Could you kindly confirm receipt of these comments and provide copies of them to the Environment Agency and WSP.

Also could you please correct our last submission and amend it as coming from Lancing Manor SE Residents Network and not under the name of the undersigned.

Ref: AWDM/0706/25

Dear Adur Planning,

Lancing Manor SE Residents' Network (LMSERN) is responding to the further documents to do with drainage and ecology submitted for the above application.

These comments should be read in conjunction with the previous two submissions from this Network.

Drainage this Winter

Firstly, we would alert you to the rising groundwater problems which have been occurring this winter for at least the last 6 weeks and are still continuing in the neighbouring roads/gardens. The problem as ever also applies to the 74 Old Shoreham Road application site.

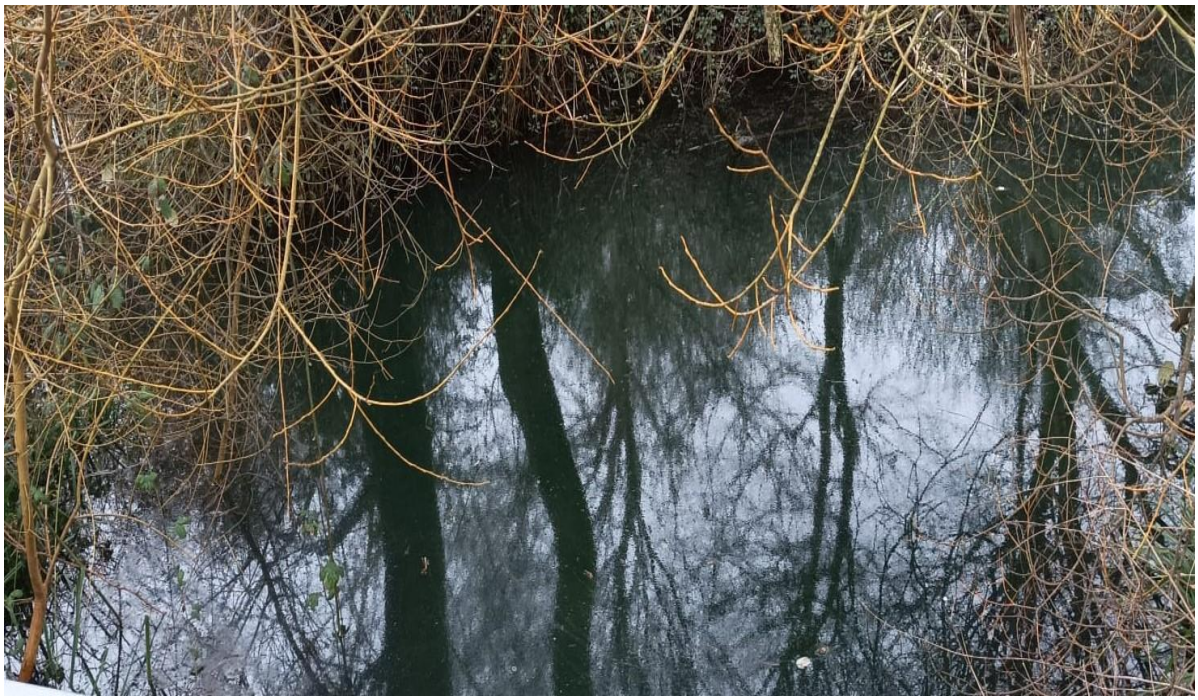
Below is a picture of the 7th March showing tankering to reduce sewer network levels by Southern Water to maintain foul waste facilities for residents because of ground water surcharging.



Also below, pictures of 8th February showing once again, the 74 Old Shoreham Road application site experiencing flooding from rising ground water.







The prelude to this problem is always the intermittent streams which emerge through the tarmac in the slip road/mini crescent when aquafers surcharge and cause road flooding. Photos below taken on the 8thFebruary are evidence to this again this winter.

Residents' loss of sewer facilities with garden flooding from high level groundwater always follow when this occurs.




No 78 -68 Old Shoreham Road (Slip Road) 8.2.26

As evidence of the level of groundwater (see photo below of the 8th February), the immediate neighbour at 72 Old Shoreham Road had dug channels around the perimeter of their front area in preparation for adding to their driveway.. The ground water rose to a level to completely fill those channels.

This clearly demonstrates what the level of ground water is in the area including for the neighbouring property next door at 74 Old Shoreham Road and the application site behind.



This groundwater drainage issue in sustained heavy wet winter periods simply cannot be ignored. A finished up detailed scheme also taking this fully into account must be presented for officer/committee consideration before a decision is taken.

Comments against the Submitted Drainage Scheme.
The applicant's drainage consultant has submitted a scheme which he admits is not finished up because it requires investigation into ground water levels to design in all factors which can impact drainage..

It is obviously their intention to receive an approval with a post condition before a final drainage scheme needs to come forward. To comply with that post approval condition, groundwater investigations would be carried out after scheme approval .

From the evidence above, the history of the area and the wellbeing concerns of local residents, with all the area's drainage sensitivities because of rising ground water, a post approval condition is simply not good enough!

LMSERN is adamant that a full, finished up scheme should be submitted which takes groundwater fully into account for officers/drainage consultees/planning committee to consider before any decision is taken.

Surely, the applicant will have been aware over the last two months of the high groundwater levels which the area and the development site have been experiencing. Why were these investigations of levels not done during this period?

Obviously investigation results done during dry Summer months will provide much more favourable results which do not answer the question of high level ground water management as experienced during winter months !

