

From: **Mijhan Blann**

Date: Thu, 30 Jul 2026 at 20:15

Subject: Objection to Planning Application: AWDM/0810/26 - Site: Barns at New Salts Farm, New Salts Farm Road, Shoreham-by-Sea

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Application Reference: AWDM/0810/26

Address: Land and Barns New Salts Farm, New Salts Farm Road, Lancing, West Sussex

Proposal: New development comprising the erection of 10 no. dwellings following the demolition of existing agricultural barns

Case Officer: Giles Holbrook

My Title: Mrs.

My First Name: Mijhan

My Surname: Blann

My Address: 39 Orient Road, Lancing, West Sussex, BN15 8JZ

My Tel. No:

My Email Address:

Commenter Type: Neighbour

Stance: Object

Reason for comment: Design

Highway Access and Parking

Loss of General Amenity

Other

Overdevelopment

Privacy Light and Noise

Trees and Landscaping

Dear Sir,

I am writing as a nearby neighbour, directly opposite the site, to object in the strongest possible terms to the proposed residential development of 10 dwellings at the Barns at New Salts Farm. This application is fundamentally flawed, ecologically destructive, directly violates local planning protections, and fails to provide safe access or viable infrastructure.

1. Conflict with Strategic Green Gap Policy & Previous Site Rejection

Erosion of the Strategic Green Gap: The site sits within designated open countryside inside the Strategic Green Gap between Shoreham-by-Sea and Lancing, which is already critically narrow. Development here extends the urban footprint of Shoreham into the gap, eroding its essential function of preventing the coalescence of the two settlements and setting a dangerous precedent for piecemeal development.

Protection of Iconic Views: The Strategic Green Gap exists to preserve clear, uninterrupted views across open fields to the South Downs, Lancing College, and the historic Art Deco Shoreham Airport.

Prior Rejection by Adur District Council (SHLAA Site ADC/160/19): Adur District Council has previously assessed and **rejected** this exact site for housing in the Strategic Housing Land Availability Assessment. The Council noted that the site lies outside the Built Up Area Boundary, within the critically important Local Green Gap, and within Flood Zone 3 at high risk of tidal flooding.

Undermining Council Land Commitments: Adur District Council purchased the surrounding agricultural land at New Salts Farm explicitly to preserve the Local Green Gap, manage flood risk, and establish a nature reserve. Allowing private executive housing on this enclosed parcel directly undermines the Council's own strategic investment, public promises, and environmental commitments for these fields.

2. Severe Ecological Impact, Protected Species & Loss of Habitat

The applicant has answered "No" to Section 13 (Biodiversity and Geological Conservation), claiming no protected or priority species will be affected. **This response is incorrect and misleading.**

Location within the Weald to Waves Corridor: The site lies directly within the Radiant Zone of the *Weald to Waves* Core Wildlife Corridor. Paragraph 180 of the NPPF requires planning decisions to protect and enhance wildlife corridors to prevent habitat fragmentation.

Breeding Barn Owls & Bats: The existing agricultural barns are actively used for breeding and roosting. Barn Owls (a Schedule 1 protected species) roost in the southern barn and sightings are frequently documented by local residents and I also have personal observations of owls hunting low over the adjoining field. Bats and Swallows are regularly witnessed feeding across and adjacent to the field by me. Demolition and heavy site lighting during construction and subsequent street lights

and residents security lights, will permanently destroy this dark corridor that owls and bats rely on. Should the Barn Owls, Bats and Swallows leave they probably will never return to this Strategic Green Gap.

Documented Local Fauna & Trail Camera Evidence: As an immediate neighbour, my records and backyard trail camera footage confirm an active, interdependent food chain using this land:

Amphibians & Reptiles: Slow Worms, Grass Snakes and Toads inhabit my garden. There is a breeding population of newts in my adjoining wildlife pond (within the applicant's 250m survey radius). Please note The Preliminary Ecological Appraisal Figure 4 states there was only 1, now redundant, pond within this radius.

Mammals: Foraging Foxes, Hedgehogs, and Field Mice. The introduction of domestic pets from 10 new households will introduce heavy predation on this smaller mammal population that owls and raptors depend on.

