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Planning - <planning@adur-worthing.gov.uk>

FW: AWDM/0219/23

1 message

[redacted] 13 March 2023 at 07:33

To: Gary Peck' <gary.peck@adur-worthing.gov.uk>, planning@adur-worthing.gov.uk

Could you kindly confirm receipt of this submission

Please note: a further two attachments will be sent on a follow up email because of file sizes. Please add them to the submitted comments below.

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AWDM/0219/23 | Approval of Details Reserved by Conditions: Condition 6 (Construction Management Plan) ; Conditions 7, 8 and 9 (Surface Water Drainage Scheme and Watercourse details); Condition 11 (Soft and Hard Landscaping details); Condition 12 (Schedule of Materials and Finishes) of approved application AWDM/1802/19 | 6 Old Shoreham Road Lancing West Sussex BN15 0QT

Dear Mr Peck,

In respect of this application for discharge of planning conditions we would comment as follows:-

Construction Plan

1.This plan notifies that construction is being planned to commence in April this year. What appears to have been overlooked is the condition 4 shown below. This Traffic Regulation Order requirement is for 'no waiting' restrictions on the junction of Manor Way and Old Shoreham Road.

Without prior discharge of this condition, then construction will not be permitted to commence in April this year. Has this TRO been applied for? If so, should there not be documentary evidence for this and its implementation? Also when will the waiting restrictions be implemented by WSCC and their confirmation of the execution of the order to the planning authority? In their comments, WSCC Highways have overlooked this requirement unless, that is, a TRO has been approved.

The construction plan does not indicate management for construction traffic flows for the site which surely must also be approved by National Highways through the planning authority as per condition 6 below?

> 04. No part of the development hereby permitted, except for the demolition of the existing dwelling, shall commence until the necessary traffic regulation order to implement the waiting restrictions at the junction Old Shoreham Road with Manor Way shown on Civil Engineering Practice's Drawing No. 120 "Proposed Site Access Arrangement and A27 Access Alterations" dated April 2018 has been made and approved and the local planning authority have obtained confirmation in writing from the local highways authority that they are in a position to implement the waiting restriction.
>
> Reason: To ensure that traffic can negotiate a U-turn between the service road and the main carriageway of the A27 Trunk Road at its junction with Manor Way and to ensure that the A27 Trunk Road continues to be an effective part of the national system of routes

for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

06. No part of the development hereby permitted shall commence until a Highways England Planning Response (HEPR 16-01) January 2016 Construction Management Plan has been submitted and agreed in writing by the local planning authority (who shall consult Highways England). Construction of the development shall then be carried out in accordance with the agreed Construction Management Plan.

Reason: To ensure that construction of the development does not prejudice the free flow of traffic and conditions of safety on the highway, nor cause inconvenience to other highway users, and ensure that the A27 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

2. In consideration for local residents in adjoining roads, could the construction plan make provision for all site workers and materials deliveries to park their vehicles on site?

3. Old Shoreham Road is 4.8m wide. Large construction vehicles will have problems accessing the site through that slip road off the A27. Can we request that large vehicles be instructed to gain access from the existing approved entrance off the Manor Roundabout?



Lorry mounts verge to deliver to the site

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Land Relevelling

We draw attention to condition 14 below. In 2016, without planning approval, the site was levelled and up to 300 mm of MOT/tarmac planings rolled out across the site. Also, an unapproved drainage sump and surface water drain was connected to a manhole which is within the culvert which serves surface water flows from Grinstead Lane to the ditch network to the east.

Within one month of the application approval (14th May 2020) the condition below, required a plan from the applicant to restore the site to the original ground levels.

Almost 3 years later, no plan has been noted and this condition has not been complied with.

Removal of this surface will have consequences for the abundant wildlife, natural habitat within the site. See further comment below.

14. Within 1 month of the date of the permission for the development hereby approved, a scheme shall be submitted specifying the timetable for the removal of the unauthorised hardstanding on the site, together with details of any restoration of the site pending the commencement of the development hereby approved.

Reason: The retention of the hardstanding is unacceptable and should be removed prior to the commencement of development on the site in the interests of visual amenity and to ensure compliance with the agreed drainage solution.

Drainage

The drainage scheme and site plan is noted.

