November 2019

EIAOPINION/0002/19

Below is a response to the request from ECE Planning about the need for an Environmental Assessment. It is submitted by Adur Residents Environmental Action

We believe if a genuine, thorough Environmental Assessment is not undertaken ECE Planning and Adur Council Planning will be failing in their responsibility to the residents of Shoreham.

IS AN EIA NEEDED FOR Civic Centre development EIAopinion/0002/19 ?

1. The development includes up to 200 dwellings.

2. We believe there will be an environmental impact in relation to:

A: PARKING – As a result of the under provision of parking places at the nearby FOCUS development, between 60 and 70 cars are forced to park elsewhere, much to the detriment of local residents. FOCUS plans to increase its workforce by 200, thus requiring more parking places. The redevelopment nearby of The Mannings could well lead to further parking overspill as only 27 parking places are being provided for 72 flats. Local residents in nearby streets are frustrated and have raised concerns at the under projected levels of parking spaces for sites in the area. Overspill parking blocks their driveways and further congests their roads.

As only 85 parking spaces are being allowed for the old Civic Centre's proposed 200 homes and commercial this could lead to yet more overspill parking. The number of proposed parking places does not comply with the West Sussex Parking Guidance (5.2), which when calculated, indicates there should be 181 spaces. This does not include parking for visitors and the commercial aspect of the development. The ratio of parking places to housing is only 0.5, well below WSCC parking standards.

B: AIR POLLUTION – This development will add to the air quality problems of an area that already suffers from the effect of the many idling cars at the A259 traffic lights, queues for Mcdonalds and the traffic at the level crossing where cars can often idle for 10 minutes. With the forthcoming Free Wharf and other nearby substantial development on the harbour side air pollution is already set to increase. The height of this development will add to the canyon effect created by the other tall buildings, which increases the levels of air pollution.

How will the air quality assessment be conducted? Will it be modelled? Will there be actual measurements? Will council monitoring be the basis? Even without this development air quality is a significant issue. This development will contribute to rush hour queueing, will contribute to local roads being used as rat runs and therefore will contribute to a worsening of air quality.

Opposite this proposed development is the skate park which has no green screening from the 3 surrounding roads. The effects on children of air pollution are well documented.

C: TRAFFIC – This area is already extremely congested. As cars emerge from the proposed site and turn right they will have to queue to emerge onto Ham/Eastern Rd where the traffic queues for the level crossing and the A259 traffic lights. They will be in competition with traffic emerging from FOCUS at the

evening rush hour. Any increase in traffic in the town will cause even further congestion. The ECE panning report states that it is thought that highways impacts are unlikely to be significant, given the sustainable location of the site. What verification can be produced to confirm that statement?

The developers for FOCUS also believed that the site was sustainable and that most employees would use public transport. This has not happened. While we agree a housing development generates less regular traffic as residents will walk into the town centre, many will be using their cars to get to work, thus increasing the congestion at rush hours. If the uptake of travel by public transport is as underestimated for this development as it was for FOCUS then we do not believe that the traffic impact, especially when considered cumulatively, will not be insignificant.

D: LIGHT- Due to the excessive height of the building there will be a loss of light in the afternoon when many children come to the skate park after school. What will the cumulative impact for loss of daylight be when combined with the supposedly "negligible" impact of the Free Wharf development now under construction? The tallest block of up to 12 storeys will be immediately to the west and within metres of the skate park. This surely requires examination within an EIA report.

D: GREENSPACE AND PLANTING – As this is a polluted area and Adur council has declared a climate emergency we appreciate that a certain amount of planting will be included. However we believe the amount of planting should be increased in order to help counteract the effects of the traffic, particularly beside the A259. This will assist in protecting people who are using the provided open area between the two buildings.

We would also like to point out that there is virtually no mitigation for pollution aside from a decrease in traffic, an improvement in road structure and an increase in the uptake of electric cars. The A259 has been a source of congestion for many years and is at capacity. In spite of proposals put forward in 2013 by consultancy firm Parsons Brinckerhoff there have been few if any improvements. The only proposals we are aware of now is a cycle lane on the south side of the A259. Cumulative effects of traffic and pollution must be taken into account. (Schedule 3 criteria of ECE Planning document)

It's for these reasons that we believe a thorough Environmental Assessment should take place.

We look forward to receiving your response and a detailed environmental document or else your reasons for concluding that one is not necessary.

A copy of this submission has been sent to Councillor Arnold and Councillor Zeglam. We request that, as councillors for St Mary's Ward, they "call in" this application for Planning Committee consideration, rather than having it delegated to a planning officer decision.

Sincerely,

Barb O'Kelly for Adur Residents Environmental Action

Chair AREA

Cc Councillor C Arnold and Councillor Zeglam