

Appendix H – Surface Water Catchment Plan



NORTHERN ACCESS ROAD NOT CONSIDERED FOR CALCULATION. PERMEABLE SURFACE TO BE PROVIDED SUITABLE TO ACCOMODATE ACCESS FOR LARGE SERVICE AND EMERGENCY VEHICLES. RUNOFF TO INFILTRATE THROUGH SURFACE AND UNDERLYING STRATA OR DRAIN TO ADJACENT FIELDS.

- NOTES
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 - THIS DRAWING IS BASED OFF THE ARCHITECTURAL LAYOUT REVISION A DATED 20.01.26, DRAWING NUMBER '2250(11)002.

- LEGEND
- SITE BOUNDARY
 - CATCHMENT A - IMPERMEABLE AREA - 2472m²
 - SOFT LANDSCAPING

- DESIGN ASSUMPTIONS
- SURFACE WATER DRAINAGE PROPOSALS ARE DESIGNED TO ACCOMMODATE AN IMPERMEABLE AREA OF 2472 m² CONSISTING OF ROOFS, HARDSTANDING, AND PAVED ACCESS ROUTES, UP TO AND INCLUDING THE DESIGN STORM OF 100 YR + 45% CLIMATE CHANGE. ALL RUNOFF IS ROUTED VIA A COMBINATION OF PERMEABLE PAVING, INFILTRATION BASIN AND SOFT LANDSCAPING WITH EXCEEDANCE ROUTING DIRECTED AWAY FROM PROPOSED BUILDINGS.
 - PROPOSED LEVELS SUBJECT TO CHANGE BY OTHERS. DESIGN CURRENTLY ASSUMES LEVELS ARE CONSTRUCTED TO AVOID PONDING AND ENSURE SAFE CONVEYANCE TOWARDS SUDS FEATURES.

P02 22/05/26	UPDATED RED LINE BOUNDARY	MV	DN	
P01 15/04/26	ISSUED FOR COMMENT	MV	MD	
REV	DATE	DESCRIPTION	BY	CHECKED
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HILSON MORAN

CLIENT

NEW SALTS FARM

PROJECT

SURFACE WATER DRAINAGE
CATCHMENT PLAN

TITLE							
MV	09/04/2026	MD	A1				
DRAWN BY	DRAWN DATE	CHECKED BY	SHEET SIZE				
6422I	STAGE 2	S2	1/250				
PROJECT NO.	PROJECT STAGE	SUITABILITY CODE	SCALE				

6422I	AKT	XX 00	DR C	00400	P02		
PROJECT ID	ORIGINATOR	ZONE	LEVEL	TYPE	ROLE	DRAWING NO.	REVISION

ISSUED FOR COMMENT

Appendix I – Exceedance Flow Plan



- NOTES
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- LEGEND
- SITE BOUNDARY
 - SURFACE WATER FLOW PATH
 - SOFT LANDSCAPING
 - BUILDING FOOTPRINT
 - LEVEL SYMBOL

- DESIGN ASSUMPTIONS
- SURFACE WATER DRAINAGE PROPOSALS ARE DESIGNED TO ACCOMMODATE AN IMPERMEABLE AREA OF 2472 m² CONSISTING OF ROOFS, HARDSTANDING, AND PAVED ACCESS ROUTES. UP TO AND INCLUDING THE DESIGN STORM OF 100 YR + 45% CLIMATE CHANGE. ALL RUNOFF IS ROUTED VIA A COMBINATION OF PERMEABLE PAVING, INFILTRATION BASIN AND SOFT LANDSCAPING WITH EXCEEDANCE ROUTING DIRECTED AWAY FROM PROPOSED BUILDINGS.
 - PROPOSED EXTERNAL LEVELS ARE INDICATED TO DIRECT OVERLAND FLOWS FROM A HIGH POINT AT +2.6m AOD AT THE NORTHERN ACCESS ROAD ADJACENT TO THE NATURAL PLAY SPACE TO ALLOW SLOPING SOUTHWARDS TOWARDS PERMEABLE PAVING (+2.5m AOD), FOLLOWED BY NATURAL COLLECTION WITHIN THE INFILTRATION BASIN AREA. PROPOSED HOUSING TO BE SITED ABOVE EXTERNAL LEVELS.
 - PROPOSED LEVELS SUBJECT TO CHANGE BY OTHERS. DESIGN CURRENTLY ASSUMES LEVELS ARE CONSTRUCTED TO AVOID PONDING AND ENSURE SAFE CONVEYANCE TOWARDS SUDS FEATURES.