1.Application AWDM/1802/19 was approved. However, the submitted drainage scheme was still not approved by Adur Technical. Drainage for the area is critical and it was agreed by the planning committee that the final drainage scheme, when approved by Adur Technical, must come back to the committee for its final approval. (motion by the then member, Cllr David Balfe - carried and agreed). So, this should apply to whatever scheme is finally accepted by Technical.

The drainage scheme tabled is dated 2021 and in our regular updates on area drainage matters with the consulting engineer for Adur there was confirmation that no scheme had been approved.

The scheme submitted is obviously the latest put forward (dated 2021) and was not approved by Technical at that time. That information can be confirmed by the then engineer's files.

Regarding the drainage plan it is noted that the culvert which drains the Grinstead Lane area across the site is to be opened up as a ditch. We would request that trash screens be installed at the three outfall headwalls HW 4, 5 & 6. The Doctor's Ditch behind number 3 Manor Way experiences considerable rubbish in the now improved ditch across that land. Already, a manhole at the rear of 7 & 9 Manor Way needs clearing of rubbish. Flows go from that manhole/culvert run into the Doctors Ditch.

Once again this Winter North Lancing experienced significant groundwater flooding with sewer inundation/loss of foul waste facilities. flooded gardens, loss of power and gas facilities plus A27 closures/disruption from flooding. This groundwater flooding included 4 OSR site and many gardens in the area, particularly nearby rear gardens in Manor Way adjoining the site. All experienced flooding from rising groundwater.

See evidence in picture below/attached videos.



4 Old Shoreham road – Gound water flooding Jan 2023

The drainage scheme only addresses surface water flows/precipitation and its attenuation. It fails to acknowledge the site and area flooding from rising groundwater. Before (and since), the unapproved resurfacing and sump drain, 4 OSR regularly experienced up to 300mm winter flooding from rising groundwater for weeks at a time – see picture below



4 Old Shoreham road – Gound water flooding Jan 2016 – prior to levelling/ MOT//tar planings surfacing

The rear of the site with substantial building development and the access road infill will not help this groundwater problem. Like ‘a brick in a bucketful of water’ substantial infill will only exacerbate this problem with impact on the properties around and the site itself.

It is noted that the approved application also includes a higher wooden walkway as a means of safe escape in the event of flooding for the two detached properties.

Those dwellings will be located within the area which suffers flooding from groundwater. This drainage characteristic will continue. There is no apparent provision in the drainage scheme to cater for managing this and common sense says that these proposed properties will have issues in the Winter months of extreme wet weather as experienced once again this year. **So, whatever plan is finally approved simply must take account of this aspect of groundwater drainage in the interests of the neighbouring properties and the site itself.**

2.Where is the maintenance manual and its financial management for the drainage scheme and its attenuation? If starting work in April, this should be submitted now prior to commencement of any works. The following condition applies

> 08. Development, other than the demolition of the existing dwelling, shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.
>
> Reason: To ensure adequate maintenance and management of the surface water drainage system.

3.The following advisory will require complying with once a drainage scheme is approved and the lead authority's approval should be evidenced prior to commencement of any works. Will this be achieved by the stated April commencement date?

> Advisory
>
> 05. Under Section 23 of the Land Drainage Act 1991 Land Drainage Consent must be sought from the Lead Local Flood Authority (West Sussex County Council), prior to starting any works (temporary or permanent) that affect the flow of water in an ordinary watercourse. Such works may include culverting, channel diversion, discharge of flows, connections, headwalls and the installation of trash screens. The development layout must take account of any existing watercourses (open or culverted) to ensure that future access for maintenance is not restricted. No development is permitted within 3m of the bank of an ordinary watercourse, or 3m of a culverted ordinary watercourse.

Pile Driving

It is noted that because of ground instability Piling is proposed for the construction of the two detached properties at the rear of the site.

A matter for local residents' concern is an exacerbation of the drainage problems experienced most winters. How deep will the piles go? Will they create an artesian effect to bring up groundwater? We refer to the WSCC SWMP 2015 report by CH2MHill

https://www.westsussex.gov.uk/media/6139/lancing_swmp_final_technical_report.pdf

Sections 3.4. 3.5 and 5.1 confirm the geology and ground water characteristics and propensities for groundwater flooding of the North Lancing area. We draw attention particularly to 5.1.1.4 regarding this flooding in the immediate location of the site.

