

PLANNING STATEMENT

IN RELATION TO:

‘New development comprising the erection of 10 no. dwellings following the demolition of existing agricultural barns’

**Barns at New Salts Farm, New Salts Farm
Road, Shoreham-by-Sea, West Sussex,
BN43 5FE**

July 2026

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1.0 INTRODUCTION

- 1.1 Planning permission is sought on behalf of the Applicant for a new development comprising 10 No. residential units. The site currently comprises existing agricultural barns, which are located at New Salts Farm, New Salts Farm Road, Shoreham-by-Sea.
- 1.2 This Planning Statement is submitted in support of the above Planning Application. The statement describes the site, its surroundings and the proposal itself. The Planning Policy background is considered along with an assessment of the proposal considering the relevant policies and all other material planning considerations.
- 1.3 This Planning Application should be read in conjunction with the detailed drawing package that has been prepared by the scheme's architects and the following supporting statements: -
- Design and Access Statement, prepared by Meynell and Gunton.
 - Flood Risk Assessment and SuDS Strategy, prepared by Hilson Moran.
 - Transport Statement, prepared by Motion.
 - Landscape and Visual Appraisal, prepared by Huskisson Brown Associates.
 - Preliminary Ecological Appraisal, prepared by Ecology Partnership.
 - Biodiversity Net Gain Feasibility Assessment, prepared by Ecology Partnership.
 - Planning Noise Impact Assessment, prepared by Acoustic South East.
 - Phase 1 Contaminated Land Assessment, prepared by Hilson Moran.
 - Viability Report, prepared by Bespoke Property Consultants.
 - Energy and Sustainability Statement.
 - Statement of Community Involvement.

2.0 SITE CONTEXT

- 2.1 The Site that is the subject of this planning application measures approximately 0.575 hectares in size, including the access drive from New Salts Farm Road.



Fig 1. Site Location Plan

- 2.2 The site comprises a total of 3 No. agricultural barn buildings, as detailed below:
- 2 no. 28m x 19m adjoining barns
 - 1 no. 28m x 12m detached barn

The barn structures are partially open-sided and provide an existing built footprint of 1,202m².



Fig 2. Aerial map of the site, showing existing built form (*courtesy of DAS*)

- 2.3 The planning application site lies to the southwest of New Salts Farm Road and is accessible via a private track. The site is located to the south of Brighton City Airport, west of the town of Shoreham-by-Sea and east of the settlement of Lancing. The south coast railway line runs a short distance to the north of the site. The A259

highway is a short distance to the south, whilst the A27 trunk road is easily accessible to the north.

- 2.4 In terms of the site's constraints and designations, the Site is located outside of the built-up area boundary, within designated countryside. The site also lies within a Local Green Gap.
- 2.5 The Site is outside of the South Downs National Park and does not lie within any National Landscape (formerly Area of Outstanding Natural Beauty [AONB]), and to our knowledge it is not subject to any other site specific or wider landscape constraints.
- 2.6 With respect to heritage matters, the Site has no listed buildings proximate to it, and it is outside of any Conservation Area. Shoreham Airport appears to be the closest site of a listed building, although the application site is comfortably far enough away to not cause any issue to the heritage setting.
- 2.7 The accompanying Design and Access Statement considers the surrounding character, noting that *"The surrounding context has a varied character, style and appearance. Buildings are mainly two-storey with some taller exceptions. The Grade II* Listed Airport is near but is not viewed in the same context as the application site given its distance and other buildings / obstructions restricting this. Several nearby buildings have relatively bland unarticulated facades. A mixture of materials are utilised such as render, flint, brick, tile, cladding board. The nearby Old Farm Court appears to provide the most interesting and articulated materiality with its flint work, brick quoins and barn-style glazing."*
- 2.8 According to the Government's 'Flood Map for Planning' online resource, the site is located within Flood Zone 3, where land has a high probability of flooding from rivers and the sea. This matter will be discussed in further detail below.



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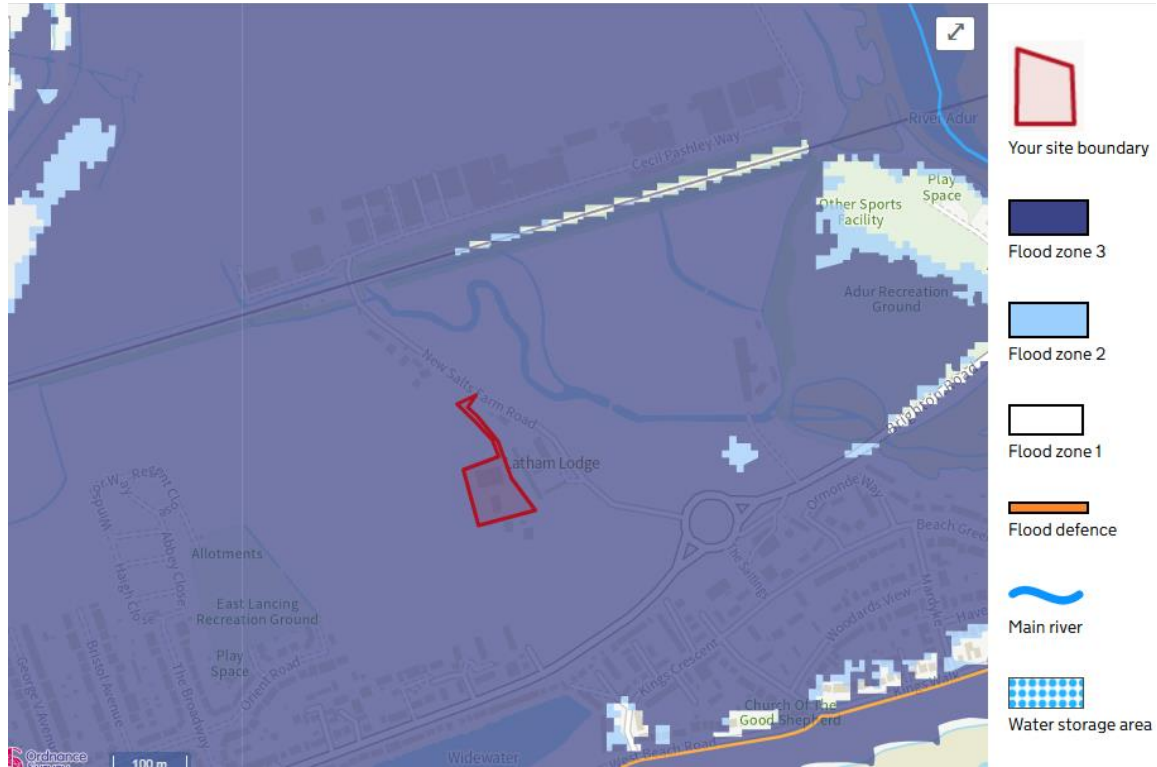


Fig 3. Extract from the Gov.uk Flood Risk for Planning Map

3.0 PLANNING HISTORY AND PRE-APPLICATION ENQUIRY

(i) Planning History

Application Site

- 3.1 According to the Council's online planning records, there are no planning applications that relate to this Application Site.

(ii) Pre-Application Planning History

- 3.2 A pre application enquiry was submitted to the Council for '*demolition of existing agricultural barns and redevelopment comprising 10 No. new dwellings*' (ref: PREAPP/0046/25). A written response was received via letter dated 1st May 2025.



Fig 4. Pre app Site Plan and Sketch Aerial View (courtesy of DAS)

- 3.3 The pre-app submission comprised an informal cluster of 10 no. detached dwellings arranged around a central landscape-led community amenity space. This was informed by the historic farm yard buildings to the immediate east of the site. Dwellings were gently stepped to create interest which reflects the built footprint of the adjacent farm buildings. This presents an opportunity for high-quality detailing in materials such as flint, brick, timber, tiles. The buildings were designed to ensure

a small footprint which in turn gave as much area as possible to landscape. As such, the dwellings were three-storey with the top floor being 'room in the roof' style. Naturally, these became taller buildings due to the ridge heights required and were higher than the existing barns and also the adjacent arm buildings.

- 3.4 The Council's Planning Officer's response confirmed that the site lies outside the built-up area boundary and is within the countryside and Local Green Gap between Shoreham and Lancing.
- 3.5 The response also confirmed that the Council cannot demonstrate a five year housing land supply of deliverable housing sites and for decision taking, and therefore paragraph 11(d) of the NPPF applies.
- 3.6 Notwithstanding the Council's housing land supply position, concerns were raised regarding the development proposal. The Planning Officer's response concludes that *"the proposed redevelopment of this site for 10 dwellings would be contrary to Development Plan policies and national planning guidance. While there is a housing need in the District, the proposed development would have numerous adverse impacts, which have been identified in this letter, and which would significantly and demonstrably outweigh any benefits, when assessed against the policies in the NPPF taken as a whole"*.
- 3.7 The current planning application has been directly informed by the above comments, and this will be discussed in greater detail below. In summary, our position is that the revised development proposals now provide significant benefits, which outweigh any limited impacts that would arise from the development of the site.

4.0 THE PROPOSAL

- 4.1 This application seeks planning permission for a proposed residential development, comprising 10 No. houses, following the demolition of the existing agricultural barns.



