

Please could you kindly confirm receipt of this submission

**AWDM/0706/25 Demolition of existing bungalow at 74 Old Shoreham Road to enable access to land to the rear for the construction of nine dwellings along with associated infrastructure.**

**Site of 74 Old Shoreham Road and Land South of 72 To 88A Old Shoreham Road Lancing West Sussex**

Objection to AWDM 0706/25

Dear Adur Planning,

This submission is on behalf of the 150+ members of Lancing Manor SE Residents Network (LMSERN).

**This network community in North Lancing is fiercely opposed to this highly inappropriate development proposal.**

There are three key reasons for our concern and these are given a subject at a time below:-

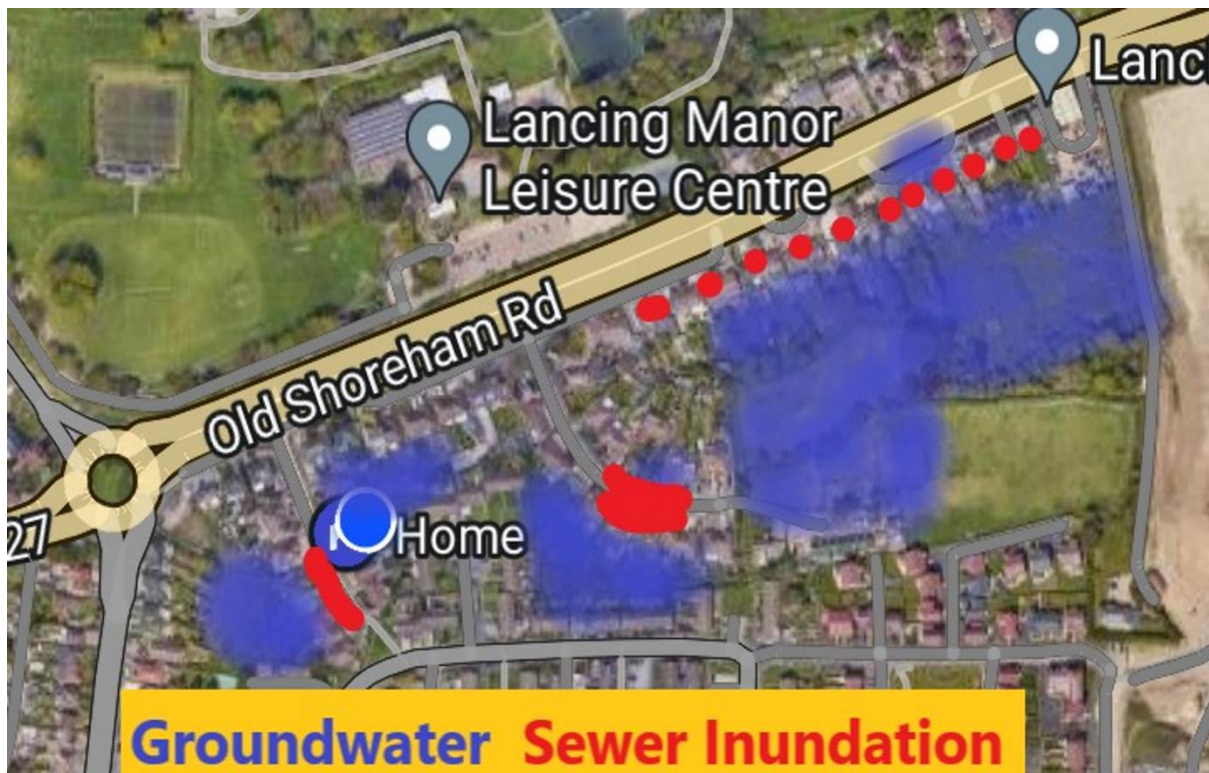
#### Drainage

This 1.5 acre site experiences flooding from rising groundwater in at least 7 out of every 10 winters, as do many of the gardens from Grinstead Lane eastwards across to this site. This is coupled with ground water inundation of foul waste sewers with loss of facilities, This continues for months at a time.