Winter Bird Populations & Red-Listed Species: During winter, the adjacent fields become heavily sodden with standing water creating a crucial foraging site for **Red-Listed Herring Gulls**, Black-Headed Gulls, Common Gulls, the local Magpies, Crows and Wood Pigeons. A Kestrel (Amber-Listed) is often seen nearby and Starling (Red-Listed) murmurations are witnessed. Historically **Lapwings (Red-Listed)** and other wading birds used these fields during cold winter months as critical feeding grounds when inland soils froze. **Skylarks (Red-Listed)** have been historically seen in the area and likely nested here. Replacing quiet agricultural barns with housing infrastructure and accompanying human activity might well eliminate the possibility of these threatened species returning. Over 38 years I have documented 55 species of bird species from my home including waders, wildfowl, garden, field, hedgerow and migrants. While many are in decline they could successfully return under the Council's Local Nature Recovery and Habitat Connectivity targets provided this land remains open and undisturbed.

Vital Inland Buffer for Protected Habitats: This application site does not exist in isolation. It serves as a vital inland green buffer and ecological stepping stone connecting two major coastal wetland habitats: Widewater Lagoon LNR and the River Adur Estuary. Waterfowl, waders, and raptors regularly navigate this corridor.

Pollinator Corridors: The undisturbed grassland margins support rich insect life including various bee species and diverse butterfly populations of Meadow Browns, Peacocks, Painted Ladies, Red Admirals, Common Blues, and yellow butterflies, either Brimstones or Clouded Yellow. These have all been seen locally. Local moths and insects support the bat population.

Loss of Active Agricultural Infrastructure & Impact on Farm Viability: Agricultural barns are part of the rural landscape. This is an active agricultural site supporting ongoing local farming, not redundant, brownfield or derelict land. The barns provide essential winter shelter for livestock and hay storage. Removing this working infrastructure threatens the viability of farming on the adjoining field, risking

its decline into an overgrown state, especially as Adur District Council's aim to turn it into a wildlife haven has stalled.

3. Severe Highways Hazards, Pedestrian Safety & Lack of Sustainable Access

The development fails to provide safe, suitable pedestrian access, conflicting directly with **NPPF Paragraph 114** and **Adur Local Plan Policy 28**.

Hazardous Pedestrian Routes to Basic Amenities: The nearest convenience store (Little Waitrose at the Shell forecourt) requires pedestrians to take an 18–20 minute round trip along New Salts Farm Road, a narrow, unlit lane lacking a continuous pavement, and crossing the A259 (see below).

Unsafe A259 & Saltings Roundabout Crossings: To reach Little Waitrose, bus stops, Shoreham Beach School or the Beach and any Shoreham Beach amenities, on the south side of the A259, pedestrians must navigate the busy Saltings Roundabout (which lacks controlled crossings) or cross the multi-lane A259 via basic central refuge islands further south or much further north. In practice, people will take the shortest, most dangerous path across multi-lane traffic, particularly hazardous during dark winter months. Inevitably, at times, parents might have no option other than to walk children to school, older children might walk on their own and routine dog walkers who do not use their cars results in walking close to the congested A259 or crossing it.

Direct Personal Observation on Pedestrian Safety: *"Having personally navigated these island refuges with dogs and young children, I know first hand how hazardous and stressful they are. Standing on a narrow central refuge island surrounded by multi-lane, fast-moving traffic is deeply unsafe for vulnerable road users, including parents with pushchairs, school children, and dog walkers."*

Car Dependence & Local Traffic Strain: Because walking routes are hazardous and local town centre parking is restricted for free parking or has to be paid, residents will inevitably rely on private vehicles for even minor trips. Adding 20+ vehicles plus visitors and increasing deliveries daily will exacerbate existing congestion at the Saltings Roundabout, along Brighton Road and the bottleneck on the approach into Shoreham. The nearest Post Offices are in Shoreham Town Centre or at the parade of shops along Brighton Road where more visitors would exacerbate the illegal parking at the top end of The Broadway which is already a difficult exit from the West Beach Estate.

4. Unviable Drainage, Foul Sewage Strategy & Increased Off-Site Flood Risk

The site sits in **Flood Zone 3**, where ground conditions and high water tables create severe hydrological constraints.

Prohibition of Soakaways: Southern Water has explicitly requested that no soakaways be used on site due to the high water table and flood risk.