Fig 5. Extract from proposed Site Layout Plan



Fig 6. Plot 1 & 2 – Front and Side elevation – proposed

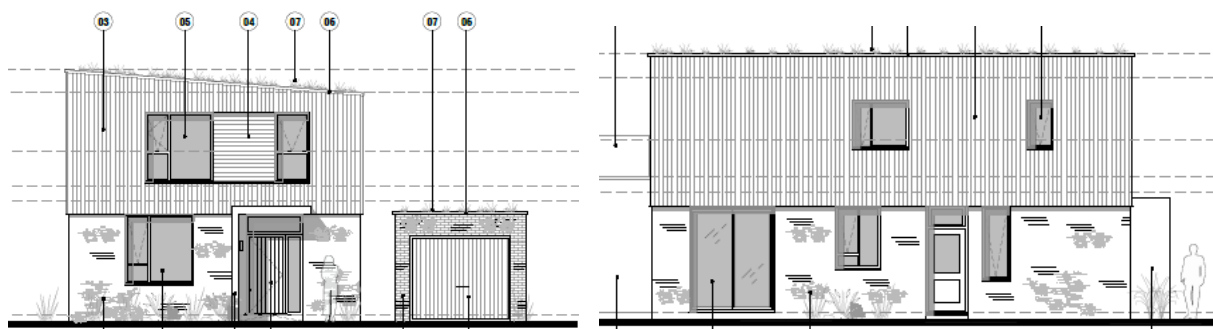


Fig 7. Plot 10 – Front and Side elevation – proposed

- 4.2 Each of the dwellings would accommodate 3 or 4 bedrooms over two floors (plots 2, 3 & 4 comprise three bedrooms; plots 1, 5, 6, 7, 8, 9 & 10 comprise four bedrooms).
- 4.3 The key points of the development are summarised within the accompanying DAS as follows: -
- *“10no dwellings proposed*
 - *There are 7no 4-bed dwellings and 3no 3-bed dwellings.*
 - *4no dwellings are semi-detached, along the eastern side, the remaining 6no dwellings are detached.*
 - *7no dwellings have private garages along with parking spaces for a further 2no vehicles.*

- *Cycle storage is sought to be within the garages, whilst those units without garages have cycle storage as a independent units within the rear amenity space.*
- *4no visitor bays are provided.*
- *A generous landscape buffer is proposed along the north and western site boundaries. This will create a soft transition from the open fields to the edges of private amenity space.*
- *Open space is proposed at the north east corner of the site - providing a valuable location for new residents to meet.*
- *Central, over-sized soft landscaped verges run through the heart of the site providing a green finger of high quality landscaping - this will be visible from key vantage points in the wider context and will help break up any perceived mass from the development.*
- *A SUDs basin is located in the south-east corner of the site. A key feature within the drainage strategy which can be utilised for other uses during dry seasons such as the proposed Nature Walk with seating to encourage community use.*
- *The plots along the western boundary all have first floor external amenity off of the master bedroom, taking advantage of far-reaching views.”.*

- 4.4 The proposed materials to be used for the new dwellings have been selected to complement the surrounding context of nearby buildings. The materials are to include red/brown multi brickwork and flint, and a durable timber effect cladding finish to the elevations, whilst the dwelling roofs comprise a sedum/green roof.
- 4.5 With regard to the highway matters, access to the site will be provided via the existing access junction onto New Salts Farm Road, which is positioned to the north of the application site. The access road and junction will be improved and enhanced to allow safe two-way movement to and from New Salts Farm Road.
- 4.6 The application is accompanied by a detailed Landscape Strategy and overall illustrative Masterplan. The DAS confirms that *“The site is located within a sensitive*



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area; however, the proposal replaces existing buildings and has been carefully designed to reflect the character of nearby development. Sensitive boundaries of the site have been softened with generous landscape treatment. This helps to blur the line from the site edge, the wider open fields and private rear garden space. A central permeable access road proposes a generous shrub planting, new trees and swales. The layout, scale and landscaping of the scheme help to reduce its visibility and ensure it sits comfortably within its surroundings. With the proposed planting, sedum green roofs and mitigation measures in place, the development would not result in unacceptable harm to the landscape or to views from surrounding areas."



5.0 POLICY CONTEXT

a. NATIONAL PLANNING POLICY FRAMEWORK ('THE NPPF')

- 5.1 The National Planning Policy Framework (NPPF) was originally published in 2012 and has been subject to a number of revisions subsequently, with the most recent version being published on 12th December 2024.
- 5.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.3 The focus of the revised NPPF continues to be achieving sustainable development. The NPPF clarifies that *"at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs"* (taken from Resolution 42/187 of the United Nations). However, at paragraph 8 the Framework sets out that in planning terms, and to achieve sustainable development there are *"three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)"*. These objectives are economic, social and environmental, which *"should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area"* (paragraph 9).

- 5.4 Paragraph 11 is an important element of the NPPF. It states that: *“Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.*
- 5.5 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed”.*
- 5.6 Paragraph 14 is relevant in this case. It states *“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:*

a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70);

- 5.7 Section 4 of the Plan refers to Decision Making. At paragraph 39 of the Framework, it sets out that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*.
- 5.8 The Framework also sets out that there are only limited circumstances where decision-makers should give weight to policies in emerging plans, and generally *“refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan”* (paragraph 51).
- 5.9 Section 5 relates to delivering a sufficient supply of homes. It reiterates at paragraph 61 that the Government’s objective is to significantly boost the supply of new homes. Paragraph 65 confirms that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.

- 5.10 Paragraph 72 states that *“strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*
- a) specific, deliverable sites for five years following the intended date of adoption ;*
 - and*
 - b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period”.*
- 5.11 Paragraph 73 continues *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
 - b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;*
 - c) use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;*
 - d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
 - e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes”.*

- 5.12 With regard to housing supply, paragraph 78 states that *“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.³⁹ The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*
- a) 5% to ensure choice and competition in the market for land; or*
 - b) 20% where there has been significant under delivery⁴⁰ of housing over the previous three years, to improve the prospect of achieving the planned supply; or*
 - c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework⁴¹, and whose annual average housing requirement⁴² is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance”.*
- 5.13 Section 9 discusses promoting sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles.
- 5.14 At paragraph 110 the Framework confirms that *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.*

However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”.

- 5.15 Paragraph 113 sets out that *“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport”.*
- 5.16 Paragraph 115 confirms that the main considerations in transport terms when determining specific planning applications is that proposals should provide:
*“(a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
(b) safe and suitable access to the site can be achieved for all users;
(c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code ⁴⁸; and
(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach”.*
- 5.17 At paragraph 116, the framework also confirms that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.*
- 5.18 Section 11 is entitled ‘Making effective use of land’. Paragraph 119 confirms that *“planning policies and decisions should promote an effective use of land in meeting*

the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”.

- 5.19 Paragraph 129 discusses the need to achieve appropriate densities. Account needs to be given to the identified need for different types of housing and the availability of land suitable for accommodating it, local market conditions, sustainability, existing character and setting, and *“the importance of securing well-designed, attractive and healthy places.”*
- 5.20 Section 12 refers to achieving well-designed and beautiful places. Paragraph 131 states *“the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development...”*.
- 5.21 Paragraph 135 sets out that *“decisions should ensure that developments:*
- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users ⁵¹; and*

where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

- 5.22 Paragraph 139 confirms that *“development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes”.*
- 5.23 Section 15 relates to Conserving and enhancing the natural environment. Paragraph 187 states that *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.

b. DRAFT NPPF

- 5.24 The Government published a new version of the NPPF on 16th December 2025, which was subject to consultation until 10th March 2026. This draft document can only be given limited weight at this time as it is currently unknown what the final version will say. The Government have advised that the new NPPF will be published in “Summer 2026”. We reserve the right to comment further if/when the new NPPF is published.

c. LOCAL PLANNING POLICY

- 5.25 The Adur Local Plan was adopted at a meeting of Adur Full Council on 14th December 2017. The new Local Plan sets the strategic development and land-use priorities for Adur (outside of the South Downs National Park) up to 2032 and contains the policies against which development management decisions within that area will be made. It replaces the saved policies of the Adur Local Plan 1996 as the Council's Local Plan.
- 5.26 The Council’s Proposals Map (refer to **Fig 8** below) shows the Application site is located outside of the built-up area boundary, within designated countryside. The site also lies within a Local Green Gap.

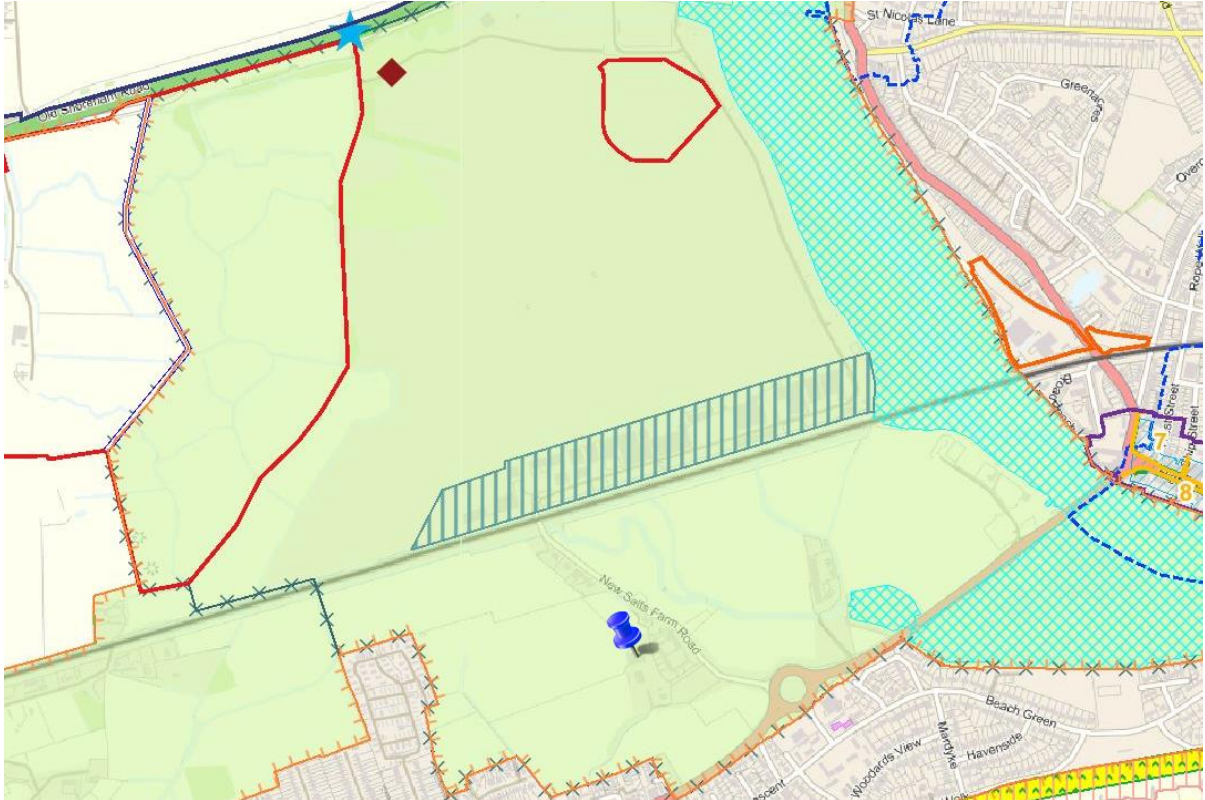


Fig 8. Extract from Adur Policies Map 2023 Interactive Map

- 5.27 **Policy 3** refers to the District's housing provision. Within the Plan period (2011-2032) a minimum of 3,718 dwellings are to be provided, with 1,538 units to be within the built-up area. This equates to an annual target of 177 dwellings per year over the 21 year plan period, which is notably less than the District's housing need, both now and at the time of the ALP being adopted. Indeed, the Planning Inspector's report on the examination of the ALP (dated 29th September 2017) noted that the objectively assessed housing need (OAN) at that time was 325 dwellings per annum (dpa), or 6,825 over the Plan period.
- 5.28 Since 2017, the previous Government amended the standard methodology – which is used for calculating future housing needs. At that time the methodology advised that Adur's housing need had increased to 449 dwellings per annum. In December 2024, the Labour Government have now amended the calculation for the standard

methodology, and Adur's revised figure is understood to now be 558 dpa. The constrained nature of Adur District was accepted by the previous Inspector as justification for a lower ALP housing figure of 177 dpa. Our understanding is that the new standard method figure (558 dpa) is now a mandatory requirement.

