

From:  
Date: Wed, 21 Jan 2026 at 11:40  
Subject: AWDM/0706/25 74 Old Shoreham Road  
To: Planning - <[planning@adur-worthing.gov.uk](mailto:planning@adur-worthing.gov.uk)>

Could you kindly confirm receipt of this submission and provide copies to consulting officers for National Highways, the Environment Agency and WSP

**Ref: AWDM/0706/25 74 Old Shoreham Road**

Dear Adur Planning,

Lancing Manor SE Residents Network's (LMSERN) further comments of objection below should be read in conjunction with those submitted on 11.8.25

**Following the applicant's further submitted documents to which National Highways, the Environment Agency, and WSP responded, our members are in disbelief that these consulting bodies withdrew their objections and recommended post-approval conditions !!**

Observing the 'toing and froing' with Planning and the above consulting organisations, there obviously have been significant difficulties to overcome and discomfort with evidence which had so far been submitted.

It should be noted that in the 1980s three such applications and an appeal to create back developments on this site were all refused because of unacceptable drainage/flooding and road access problems

So what has changed since then? Quite frankly, traffic and drainage issues have become worse. Since the 1980s, the level of traffic has increased on the already overcapacity A27. Particularly with the recent New Monks Farm 600+ homes development (plus the IKEA owned commercial site and school to still be developed).

This site, in heavy wet winters, still floods from rising ground water. Despite rerouting drainage flows to the pumping station on the river within the New Monks Farm development. In prolonged wet winters ground water flooding with loss of foul waste facilities in the area has worsened.

In real terms those latest transport and drainage submissions by the applicant have failed to bring anything new to the table to provide solutions for sustainable access and drainage.

With these documents, there are still access problems, even substandard visibility splays when entering the A27. The site still floods in very heavy wet winters from rising ground water which has occurred in at least 7 out of 10 winters during the last 10 years.

*In residents' opinions, for increased traffic volumes alone and public safety, this development should not be permitted.*

**For this application, the matters of drainage and site access are key, important material considerations. There is no way that these vital elements should be given planning consideration without full, calculated and proven evidence with metrics that the schemes will work in terms of access and drainage. Certainly not ghosted through with after approval conditions. In our opinion, so far, that evidence has not come forward. Post approval conditions in this case will not be appropriate!!**

With experience of other applications where such post approval conditions have been applied, LMSERN has absolutely no faith in the resulting outcomes in terms of

community concerns and specifically for drainage and access to a development.. As always happens, those concerns are ignored and not considered, particularly for Highways and drainage matters.

Approval of evidence for conditions usually by officers creates loss of transparency for the public in those approvals by the respective consulting authorities. Decisions are made which are to the considerable detriment of the local community and the general public with no consideration of their concerns.

**We therefore respectfully request that for matters of transport access and drainage for this application the requested post approval conditions are not applied and the authority addresses these matters as follows to allay our residents' concerns :-**

#### Road Access

Clearly, it is evident that National Highways has failed to assess fully the real implications of access/egress from the site through the narrow substandard service road (mini crescent) with its very tight turns.

***These implications can only be understood with a visit to the site.***

Large vehicles, particularly construction traffic, will be unable to make two left hand turns and access the new entrance road through the garden of no.74 without driving across and damaging the kerb, central green verge and street infrastructure therein (A27 street light, Old Shoreham Road street sign, a flashing A27 40mph warning sign plus two trees). Exiting from the site into the A27 will be the same problem.

Inevitably, site construction would go on for many months, meanwhile local residents and their visitors will have to endure totally unacceptable noise, dust pollution, road disruption with loss of parking amenity.

This proposed TRO with 'no parking' restriction is of great concern to all local residents and particularly the owners of the well established cattery at no 68 who foresee considerable loss of business through restricted 'no parking' in the service road. This cattery provides a really invaluable, convenient and respected service for the local community and the area. No parking in the service road will inevitably damage its level of custom and unacceptably jeopardise this much valued service. The Fire Service has responded requesting that fire hydrants should be accessible in compliance with their operating standards. But has the Service fully examined how their site access for tenders through the very small service road will be achieved in the event of a fire?

Has Adur waste collection service been consulted? As stated previously, their vehicles never enter this service road because it simply is not easily accessible. They remain in the nearside lane of the A27 to execute collections. If they decide not to enter the site for collections, what are the applicant's plans for these collections in that situation? The waste operatives will not wish to manually collect and return bins for each of the 9 households from the main road.

National Highways have requested a post approval condition for submission of a Construction Environmental Management Plan. The local 4 Old Shoreham Road development application also required a similar condition for post approval. The condition was approved much later but totally neglected local residents' raised concerns in matters of public safety and traffic management during construction. This created severe problems for most of 2025. If this application goes ahead, LMSERN is concerned that these problems are not repeated for 74 Old Shoreham Road..

Our experience over the last year with the 4 Old Shoreham Road development, the problems of simultaneous multi lorry deliveries gave great concern for the aspect of

public safety and wellbeing. For most of time unattended by a banksman. Many of these were very large articulated vehicles. There will be many more for this development which is over twice the number of dwellings compared with 4 Old Shoreham Road.