P03 22/05/26	UPDATED RED LINE BOUNDARY	MV	DN
P02 27/04/26	ISSUED FOR COMMENT	MV	DN
P01 15/04/26	ISSUED FOR COMMENT	MV	MD
REV	DATE	DESCRIPTION	I BY CHECKED
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NEW SALTS FARM

PROJECT

SURFACE WATER
EXCEEDANCE FLOW PLAN

TITLE

MV	14/04/2026	MD	A1
DRAWN BY	DRAWN DATE	CHECKED BY	SHEET SIZE
64221	STAGE 2	S2	1:200
PROJECT NO.	PROJECT STAGE	SUITABILITY CODE	SCALE

64221 AKT XX 00 DR C 00500 P03

PROJECT ID ORIGINATOR ZONE LEVEL TYPE ROLE DRAWING NO. REVISION

ISSUED FOR COMMENT

Appendix J – Drainage Strategy Drawing

PERMEABLE PAVING FOR STORAGE / INFILTRATION
PROPOSED AREA = 317 m²
VOLUME = 54.2m³
STORAGE DEPTH = 570mm
POROSITY = 30%
INFILTRATION TO GROUND

INFILTRATION BASIN
PROPOSED AREA = 164m²
VOLUME = 44.9m³
DEPTH = 0.520m (INCLUDING 150mm FREEBOARD)

- DESIGN ASSUMPTIONS**
1. THE SURFACE WATER DRAINAGE PROPOSALS ARE DESIGNED TO ACCOMMODATE AN IMPERMEABLE AREA OF 2472 m² CONSISTING OF ROOFS, HARDSTANDING, AND PAVED ACCESS ROUTES, UP TO AND INCLUDING THE DESIGN STORM OF 100 YR + 45% CLIMATE CHANGE. ALL RUNOFF IS ROUTED VIA A COMBINATION OF PERMEABLE PAVING, INFILTRATION BASIN AND SOFT LANDSCAPING.
 2. PROPOSED EXTERNAL LEVELS ARE INDICATED TO DIRECT OVERLAND FLOWS FROM A HIGH POINT AT +2.6m AOD AT THE NORTHERN ACCESS ROAD ADJACENT TO THE NATURAL PLAY SPACE TO ALLOW SLOPING SOUTHWARDS TOWARDS PERMEABLE PAVING (+2.5m AOD) FOLLOWED BY NATURAL COLLECTION WITHIN THE INFILTRATION BASIN AREA. PROPOSED HOUSING TO BE SITED ABOVE EXTERNAL AREAS.
 3. STORAGE VOLUME BASED OFF INFILTRATION TESTING FROM GROUND AND ENVIRONMENTAL SERVICES LIMITED REPORTS REF: 13718, PRESENTING WORST-CASE SCENARIO:
 - INFILTRATION RATE OF 3.91 x 10⁻⁴ m/s
 - GROUNDWATER LEVEL OF 1.4 m BELOW GROUND LEVEL, APPROX. 0.8m AOD
 4. THE INFILTRATION BASIN IS DESIGNED WITH MAXIMUM 1:3 SIDE SLOPES, AT 0.62m DEEP INCLUDING A 150mm FREEBOARD ALLOWANCE. THE INFILTRATION BASIN WILL OPERATE AS AN OVERFLOW IN ANY STORM WATER EXCEEDANCE EVENTS.
 5. PERMEABLE PAVING BUILD-UP (FOR STORAGE / INFILTRATION) IS DESIGNED WITH A TOTAL DEPTH OF 700mm INCLUDING PERMEABLE PAVERS AND SAND DEPTH OF 130mm AND 570mm OF 4/20 COARSE GRADED AGGREGATE WITH 30% VOID RATIO FOR STORAGE.
 6. PROPOSED COVER LEVELS AND INVERT LEVELS TO BE DEVELOPED AT NEXT DESIGN STAGE. MINIMUM PIPE COVER SUBJECT TO FINAL COORDINATED LEVELS. STORAGE OF THE PERMEABLE PAVING BUILD-UP (FOR CONVEYANCE) IS NOT INCLUDED IN HYDRAULIC CALCULATION, ITS DEPTH SUBJECT TO STRUCTURAL REQUIREMENTS ONLY - TO BE DESIGNED AT THE NEXT DESIGN STAGE.
 7. PROPOSED LEVELS SUBJECT TO CHANGE BY OTHERS. DESIGN CURRENTLY ASSUMES LEVELS ARE CONSTRUCTED TO AVOID PONDING AND ENSURE SAFE CONVEYANCE TOWARDS SUDS FEATURES.
 8. UTILITIES TO BE DESIGNED BY OTHERS.
 9. PROPOSED PERMEABLE PAVING SUB-BASE IS SHOWN TO BE WITHIN 5m OF PROPOSED BUILDING FOUNDATIONS IN CERTAIN LOCATIONS, WHERE THIS IS THE CASE, THESE AREAS ARE TO BE:
 - 9.1. JUSTIFIED IN CONSULTATION WITH AN APPOINTED GEOTECHNICAL SPECIALIST AT THE NEXT DESIGN STAGE, OR
 - 9.2. BE IMPERMEABLY LINED UP TO THE 5m OFFSET.