- 5.29 Therefore, the demand for housing in Adur District has risen from 325 dpa to 558 dpa since the last Local Plan was adopted. The current ALP is therefore significantly underdelivering in this respect.
- 5.30 **Policy 5** relates to New Monks Farm, Lancing, a site allocation to the north west of the application site and as identified, by a red outline on the proposals map (**Fig 6** refers). This policy provides for a mixed use development comprising at least 600 new dwellings, a community, a primary school, 10,000 sqm of employment-generating floorspace, and access from the A27.
- 5.31 **Policy 7** of the Adur Local Plan relates to an area of Shoreham Airport, as identified by a red outline on the proposals map (Fig 6 refers). This policy allocates a *"minimum of 15,000 sqm of new employment generating floorspace (both aviation and non-aviation related), including a mix of B1 (business), B2 (general industry) and B8 (storage)/ hangar uses, will be provided on the north-eastern side of the Airport (as shown on the Policies Map)."* The policy stipulates that *"New development at the Airport must be designed to minimise its impact on the landscape as well as on the open nature of the Shoreham-Lancing Local Green Gap. Key views must be retained, and any impacts on the historic character of the Airport and the historic assets within it must be minimised... Due to the current Flood Zone 3b (functional floodplain) designation at the Airport, no development shall take place within the allocated area until the relevant section of the Shoreham Adur Tidal Walls on the west bank has been completed. In addition, flood mitigation measures will need to be incorporated into the development in order to further reduce flood risk. A Flood Risk Assessment (FRA) will be required at the planning application stage. The FRA*

must take account of and seek to facilitate relevant recommendations of the Lancing Surface Water Management Plan... Mitigation measures will be required to ensure that new development at the Airport does not impact on the ecological value of the airport itself or the adjacent Adur Estuary SSSI. Where possible, ecological enhancements should be incorporated as an integral part of the development."

5.32 **Policy 15** is a detailed design policy, entitled 'Quality of the Built Environment and Public Realm'. It says as follows (inter alia):

"Development should be of a high architectural quality and respect and enhance the character of the site, and the prevailing character of the area, in terms of proportion, form, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping. Development should:

- Enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping and layout of the development;*
- Include a layout and design which take account of the potential users of the site...*
- Make a positive contribution to the sense of place, local character and distinctiveness of an area; and not have an unacceptable impact on adjacent properties, particularly residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook or open amenity space;*
- Respect the existing natural features of the site, including land form, trees and biodiversity and contribute positively to biodiversity;*
- Have safe access to the highway network, and not result in harm to highway safety;*
- Have acceptable parking arrangements (in terms of amount and layout);*
- Take into account the need for waste reduction and recycling, both during the construction phase and over the lifetime of the development..."*

- 5.33 The supporting text to **Policy 15** highlights the importance of respecting local spatial character and pattern of existing development. It says *“The quality of new design plays an important part in creating successful developments – well-designed developments relate well to existing buildings and spaces around them, are pleasant to use and take account of local distinctiveness without necessarily replicating what is already there... Existing poor design should not set a precedent... New developments should be well-designed and integrated into the landscape and townscape, and contribute positively to Adur's character and distinctiveness. These matters should be taken account of when developing proposals for new development. The urban areas of Adur have differing characters (see Appendix 2: A Spatial Portrait of Adur), which should be taken account of, and be respected by, new development. Good design encompasses architectural design, form, height, scale, siting, layout, density, orientation, materials, parking and open space/green infrastructure.”*
- 5.34 **Policy 20**, which refers to Housing Mix and Quality, requires the provision of *“family sized units”* on infill developments (defined as 2-3 bedrooms), and *“New dwellings across all tenures will be expected to meet the minimum nationally described space standards”*
- 5.35 **Policy 22** sets out density requirements for development across the District. It says that *“New residential developments should achieve densities of a minimum of 35 dwellings per hectare... In exceptional cases residential development may be permitted at a lower density, where it is demonstrated by the applicant to the satisfaction of the Local Planning Authority that the minimum density specified above would result in an unacceptable impact on the surrounding area. Proposals for new dwellings will be expected to comply with the criteria contained in the Council's adopted Development Management Standard No.1 “Space Around New Dwellings and Flats” or any other appropriate national standard.”*

- 5.36 The supporting text to **Policy 22** clarifies that *“Controlling density does not in itself create a good quality environment. Sufficient external space around and between new homes is an important factor in the creation of a pleasant residential environment contributing to the character, identity and appearance of an area.”*
- 5.37 The following policies of the Local Plan are of relevance: -
- **Policy 1:** The Presumption in Favour of Sustainable Development
 - **Policy 2:** Spatial Strategy
 - **Policy 4:** Planning for Economic Growth
 - **Policy 11:** Shoreham-by-Sea
 - **Policy 13:** Adur Countryside and Coast
 - **Policy 14:** Local Green Gaps
 - **Policy 18:** Sustainable Design
 - **Policy 21:** Affordable Housing
 - **Policy 28:** Transport and Connectivity
 - **Policy 31:** Biodiversity
 - **Policy 32:** Open Space, Recreation and Leisure
 - **Policy 36:** Flood Risk and Sustainable Drainage.
- 5.38 It is understood that the application site is outside of any neighbourhood plan area.

**d. STRATEGIC HOUSING & ECONOMIC LAND AVAILABILITY ASSESSMENT
(‘SHELAA’)**

- 5.39 The application site is identified within the Council’s latest SHELAA document, which was published in March 2026, with a base date of study of 1st April 2025.
- 5.40 The details are as follows: -
SHELAA reference **ADC/160/19**:
‘Barns at New Salts Farm, New Salts Farm Road, Shoreham by Sea’.
The latest iteration of the SHLAA rejected the site.

The District Council's brief published assessment for the site says: *"The site lies outside Built Up Area Boundary, and within the Local Green Gap. The Local Green Gap is a critically important part of the landscape setting of Shoreham-by-Sea and Lancing which border the gap, contributing to their individual, distinctive character and local identity. The site is currently in Flood Zone 3 but benefits from the presence of flood defences. However with climate change flood risk is predicted to increase and where current flood defences are taken into consideration the site is expected to be at a high risk of tidal flooding. The site has been rejected."*

e. OTHER RELEVANT POLICY GUIDANCE

- 5.41 The District Council has adopted the following Supplementary Planning Documents (SPDs), which are of relevance: -
- Development Control Standard – Space around dwellings and flats.
 - Adur Interim Affordable Housing Position Statement. This confirms that the *"District Council will use the NPPF threshold of 10 dwellings for seeking affordable housing contributions"*.

f. EMERGING PLANNING POLICY

5.42 Emerging Adur Local Plan

We are aware that Adur District Council has started work on preparing a new Adur local plan. The Council's website states that the *"latest Local Development Scheme for Adur indicates that the Plan will be progressed under the new national planning system introduced by the Levelling Up and Regeneration Act 2023. The government has not yet published the regulations for this new system. It is expected that these will be published in 2026"*.

6.0 PLANNING ASSESSMENT

Principle of Development & Housing Supply

- 6.1 It is acknowledged that the application site is located outside of the Built-up Area Boundary for Shoreham by Sea and is therefore defined as countryside in planning policy terms. The site is also located within a Local Green Gap, where **Policy 14** of the Adur Local Plan applies.
- 6.2 The application site is also located within Flood Zone 3, where land has a high probability of flooding from rivers and the sea. This will be discussed in further detail below.
- 6.3 The Site is not appreciably close to any heritage asset, such as a Conservation Area or Listed buildings, and therefore it is not anticipated that the setting of any heritage asset would impinge upon the development potential of the Site.
- 6.4 As is set out above in Section 5 of this report, the demand for housing in Adur has risen significantly from 325 dwellings per annum to 558 dwellings per annum since the last Local Plan was adopted.
- 6.5 Further, the new Government published a revised version of the National Planning Policy Framework (NPPF) in December 2024. This says at paragraph 62 that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”* In this regard it is understood that neighbouring Brighton & Hove have a significant unmet need of circa 30,000 dwellings.

- 6.6 Critically, the revised Standard Method for calculating housing needs is now mandatory, not advisory. Therefore, the previous approach of accepting a Local Plan housing figure below the accepted OAN is no longer acceptable. This has significant implications for Adur District, and therefore there is an increased requirement for the Council to approve sustainable residential development including in locations outside of the defined built-up areas.
- 6.7 The Council within their pre-application response confirmed that *“the most recent 5 Year Housing Land Supply (5YRHLS) (2024-2029) position for Adur as at 01/04/2024 demonstrates that a total of 2,139 homes are deliverable within this period, equating to 3.3 years of housing land supply against the housing requirement figure (as set by the Standard Methodology figure) of 547 dwellings per annum plus a 20% buffer = 656 dwellings per annum”*.
- 6.8 Subsequent to the Councils pre application response, the Adur Five Year Housing Land Supply 2024-2029 (with a 20% buffer) statement was amended in March 2026. This document confirms that the Council are unable to demonstrate a five year housing land supply (5YHLS) at the current time. The Adur Five Year Housing Land Supply 2025 - 2030 (with a 20% buffer) demonstrates a **3.2 year supply of housing** as of March 2026 against the Standard Methodology figure of 549.
- 6.9 The Council’s statement confirms that *“As Adur District adopted its Local Plan more than 5 years ago the Five Year Housing Land Supply Position Statement uses a housing requirement based on the local housing need that is calculated by the standard methodology set out in the PPG. Updated data on national affordability ratio (dated 22nd May 2025) has subsequently resulted in a revised local housing need (LHN) figure based on the standard method calculation. The LHN figure has been amended to 549 dwellings per annum for Adur (previously it was 547 dwellings).”* The report concludes that *“In accordance with the definition in paragraph 78 of the NPPF, Table 1 above sets out the number of net new homes that*

are deliverable in the five years between 1 April 2025 and 31 March 2030. The council can demonstrate that a total of 2,115 homes are deliverable within this period, equating to 3.2 years of housing land supply against the Standard Methodology figure of 549 plus a 20% buffer (=659)". We will monitor changes to the District's Housing land supply position, and we reserve the right to comment further in this respect.