Southern Water have undertaken considerable works to improve the sewer network, but since doing so, SW agree the 'jury is still out' on that. The last winter did not experience high groundwater levels to test whether the inundation problem had improved.

Even with an improved main sewer network, groundwater will still enter the network through faulty, leaking lateral pipes which serve individual properties and are not the responsibility of the water company. In N Lancing area, there are 344 properties involved which can contribute to this problem for this network section.

We definitely do not wish to have a further 9 properties added to this sewer network section which can only add to these problems.



Groundwater garden flooding and sewer inundation – Winter 2023-24

A key drainage ditch flows across the southern perimeter of the site which carries the surface water of all the local road drainage from Grinstead Lane to the Mash Barn Lane including that of the A27. It then flows through a culvert under the Mash Barn Lane into the new Northern Channel to the Archimedes screw pumping station on the west bank of the river Adur.

At this point it should be mentioned that the applicant's contact with the company who designed and manages the northern channel and pumping station gave confirmation that everything was working well regarding this drainage infrastructure.

(see page 3 – item 1.7 of Technical Note - Provisional Drainage Strategy)

This simply is not correct when we have extreme wet winters. In January of winter 2022/23 North Lancing was experiencing heavy groundwater issues with garden flooding and sewer ingress across much of the area including this development site.

At the time, there was work with diggers going on at the pumping station and was this work adversely impacting pumping operations? Their director confirmed to LMSERN these works were not affecting its operations. All was pumping normally. It was pointed out that drainage was not getting off the land in North Lancing. What could be done to try and improve this?

He instituted a check on the northern channel ditch for blockages and also opened a penstock valve to try and supplement flows and relieve pressure on the culvert under Mash Barn Lane. (That penstock valve capped off the original drainage channel into New Monks Farm which was isolated when the northern channel was instituted. That channel connects with the southern ditch network which drained south through the Shoreham sluices.)

**Those actions did not improve the drainage/flooding problems.**

Winter 2023/4 was as extreme with considerable garden flooding and sewer inundation from groundwater from December through to April. This also created flooding on this proposed development site and particularly the rear gardens in Old Shoreham Road which back onto the site.

Southern Water ran tankering operations 24/7 on the sewer network to maintain facilities for many months during both winters 2022/3 and 2023/4.

As mentioned above, this 1.5 acre site floods in these extreme winters. See pictures below. In fact, this plot provides an unofficial attenuation/containment facility when the water does not flow off the land in such winters and backs up before the Mash Barn Lane culvert (into the northern channel) causing the site to flood as flows add to the rising ground water.



Note bull rushes in foreground.





If this is approved, development infill will definitely cause a 'brick in a bucketful of water' effect to worsen the existing flooding problems for the properties in this area of N Lancing and for future occupants of these new dwellings.



The applicant for the New Monks Farm development, Brighton & Hove Albion had first option to purchase this site from the previous owner. They withdrew from its purchase. They had identified the drainage issues with this land.

Below is an extract from the Flood Risk Assessment for the New Monks Farm development confirming that flooding.

*New Monks Farm FRA Pages 10 & 11*

*4.2.1 4.2.2 Historically groundwater springs have broken through the ground surface within the highway fronting number 76 Old Shoreham Road*

*4.2.3 Groundwater flooding is present on the Monnery Land between Manor Close and Mash Barn Lane during periods of high groundwater levels in the winter months. This has also resulted in flooding of the northwest corner of the proposed development site where the existing ground level is in the order of 2m AOD.*

See photo below of the groundwater stream emergence in the mini crescent. In wet winters this is always the first sign of rising groundwater problems and is LMSERN's alert to Southern Water to shortly put in place tankering support to maintain foul waste facilities. Usually, these are required initially in Manor Close or the Grinstead Lane and, followed by Old Shoreham Road and if it escalates, Manor Way.



**Groundwater emergence in mini crescent for 68 – 78 Old Shoreham Road.**

Over many years these problems have had a tremendous impact on the quality of life for the community who live in N Lancing. Absolutely, there needs to be no further impact on that with this development proposal.