- NOTES**
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- LEGEND**
- SITE BOUNDARY
 - SURFACE WATER DRAINAGE PIPE
 - SURFACE WATER PERFORATED PIPE
 - RAINWATER DRAIN POINT
 - SURFACE WATER CHANNEL DRAIN
 - SURFACE WATER INSPECTION CHAMBER
 - PERMEABLE PAVING (FOR STORAGE / INFILTRATION)
 - PERMEABLE PAVING (LINED FOR CONVEYANCE)
 - SOFT LANDSCAPING
 - BUILDING FOOTPRINT
 - INFILTRATION BASIN
 - LEVEL SYMBOL

P04	22/05/26	UPDATED RED LINE BOUNDARY	MV	DN
P03	29/04/26	ISSUED FOR COMMENT	MV	DN
P02	27/04/26	ISSUED FOR COMMENT	MV	DN
P01	15/04/26	ISSUED FOR COMMENT	MV	MD
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HILSON MORAN

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NEW SALTS FARM

PROJECT

**PROPOSED DRAINAGE
STRATEGY**

MV	02/04/2026	MD	A1
DRAWN BY	DRAWN DATE	CHECKED BY	SHEET SIZE
64221	STAGE 2	S2	1:200
PROJECT NO.	PROJECT STAGE	SUITABILITY CODE	SCALE

64221 AKT XX 00 DR C 21000 P04
PROJECT ID ORIGINATOR ZONE LEVEL TYPE ROLE DRAWING NO. REVISION

ISSUED FOR COMMENT

Appendix K – Proposed Foul Sewer Diversion

Appendix L – Pre-Application Response



ADUR & WORTHING
COUNCILS

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Date: 1 May 2025

Service: Development
Management

Tel: 01903 221065
planning@adur-worthing.gov.uk

Our Reference: PREAPP/0046/25

**Land And Barns, New Salts Farm, New Salts Farm Road, Lancing
Demolition of existing agricultural barns and redevelopment comprising 10 no.
new dwellings**

Dear Mr Rodway

Thank you for your recent pre-application enquiry regarding the above. As promised at our meeting on 15th April I am now providing a written response setting out the main considerations and concerns.

Policy

As you know, the site lies outside the built up area boundary and is within the countryside and Local Green Gap between Shoreham and Lancing. Adur Local Plan (ALP) Policy 13: Adur's Countryside and Coast states that:

'Outside of the Built Up Area Boundary (as shown on the Policies Map), development will only be permitted where the need for a countryside location is essential; it is for quiet informal recreation or the essential needs of agriculture, horticulture, flood management or it otherwise consistent with this plan.'

