

From: **Evan Pugh**

Date: Fri, 31 Jul 2026 at 12:27

Subject: Objection to Planning Application AWDM/0810/26

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**Re: Objection to Planning Application AWDM/0810/26**

Site: Land and Barns, New Salts Farm, New Salts Farm Road, Lancing/Shoreham-by-Sea, West Sussex, BN43 5FE

Proposal: Erection of 10 no. dwellings following demolition of existing agricultural barns

Case Officer: Giles David Holbrook

Dear Sir/Madam,

I am writing to formally object to the above planning application. I ask that the Council REFUSE planning permission. My objection is made on material planning grounds only, set out below.

**1. Relevant Planning Policies**

**1.1 PRINCIPLE OF DEVELOPMENT – COUNTRYSIDE AND THE LOCAL GREEN GAP**

The application site lies outside the Built-Up Area Boundary, within open countryside, and within the designated Local Green Gap between Lancing and Shoreham-by-Sea (Adur Local Plan Policy 14, read with Policy 13 on the countryside). Residential development of this kind is not an essential countryside use.

This is not a marginal or novel concern. At pre-application stage (ref. PREAPP/0046/25), the Council's own officers advised that a scheme of this description would be “unacceptable in principle and very likely refused,” specifically because it would extend an isolated linear group of buildings and contribute to the coalescence of Lancing and Shoreham-by-Sea, contrary to Policies 13 and 14. Officers concluded that even the Council's shortfall in a five-year housing land supply did not outweigh the policy harm arising from this location.

Reducing roof heights and adding landscaping, as the applicant has since done, does not answer that fundamental objection to the principle of development.

The Local Green Gap is a critically important part of the landscape setting of Shoreham-by-Sea and Lancing, both of which border it, and it contributes directly to their individual, distinctive character and local identity. Even applying the NPPF paragraph 11(d) “tilted balance” that the applicant relies on (given the Council's reported housing land supply of around 3.2 years), the tilted balance still requires refusal where the adverse impacts of a proposal significantly and demonstrably outweigh its benefits, and where policies protecting areas of particular importance – including areas at risk of flooding – provide a clear reason for refusal. Both limbs point to refusal of this application.

## **1.2 FLOOD RISK – FLOOD ZONE 3**

The site lies wholly within Flood Zone 3, an area of high probability of flooding, a constraint acknowledged by the applicant's own Design & Access Statement and Flood Risk Assessment. The Council's pre-application advice was that it was “unlikely the Sequential Test and Exceptions Test could be satisfactorily passed,” particularly given the availability of lower-risk alternative sites and the limited public benefit of a 10-unit scheme.

On the evidence available, the Sequential Test has not been properly passed. The applicant's own Flood Risk Assessment identifies several alternative sites at lower flood risk, but discounts each of them not because they are unavailable, but because they do not suit the applicant's preferred house type, density or tenure. This inverts the purpose of the Sequential Test, which asks whether the identified housing need can be met on a lower-risk site – not whether a lower-risk site can accommodate the applicant's commercial preferences. Where the Sequential Test is not passed, the application should be refused without the Exception Test needing to be reached; and even judged on its own terms, the Exception Test rests on modest benefits (housing delivery and a small play area) weighed against a scheme that depends on raised sleeping accommodation, evacuation planning and an unproven land-raising strategy – itself an implicit acknowledgement of high residual risk.

With climate change, flood risk at this location is predicted to increase, and even where existing flood defences are taken into account, the site is understood to be at high risk of tidal and surface water flooding. The long-term effectiveness of the proposed drainage strategy depends entirely on ongoing, funded maintenance that has not been demonstrated or secured, and there is no evidence of modelled exceedance-flow routes protecting neighbouring properties, several of which sit at differing ground levels from the application site.

## **2. Previous Decisions**

This site has already been formally assessed and rejected for residential development on multiple occasions, and those previous decisions are directly relevant to the current application.

Strategic Housing & Economic Land Availability Assessment (SHELAA), March 2026: two site references covering this land (ADC/160/19, “Barns at New Salts Farm,” and ADC/106/13, “Land at New Salts Farm”) were both rejected. The assessment records that the site lies outside the Built-Up Area Boundary and within the Local Green Gap, that the Local Green Gap is critically important to the landscape setting and distinct identity of both Shoreham-by-Sea and Lancing, and that the land forms part of the landscape setting of local landmarks including the Grade II\* listed Shoreham Airport terminal. The SHELAA further records that the site is at high risk of tidal flooding once climate change and existing flood defences are taken into account, and concludes the site is not suitable for residential development unless flood risk can be resolved to the satisfaction of the Council, West Sussex County Council (as Lead Local Flood Authority) and the Environment Agency.