With all the infill of the so far developed New Monks Farm site, winter drainage problems have most certainly worsened during wet winters with extreme ground water levels.

Because of those many years experience with these issues, North Lancing residents know instinctively that this site, if developed, will cause increased flooding problems in the area. The land is virtually flat from Grinstead Lane going eastwards across to the River Adur. Further infill will increase these drainage problems.

The applicant has failed to comply with NPPF and guidance and Adur planning Policies 35 & 36 to demonstrate with evidence that there will be no impact of flooding elsewhere or for the site itself.

**Both WSP and the Environment Agency have refused to approve the drainage proposals submitted because they do not comply with planning guidance and the NPPF in terms of providing evidence that this development will not cause adverse drainage issues for the site and elsewhere.**

**This is why LMSERN members and local residents are strongly opposed to this inappropriate development.**

**Categorically on community flooding concerns alone, it must be refused.**

Essential reference material regarding groundwater and flooding  
Adur & Worthing have drainage reports which deal with all flood risk and drainage matters for their areas. The link below opens all these documents plus the two groundwater maps below.

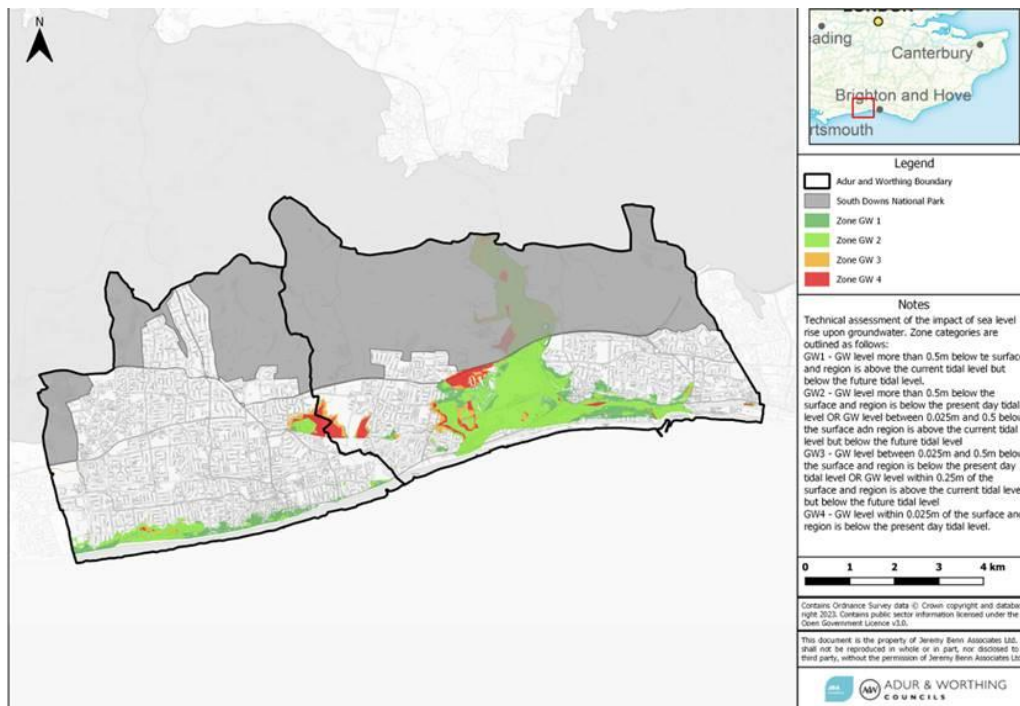
<https://www.adur-worthing.gov.uk/planning-policy/joint-aw/adur-and-worthing-background-studies-and-info/flood-risk/>

Reading the submitted documentation for drainage so far, while ground water is acknowledged as a source of flooding – in this area it is the main source of this drainage problem – the application has failed to consider this aspect in respect of the scheme and to prove it will not adversely impact other areas.

These maps in the above Adur documents are important references for this aspect of this development plan.