- 6.10 Given the above failure of the Council to demonstrate a 5YHLS, and that the Local Plan (adopted in 2017) is out of date, it is clear that paragraph 11(d) of the NPPF is engaged and the 'tilted balance' should be applied to proposals for new housing. It is also clear that the District's existing development boundaries will need to be breached if the Council are to meet their increased housing requirements. Therefore, given the above context, the fact that the site is outside of the built-up area boundary should not be considered fatal to the acceptability of the development proposals at this site from a policy perspective. Instead, we contend that permission should be granted for housing development at this site given that any adverse impacts of doing so would not significantly and demonstrably outweigh the benefits of providing new housing in this location. As set out below, the site is located within a sustainable location, the proposals make effective use of land and will secure a well-designed place that respects the local landscape character and will not erode the local gap. Further we contend that the policies that protect areas or assets of particular importance (e.g. flood zone 3), in this case do not provide a strong reason for refusing the development proposed.
- 6.11 In terms of the lawful use of the site for agriculture, it is important to note that since the District Council took ownership of the adjacent land at New Salts Farm in 2020 the barns have diminished in use, in line with the restricted annually renewable grazing rights granted to the current tenant farmer. It is understood that Adur Council have a committed plan for the future use of the adjacent land, which, if

implemented, will result in the barns ceasing to be used for farming purposes in the near future.

- 6.12 Therefore, the principle of redevelopment of this previously developed site in a sustainable location must be considered acceptable, and we consider that proposals are in full accordance with the NPPF when read as a whole, including paragraph 11.

Sustainability

- 6.13 The application site is positioned to the south of Brighton City Airport, on the outskirts of Shoreham-by-Sea. It is located to the northwest of the main A259. The site is also close to Lancing and the town of Worthing, and as such, it is considered to have easy access to the facilities and services that these large urban areas provide.
- 6.14 The site is currently positioned within easy access of all services that are required by modern living, including a good range of shops and other facilities in Shoreham town centre and the services at Beach Green roundabout. This access to a range of services and facilities is further evidenced by the information set out below: -

Accessibility and Transport

- **Access on foot and by cycle** – The Transport Statement confirms that “*New Salts Farm Road is a shared surface (mixed use) rural street with no separate footways. Traffic speeds and volumes are evidently low, with observed average daily two-way traffic volumes and prevailing average speeds significantly below the desirable upper limits enabling inclusive cycling (2,500 daily movements and 20mph respectively) as set out in LTN 1/20 guidance. Furthermore, the observed speeds and flows are also below the recommended upper limits for ‘quiet lanes’ and other mixed-use rural streets (1,000 daily movements and 40mph respectively) as set out in LTN 1/20 guidance. Footways and a footway/cycleway join New Salts Farm at its southernmost*

point (around 300m south of the site access) where it joins with Saltings Roundabout and the A259. These footways and the footway/cycleway are separated from the carriageway by a grass verge in proximity of Saltings Roundabout and are provided with dropped kerbs and appropriate tactile paving where required. From Saltings Roundabout, there are footways on both sides of the A259 in both directions (as well as the footway/cycleway which extends around 100m southwest of the junction).” We consider that the site is suitably located in terms of accessibility for persons on foot and by cycle, with Motion further confirming that “The volume and speed of traffic on New Salts Farm Road is therefore broadly within the parameters set out in Manual for Streets (MfS) for a shared-surface residential street where pedestrians are comfortable sharing road space.”

- **Bus Service** – The Transport Statement confirms that “There are bus stops serving both directions on the A259 within around 600 metres (eastbound stop) and around 450 metres (westbound stop) of the site access onto New Salts Farm Road. These stops both enjoy shelters with seating, a flagpole and timetable. The stop on the southern side of the A259 can be accessed via an uncontrolled crossing point with a pedestrian refuge island located circa 20 metres east of that stop. These bus stops provide access to services 700 Coastliner, 19A and N700 Coastliner, which provide continuous, frequent routes between Brighton and Durrington, and Worthing. Further bus stops are located along The Saltings, to the south of Saltings Roundabout which provide access to service 19 providing a route between Shoreham Beach and Shoreham-by-Sea.”

Destination	Route	Frequency		
		Mon-Fri	Sat	Sun
19A	Shoreham – Lancing (School Bus)	2 per day	-	-
700 Coastliner	Brighton – Hove – Portslade – Shoreham-by-Sea – South Lancing – Worthing – West Worthing – West Durrington	5 per hour	5 per hour	4 per hour
N700 Coastliner		3 between 00:10 and 03:25	4 between 00:10 and 04:25	3 between 00:10 and 03:25

Fig 9. Summary of local Bus Services (*Courtesy of Transport Statement*)

- **Railway Station** – The Transport Statement confirms that “The closest railway station to the site (Shoreham-by-Sea) is located around 1.9 kilometres to the east, which can be accessed within a 25-minute walk or 6-minute cycle. Shoreham-by-Sea railway station has 42 covered cycle parking spaces as well as 131 car parking spaces. The railway station provides frequent services to London Victoria, Portsmouth & Southsea, Brighton, Southampton Central, Littlehampton and Chichester.”
- **PRoWS** – There are several Public Rights of Ways (PRoW) which provide access to local amenities. These are located south of the site along the Shoreham Beach and along the western edge of the Rive Adur.

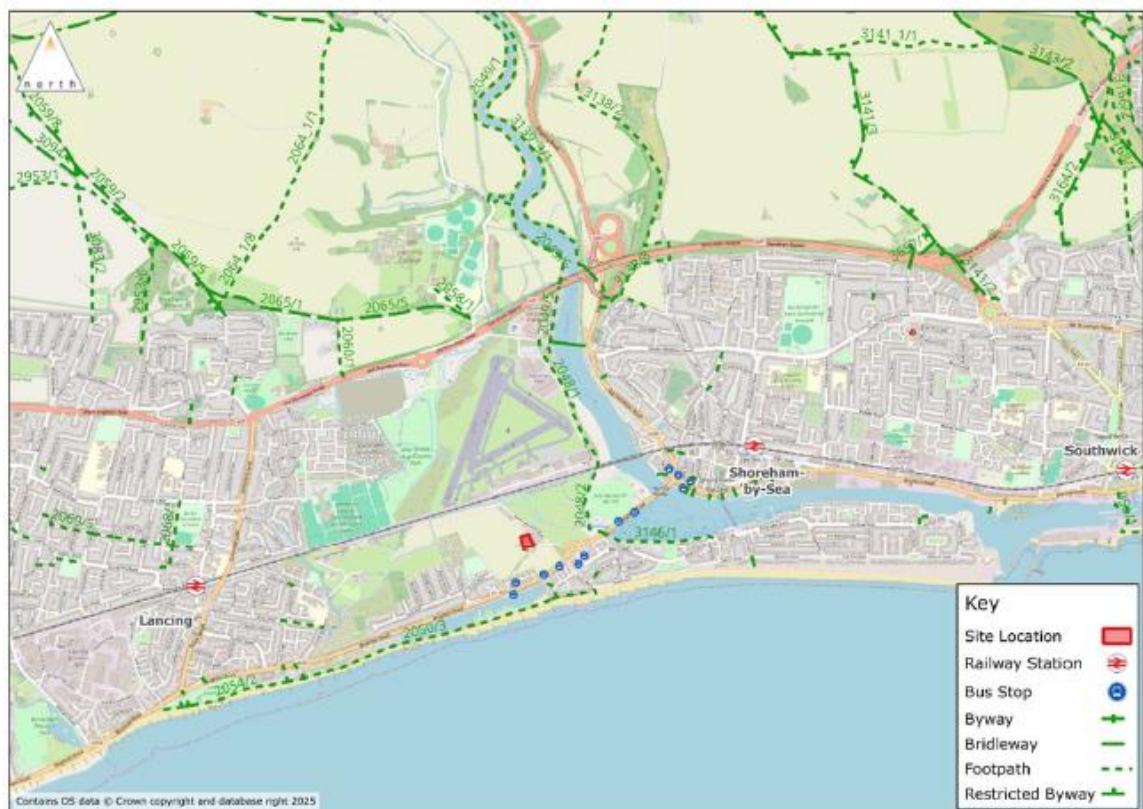


Fig 10. PRoW near to the site (*Courtesy of Transport Statement*)

Local Services

- **Hospital** – Southlands Hospital is located 1.7 miles from the site. Worthing Hospital is located 3.2 miles from the site.
- **Doctors** – Adur Health Partnership is located 0.8 miles from the site, with New Pond Road Surgery 1.4 miles.
- **Dentist** – There are four Dentists within a 1 mile radius of the site – Church House Dental Practice Limited (0.8 miles); Shoreham Oral Care Ltd (0.8 miles); Edwards, Judith Margaret (0.8 miles); Alpha Dental Care (0.9 miles).
- **Shopping** – A Petrol Station which includes a Waitrose retail unit is located on the A259, close to the site to the south. A little further to the south are other retail uses within a parade on Beach Green. The Longshore public house is close by on the south side of the A259 also. There are additional business uses/ café within the Shoreham Airport Complex. Shoreham-by-Sea includes a large variety of uses includes a Community Centre, Churches, Post Office, Library, and huge variety of Class E uses including a range of shops, cafes and restaurants, Estate Agents, Pharmacies, Co-op shops, Hairdressers, and Beauty Salons. The town provides a significant amount of employment floorspace including office space. The Transport Statement also confirms that *“there are a number of facilities accessible on foot and by cycle from the site. The majority of these are located south and east of the site, towards or in Shoreham-by-Sea”*. The table below provides a summary of some of the everyday local amenities in the vicinity of the site:-

Amenity	Distance (m)	Walk Time (min)	Cycle Time (min)
Little Waitrose at Shell Shoreham	600	8	2
Beach Green Stores	650	9	2
Pebbles Pre-School Shoreham	700	10	3
Beach Green Playground	1,200	16	4
Adur Recreation Ground and Playground	1,000	13	3
Shoreham High Street	1,500	19	5
Boots Pharmacy	1,500	19	5
Shoreham Health Centre	1,800	24	7
Co-op Shoreham	2,000	27	7

Fig 9. Table showing access to local amenities (courtesy of Transport Statement)

Schools

The following primary and secondary schools are located within close proximity of the site:-

- **Primary Schools**

Swiss Gardens Primary School (0.7 miles); Seaside Primary School (0.9 miles); Shoreham Beach Primary School (1.1 miles); Buckingham Park Primary School (1.1 miles).

- **Secondary Schools**

Lancing College (1.2 miles); The Sir Robert Woodard Academy (1.7 miles). Shoreham College (2 miles); Shoreham Academy (2.1 miles); and Davidsons Church of England High School for Girls (2.9 miles).

6.15 The Transport Statement confirms that *“the site is accessible by active and sustainable transport modes, with the closest bus stop and railway station being easily accessed from the site and providing routes to nearby towns and villages where further amenities or transport options are available, that have the potential to reduce reliance upon the private car. In this regard, it is considered that the*

location of the site gives future residents a genuine choice about how they wish to travel.”

- 6.16 It is our opinion that this application site would represent a sustainable location, which would be eminently suitable for new housing development.

