From: Jacqueline Fox
Sent: 10 April 2018 11:47
To: Planning -
Subject: Fwd: Land At Former 5 Brighton Road Shoreham-By-Sea West Sussex

Please could this consultation response be indexed/uniform etc

Thanks

Jackie
---------- Forwarded message ----------
From: **Nadeem Shad** <nadeem.shad@adur-worthing.gov.uk>
Date: 9 April 2018 at 16:00
Subject: Land At Former 5 Brighton Road Shoreham-By-Sea West Sussex
To: Jacqueline Fox <jacqueline.fox@adur-worthing.gov.uk>

AWDM/1979/17

Land At Former 5 Brighton Road Shoreham-By-Sea West Sussex

I refer to the above application and make the following comments in relation to Air Quality. My comments relate to the Air Quality Assessment produced by Southdowns Environmental Consultants and dated December 2017.

- Comments related to the Local Plan in paragraph 3.3.2 are out of date as the Plan was adopted in late 2017.

  Policy 28 relates to Transport & Connectivity and Policy 34 to Pollution and Contamination.

- Paragraph 3.3.4 incorrectly states that the Air Quality Action Plan was published in 2017, it was published in 2007.

- Paragraph 4.2.5 incorrectly states there will be 27 parking spaces, when the development incorporates 136 car parking spaces.

- Paragraph 5.2.1 states continuous monitoring in Shoreham High Street began in 2014. It commenced in 2007.

- We will require further air quality modelling of the proposed CHP energy plant (paragraph 7.2.3).

- In paragraph 8.4.3 an assumption is made that there will be zero HDV traffic associated with the development. However the development includes D1/D2 space to the ground floor and flexible A1/A3 to the ground floor. Therefore I do not believe this assumption is correct.

- In terms of construction impact mitigation I recommend that all HGV and LGV movements associated with the development are routed to avoid both the Shoreham AQMA and the Brighton AQMA. All construction mitigation should be incorporated into a mitigation plan, perhaps within the Construction and Management Plan.

- In terms of operational impacts the emissions cost calculation amounts to £29,168. I do not have access to the calculation so cannot check the inputs, however I recommend this is checked and the calculation supplied for verification.

- The mitigation measures proposed should not include travel plan measures as these are already required by West Sussex County Council and by including them within the air quality mitigation cost they are double-counted. The commitment to electric vehicle charging is welcomed, however these must include actual charging points rather than just teh cabling, as this will have a greater impact on encouraging behaviour change. We recommend a mixture of charging points and incorporating ducting and cabling to enable installation of additional ev charge points by homeowners in the future (making future installation much cheaper and easier). We strongly recommend that a proper air quality mitigation scheme be submitted to the full value of the emissions mitigation calculation. This should be allied to the emerging air quality action plan.

Nadeem Shad
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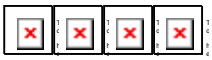

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