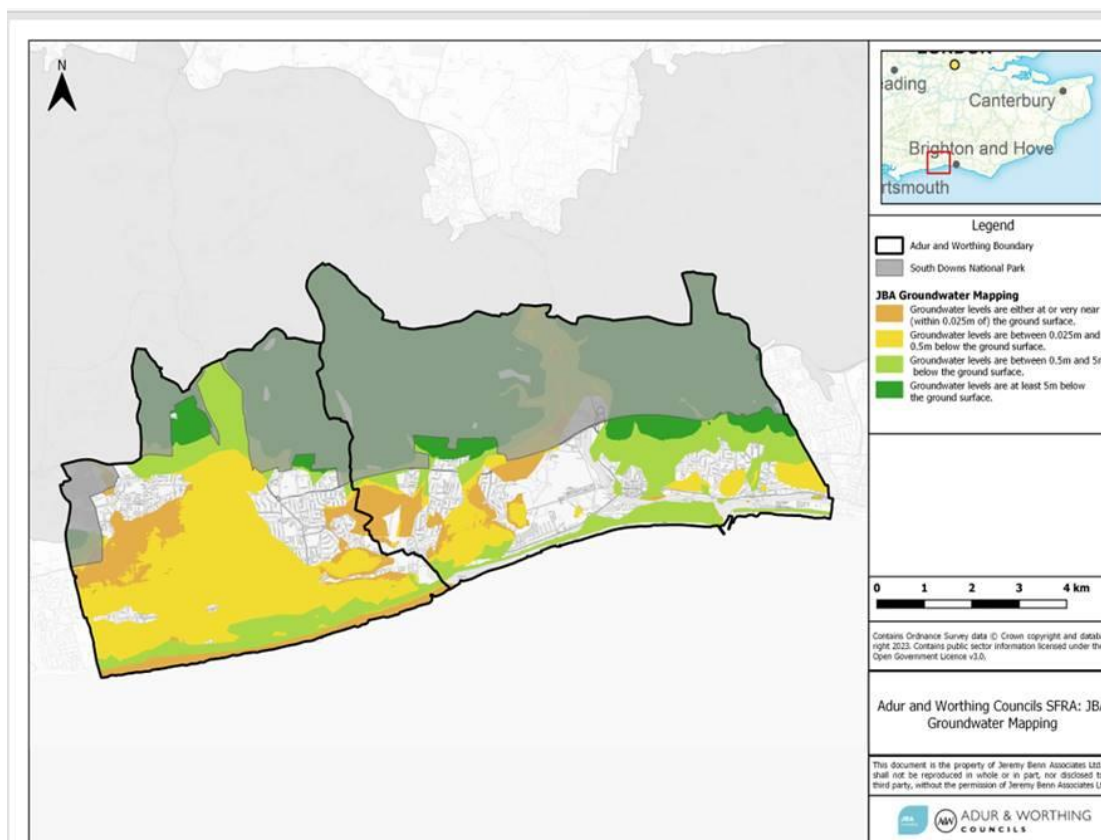
## 1. A-W Groundwater levels in relation to tidal levels - appendix J

Note: GW4 - GW level within 0.025m of the surface and region for this site is below the present day tidal level. Colour code: Cerise.



## 2. A-W Groundwater levels map – appendix k

Note: Groundwater levels are either at or very near (within 0.025m of) the ground surface. Colour code: beige.



**LMSEARN is certain that the two maps above clearly show the hazards of permitting development of this site. It is located in a region which is below current tidal levels with a groundwater level of only .025m below or very near the ground level.**

### Transport & Access

Residents cannot believe that a planning application for this back development using the small mini crescent as the access to the site would even be considered.

The Lancing section of the A27 has been at over capacity for many years. Every rush hour, long tail backs occur along the westbound carriageway from beyond the new New Monks Farm Roundabout to the Manor Roundabout. Every additional vehicle will add to delays and air pollution increase.

For the latter this stretch is known to be very high for pm 2.5 particulates, and well in excess of NO2 levels – levels far above WHO guidance.