A post approval condition for such a key matter as drainage in this area simply is not good enough.

LMSERN has witnessed such post approval conditions for drainage where, after approval, a scheme is submitted to comply with a condition . The scheme submitted was accepted even when Adur's own engineer would not accept the drainage metrics!

What has been presented so far clearly fails to comply with NPPF paras 170,171 and footnote 63 of 176.

Residents are certain that with all this infill of development, drainage conditions will only worsen to their detriment. The authority is strongly requested to refuse this application on this alone.

Note: DEFRA Magic Maps identify this site as 'grazing marshland'. That surely should preclude its being approved for development!

Ecology
A Biodiversity Net Gain (BNG) report has been submitted. It has been developed from desk research and has also referenced an ecology/environmental assessment of the site carried out for Adur DC in 2025 by Surrey Wildlife Trust (SWT) – see link:-.
https://www.adur-worthing.gov.uk/media/Media,173127,smxx.pdf

SWT Report - Extract from page 41

Site G is the third largest of the eight potential site allocations. It does not fall within in any statutory or non-statutory designations, or BOA. However HPI habitats are present including lowland mixed deciduous woodland and CFGM. Ecologically valuable habitats including lines of trees, rural trees and ditches are also present. The connectivity analysis indicates the site provides notable connectivity, with a key ecological corridor passing through the site. This corridor connects to a core nature area immediately to the north of the study area boundary, and beyond this core nature area there is high resistance to dispersal (see Figures 6 and 7). Further, as presented on Figure 7, it provides a key corridor for dispersal from the core nature area to the wider area of study area; evidenced by the multiple routes it divides into to the south-east, south and south-west. As above, it is also near the A27 where there is a relatively higher resistance of dispersal. There has been significant development around this since 2019 with a residential development constructed to the south and southeast, and further development likely to take place to the East*. This has fragmented the habitats present on site, which makes conserving and enhancing the connectivity corridor an imperative. It should be noted that this site falls within Flood zones 2 and 3 (GOV.UK,)

*Phase 2 New Monks Park, commercial development & school

This report clearly endorses why this site (as stated within the Local Plan 2017, Policy No 5) should be treated as a Biodiversity Action Plan area to enhance biodiversity.(and should not be built upon).

See also, pages 122-131 of the SWT report for full detailed assessment information of the site.

The report informs that DEFRA MAGIC mapping identifies this 74 Old Shoreham Road site as ***'grazing marshland'****. With development, Its loss inevitably will negate its carbon retention benefits to the area and the environment.*

The SWT report also identifies that the site is an area which combines all three, key 'Habitats of Principal Importance'- classed by DEFRA MAGIC maps as priority inventory habitation (England).
These are:-

Grazing Marsh Land
Waterways
Woodland.

The SWT report also states that this is a strategically important habitat site for fauna and flora and pathways which imperatively should be conserved and enhanced to preserve the connectivity corridors for nature to other habitats in the area. (e.g. the Lancing Ring Nature Reserve in the Downs above). *See highlighted paragraph in the above extract*.

This site is a key area to preserve what we have left of nature in Adur. With the SWT evidence, this is a further reason not to approve this development.

Adur is holding a public consultation on an SPD (Supplementary Planning Document) for assisting applicants with the ecology matters of their developments-- all part of Adur's policy to improve and green up the district for nature and the environment. *Approval of this application certainly does not comply with those aims.*

The BNG submission is not exhaustive on species identification because the SWT assessment in 2025 was carried out by walkovers not long term examination over a number of suitable months

It states for example that badgers may be present based on anecdotal evidence. LMSERN knows that setts/outliers have existed within the site for decades as registered by the Badger Trust.
Residents have sightings of Roe Deer who forage in the area. A resident who backs onto the proposed development site regularly feeds hedgehogs coming into the garden from the site in the months when they are not hibernating. There will most certainly be other such wildlife which only a long term examination will identify..

The applicant most certainly has failed to undertake such a long term physical survey.

Adur does not have a qualified ecology officer. Biodiversity and BNG metrics are complex matters,

With such a key site for ecology and the applicant's BNG report which needs professional assessment, LMSERN strongly requests that the authority seeks an independent assessment of that BNG report from a qualified consultant.

Particularly as this site is such an important area for biodiversity within Adur, as evidenced by the SWT report.

If that is agreed, it would be welcomed if these LMSERN comments also be passed to such a consultant.

It should be noted that Adur commissioned an independent consultant's assessment for a report submitted by an applicant on similar concerns for biodiversity on the site behind 20 Firle Road, Lancing. Why not for this equally as sensitive site at 74 Old Shoreham Road?

Background Information

This site has been listed for potential development in the authority's SHLAA 2025 list.

LMSERN and local residents have been campaigning continuously that this site should be deleted from the SHLAA. for all the reasons which have been outlined here and in LMSERN's two previous submissions. The local ward councillor even had to challenge this green site's inclusion in the brownfield register! It was deleted, but, so far, community wishes to take it off the SHLAA have not been responded to or actioned.

The above evidence is proof that that deletion from the SHLAA is absolutely appropriate.

Conclusion
This application with its unresolved problems of drainage, ecology/environmental sensitivity and totally unsustainable access once again brings LMSERN to strongly insist that the authority refuses this application, in the interests of the local community and the public and users of the A27.

Your faithfully,

DW Freeman
Lancing Manor SE Residents Network
5 Manor Way
Lancing BN15 0QU
[redacted]
bcc: Network Members