Adur District Council's purchase of the adjacent land (2020): the Council itself purchased the adjoining 70-acre New Salts Farm, expressly to protect it from housing, return it to natural/wetland habitat, conserve and enhance biodiversity, and preserve the green gap between Lancing and Shoreham. That purchase followed the refusal/withdrawal of a much larger scheme (reportedly around 450 dwellings, promoted by Hyde New Homes) on flood-risk grounds. It would be inconsistent for the Council to have spent public money protecting the adjoining land from housing on flood-risk and green-gap grounds, while permitting a housing estate immediately beside it that introduces the very use that purchase was designed to prevent.

The Council's own pre-application response (PREAPP/0046/25): as set out above, officers concluded a scheme of this kind would be unacceptable in principle and very likely refused, for reasons including countryside and Local Green Gap policy conflict, landscape and visual harm, residential amenity impacts at Old Farm Court, and flood risk. Nothing in the current, only modestly amended, submission overcomes those conclusions.

I ask the Council to explain, if it is minded to approve this application, how that decision would be reconciled with its own recent and directly applicable previous assessments of this same land.

### **3. Design, Appearance, Materials and Character**

The proposal would replace three low, open-sided agricultural barns with ten two-storey suburban dwellings arranged around an internal estate road – a fundamental change in the character of this historic farmstead. Although the applicant has reduced roof heights following pre-application feedback, the dwellings remain, by the applicant's own figures, up to approximately 700mm higher than the tallest existing barn. Combined with the introduction of a permanent, lit, domestic estate form in place of agricultural structures, this represents a materially more urbanising and visually complex presence on the site, not a like-for-like or reduced-impact replacement.

The design does not derive from the site's agricultural context. Nearby development at Old Farm Court reads as a sympathetic barn-style conversion retaining a visible connection to the site's origins; by contrast, the proposed flat/mono-pitch, estate-style layout of detached and semi-detached houses is imposed on the site rather than responding to it, contrary to the emphasis in Policy 13 on reinforcing local distinctiveness and vernacular character.

There is also a fairness and consistency concern. Where the Council has required even a modest, single-storey extension to an existing dwelling nearby (3 Old Farm Court) to be carefully controlled in height, scale and materials to remain in keeping with the site's character, it is difficult to see how a ten-unit redevelopment of the wider site, taller than the existing barns and of an unrelated architectural form, can be considered acceptable by the same standard.

### **3.1 DISPUTED CLAIM: "A COLLECTION OF MODEST, WELL-SPACED BUILDINGS"**

The applicant's Design & Access Statement asserts that the "massing strategy prioritises visual permeability, enabling long-distance views and ensuring the development is read as a collection of modest, well-spaced buildings rather than a dominant single block." I do not consider this characterisation to be credible, and it should not be accepted at face value.

The application site measures only 5,750 m<sup>2</sup> (0.575 hectares). Within that area, the proposal must accommodate ten dwellings, an internal estate road, 27 private parking spaces plus 4 visitor bays, private gardens, a SuDS pond, and boundary landscaping. The site's own proposed layout shows the plots arranged tightly around a narrow central road, with several dwellings semi-detached and others separated only by driveways, garages and narrow side gaps. This is a dense, closely-packed arrangement, not the loosely distributed, generously spaced layout the phrase "well-spaced buildings" implies.

Several immediate neighbours have made the same point in their own representations, describing the layout as having a "tight footprint" that would result in significant overlooking and loss of separation compared with the existing, genuinely spaced-out barn structures. If experienced neighbours looking at the same site plan reach the opposite conclusion to the applicant, that is a strong indication that the DAS's description is promotional rather than an objective account of the scheme.

The claim that the layout would preserve "long-distance views" is similarly unconvincing. Ten occupied dwellings, each with its own roof, boundary treatment, garden and driveway, densely arranged across a 0.575-hectare site, cannot be reasonably expected to offer the same degree of visual permeability as three widely-spaced, low, open-sided agricultural barns occupying a smaller combined footprint. I ask the Council to test this claim against the submitted site plan and cross-sections itself, rather than relying on the applicant's own descriptive language, and to treat the Landscape & Visual Appraisal's benign conclusions with corresponding caution given this apparent mismatch between the applicant's narrative and its own drawings.

#### **4. Highway Safety, Traffic and Parking**

New Salts Farm Road is a narrow, largely unadopted lane without footways along the relevant section. It is already used as a through-route by traffic moving between the A259 Brighton Road and the A27, and multiple neighbouring residents have described vehicles regularly travelling at unsafe speeds along it, with pedestrians – particularly children, given the family housing proposed – having no pavement and needing to step into the carriageway to pass vehicles.