As the proposed development site is outside the built up area boundary it is also not consistent with Policy 2, Spatial Strategy and is not consistent with the uses identified as essential in Policy 13 and would therefore not be in accordance with this policy.

Policy 13 further states that:

‘The extension of isolated groups of buildings or the consolidation of linear or sporadic development will not be permitted.’

The proposed development site is to the rear of an isolated linear group of buildings along New Salts Farm Road and the redevelopment of this site would extend/consolidate this, contrary to the policy.

ALP Policy 14: Local Green Gaps 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.’

The proposed development site is within the Local Green Gap between Lancing and Shoreham-by-Sea. As indicated above the proposed development is not consistent with the uses set out in Policy 13; it is also considered that it would contribute to coalescence.

Policy 20 makes reference to the provision of family sized dwellings through infill developments, identified strategic locations and town centre regeneration. Infill developments are generally understood to constitute a site surrounded by other development, whereas the site in question is in fact adjacent to development on one side only, and is open to the countryside on the other sides, making it prominent in the landscape.

Housing Need

In December 2024, the Government published an updated National Planning Policy Framework (NPPF 2024). This reintroduced requirements for local planning authorities to demonstrate a five-year housing land supply, regardless of the age of the adopted plan.

The Adur Local Plan was adopted on 14th December 2017. Policy 3: Housing Provision makes provision for a minimum of 3,718 net additional homes in the period 2011 to 2032, equivalent to 177 dwellings per annum. 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 was published on 24th March 2025 which has subsequently resulted in a revised local housing need (LHN) figure based on the

standard method calculation. The LHN figure has been amended to 547 (previously it was 558) dwellings per annum for Adur.

In 2018, the Housing Delivery Test was introduced against which housing delivery is measured. If housing delivery is below 85% of the housing requirement over the previous three years, a 20% buffer must be applied. The Housing Delivery Test 2023 (covering the monitoring periods 2020/21, 2021/22 and 2022/23), published December 2024, indicates that Adur delivered 81% of its requirement. As a consequence, the presumption in favour of sustainable development no longer applies; an Action Plan will be prepared (to be published by the end of June 2025), and in calculating the five-year housing land supply, a 20% buffer must be added. It must be noted that the HDT position has improved with the previous test result (December 2023) being 72%.

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.

Given that the Council cannot demonstrate a 5 Year Housing Land Supply of deliverable housing sites, this means that for decision taking, paragraph 11 d) of the NPPF applies which states:

‘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.’

With regards to the discussion of the Standard Methodology (SM) and housing need in Section 6 of your Statement, it should be noted that the Standard Methodology is an assessment of housing need; it does not equate to a Local Plan delivery target.

Landscape Impact

Paragraph 20 of the National Planning Policy Framework (NPPF) (2024) states:

“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for ... conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

ALP Policy 13: Adur’s Countryside and Coast states:

“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.”

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.*

And that:

“These gaps form a critically important component of the landscape setting of Sompting, Lancing and Shoreham-by-Sea, and contribute to their individual character and local identity.”

The Adur Local Plan Landscape Character Assessment (2023) identifies the site as part of LCA10 - New Salts Farm. This assessment highlights the importance of this area to the landscape character of Adur.

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.

The document prepared by Meynell and Gunton accompanying this pre-application suggests that *“the site is largely concealed from public view due to the sheer distance from any public roads coupled with the various buildings which block any direct view. Views from New Salts Farm Road are almost entirely blocked by existing built form of varying heights. The most direct and visible view is from the point of access from New Salts Farm Road, but since the barns are a generous distance away, they blend in with the general wide perspective available.”*

However 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.

Design

The proposed dwellings will be 2.8m taller than the existing barns. While you have suggested that they will be no higher than the dwellings to the east, the barns currently sit relatively unobtrusively in the landscape due to being on lower ground than the houses, and being partly overgrown with vegetation which helps to soften their appearance in the landscape. They are open ended which also helps to provide views through them and makes them appear less of a solid mass. Barns are established features in a rural location and tend to integrate more easily into the landscape than a residential development.