During the tests, was groundwater encountered? This intrusive testing was undertaken after a very dry Winter followed by a Summer with drought conditions. The findings may not

show the groundwater levels which are the repeated cause of Winter flooding.

Will piling cause puncturing into to the underlying chalk aquifers to make these frequent problems of flooding worse?

Whatever the case, we ask that the drainage scheme for this site provides an answer to the management of these frequent issues for the site. Groundwater flooding with sewer inundation has occurred at least 8 times in the last 11 years. Residents are very concerned that this problem is not made worse. Please refer to the CH2MHILL report above.

Should there not be a submitted report for the intrusive ground inspection carried out in 2022 as evidence to support the need for piling?

Landscaping

Two points to make.

1)There is conflict with the wooden escape route platform on the west of the site. The landscape plan indicates the planting of hedgerow on that part of the boundary.

2) On the eastern boundary behind 8 Manor Way there is an existing mature willow tree with a hawthorn growing up through it. Is this tree/hawthorn to be removed? Neither removal or retainment of this tree is shown on the landscaping documents.

Ecology

Attached is a spreadsheet which denotes all the sightings in the site for birds, insects, invertebrates and mammals for which this site has become a habitat. This data of approaching 50 species has been provided to the Sussex Biodiversity Record Centre of the Sussex Wildlife Trust.

With the level of biodiversity which is apparent, before any site relevelling or construction work is carried out, there are concerns that this will create significant harm to the abundant nature within this site.

To comply with Adur's Local Plan policy 31 to protect biodiversity, we would request that a professional ecology assessment be carried out prior to any works to plan and manage this aspect and to demonstrate how a Biodiversity Net Gain can be evidenced and achieved with this management.

It should be noted that already birds are building nests in the area, As confirmed by Natural England nesting season runs from February until August.

Referencing the demolition of the old building in Springtime 2020 when no heed or proper care was taken for this and with no ecology management to protect birdlife and probably bats and mammals within the building, an assessment and plan to manage this will ensure that there will be no infringement of the relevant wildlife acts.

Roads

We would draw attention to two matters concerning the Old Shoreham Road extension into the site.

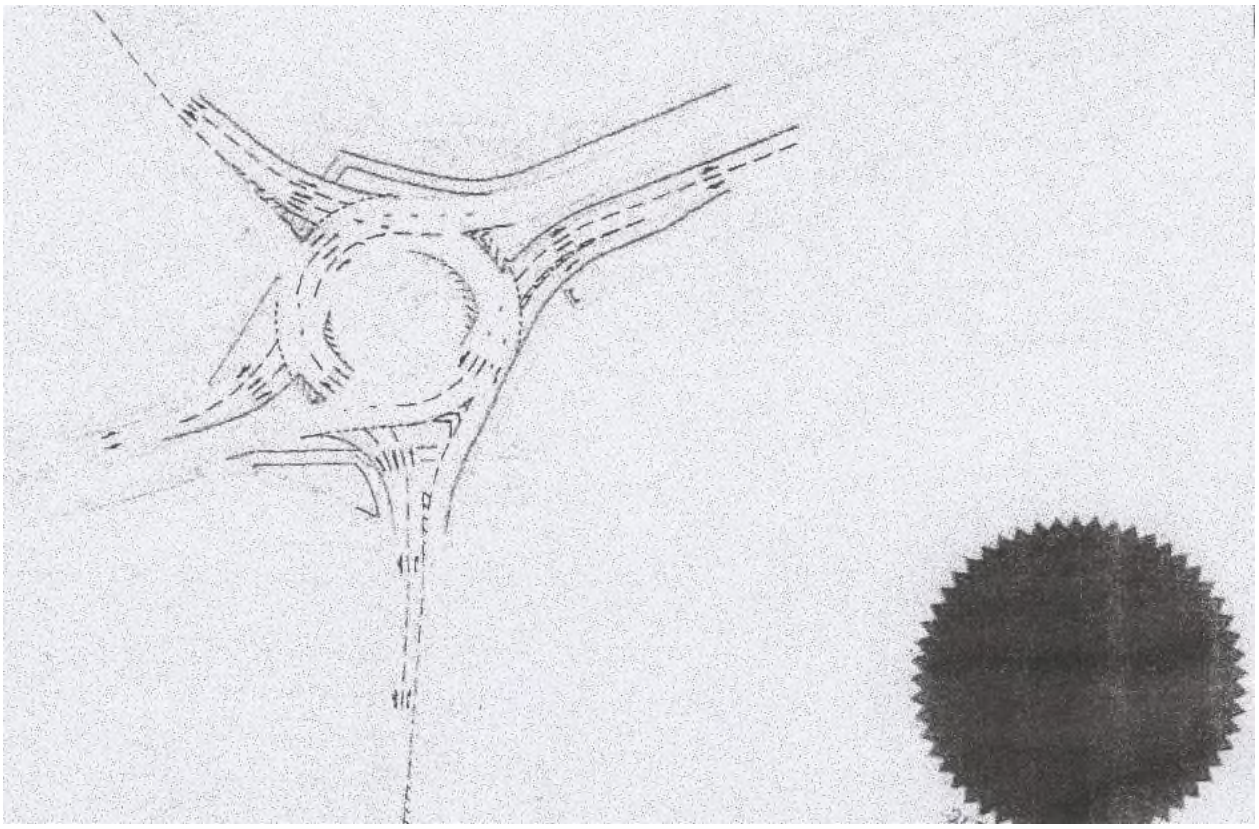
1.Approximately one metre from the existing dead end of the road there is a power substation. This was installed in 2017 for the new A27 street lighting by UK Power Networks for Highways England (now National Highways). This will need relocation to