Surface Water Runoff: While the existing barn plot already contains concrete bases and gravelled tracks, replacing these agricultural structures with 10 residential houses, roofs, and paved driveways will significantly increase the volume of surface water runoff some of which is shown to runoff into the adjoining fields which already becomes saturated in winter.

Flawed Surface Water Attenuation Pond: The proposal relies on an open attenuation pond. However, during winter months, groundwater breaks the surface across this land. An attenuation basin will already be full of rising groundwater and winter rain, leaving zero capacity to store surface runoff during heavy downpours or high tide events ("tidal lock"). This will push displaced surface water onto neighbouring properties, New Salts Farm Road, and lower-lying streets such as The Broadway and West Way worsening the regular road flooding residents on these streets endure.

Omission of Foul Drainage Strategy: The applicant has listed the foul water drainage solution as "**unknown**". Non-mains drainage (such as septic tanks) is unacceptable in Flood Zone 3 due to water pollution risks. The sewage system running through the West Beach Estate is, I believe, at capacity and a few years ago caused many sewage leaks which have been addressed by Southern Water by relining the pipes but doing so does not increase their capacity. The applicant has failed to demonstrate a deliverable foul drainage strategy.

Formal Request for Winter Groundwater Testing: The Council must require full groundwater monitoring directly on the barn plot between **November and March**. Standard summer soil soakage tests fail to reflect the high winter water table.

5. Failure to Provide an Appropriate Housing Mix

The applicant proposes seven 4+ bedroom luxury houses and three 3-bedroom houses.

Overdevelopment: This exclusive, high-end semi-rural cul-de-sac completely ignores documented local housing needs for smaller, affordable starter homes and downsizing options for existing residents. It offers no real benefit to our community.

Policy Conflicts: Developing on a sensitive Green Gap boundary purely to maximise developer profits with luxury executive homes directly breaches **Adur Local Plan Policy 3 (Green Gaps)** and **Policy 20 (Housing Mix)**.

6. Application Errors, Inconsistencies

Floorspace Calculation Errors: The application form quotes existing gross internal floorspace to be demolished as 1,202 sq. m, but lists the proposed new internal floorspace as 0 sq. m (resulting in a mathematically incorrect total).

Misleading Photographic Evidence: In the Preliminary Ecological Appraisal:

Photograph 4 claims to show 'Grassland along eastern boundary', but actually looks west to east along the southern boundary.

Photograph 6 labels the southern barn as the 'North east barn'.

Photograph 1 mislabels northern barns as 'Western barns'.

These errors misrepresent the physical layout and ecological context of the plot.

7. Unenforceable Design Claims

Unenforceable "Eco-Features" & Flawed Long-Term Estate Management: High Risk of Management Company Failure: On a small development of just 10 homes, the entire financial burden of a private Management Company falls on a very small group of residents. Small estate management arrangements frequently break down over the long term as costs rise, leaving communal infrastructure neglected.

Unclear Responsibility for SuDS & Drainage Maintenance: The proposed attenuation pond, its surrounding planting, and the drainage channels running from private roads and patios require ongoing, specialised maintenance. If private patio and driveway drains become blocked, surface water will bypass the SuDS entirely, exacerbating flood risks for neighbouring properties.

Neglect of Communal "Pocket Parks": Without formal council adoption, features like the "pocket park" and associated native planting rely entirely on private upkeep. When management arrangements fail, these spaces quickly become overgrown, unmaintained, or repurposed, destroying their intended community and ecological value.

Unenforceable "Eco-Features" such as Green Roofs: Green roofs require specialised, long-term maintenance. Should they leak, deteriorate, or become too costly for individual homeowners to maintain, they are likely to be replaced with standard roofing, completely erasing the promised thermal and biodiversity benefits.

Risk of Developer Downgrading: Premium "eco-friendly" design claims, such as green roofs, pocket parks, and landscaped attenuation basins, are easily altered, downgraded, or dropped altogether if the site is sold on to a commercial builder after initial planning approval is granted.

Conclusion

This application represents an unjustified encroachment into a protected Strategic Green Gap, presents severe ecological harm to protected species, provides no safe pedestrian access, and lacks a viable strategy for surface or foul water drainage. I strongly urge the Planning Committee to **refuse** this application.