**In the interests of public health, the applicant should be requested to provide a report to demonstrate that with the additional movements there will be no further impact on the already unacceptable levels of air pollution.**

The projected 34 additional vehicle movements a day into this strategic road using a highly constricted mini crescent is simply not common sense. With 18 parking spaces for the 9 properties, we believe that this figure is under called particularly when you add deliveries and service vehicle movements into the count. Tail backs occur during many different times of the day other than rush hours.

**LMSEARN residents vehemently object to the applicants recommendation to create double yellow lined ‘no parking’ restrictions in this small crescent.** Parking space for existing residents is already at a premium, as observed by the transport report. The only reason this is proposed is because this short slip road is only 4.8m wide and they claim large lorry type traffic cannot access without running wheels over the grass verge. If no waiting is implemented where will all the displaced residents park where there is nowhere else to go locally? **For once, the existing community should be supported in this to preserve their parking amenity and not lose it at the expense of a profit making developer with a scheme which for many reasons is totally inappropriate for the area.**



Irrespective of that, the tracking plans for vehicle movements are questionable as to their accuracy. Particularly for the fire tender and dust cart drawings. Currently, the waste collection vehicles never enter the crescent. They remain in the nearside lane of A27 and do their bin collections from there. The access turn for this slip road is extremely tight both into and out of the mini crescent which is probably the major factor why dust carts operate from the main road.

**We request that the fire, waste collection and postal services be consulted on this access proposal.**

The proposal to sign in and out as a one way route is unacceptable. There is already too much signage in the area. This is not necessary. Drivers instinctively follow a one direction of flow westwards for entering and exiting this slip road. It does not require signage to do that.

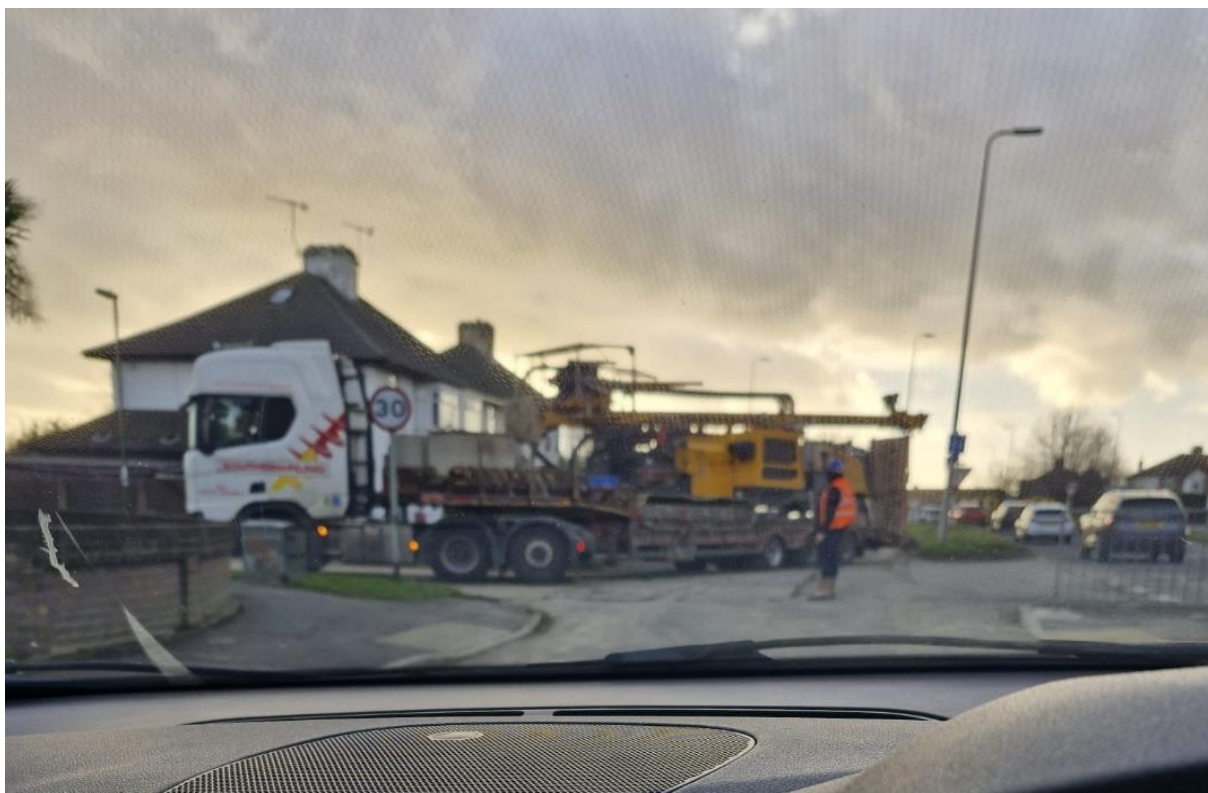
The other concern is that this slip road is part of a very busy, well used 'two way' official cycleway. Already, residents are aware of near accidents for this cycleway in the vicinity of this slip road. More traffic – more likelihood of accidents. One way signage stipulation would nullify the two way flow and create confusion for those cycle users on a pathway which cycling groups have already complained is sub standard along this section. So another reason to leave things as they are with no additional signage.