permit the road extension into the site. Presumably, the applicant has made suitable arrangements for that relocation with National Highways?



Power box for A27 street lighting.

2.As part of the February 2020 approval for the New Monks Farm development there is an S106 agreement for the improvement of the Manor Roundabout. The plan below shows the addition of a filter lane into the Grinstead Lane. This will require land take of the green verge which separates the A27 west bound carriageway from Old Shoreham Road. With the land take involved is there likely to be conflict with the proposed road extension into this development site?



Final Comments

The local community has strenuously objected to this development and all the previous ones which were not approved., Particularly on drainage and road scheme concerns.

Residents view that this submission for discharge of planning conditions is far from complete, particularly when the applicant is looking to commence construction in April.

Bearing in mind that planning consent expires for this proposal on 13th May 2023, we request that with the closeness to the declared April construction commencement date, these reserved matters should come back to planning committee for consideration.

Yours sincerely

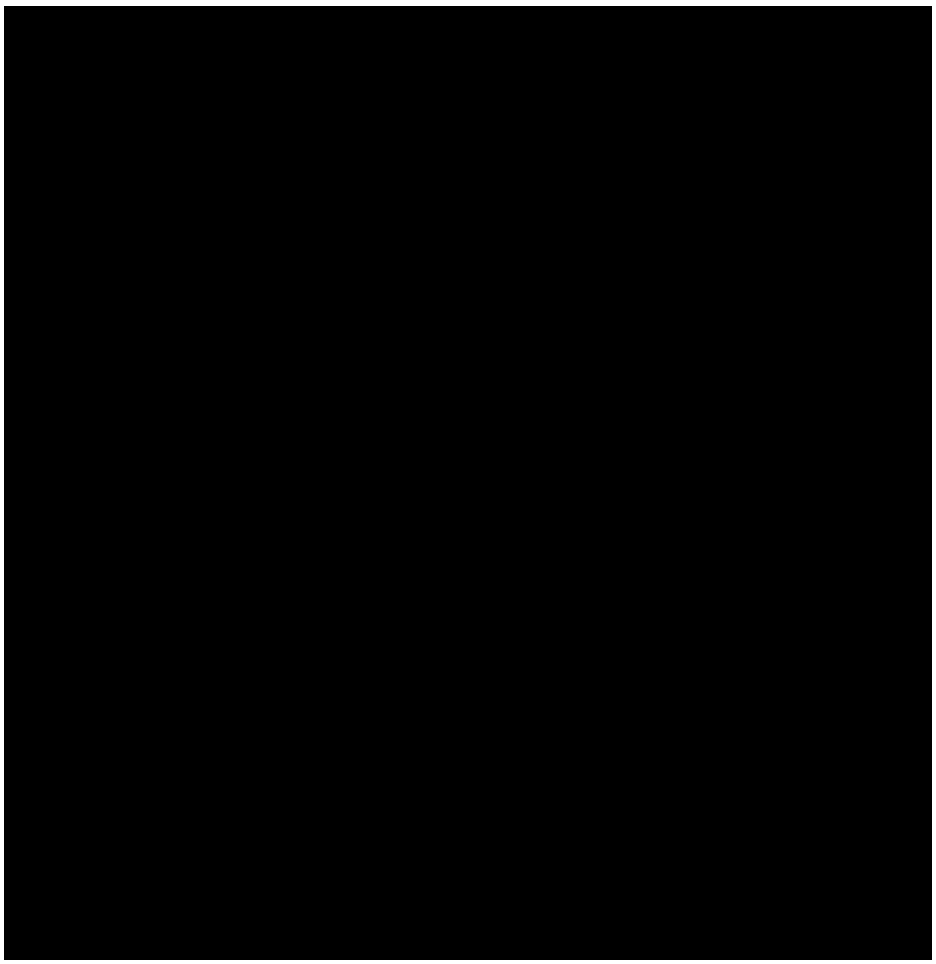
Bill Freeman

Lancing Manor (S.E.)

Residents' Network

Adur Floodwatch Group

CCs The Residents







SpeciesName	Date	Abundance	Location Name	Grid Ref	ViceCounty	Recorder	Determiner	Sample Method	Comment
Bird Species									
Sparrowhawk	Dec-19	1	4 Old Shoreham Road Lancing BN15 0QT	50.8360-031652		Chris Coole		Observed from 8 Manor Way backgarden	
Wood Pigeon	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Ringed necked Dove	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Starling	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Hedge Sparrow	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Gold Finch	End of August 2019		Ditto	Ditto		Ditto		Ditto	
Bullfinch	Occasionally during 2019		Ditto	Ditto		Ditto		Ditto	
Green Finch	Early August 2019		Ditto	Ditto		Ditto		Ditto	
Yellow Hammer	Occasionally during 2019-20		Ditto	Ditto		Ditto		Ditto	