The scheme would generate a material increase in vehicle movements: with private parking for two cars per dwelling (27 spaces across 7 dwellings with garages) plus four visitor bays, in the region of 15–20 additional vehicles could regularly use this substandard access. Several neighbours living immediately alongside the access have raised the risk that delivery vehicles, utility vans or parked cars would obstruct the single-track lane, creating a real risk of delay to fire engines or ambulances attending in an emergency.

Both construction traffic and permanent additional traffic would be loaded onto a lane that is understood to be privately maintained, historically at residents' own cost, with no confirmed capacity for the additional wear associated with HGVs, plant and delivery vehicles. I ask that, before any permission is granted, the Highway Authority (West Sussex County Council) be asked to comment specifically on the suitability of New Salts Farm Road – as opposed to access from the A259, which was the basis on which residential development in this immediate area was previously assessed as acceptable in principle by the applicant's own transport consultants for the earlier, larger scheme on the adjoining land.

#### **5. Noise, Disturbance and Smells**

The change from occasional, low-key agricultural use to ten permanently occupied households would introduce a significant and continuous increase in noise and general disturbance to what is currently a quiet rural lane, through everyday vehicle movements, deliveries, refuse collection and domestic activity. Several neighbouring residents have also raised the introduction of night-time external and security lighting, and vehicle headlights, into a site that is currently unlit – a material change to the amenity of a presently dark, quiet rural edge, and a form of ongoing disturbance in its own right, separate from its effect on wildlife.

Construction-phase noise and disturbance over an extended build period would also affect neighbouring occupiers directly bordering the site, and should be controlled by condition (including restricted working hours, plant noise limits and a Construction Traffic Management Plan) if the Council is minded to grant permission.

#### **6. Overlooking, Loss of Privacy and Light**

Neighbouring occupiers at Old Farm Court share a direct boundary with the site, currently separated from the low, open-sided barns by nothing more than a low, waist-height farm-

style fence. The proposed two-storey dwellings, with first-floor windows and balconies facing existing properties, would introduce a materially different and much closer level of overlooking than exists today. Submitted separation distances of around 22 metres apply only to certain building-to-building relationships in the north-east of the site; boundary-to-plot distances at other points appear considerably closer, and I ask the Council to scrutinise the actual window-to-window and window-to-garden relationships on a plot-by-plot basis rather than relying on the single most favourable figure quoted.

A proposed “nature walk” and public open space are shown close to the rear boundaries of existing properties, which neighbouring residents have raised would introduce a public route and associated activity immediately behind gardens that currently enjoy privacy and quiet enjoyment. The loss of outlook – replacing open agricultural land with rooflines, boundary treatments, lighting and vehicle activity – would also be a material and permanent change for adjoining occupiers.

## **7. Effect on Trees**

The applicant's own Design & Access Statement records that no arboricultural survey data is available for trees on the site, and that existing trees along the eastern boundary – which currently provide a buffer between the site and neighbouring properties – are relied upon to be retained without amendment. Given that this buffer plays a direct role in screening the development from Old Farm Court and mitigating landscape and privacy impacts, I ask that a full arboricultural assessment (including root protection areas and construction method statements for retained trees) be required and secured by condition before any permission is granted, so that the buffer these trees provide is not compromised during construction.

## **8. Effect on Listed Buildings and Conservation Areas**

The site forms part of the wider landscape setting of the Grade II\* listed Shoreham Airport terminal building, a designated heritage asset of the highest significance outside Grade I and II\*. The SHELAA itself records that this area makes an important contribution to the landscape setting of Shoreham and Lancing and to views across the gap, including the setting of the listed terminal, from the A259 and the railway.

The Council's own adopted landscape evidence base (the Adur Landscape Character Assessment) identifies this site within a discrete, named character area (LCA 10: New Salts Farm) and, following its October 2023 update, includes a dedicated viewpoint (View 15) looking north across this land from the A259 – formal recognition that views across this site, including toward the listed airport setting, are sensitive and merit specific assessment. The applicant's own Landscape & Visual Appraisal, while relying on this evidence base, reaches a more benign conclusion by excluding the most affected receptors and relying on winter baseline views and long-term (Year 15) planting maturity. I ask the Council to weigh its own adopted landscape and heritage evidence, rather than the applicant's selective reading of it, in assessing harm to the setting of this listed building.

## **9. Ecology and Protected Species – A Legal and Planning Policy Duty**

Although not separately listed among the Council's standard categories for objections, the presence of legally protected species is a genuine material planning consideration, not merely an environmental preference. Bats (all species) and barn owls are protected under the Wildlife and Countryside Act 1981 and, for bats, the Conservation of Habitats and Species Regulations 2017. The National Planning Policy Framework (Chapter 15) and the Council's own biodiversity net gain duties under the Environment Act 2021 require that protected species and their habitats be properly identified, assessed and, where necessary, protected before permission is granted. I raise this issue on that basis, as a matter of law and adopted planning policy engaged by this application, and ask that it be given corresponding weight.