Access & Parking Arrangements

- 6.17 The application is accompanied by a Transport Statement, which has been prepared by Motion. Prior to the submission of this Planning Application Motion engaged with WSCC Highways via a formal pre-application enquiry. Motion’s report now confirms that *“access to the site for all modes will be provided via the existing access junction onto New Salts Farm Road located to the north of the development site. The access road and junction will be enhanced and improved to allow safe and suitable two-way vehicle movements to and from New Salts Farm Road (including for refuse collection vehicles)”*.
- 6.18 The transport statement confirms that the proposal includes parking in accordance with WSCC’s parking standards.

Number of Bedrooms	PBZ 4 – Car Parking Standards	Proposed Units	Standard Provision	Proposed Provision
1-bed unit	0.9	-	-	-
2-bed unit	1.1	-	-	-
3-bed unit	1.7	3	5.1	6
4-bed unit	2.2	7	15.4	17.5
Total		10	20.5	23.5

Fig 10. WSCC’s Car Parking Standards (*Courtesy of Transport Statement*)

- 6.19 It is proposed that *“each of the three-bedroom units would be provided two parking spaces each, resulting in 6 spaces overall. For the four-bedroom units, it is proposed to provide two parking spaces each, plus a garage (to the required minimum internal*

dimensions) resulting in a notional provision of 2.5 spaces per dwelling and hence the equivalent of 17.5 spaces overall. The total allocated parking for the development would therefore equate to 23.5 spaces. These levels of provision are therefore broadly in keeping with WSCC's published guidance. It is also proposed that each dwelling would be provided with an active electric vehicle charging (EVC) outlet as per the applicable mandatory building regulations".

6.20 There would also be 4 unallocated/ visitor parking spaces proposed throughout the site to allow for short term deliveries, tradesman and visitor parking. Each dwelling will also be provided with cycle storage for a minimum of 2 cycles per dwelling. This would either be in garages (where provided) or in bespoke cycle stores within rear gardens.

6.21 The report draws the following conclusions: -

- *"This planning application seeks permission for the removal of the existing barns and the construction of 10 dwellings (arranged as 3 No. three-bedroom and 7 No. four-bedroom units) with associated car parking and landscaping. Access to the site will be taken via the existing access junction onto New Salts Farm Road, which will be formalised and enhanced. Appropriate levels of car parking and cycle storage will be provided in accordance with relevant standards.*
- *The proposals have been subject to pre-application scoping with WSCC and applicable advice has been taken on board.*
- *In summary this Transport Statement has demonstrated the following:*
 - *The proposals accord with national and local policies relevant to transport;*
 - *The site is accessible by public transport, walking and cycling within the applicable context. This offers future residents a genuine choice of travel modes;*
 - *Safe and suitable access to the site can be achieved for all users;*

- *Appropriate provision is made for car parking (including EVC) having regard to the relevant guidance;*
- *Each residential dwelling will benefit from secure cycle storage;*
- *The proposals include appropriate provision for refuse collection and servicing activity; and*
- *The proposals would not create a significant amount of vehicle movements and therefore would not have a detrimental impact on the operation of the local highway network.*
- *In view of the above, the proposed development is considered acceptable in highways and transportation terms and meets with local and national policy criteria. The assessment work undertaken has shown that there would be no demonstratable harm arising from the proposed scheme and it would not cause any severe impacts. Therefore, there are no highways and transportation related reasons why the proposals should be resisted”.*

6.22 The proposal would be fully acceptable from a transport perspective, with an acceptable level of parking provisions to be provided as part of the development. The proposal would be fully compliant with guidance contained within the NPPF and **Policy 28** of the Adur Local Plan.

Flood Risk and Drainage

- 6.23 According to the Government’s ‘Flood Map for Planning’, the site is located within Flood Zone 3, where land has a high probability of flooding from rivers and the sea.
- 6.24 The Planning Application is accompanied by a Flood Risk Assessment and SuDS Strategy, which has been prepared by Hilson Moran. Prior to the submission of this Planning Application, Hilson Moran engaged with the Local Lead Flood Authority and the Environment Agency. Hilson Moran’s report confirms that *“The Environment Agency (EA) Flood Map for Planning has identified that the site is wholly within Flood Zone 3 (benefitting from coastal and tidal defences), with no flooding of the site in*

the current or future defended scenarios. The main source of flood risk in the area is a combination of coastal surges (with the coast located approximately 500 m to the south), as well as a tributary of the River Adur which is tidally influenced (located approximately 130 m to the east)."

6.25 The report draws the following conclusions:

- *"the site benefits from local flood defences, including "Demountable Defences" along the entire stretch of the coastline directly south of the site... Flood risk within the development is further mitigated due to local flood defence schemes such as the Shoreham Adur Tidal Walls Flood Defence Scheme... Other sources of flooding have been assessed and are deemed as low risk to the site.*
- *In order to manage runoff generated by the proposed development, c. 99.2m³ of attenuation within SuDS features will be provided within the site. This will be achieved by installing permeable paving within the central road, and an infiltration basin within the south east of the site. Runoff will be attenuated within these SuDS features and discharged to the ground via infiltration.*
- *The proposed SuDS on site will manage the quality of surface water runoff leaving the site...*
- *The proposed Drainage Strategy aligns with the Defra National Standards for SuDS. It provides a SuDS approach that manages development runoff, including allowances for climate change and urban creep, without increasing flood risk on site or elsewhere. It will discharge runoff in line with the drainage hierarchy and the proposed SuDS features will provide added water quality, amenity and biodiversity benefits.*
- *A Sequential Test has been conducted for the application site. Following a detailed and robust assessment of sequentially preferable sites, in full accordance with relevant guidance and advice, this study finds that there are no other reasonably available or currently developable sequentially preferable sites in the study area.*

- Consequently, it is wholly evident that the proposal passes the Sequential Test. It has also been demonstrated that the proposals meet both requirements of the Exception Test.

- In light of the findings and recommendations presented within this report, the principle of the proposed development is deemed appropriate on flood risk grounds.”

6.26 With respect to the approach for Planning Applications for new housing in areas at risk of flooding, the NPPF sets out within Section 14 (subsection entitled ‘Planning and Flood Risk’) that *“A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below [para 173]... Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test [para 174]...”* The Planning Practice Guidance (PPG) also provides further advice in respect to the application of the Sequential Test, confirming that it needs to *“be applied proportionately focusing on realistic alternatives in areas of lower flood risk that could meet the same development need.”* and *“Sites should be considered ‘reasonably available’ for the purposes of the sequential test if their location is suitable for the type of development proposed, they are able to meet the same development needs and they have a reasonable prospect of being developed at the same time as the proposal.”*

6.27 In this case, Hilson Moran have undertaken a Sequential Assessment and Exception Test (see Section 7 of their accompanying report). This describes the methodology used to conduct the Sequential Test, which follows the pre-app input from the Council in relation to the appropriate Search Area. Having applied the methodology, the Sequential Assessment considered 15 alternative sites (12 allocated and 3 windfall sites). The assessment indicates that 7 of these 15 alternative sites were at

lower flood risk than the Application Site. However, the assessment set out in Hilson Moran's report confirms that these 7 sites have all been excluded on various grounds relating to deliverability. Having applied the sequential test, it is concluded that there are no sequentially preferable sites available. Paragraph 177 of the NPPF confirms that in such circumstances the Exception Test may then have to be applied, and this depends on the vulnerability of the site and of the development.

- 6.28 In this case, the Exception Test does apply as the proposed residential use is classified (according to Annex 3 of the NPPF) as 'more vulnerable' development, and the site is within Flood Zone 3a. The NPPF (paragraphs 178 and 179), states that for the Exception Test to be passed it should be demonstrated that: (a). *"the development would provide wider sustainability benefits to the community that outweigh the flood risk; and (b). the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."* Both elements of the Exception Test should be satisfied for development to be allocated or permitted.
- 6.29 At paragraphs 7.3.1 and 7.3.2 of the Hilson Moran report it sets out how the proposals are compliant with the Exception Test, which (in summary) are because the proposals will result in wider sustainability benefits to the community and that the design will include flood risk measures without increasing flood risk elsewhere, and the development will be safe for its lifetime.
- 6.30 In conclusion, the Hilson Moran report confirms that the proposal passes the Sequential Test, as well as meeting both requirements of the Exception Test. The proposal is deemed *"appropriate on flood risk grounds"* and would be fully compliant with planning policy contained within the NPPF and PPG, and at the local level, **Policy 36** (Flood Risk and Sustainable Drainage) of the Adur Local Plan.

Character and Amenity

- 6.31 The site is located within a Local Green Gap, protected by **Policy 14** of the Adur Local Plan. This policy states that *“Local Green Gaps between the settlements of Lancing/ Sompting- Worthing, and Lancing-Shoreham-by-Sea, (as shown on the Policies Map), will be protected in order to retain the separate identities and avoid coalescence of these settlements. Within these areas any development permitted must be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the coalescence of settlements.”*
- 6.32 **Policy 13** of the Adur Local Plan notes that *“the landscape character of Adur and other areas of countryside, the coast, river, and settlement pattern will be protected and where possible enhanced. Any development or activities within the countryside must respect and where appropriate reinforce the setting, distinctiveness and sense of place of the above areas, taking into account the various elements which contribute to their distinctiveness such as geology and landform, biodiversity, scenic quality, strategic views, tree cover, settlement patterns, heritage and local vernacular, and land use. The setting of the South Downs National Park must also be respected.”*
- 6.33 The supporting text (paragraph 3.42 - 3.43) notes that areas identified as Local Green Gap have the following characteristics:
*“the open and undeveloped character of the land (this does not relate to landscape quality although some areas of gaps may happen to be of good quality);
they form a visual break between settlements – actual and perceived (from physical development or level of activity);
they create a sense of travelling between settlements; their boundaries follow physical features on the ground, taking account of the need to accommodate development requirements of the Plan;
only land necessary to secure the objectives of gaps on a long term basis has been included in these gaps”.*

- 6.34 In our opinion there would not be any coalescence in this instance due to the strategic gap being substantial and the site in question being small scale and already comprising fairly substantial built form. The site is well related to the existing adjacent buildings to the east, and the development proposals would be two storeys in height and in keeping with neighbouring development. Further, the dwellings would not have an increased built footprint when compared with the existing barn complex.
- 6.35 The proposals would be well contained within the existing boundaries of the site and would not encroach on the ADC owned land that lies adjacent to the barns site. The proposals also provide ample opportunity for on-site planting and landscape buffer, which would also provide biodiversity enhancement, as well as visual benefits. We are therefore confident that the integrity and function of the gap would not be diminished via the sensitive redevelopment of the site.
- 6.36 In addition, large scale development has been accepted nearby at the New Monks Farm site, which is located on the opposite side of the railway line to the northwest of the site. The New Monks Farm site was located outside the built-up area boundary, albeit it was allocated for development with the Adur Local Plan. The physical constraints of the site were considered within the SHELAA (ref: **ADC/122/13**). This stated that *“the site is within Flood Zone 3 and there are also issues with groundwater flooding...”*
- 6.37 It will be noted from a site visit that housing in this area is varied, consisting of terraced, semi-detached and detached housing, all set within varying size plots. The site contains extensive barn structures that provide a significant level of floor area and built volume as existing. The site is well related to the adjacent housing that is located to the east, and it will not appear an isolated or prominent form of development in landscape terms. Indeed, we consider that the proposals will appear discrete and would form an appropriate use of a site that contains existing built

form, which is no longer required for its lawful (agricultural) use, following the Council's purchase of the adjacent farmland (which we understand is set to be set aside for non-agricultural purposes).