Blackbird	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Song Thrush	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Wood Pecker	End of July 2019		Ditto	Ditto		Ditto		Ditto	
Jackdaw	5 regularly roost in derelict bldg	5	Ditto	Ditto		Ditto		Ditto	
Magpie	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Pied Wagtail	Occasionally during 2019		Ditto	Ditto		Ditto		Ditto	
Coal Tit	Occasionally during 2019		Ditto	Ditto		Ditto		Ditto	
Blue Tit	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Long Tailed Tit	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Pigeon	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Heron	twice in garden of 8 Manor Way		Ditto	Ditto		Ditto		Ditto	
Robin	twice in garden of 8 Manor Way		Ditto	Ditto		Ditto		Ditto	
Wren	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Collared Dove	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
White Dove	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Butterflies/Moths/Insects									
Smalll Blue	Regularly during 2019-20								
Gatekeeper									
Painted Lady	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Tortoiseshell	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Red Admiral	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Cabbage Whire (Small & Large)	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Common Blue	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Orange Tip	Jul-20		Ditto	Ditto		Ditto		Ditto	
Small Copper	May-20		Ditto	Ditto		Ditto		Ditto	
Skipper	Aug-19		Ditto	Ditto		Ditto		Ditto	
Speckled Wood	Apr-20		Ditto	Ditto		Ditto		Ditto	
Brimstone	Jul-19		Ditto	Ditto		Ditto		Ditto	
Buenet 6 spot			Ditto	Ditto		Ditto		Ditto	
Meadow Brown	May-20		Ditto	Ditto		Ditto		Ditto	
Comma	May-20		Ditto	Ditto		Ditto		Ditto	
Small Heath	Apr-20		Ditto	Ditto		Ditto		Ditto	
Stag Beetle - femail	Febuary-20		Ditto	Ditto		Ditto		Ditto	
			Ditto	Ditto		Ditto		Ditto	
Other Species			Ditto	Ditto		Ditto		Ditto	
Slow Worm	Summer 2020		Ditto	Ditto		Ditto		Ditto	
Hedgehog	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Red Fox	Regularly during 2019-20		Ditto	Ditto		Ditto		Ditto	
Toad	Mar-20		Ditto	Ditto		Ditto		Ditto	