A number of local residents with direct, long-standing knowledge of the site – including a member of the Shoreham District Ornithological Society Council, an experienced local ornithologist with BTO/BirdTrack records, and several immediate neighbours – have submitted representations recording repeated sightings of barn owls entering and leaving the barns with prey, consistent with active nesting and breeding in 2026, together with regular sightings of bats (including pipistrelle and brown long-eared bats), and other protected or notable species including slow worms, grass snakes, badgers and hedgehogs using the site and surrounding land.

These observations directly conflict with the applicant's own Preliminary Ecological Appraisal, which concludes the barns are unsuitable for barn owls “due to a lack of suitable ledges and high light and wind exposure,” and which based its bat assessment on a single daytime inspection judging the barns of “negligible” roost suitability – without any dusk emergence or dawn re-entry survey being carried out. Given the direct, dated, first-hand observations submitted by local residents, I do not consider the ecological appraisal accompanying this application to be a reliable basis on which to conclude that protected species are absent, and I ask the Council to require a proper, independent, licensed survey (including dusk/dawn bat activity surveys and a barn owl survey carried out at appropriate times of year) before determining the application. If demolition were ultimately permitted, this should be conditional on works being timed outside the bird and bat breeding season, and on suitable alternative roosting and nesting provision being secured in advance, not after the barns are demolished.

I would also note that the application form is understood to have indicated that no protected species, designated sites or biodiversity features are present on or near the site, notwithstanding that the applicant's own ecological appraisal separately identifies the Adur Estuary Site of Special Scientific Interest within the relevant Impact Risk Zone. Given this, and the biodiversity net gain claims made in support of the application, I ask that the ecological evidence base be independently verified before any weight is placed on it.

## **9.1 THE PROPOSED BAT BOX MITIGATION IS UNQUANTIFIED AND UNPROVEN**

The applicant's Design & Access Statement states only that “Bee Bricks, Bat Boxes and Bird Boxes” will be incorporated into the external walls of the houses, illustrated with a single generic image of an “Integrated Bat Box.” Nowhere in the submitted documentation is any number of bat boxes specified, nor is any assessment provided of how many boxes, of what design, and in what locations, would be required to accommodate the roosting bat population currently using the barns. Without a stated quantity linked to a proper survey of the existing population, this mitigation cannot be assessed or conditioned meaningfully, and should not be accepted as adequate compensation for the loss of an established roost.

This matters because Bat Conservation Trust guidance on siting bat boxes ([bats.org.uk](https://bats.org.uk)) makes clear that boxes are only effective where several are provided, facing different directions, at height, sheltered from wind, exposed to sun for part of the day, and positioned close to hedgerows or tree lines that bats use to navigate. A handful of boxes built into house walls, without regard to these siting requirements or to the specific species recorded on this site, cannot be assumed to replace a roost of unknown size and composition.

Critically, the same guidance states that “bats need time to find and explore new homes, and it may be several months or even years before boxes have residents.” The application does not explain where the bat population displaced by demolition of the barns is expected to live during construction, nor during the months or years it may take for any replacement boxes to be found and adopted once the new houses are complete. Integrated bat boxes built into external walls cannot, by their nature, be installed and available until the dwellings themselves are largely finished – by which point the barns will already have been demolished. This leaves a real and unaddressed gap between the loss of the existing roost and the availability of any functioning replacement, during which displaced bats (a European Protected Species) would have nowhere suitable to go. I ask the Council to require the applicant to specify the number, design, siting and orientation of bat boxes proposed, by reference to a proper survey of the existing roost, and to secure an interim mitigation strategy – such as temporary bat boxes or roost features installed and allowed to establish well in advance of demolition – so that continuity of roosting provision is not lost during the gap this guidance identifies.

### **Conclusion**

This application proposes housing development in the open countryside and within a designated Local Green Gap, on a site within Flood Zone 3 that has been repeatedly assessed and rejected for residential development, immediately adjoining land the Council itself purchased to protect from exactly this form of development. The scheme would cause harm to the character and appearance of a historic farm setting and the wider landscape (including the setting of a Grade II\* listed building), would result in unacceptable impacts on neighbouring privacy, light and outlook, would rely on a substandard and unsafe highway

access, and raises serious, inadequately resolved questions about the presence of legally protected species.

Taken together, these adverse impacts significantly and demonstrably outweigh the limited benefits of ten open-market dwellings, and the flood-risk and Local Green Gap policies engaged by this site provide a clear reason for refusal in their own right. I respectfully ask the Council to REFUSE planning application AWDM/0810/26.

Regards,

Evan Pugh