- 6.38 Further, there is a need to ensure that new development provides an efficient use of available land resource. It is our opinion that the erection of 10 no. residential houses on this site would be wholly appropriate and make an efficient use of the site, which would appear in keeping with the character and appearance of the surrounding area.
- 6.39 We note that ALP **Policy 22** requires new residential developments to achieve densities of a minimum of 35 dwellings per hectare. However, this policy accepts that *"In exceptional cases residential development may be permitted at a lower density, where it is demonstrated by the applicant to the satisfaction of the Local Planning Authority that the minimum density specified above would result in an unacceptable impact on the surrounding area"*. We contend that the edge of settlement location, together with the relationship with the adjacent former farmland (located within the Gap), and the need to provide parts of the site for a SUDS pond and open space provision, lends itself to a lower density scheme. Indeed, the 10 units that are now proposed would represent a density of approximately 17 dwellings per hectare.
- 6.40 At the time of the pre-application enquiry being considered, the Council's Planning Officer noted that *"the area is characterised by flat, open farmland with clustered groups of buildings at New Salts Farm Road. The landscape here is vulnerable to change...There are significant longer distance views southwards from Lancing Ring and Hoe Court Farm. More locally the area forms part of the setting of the Grade II* listed Shoreham Airport terminal building, as well as direct open views across the Local Green Gap from the A259 to the south...New Salts Farmhouse, although unlisted, is a prominent local landmark in both near and long distance views of the*

area”. They went on to note that in their opinion *“the site is clearly visible from the A259, a busy road to the south, and from the railway line to the north. The visual impact of the development should be considered from these viewpoints”*.

- 6.41 The accompanying DAS refers to the CGI image detailed below, noting that it *“is intended to provide a realistic representation of the completed scheme within its wider context, illustrating how the development will sit comfortably within the existing landscape. From a number of viewpoints in the surrounding area, the site will be visible from elevated positions. For this reason, particular care has been taken to demonstrate how effectively the proposal integrates with its surroundings. This is achieved through the use of green sedum roofs and a palette of timber cladding with varied tones and finishes, which together help the development blend naturally into the landscape.”*



Fig 11. CGI Image of the proposed development (*Courtesy of Meynell Gunton*)

- 6.42 This Planning Application is also accompanied by a Landscape and Visual Appraisal, which has been prepared by Huskisson Brown Associates. The report confirms that

“HBA was appointed after the pre-application submission, to provide landscape and visual recommendations to the Applicant and Design Team in order to help address the preapplication comments and to steer a sensitive design approach to the Proposed Development. This addressed the need to respond to the local landscape character, context and location within a Local Green Gap, as designated in the Adur Local Plan (2017), as part of an iterative LVA assessment and design process.”

- 6.43 The LVIA acknowledges the site’s location within a local green gap, and that it lies within landscape character area SC13 Worthing and Adur Fringes (as assessed in the Landscape Character Assessment of West Sussex, 2003) and landscape character area 10: New Salts Farm (as assessed in the Landscape Character Assessment for the Adur Local Plan Area, 2023). The LVIA says *“The published landscape character studies note that the landscape of the coastal plain plays an important role in the relationship between the South Downs National Park and the coast... The Site in its local context is of overall medium landscape value in its current form”*. The LVIA confirms that *“Landscape and visual considerations have played a fundamental role in shaping the design of Proposed Development, forming an integral part of a structured and iterative design process. The Proposed Development would include the demolition of the existing barns and the construction of 10 no. dwellings which would feature flat green roofs. The proposal would be implemented alongside a landscape strategy that seeks to blend the development into the adjacent agricultural landscape through the use of a staggered planting scheme to the periphery of the Site. Within the development, a series of SUDs interventions would contribute towards a green setting to the development whilst providing valuable drainage functions to the Site’s flood plain setting.”*
- 6.44 The LVIA goes onto draw the following conclusions in respect of the development proposals:-
- *[the proposals reduce] the overall built footprint while redistributing built form across the Site. The scheme would result in a permanent change of use*

from agricultural to residential, introducing human activity and associated paraphernalia, however this would not be uncharacteristic given the existing residential context along New Salts Farm Road..... As the proposed landscape strategy establishes, the development would become embedded into a new landscape structure which blends into the surrounding agricultural landscape and provides a degree of screening.

- *The proposed development would not give rise to adverse landscape effects on the purpose of the Local Green Gap Designation as the Site is brownfield and forms part of a cluster of built form including other residential development that sits within this part of the gap. The separate identities of Lancing and Shoreham-by-Sea would be retained and there would be no physical or perceived coalescence between the two settlements. In the longer term the proposed development would introduce increased vegetation around the site that would contribute to the overall perception of 'green' in the area and soften the appearance of both the new and existing built forms in this part of the gap. The visual effects of the proposed development would be limited on account of the screening effect of existing built form within the local landscape.*
- *The proposed development would not be readily perceptible or detract from panoramic or 'breathtaking views' from the National Park. The Special Qualities of the National Park (ie. the purpose for which it is designated) are not considered to be adversely affected by the proposed development.*
- *The visual effects of the Proposed Development would be limited on account of the screening effect of existing built form within the local landscape.*
- *By Summer Year 15, there would still be a sense that the Site has been developed when travelling on New Salts Farm Road on account of the formalisation of the access track and glimpses of the development, however views of the Proposed Development from elsewhere would be mostly screened by the establishment of the proposed landscape strategy.*

- *Regarding long distance panoramic views across the coastal plain from the South Downs, within which the Site forms a very minor component. From these elevated views, the Proposed Development would be difficult to discern at both Day 1 and Year 15, with the green roofs of the proposed dwellings assisting with the integration of the Proposed Development into its wider landscape setting. The composition of views towards the Site from the South Downs National Park would be retained, with the Proposed Development becoming integrated into the existing pattern of built form and vegetation, the Site itself for the most part screened by existing built form. The perception of a 'green gap' between the South Downs National Park and development at Shoreham-by-Sea and Lancing would be retained.*
- *The Proposed Development seeks to create a modest housing scheme which minimises the impact of the development on its setting within a Local Green Gap and its relationship with the South Downs National Park through the utilisation of an already developed Site and the creation of a suitable landscape structure within and around the Site that in the longer term would result in a softer appearance to this part of the Local Green Gap."*

6.45 Clearly great care and consideration has been paid to the design and layout of the development proposal. We are of the opinion that this low-density scheme would create a high-quality environment, with ample external space around and between the new homes, which will provide a landscape led, pleasant residential environment that will positively contribute to the character, identity and appearance of the area. There would not be any coalescence in this instance due to the strategic gap being substantial and the site in question being small scale and already comprising fairly substantial built form. The development proposal would be fully compliant with guidance contained within the NPPF and **Policies 13 and 14** of the Adur Local Plan.

Design

6.46 **Policy 15** is a detailed design policy, entitled 'Quality of the Built Environment and Public Realm'. It says as follows (inter alia):

“Development should be of a high architectural quality and respect and enhance the character of the site, and the prevailing character of the area, in terms of proportion, form, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping. Development should:

- Enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping and layout of the development;*
- Include a layout and design which take account of the potential users of the site...”*

6.47 Chapter 12 of the NPPF refers to ‘Achieving well-designed places’, and says that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”* (paragraph 131).

6.48 The NPPF also says: *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot”* (paragraph 137). In this respect it is important to acknowledge that the Applicant’s have engaged with the Local Planning Authority via a pre-application enquiry, prior

to submission of this Planning Application. The Applicant has also undertaken engagement with the local community (please refer to the accompanying Statement of Community Involvement).

6.49 Concerns were raised at the pre-application stage regarding the height of the dwellings in relation to the existing barns, as well as the appearance of the proposed dwellings and the site layout. Following this pre application response, the scheme has been reviewed in detail, with a number of positive amendments have been made to the design. The following is a summary focussing on design-related items (as set out within the DAS):-

- *Heights of buildings have been significantly reduced and are now extremely close to the height of the tallest existing Barn on site (700mm higher).*
- *The proposed roof heights are now 1.9m lower than the highest roof level of Old Court Farm to the immediate east.*
- *The relationship with neighbouring properties is significantly improved through reduced heights, increased separation distances, and carefully designed landscape buffers.*
- *A SUD's drainage approach is proposed to ensure a compliant Flood Risk Compliant scheme can be delivered. In doing so, all sleeping spaces are at first floor level at a min. Datum of 5.94m AOD...*
- *Materials proposed have been carefully selected to ensure they reflect the local vernacular although in a contemporary manner. Flint and brickwork create a robust base at ground floor with timber cladding to upper levels to soften the visual appearance. Substantial variation is proposed between dwellings via building shape, cladding type, colour and tone - creating a strong sense of fluid design aesthetic and avoiding regimented built form.*
- *A landscape-led design approach forms the "golden thread" of the scheme, structuring a cohesive layout where buildings, views, and open space work together to create a calm, high-quality residential environment.*

- *A varied architectural language, expressed through differences in form, materials, and cladding helps break down uniformity and responds directly to concerns about regimented development.*
- *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.*
- *Sedum roofs introduce a ‘fifth elevation’, delivering a softer, more natural roof-scape that enhances views from higher ground and reinforces the landscape-led concept.*
- *Architectural detailing draws on local materials such as flint and brick, complemented by timber cladding, to create a contemporary rural character rooted in agrarian context.*
- *A high-quality public realm, including generous green verges, native planting, and a nature walk, ensures the scheme contributes positively to the wider landscape setting.*
- *The overall composition is carefully balanced to minimise visual impact and enable the development to sit comfortably within its surroundings.”*

6.50 The proposed footprint is less than existing and the revised flat / mono pitch roof design ensures that the mass of the buildings is kept as low as possible, with the new dwellings set 700mm higher at their highest point than the largest existing barn. The DAS concludes that *“The proposed redevelopment of the existing barns at New Salts Farm delivers a carefully considered, landscape-led scheme for ten new dwellings. The design responds positively to the site’s sensitive context through reduced building heights, broken massing, high-quality materials and a strong landscape framework, ensuring the development integrates successfully with its surroundings.”*

6.51 We consider that the presented design for the redevelopment of this site will make efficient use of land that contains existing development. The proposals will function

well and positively add to the overall quality of the area for the lifetime of the development. The proposed development will create a visually attractive scheme that includes high-quality architecture, a good layout that will function well, and appropriate and effective landscaping. As explained in the accompanying DAS, the proposals are sympathetic to local character, including the surrounding built environment and landscape setting, and will establish a strong sense of place, and will create an attractive and distinctive place for future residents to live. The proposed density is appropriate to the sites location, with reference to adjacent development and its natural setting, and also allows the incorporation of open space, landscaping and drainage features on-site. The development has been carefully designed to ensure that it will be safe and accessible, with a high standard of amenity for existing and future users, abiding by 'Secure by Design' principles.