The proposed dwellings would have a significantly different appearance and a much greater impact in the landscape. They would be spread across the whole site and their height, exacerbated by tall gable ends, would give them a dominant form. The sketch plans submitted with the application show a regimented form with unvarying roofs and height. The dwellings to the east have varied heights and hips/barn hips.

The proposal is not consistent with Policy 15 (Quality of the Built Environment and Public Realm) as it is not considered to respect and enhance the character of the site or the prevailing character of the area or enhance the local environment by way of its appearance or character. The character of development would differ considerably from that of the existing development along New Salts Road which consists of buildings of mixed style and size.

The proximity of the dwellings to the existing houses is also a concern and it appears that Plots 1 and 2 would be less than 22m from the rear of the dwellings at Old Farm Court. The existing outlook for residents at Old Farm Court is onto barns which are between 20m -47m away. The proposed development layout would be much closer, particularly at the southern end of the site which is more open.

Affordable Housing

Policy 21 of the Adur Local Plan 2017 refers to a threshold of 11 dwellings but 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. Given that this proposal is for 10 dwellings, a contribution for affordable housing should be sought.

<https://www.adur-worthing.gov.uk/media/Media.156780.smxx.pdf>

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.*”

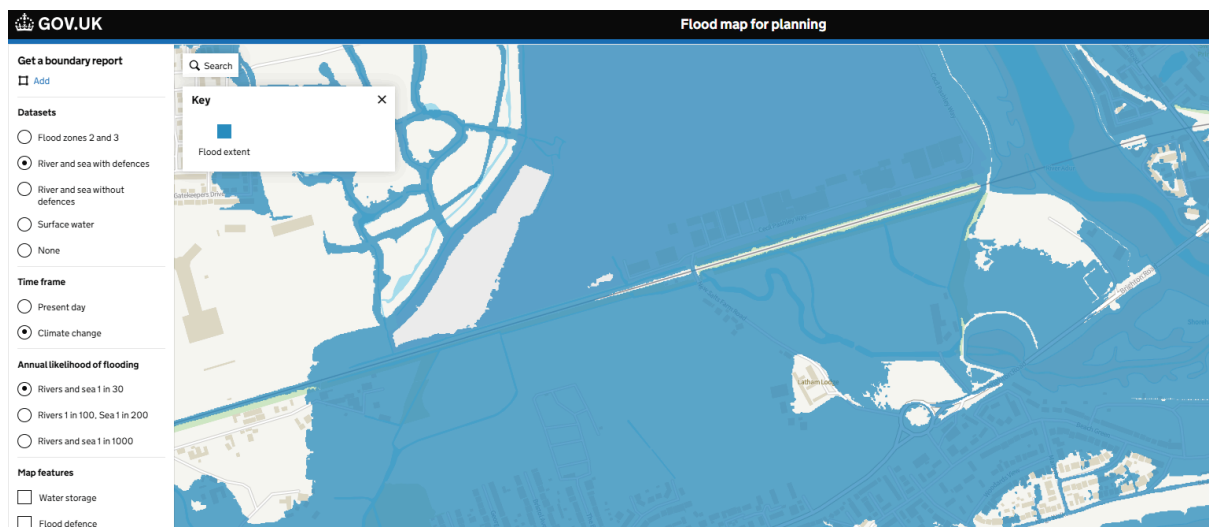
Flood Risk

The national flood map for planning was published on 25th March 2025. The new Flood Map for Planning is now the most up to date source of information for current day fluvial tidal and surface water flood risk and future tidal and fluvial risk. The Level 1 SFRA remains the most up to date source of information at this point in time for future surface water flood risk.