Vehicles of such sizes simply will not be able access the small service road and queue there to enter the site.

Avoidance of construction vehicles queueing on the A27 must surely be a priority for National Highways with lack of accommodating them within the very small service road (mini crescent). So, what is the solution?

This is yet another reason the residents object to this development. Safe construction access which causes no disruption or damage to road infrastructure simply is not possible.

***LMSERN strongly requests that this Construction Plan comes forward before planning approval consideration to ensure the wellbeing and safety of local residents, the public and users of the A27. Also, that the public can contribute their comments which are taken into account to prevent the level of chaos and safety issues caused by the 4 Old Shoreham Road development.***

**We ask that Highways be requested to visit the site and physically assess just how difficult those traffic manoeuvres will be for both construction and, if approved, the final traffic usage. Then for their officers to revisit/amend their decision appropriately.**

#### Drainage

Work has been undertaken to submit a revised FRA which both the Environment Agency and Adur's drainage consultant WSP have accepted subject to post approval conditions.

LMSERN wishes to alert to two key matters which we know undermines that work for this FRA.

1)The whole report with its surface water modelling solution has been undertaken based upon data to do with surface water. It ignores the real cause of flooding with this site and the N Lancing area which is rising groundwater. The consultant who produced this surface water modelling for site drainage openly declares that the matter of ground water has not addressed. That was being dealt with by someone else.. It's not evident who that is but it is not apparent elsewhere in the planning documents.

*In extreme, wet winters, groundwater flows through intermittent springs or bournes from surcharged aquifers in the Downs into this area to meet the rising groundwater levels from aquifers within this coastal plain. This is what causes this site and local gardens to flood during those winters with prolonged heavy rainfall*

This type of flooding does not occur every winter but when it does it causes significant garden flooding and loss of foul waste facilities and this can continue for up to 5/6 months as it did in 2022/23 and 2023/24 from November/December to May. Those flooding issues also affected the 74 Old Shoreham Road land to the rear. Flooding events occurred in at least 7 out of the last 10 winters.

We would add that the FRA claims that these problems from groundwater have improved since the NMF drainage and pumping scheme has been in place.

**This is simply not the case.** In 2022/23 winter CEP the managing consultant for the NMF northern channel/pumping station was contacted because water was simply not getting off the land in N Lancing despite this revised drainage scheme. CEP's

director immediately confirmed the pumping station was fully operational and instituted a check for blockages in the Northern Channel ditch run. He also opened a penstock valve to give additional assistance to flows through the Mash Barn Lane culvert (using what was the original drainage route into the ditch network which flows to the Shoreham sluices). This made absolutely no difference or improvement to the flooding problems being encountered.

As stated previously, since the development of housing and building infill at New Monks Farm, drainage conditions have definitely worsened and those two winters were an example of that.

***We refer once again to the flooding pictures for this site taken in winter 2023 as shown within LMSERN's first submission of the 11.8.25. That flooding is the result of rising groundwater and this must be taken into account within a solution before any planning decision is made.***

***In our opinion, the proposed solution put forward by the applicant should be re-examined and reworked to take into account with relevant metrics the impact which rising groundwater has on this site and the areas around. Failing that, the solution submitted will not provide sustainability.***

***Local residents are certain that whatever the drainage scheme, the displacement of water from this infilled site will worsen flooding of their properties and impairment of the area's road/surface water drainage during those frequent extremely wet winters (including the A27 which drains into this ditch network). Even the FRA does acknowledge that the infill of the development will cause displacement of water into other areas.***

2) The Environment Agency has lifted its objection and requested a post approval condition that 1<sup>st</sup> floor levels of the dwellings for sleeping accommodation be at a level of 6.00 metres above AOD.

This 6m level is planned to future proof and take into account the increasing sea level rise which will occur over the lifetime of the development.

This was put forward by the applicant, based upon topographic data that the development site is currently 2+m above current sea level.

***LMSERN wishes to challenge that 2+m level. Referring to Adur-Worthing's SWMP 2024 Appendix K (copy attached), the region within which this site sits is in fact below the current tidal level.***

***"GW4 - GW level within 0.025m of the surface and region is below the present day tidal level "***

See GW4 dark red/cerise colour code in:-

[Adur and Worthing SFRA - Appendix K - Tidal Risk Groundwater Zones](#)

**Based on that information, the whole design of the buildings and land build up needs re-thinking and re-submitting. First floor levels to be 6.0 M above AOD will require extremely tall buildings and/or a significant uplift in ground levels. If first floor levels are at that height, that level is equivalent to the height of a pitched roof on a standard 2 storey house!**

**Whatever the level of the site is above sea level, to achieve this condition will mean that the finished development will overlook neighbouring properties with loss of privacy and be totally out of character with the area and the street scene viewed from the A27. That will be totally unacceptable.**

Conclusion

In the interests of our residents' wellbeing, we welcome that the above points can be taken into account.

Irrespective of that, members of LMSERN still object most strenuously to this back development which will bring absolutely no benefit to the North Lancing local community and should be refused.

Yours faithfully

DW Freeman

**Lancing Manor SE Residents Network**

5 Manor Way

Lancing BN15 0QU

11<sup>th</sup> August 2025

bcc: Network Members