- 6.52 It is clear that the Council's previous concerns regarding design have fully informed the proposed development. We are confident that the revised scheme would represent a high quality design scheme, which will be fully compliant with the design chapter of the NPPF and **Policy 15** of the Local Plan.

Residential Amenity

- 6.53 The site is bordered by open fields to three sides, with the closest residential properties located to the northeast side. The proposed development would replace existing building form on the site and further, no concerns regarding residential amenity were raised at the pre application stage (with the exception of the potential for noise pollution which will be considered in detail below).
- 6.54 Separation distances of 22m to adjacent existing buildings are proposed for those dwellings in the north-east area of the site. As such, we are confident that the proposed dwellings would be set a sufficient distance away from neighbouring properties and would not cause demonstrable harm to the residential amenities of any nearby residents by way of overlooking effect, loss of light, or loss of privacy.

- 6.55 The proposals will comply with the criteria contained in the Council's adopted Development Management Standard No.1 "Space Around New Dwellings and Flats" in respect of space between buildings and the provision of outside amenity space.
- 6.56 In addition, the houses have been designed to comply with the standards set out in the Nationally Described Space Standards.
- 6.57 Taking into consideration all the above, it is our opinion that the proposed development would not have a detrimental effect on the residential amenities of any neighbouring dwellings by way of noise impact, overbearing effect, loss of privacy or loss of light and would be fully compliant with **policy 15** of the Adur Local Plan and the Council's adopted Development Management Standard No.2 Extensions and Alterations to Dwellings.

Noise Impact

- 6.58 The planning application is accompanied by a Noise Impact Assessment, which has been prepared by Acoustic Southeast.
- 6.59 Following pre-application discussions with Adur and Worthing Council, it was identified that an acoustic report would be required to cover the noise from the railway station and airport. The report confirms that *"the railway located at approximately 300m to the North of the site connects Shoreham and Lancing on the Southern railway line and runs East to West...The A259 (Brighton Road) also exists to the South of the site with approximately 300m which links Shoreham by Sea and Lancing...Shoreham Airport is located further North and has both fixed wing small aircraft and helicopters...The duration of the soundscape monitoring also included the Eastbourne Airshow (Airborne) which ran from Thursday 14 August to Sunday 17th August 2025. This is relevant as a number of the smaller aeroplanes and/or helicopters will have utilised Shoreham Airport"*.

6.60 The report draws the following conclusions: -

“A sound survey was undertaken from 12th to 19th August with a class 1 sound level meter at the application site. The findings of the assessment were that the daytime sound pressure levels were an average (logarithmic) of 49dB LAeq,16 hours and night time sound pressure levels were 41dB LAeq,8 hours. The Sound Reduction Index (SRI) required to protect future occupants is a maximum of 18dB.

The monitoring period deliberately included a weekend and by coincidence, this included the Eastbourne airshow (Airborne). It is therefore argued that the dataset presents a worst-case period when the airport is being used.

Garden areas will comfortably achieve the requirements of BS8233:2014 and ProPG2017 with an upper requirement of 55dB LAeq, 16 hour. It is noted that for the days without the airshow impact, the daytime sound pressure levels were 45dB and 47dB LAeq,16 hours respectively.

An initial site risk assessment consistent with the requirements of ProPG2017 identifies a negligible to low risk of developing the site.

An assessment made under Building Regulations Approved Document O (Overheating) identifies that bedroom windows will be capable of being opened during the night time period.

In terms of mitigation measures, rigorous calculations were carried out, consistent with the approach in Annex G.2 of BS8233:2014. Standard thermal double glazing (Rtraffic 25dB(A)) and a passive non-acoustic trickle vent of 31dB Dnew will provide the residents sufficient protection from noise levels.

Based on the above findings, planning permission should not be withheld on noise grounds”.

6.61 Our client is fully committed to carrying out the suggested recommendations, set out within section 6 of the report and would be happy for any permission to be conditioned accordingly. The development proposal would be fully compliant with guidance contained within the NPPF and **Policy 15** of the Adur Local Plan.

Space Standards

- 6.62 The proposal has been designed to be fully compliant with the National Space Standards, with respect to the internal floorspace of the proposed new residential units.
- 6.63 The Government's Technical Housing Standards - national described space standards sets out minimum gross internal floor areas and storage. The proposed development would comprise 3 No. three bedroom (5-person occupancy) houses and 7 No. four bedroom (7-person occupancy).
- 6.64 The proposed floor areas are as follows: -
- | | |
|------------------|-----------|
| Plot 1 (4b/ 7p): | 143.8 sqm |
| Plot 2 (3b/5p): | 113 sqm |
| Plot 3 (3b/5p): | 113 sqm |
| Plot 4 (3b/5p): | 113 sqm |
| Plot 5 (4b/7p): | 143.8 sqm |
| Plot 6 (4b/7p): | 157.3sqm |
| Plot 7 (4b/7p): | 143.8 sqm |
| Plot 8 (4b/7p): | 157.3 sqm |
| Plot 9 (4b/7p): | 143.8 sqm |
| Plot 10 (4b/7p): | 157.3 sqm |
- 6.65 Each of the 3bed/ 5-person occupancy houses would comfortably exceed the requirements of 93 sqm; whilst the 4bed/ 7-person occupancy houses would comfortably exceed the requirements of 115 sqm.
- 6.66 As outlined above, the proposal would be fully compliant with the Government's Technical Housing Standards document in relation to space standards.

Ecology

- 6.67 The Application is accompanied by a Preliminary Ecological Appraisal, which has been prepared by The Ecology Partnership.
- 6.68 The report states that the site covers an area of approximately 0.57 hectares and consists of hardstanding and buildings with areas of grassland and scrub. The site boards agricultural fields to the north, south and west and residential properties
- 6.69 The report draws the following conclusions: -
- *“Adur Estuary SSSI is located 380m east of the site. It is recommended that suitable pollution controls are put in place during construction and that sufficient SUDS are designed into the scheme to avoid any impact on this designation.*
 - *Due to the location, scale, and type of the proposed development, direct or indirect impacts on any other designated sites are considered unlikely.*
 - *No priority habitat is present on or adjacent to the site. It is recommended that suitable pollution controls are put in place during construction and that sufficient SUDS are designed into the scheme to avoid any impact on mudflats and salt marsh priority habitat associated with Adur estuary SSSI.*
 - *Habitat on site is of low value to foraging and commuting bats and a sensitive lighting strategy is recommended.*
 - *Any removal of suitable vegetation should be undertaken outside of the breeding bird season (March-September inclusive) or immediately after a nesting bird check by a suitably qualified ecologist. Buildings must always be checked for nesting birds, regardless of time of year. If active nests are identified, works in the vicinity of the nest must cease until the birds have fledged the nest.*
 - *The edge habitat also offers potential to support a low population of reptiles. While no further surveys would be necessary, reasonable avoidance measures are to be implemented for small areas of scrub and marginal grassland. Additionally, the grassland should continue to be cut to a short sward height*

leading up to the grounds work to ensure suitable habitat does not develop across the site.

- *Other protected species such as roosting bats, Great crested newts, dormice, otters and watervoles are unlikely to use the site due to limited suitable habitat, and the development is unlikely to impact potential habitat in the surrounding area. As such, further surveys and considerations for these species are not necessary”.*

6.70 No further ecological survey works is recommended for this site.

6.71 A number of enhancements are suggested to be incorporated into the development scheme to help reduce potential ecological impacts and provide net gains to biodiversity. These include: -

- Flowering lawn mixes to be used for areas of shorter grass within the development.
- Any attenuation ponds on site to be enhanced to provide value for wildlife.
- Bird and Bat boxes to be attached or incorporated into the buildings to increase the number of breeding/ roosting opportunities.
- Recommended that log piles and hibernacula be created along the edges of the site.
- The site could be enhanced for hedgehog, through provision of shelters in secluded areas around the edge of the development and all gardens should provide an access hole on each fence.

6.72 Our client is committed to complying with the suggested mitigation measures and would be happy for these to be ensured via a suitably worded condition. The proposals would be compliant with guidance contained within the NPPF and **Policy 31** of Adur Local Plan.

Biodiversity Net Gain (BNG)

6.73 This application is accompanied by a Biodiversity Net Gain Feasibility Assessment.

6.74 The report draws the following conclusions: -

"The baseline value of the site is 1.37 area units.

Post-development the proposed value of the site is currently predicted to be 2.33 area units, equating to a change of 69.23% in habitat units.

All trading rules have been satisfied.

As a condition of planning approval an update BNG assessment will be required based on the detailed landscape plans once finalised post approval. A Habitat Management and Maintenance Plan (HMMP) will also likely be required to detail the necessary management required to achieve the targeted net gain, over a 30 year timespan."

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	0.95
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	69.23%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

Fig 12. Table of final results (courtesy of Biodiversity Net Gain Feasibility Assessment)

6.75 Our client is happy for the Planning Application to be conditioned accordingly. The proposal would be compliant with guidance at the national level and **Policy 31** of Adur Local Plan.

Contamination

6.76 The application is accompanied by a Phase 1 Contaminated land Assessment, which has been prepared by Hilson Moran. The report concludes that *"overall, the current*

*and former use of the Site indicates that there is a **moderate** potential for significant or widespread soil and groundwater contamination to be present. There is a lack of site-specific data relating to the ground conditions at the Site, including the contamination status of soil and groundwater and the ground gas regime. Further action (such as a ground investigation and possible remediation) is recommended below, and it is considered that this can be addressed through appropriately worded planning conditions”.*

- 6.77 On the basis of the findings of the Phase 1 Contaminated Land Assessment, the report makes the following recommendations for the proposed redevelopment:
- *“A Detailed UXO Desk Study should be commissioned to assess the UXO hazard level across the Site. This is a Health & Safety requirement and should be undertaken prior to breaking ground i.e. for a future ground investigation or redevelopment.*
 - *A Ground Investigation will be required to assess the ground conditions at the Site (soil, groundwater and ground gas) and identify if contamination and/or ground gases are present which could pose a significant risk to human health and/or controlled waters.*
 - *Potential land stability issues associated with the underlying geology and former surface abstraction in the south of the Site will need to be further investigated as part of the ground investigation.*
 - *A Remediation Strategy may be required, depending on the findings of the Ground Investigation, which should include a Verification Plan for any proposed remediation.*
 - *Redevelopment should be undertaken in accordance with the Control of Asbestos Regulations 2012 (CAR 2012) and appropriate risk assessments, method statements and control measures should be implemented. A Refurbishment and Demolition Survey should be undertaken for all buildings prior to the proposed refurbishment and/or demolition and any recommendations (including removal and abatement) should be implemented in accordance with CAR 2012 and associated guidance”.*

- 6.78 Our client is committed to carrying out the required recommendation measures and would be happy for the proposal to be conditioned accordingly.