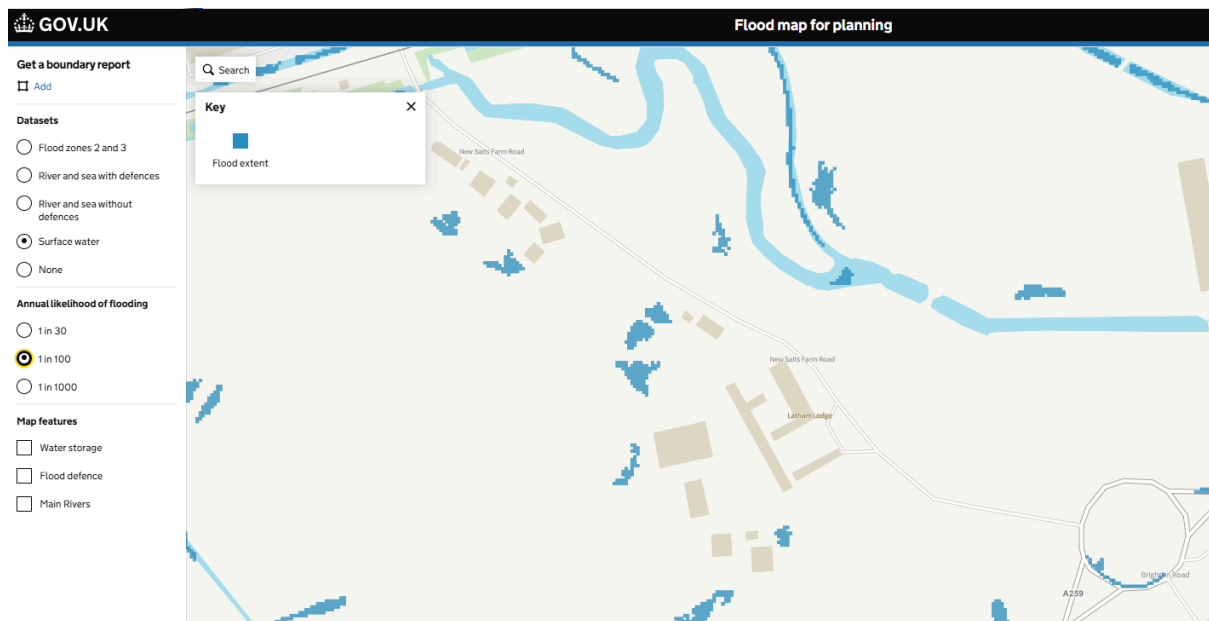
This shows the site is in Flood Zone 3 - high risk of flooding from rivers or sea.



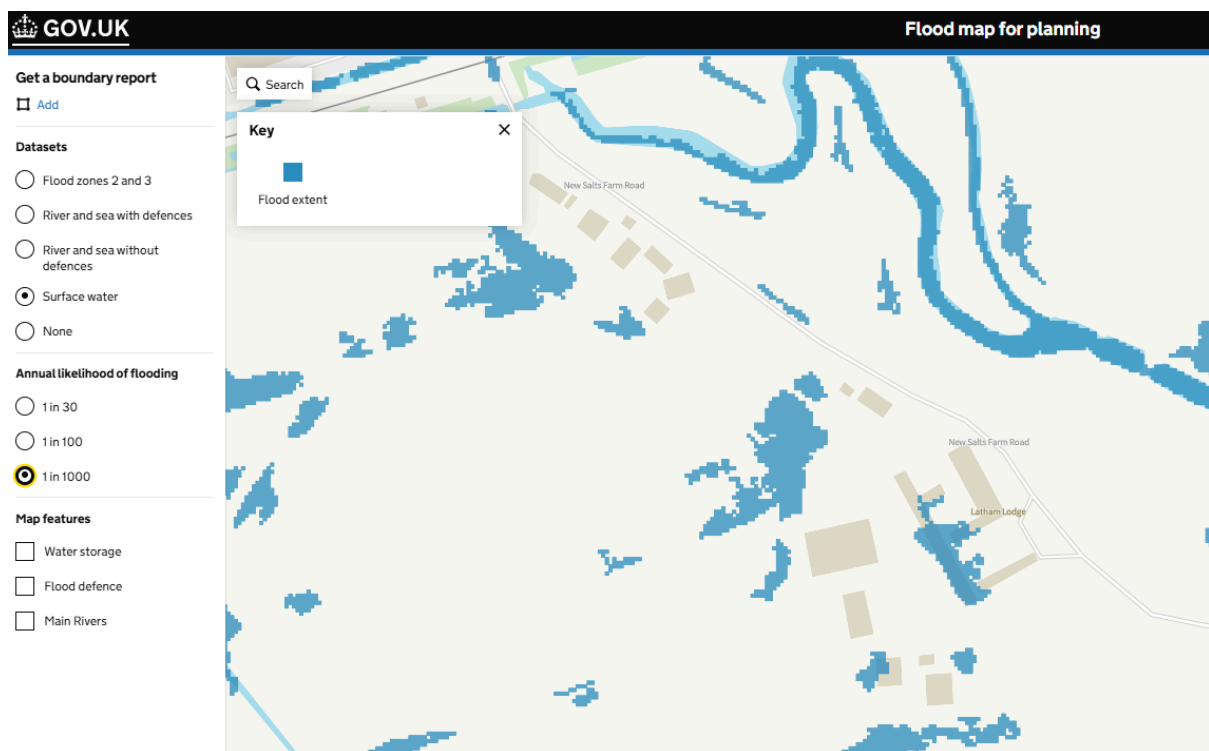
With climate change the future risk on the site increases and even when flood defences are considered the site is shown to be within the 1:30 AEP extent.