**LMSEEN requests that Sustrans be consulted on this from a cycling and active travel aspect.**

#### Construction traffic

This is of major concern to residents. The Transport document has totally failed to address construction traffic regarding access into and out of the site.

There is absolutely no way that a large articulated lorry (up to 16.5 x 2.6m in size) , will be able to enter the site without turning across the grass verge with having to pass the eastern entrance to get the right angle of turn across the verge into the access road of 74 into the site. And coming back out into the A27 will be the same issue. If it's a low loader as shown below, the access problem is worse, if not impossible. And that manoeuvre is currently not possible without removing A27 lighting, a flashing 40 mph warning sign, trees in the verge and damage to the grass verge and kerbstones.



**Low loader delivering to 4 Old Shoreham Road development**

A major concern - if approved, this 9 house build will continue for maybe up to 2 years. There will be a constant daily stream of such vehicles and large earth/materials bearing lorries damaging the road environment and causing traffic issues for residents and the A27 with great noise, filth and dust and unacceptable disruption for the community. Such a constricted access within this residential area simply is not acceptable for such long term disruption. Queuing lorries on the A27 will cause delays and further disruption for the overcapacity A27. Impacts on the neighbouring Nos 72 & 76 will be severe.

**LMSEEN strongly recommends that officers for highways, planning and planning members should visit the mini crescent to see the reality of just how impractical and constricted this access will be. This access fails to comply with Adur Local Plan Policy15 4.9 regarding safe access to the highway network and harm to highway safety.**

**There is no other access possible. This in itself is another reason to refuse this application.**

## Flawed Ecology Management Proposals

This site is known locally to contain high levels of flora and fauna together with the neighbouring plot, its woodland and the ditches which run through both sites.

Badger, fox, hedgehog, slow worms, many bird species both tree living and aquatic, bats, badger and deer.

Developers have to give evidence of a 10% Biodiversity Net Gain (BNG) to demonstrate their improvement of the ecology in such a site.

Whilst there are documents which have looked at the presence of bats and greater crested newts in the site there has been no in depth assessment carried out for the appropriate length of time to gather a full understanding of all of the area's biodiversity as per the creatures (and flora) mentioned above.

The Adur Local Plan indicates this is a strong natural habitat area and within the New Monks Farm Policy which should be enhanced with a Biodiversity Action Plan.

**The documentation submitted fails to show enhancement and meet the BNG requirements which are now part of planning law rules. LMSERN requests that the authority uses an ecology consultant to appraise these submissions..**

## Conclusion

**This development proposal brings no real benefit to the Adur community.**

**With its extremely confined access, its impacts on the A27, on the existing residents and their well being with increased flooding, loss of amenity and quality of life plus the failure to evidence progressive improvements in the area's biodiversity, we most strongly insist that this application should be refused.**

Yours faithfully,

DW Freeman

**Lancing Manor SE Residents Network**



11<sup>th</sup> August 2025