Sustainable Construction & Energy Efficiency

- 6.79 **Policies 18** (Sustainable Design) and **19** (Decentralised Energy, Standalone Energy Schemes and Renewable Energy) of the Adur Local Plan seek sustainable and energy efficient development and this is supported by the Council's recent SPD on energy. We are aware that the Council has also adopted a Planning and Climate Change Checklist which encourages a minimum 31% reduction in carbon emissions for all new build housing.
- 6.80 A detailed Energy and Sustainability Statement accompanies this Planning Application, and this confirms that the proposed measures will ensure that the development meets or exceeds current Building Regulations requirements and supports the objectives of the Adur Local Plan and the National Planning Policy Framework by promoting sustainable development and reducing operational carbon emissions.
- 6.81 The proposals would be compliant with guidance contained within the NPPF and **policies 18 and 19** of the Adur Local Plan.

Affordable Housing

- 6.82 **Policy 21** of the Adur Local Plan states that *"Affordable Housing On development sites of 11 dwellings or more (gross) a target of 30% affordable housing, including social rented, affordable rented and intermediate housing will be sought"*.
- 6.83 We are aware however that the Council subsequently adopted an Interim Affordable Housing Position Statement on 8th April 2020. This document explains that following publication of the NPPF in 2019 (which prohibited affordable housing being sought from developments which are not major developments) the threshold for seeking

affordable housing was amended to 10 dwellings, consistent with the definition of major development.

- 6.84 The Council's pre-application enquiry reply confirms that *"given that this proposal is for 10 dwellings, a contribution for affordable housing should be sought...Paragraph 4.41 of the Adur Local Plan states: "The Council will require affordable housing to be provided on site, unless offsite provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities."*
- 6.85 It is understood from our discussions with the District Council's Planning Officer, that the Council take a policy sequential approach to dealing with the provision of affordable housing as part of residential development planning applications. In this respect it is acknowledged that Policy 21 states that a financial contribution is *"a last resort in exceptional circumstances only"*.
- 6.86 Initially the Applicant approached a number of Registered Providers to invite expressions of interest in the Affordable Housing element of the proposed development of 10 dwellings on this site. Based on the responses received and lack of interest from other parties, we are of the opinion that there is no market for the delivery of affordable units on this site, and for this reason it is suggested that the provision of a commuted sum in lieu of on-site delivery is appropriate in this case.
- 6.87 It is acknowledged that the second step set out in Policy 21 states: *".. but if other factors demonstrate that [on-site] affordable housing may not be appropriate, development of affordable dwellings on another site within Adur may be considered."* In this respect the Applicants are not in control of any other land/development site within Adur District, so it is not possible for them to provide affordable housing on other land within the local area that could provide affordable housing. On this basis,

we see no other option but to deal with affordable housing provision via a commuted sum in this case.

- 6.88 It is noted that Policy 21 says that *“In cases where a financial contribution is accepted, the payment should reflect the cost of providing the number, type and size of affordable dwellings which would have been provided on-site.”* The Applicant engaged with Bespoke Property Consultants (BPC), and they have undertaken a Viability Assessment in order to appraise the financial viability of the proposed development of 10 dwellings. The BPC Viability Report accompanies this planning application.
- 6.89 BPC advise within their report’s Executive Summary that *“Based on the proposed scheme of 10 residential dwellings with a fixed land value equating to the BLV, a commuted sum for Affordable Housing of £100,000, the residual profit is £501,308. This represents a profit on GDV of 7.43% which is significantly below the minimum return of 15% recognised in the National Planning Policy Guidance. In summary we can conclude the development does not generate a surplus sufficient to make a financial contribution towards Affordable Housing of more than the figure of £100,000 offered by the applicant. The applicant recognises the need for Affordable Housing and is prepared to make the offer of £100,000 as a payment in lieu of on-site provision.”*
- 6.90 We would welcome the opportunity to discuss the above matter with the Council, during the planning application process.

Alternative Uses

- 6.91 It is acknowledged that the existing barns are classified as agricultural buildings. In the event that the principle of residential redevelopment were not supported at this site, alternative options such as a change of use via Class R (Agricultural to Flexible Commercial Use) prior approval exist. This is a realistic alternative, particularly given

that the barns will likely become redundant should Adur Council proceed with its plans for a wetland project on the adjacent New Salts Farm, as the current tenant farmer holds only a limited grazing licence.

- 6.92 However, it is our strong contention that pursuing such commercial alternative options would represent an under-utilisation of the site. Given the pressing need for housing within the District, as evidenced by the Council's inability to demonstrate a five-year housing land supply, the redevelopment of this site for high-quality residential purposes is the most appropriate and sustainable use of the land. Residential development delivers the maximum benefit to the community by directly addressing the housing shortfall in a location that is both accessible and well-suited for such use.

7.0 PLANNING BALANCE

- 7.1 The Development Plan comprises the Adur Local Plan, which was adopted at a meeting of Adur Full Council on 14th December 2017. The Development Plan is out of date in terms of (i) the spatial application of its housing policies, (ii) the Council cannot demonstrate a five-year supply of deliverable housing; and (iii) the Council failed the latest Housing Delivery Test (published in December 2024) as per the requirements of paragraph 78 of the NPPF. The identified housing shortfall, combined with the lack of consistency with the NPPF, triggers the presumption in favour of sustainable development at paragraph 11(d) of the NPPF.
- 7.2 Part (i) of Paragraph 11(d) says that permission should be granted unless *“the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed”*. Related footnote 7 confirms an area of particular importance include areas at risk of flooding. However, it is demonstrated within this Planning Application submission that drainage and flood risk considerations have been satisfied and therefore this does not provide a ‘strong reason for refusing the development proposed’.
- 7.3 Part (ii) of paragraph 11(d) then directs the decision maker to consider whether *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”*
- 7.4 Our position is that the benefits of the proposed development will outweigh any perceived limited harm that would arise from the redevelopment of this site. As outlined above, the focus of the NPPF continues to be for development to be

sustainable. It sets out there are three principle 'objectives' to achieving sustainable development: economic, social and environmental.

- 7.5 It is acknowledged in the accompanying LVIA that there will be some landscape harm arising from the redevelopment of the site, but this is limited given the site's relationship with adjacent existing properties, and that the proposals seek to make use of land that contains existing buildings. In this respect we consider that a considerable benefit of the scheme is the high quality design, which is landscape led (as set out in the Architect's Design & Access Statement). The proposals will provide on-site public open space within a comprehensive landscape scheme, with on-site surface water drainage betterment, and biodiversity net gain. **Consequently, the environmental role of sustainable development would be satisfied by this proposal.**
- 7.6 A significant benefit of the development is the provision of housing in an area with an unmet housing need. The proposal also seeks to make a financial contribution to local affordable housing. We have sufficiently demonstrated that although located outside of the built-up area boundary, the site is within a sustainable location with attractive pedestrian routes to local services and facilities, including public transport opportunities, retail, employment and education services. **Overall, it is considered that the proposal would be satisfactory from a social perspective.**
- 7.7 In terms of economic benefits, the proposed development would result in the creation of construction jobs during the build period. The additional population could help generate more local spending in the local community, provision of infrastructure and services. This is a material consideration that weigh in favour of the development. **It is considered that the proposal would satisfy the economic role of sustainable development.**

8.0 CONCLUSIONS

- 8.1 This development proposal is seeking planning permission for a residential development, comprising 10 No. residential houses to replace the existing agricultural barns. Access will be via New Salts Farm Road.
- 8.2 The Council do not currently have a 5YHLS supply, and they failed the latest Housing Delivery Test. The Local Plan is out of date. NPPF paragraph 11(d)(ii) states that for decision-making, permission should be granted unless *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”*. In this case, clearly any adverse impacts of the development do not come close to significantly or demonstrably outweighing the benefits, which is the relevant test in this scenario, leading to the conclusion that planning permission should be granted.
- 8.3 This Site is located outside of the defined built-up area boundary for Shoreham by Sea. The site is located within a Local Green Gap, where Policy 14 of the Adur Local Plan applies. The accompanying LVIA confirms that *“The proposed development would not give rise to adverse landscape effects on the purpose of the Local Green Gap Designation”*. In our opinion there would not be any coalescence in this instance due to the strategic gap being substantial and the site in question being small scale and already comprising a larger built form than that proposed by the new housing.
- 8.4 The site is located within Flood Zone 3, however this Planning Application is accompanied by a Flood Risk Assessment and SuDS Strategy, which has been prepared by Hilson Moran. The report confirms that the proposal passes the Sequential Test, as well as meeting both requirements of the Exception Test. The proposal is deemed appropriate on flood risk grounds and would be fully compliant with the NPPF and Adur Local Plan Policy 36 (Flood Risk and Sustainable Drainage).

- 8.5 We are of the opinion that the Site is of a size to comfortably accommodate a modest sized development of 10 No. homes at an appropriate residential density, which would respect the established character of the locality.
- 8.6 This Planning Application follows pre-application enquiry discussions with the Council's Planning Officer. In their response the Officer raised concerns regarding the height of the dwellings in relation to the existing barns, as well as the appearance of the proposed dwellings and the site layout. The scheme has been revised and we are confident that the design now address the concerns raised, with the creation of a high-quality development of 10 No. residential homes, which would respect the established character of the locality in terms of quantum, pattern and spatial layout of development.
- 8.7 In respect of the NPPF, we are firmly of the opinion that this eminently developable site provides an opportunity to provide a new residential development that will accord with each of the social, economic and environmental objectives of the sustainable development test, whilst also boosting the supply of housing. The proposed redevelopment optimises the potential of the site to accommodate development as required by the NPPF, whilst respecting the character of the area and taking due account the residential amenities of neighbouring properties. It is strongly considered that the proposed development constitutes a sustainable form of development, and within the planning balance the significant benefits of the proposal clearly outweigh the limited harm, and therefore planning permission should be granted without delay.

July 2026