In terms of surface water flood risk there is a small area at high risk to the west of the current barn. It is hard to determine if this is within the red line or whether development could be avoided in this area



The area at risk increases when medium risk is considered



The Adur and Worthing Strategic Flood Risk Assessment (2024) maps the climate change impacts to establish the areas likely to be at risk in the future from surface water flooding. This is based on the 2018 UK Climate Projections (UKCPI8) and follows the most recent Environment Agency guidance on climate change allowances for rainfall intensity (2022). It therefore represents the best available source of evidence at this time. This states that for development with a lifetime beyond 2100 the upper end allowances should be used.

Therefore for this SFRA, the following climate change uplifts have been applied to the Environment Agency Risk of Flooding from Surface Water dataset:

- 3.3% AEP 2070s upper end climate change allowance – 40% uplift
- 1% AEP 2070s upper end climate change allowance – 45% uplift

Unlike the new current day surface water flood map this does not show the site to be at risk of surface water flooding. Should new national mapping be produced which applies appropriate climate change allowances for residential development this should be reviewed.

You are advised to discuss the proposal with the Environment Agency.

Sequential Test

The sequential test must be demonstrated and passed for a site to be permitted. The Adur & Worthing Level 1 Strategic Flood Risk Assessment (2024) sets out a ranking methodology for undertaking the sequential test. Based on the above mapping the site is considered to have a high ranking for river / sea flooding and a low ranking for surface water flood risk (it has been assumed that the area at risk of surface water flooding falls outside the development site).

The Council considers that the whole of the Local Planning Authority area should be considered for the area of search. We are able to provide a list of sites from the SHLAA which should be considered along with their flood rankings. This is set out below. The applicant should also consider whether there are any additional (newer) sites with extant planning permission not previously identified and also whether there are suitable sites available on the open market. Sites should be identified and assessed to establish if there are any reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

The Adur Strategic Housing Land Availability Assessment & Employment Land Availability Assessment Update March 2025 has a base date of 1st April 2024. This is the most recent published version. It includes 12 potential sites.

Site ref	Site address	Flood risk (fluvial / tidal)	Flood risk (surface water)
ADC/025/13	Lancing Police Station, 107-111 North Road, Lancing	Low	Low
ADC/082/13	Gochers Laundry,	Low	Low

