more electric cars will PM2.5 increase due to more and larger, heavier electric cars on the road? Traffic figures taken from the 2024 Air Quality report based on 2023 stats states that traffic on the High St east of Middle Rd has increased by 212 vehicles from 15,232 in 2023.(average annual daily traffic)

5. Air Quality Assessment 5.2.2 The transport assessment concluded that the traffic flow in the area and along Brighton Rd. were relatively low. Therefore, it was anticipated that the emissions from local traffic are low and effects on air quality are minimal! This is a bit hard to believe given the queues at Humphreys Gap and all along the High St., particularly in the evening rush hour. There is no mention of the effects on the children in the Skate Park, with the prevailing wind from the SE.

Do you accept that the increased volumes of traffic from all the new developments if/ when they are occupied will increase air pollution, especially PM2.5. Car ownership is increasing according to government data, so, while NO2 is decreasing due to more electric cars will PM2.5 increase due to more and larger, heavier, electric cars on the road? Traffic figures taken from the 2024 Air Quality report based on 2023 stats states that traffic on the High St east of Middle Rd has increased by 212 vehicles from 15,232 in 2023.(average annual daily traffic)

Table 4.2 PM2.5 levels of 10.7 for 2023 are above WHO recommended levels. There is no safe health level for PM2.5 Health considerations should be of primary importance in planning decisions.

Speed travelled was assumed to be 50km per hour. That is unrealistic and ignores the stop start flow of traffic approaching the Humphreys Gap traffic light. Stop-start and braking create further pollution as do idling engines.

6. There is no indication as yet whether parking spaces will be allocated. Unallocated parking could increase traffic churn, congestion and pollution. The ratio of 0.37 spaces per flat is also very low, goes against WSCC parking calculator and could result in further traffic churn.

By employing consultant Tim Chapman the Council obviously thought it was necessary that a report on the overdevelopment of the WHA was necessary particularly given the lack of infrastructure improvements – traffic congestion, parking, lack of green space, play facilities, health /medical facilities and secondary schooling.

There are no plans for improvements to the road network, aside from the cycle lane, or for improved town parking facilities and public transport.

The Pond Rd surgery is not fit for the dramatic increase in population and does not have the financial resources to put into the development of the surgery.

There are no plans for easily accessible children's play facilities and open green space in the WHA, all necessary for a healthy community and to combat the effects of rising temperatures. The paucity of trees to improve air pollution and provide shade and a cooling effect are further shortfalls of this development.

This KWIK FIT development will further increase the density of the area, is too tall and dominant on the A259 frontage.

If the density was thought to be so great that the Council felt they needed to spend tax- payers money on a consultant then how is it right to grant permission to the Kwik Fit development, increasing the density and feeling of overcrowding and going against the concerns of the Council 2 years ago? This development merely compounds the already existing infrastructure problems.

AREA do not believe that this development, AWDM/0738/25, should be approved for the reasons given above and below:

JAAP 4.7.32 New developments will generate the need for new open space provision. " *No usable green space of any size or with viable equipment for children has been provided. The skate park is not suitable. The Open Space Study in 2019 concluded that local residents considered 10 minutes to be an acceptable walk time to a park or play area. The nearest area is considerably further.*

JAAP 4.7.64 Mixed use developments will be expected to have features and facilities to attract young families such as play areas and leisure uses. *The play area is totally inadequate*

JAAP4.7.58 Landscaping treatments will also be important for creating setbacks between new developments and the A259 to prevent noise and air quality impacts. *There are 6 trees along the A259 and no trees between Free Wharf and the Lane.*

The NPPF states that developments should promote developments with healthy lifestyles with open spaces. *The open spaces in this development are small, primarily terraces and balconies with no safe space for play.*

We will be sending a version of this to the planning portal for Kwik Fit.

With thanks for your time.

Sincerely,

Barb O'Kelly- AREA