	Alma Street, Lancing		
ADC/086/13	Community Buildings, Pond Road, Shoreham	High risk with climate change	Part of the site is at a high risk of surface water
ADC/136/13	The Pilot, Station Road, Southwick	Low	Low
ADC/151/18	E of Manor Close/S of 72/88 Old Shoreham Rd, Lancing	High	High
SH/009/18	Paladone, New Wharf, Brighton Road, Shoreham-by-Sea	High risk with climate change.	A small part of the site is at a high risk of surface water flooding.
SH/013/18	Fuel Tanks, Lennards Wharf, Brighton Road, Shoreham	High	High
SH/014/18	EMR, Egypt Wharf, Brighton Road, Shoreham-by-Sea	The site is partly at high risk for present day and fully with climate change	A very small proportion of the site is at high risk
ADC/171/21	Prince Charles Close, Southwick	Low	Partly at high risk with climate change. The majority of the site is at medium risk with climate change.
ADC/173/23	Garage Block Downsway	Low	Low
ADC/174/23	Garage compound at Millfield, Sompting	Low	Low
ADC/175/23	Garage compound & overgrown land at Nelson Close	Low	Partly at medium risk with climate change

This indicates that the following are sequentially preferable and should be considered:

ADC/025/13 Lancing Police Station, 107-111 North Road, Lancing

ADC/082/13 Gochers Laundry, Alma Street, Lancing
ADC/136/13 The Pilot, Station Road, Southwick
ADC/173/23 Garage Block Downsway
ADC/174/23 Garage compound at Millfield, Sompting

If none of these are concluded to be reasonably available the following sites should be further assessed to determine whether the nature and variation of risk means they are also sequentially preferable.

- SH/014/18 EMR, Egypt Wharf, Brighton Road, Shoreham-by-Sea
- ADC/171/21 Prince Charles Close, Southwick
- ADC/175/23 Garage compound & overgrown land at Nelson Close

It will be for the applicant to provide evidence as to whether these are reasonably available. Planning Practice Guidance clarifies that 'Reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development. These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available'. The absence of a 5-year land supply is not a relevant consideration for the sequential test for individual applications. (Paragraph: 028 Reference ID: 7-028-20220825).

For larger allocated sites we recommend you consider whether the proposed development could be accommodated in addition to any policy requirements including minimum housing numbers etc. We consider any sites expected to come forward in the next 0-5 years as suitable in terms of timescales.

At our meeting, your consultant referred to an appeal decision in Yatton where the appeal was allowed despite failing the Sequential Test. This is an interesting case and, although the development would need to be considered against paragraph 11 d of the NPPF, I do not consider that there are similarities between that development and what is proposed here. That case was for up to 190 homes (including 50% affordable). It was clearly a strategic development where the Inspector felt that the wider sustainability benefits outweighed the flood risk. The redevelopment of this site would not deliver anywhere near the same level of benefits and, as such, I do not consider that 10 houses would outweigh the high level of

flood risk on the site. I also note that the decision has been challenged and will be heard at the Court of Appeal, with the final outcome known later this year.

Exceptions Test

If the Sequential Test is passed as the site is at a high risk of flooding the Exceptions Test will also need to be demonstrated. This is made up of two parts:

- 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.

The Planning Practice Guidance gives examples of wider sustainability benefits as follows:

- The re-use of suitable brownfield land as part of a local regeneration scheme;
- An overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure;
- The provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure, significantly exceeding National Planning Policy Framework policy requirements for Sustainable Drainage Systems;

Paragraph: 036 Reference ID: 7-036-20220825

I do not consider that this development would provide wider sustainability benefits of the types suggested in the PPG.

In terms of Part b) of the exceptions test this will need to be supported by a Flood Risk Assessment. Planning Practice Guidance recommends that when assessing the safety implications of flood risk for development proposed in a site allocation or planning application, the following should be considered:

- the characteristics of a possible flood event, including residual risks from flood risk management infrastructure e.g. the type and source of flooding and frequency, depth, velocity, speed of onset and duration;
- the safety of people within a building if it floods and also the safety of people around a building and in adjacent areas, including people who are less mobile or who have a physical impairment. This includes the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an

extreme flood (0.1% annual probability of flooding with allowance for climate change);

- the structural safety of buildings: and
- the impact of a flood on the essential services provided to or from a development.

Paragraph: 005 Reference ID: 7-005-20220825

Drainage

We understand groundwater monitoring has been undertaken over the winter to establish that the site can be drained through infiltration. It is important that the drainage strategy informs the site layout. As the site is for major development we recommend that pre-planning discussions are also started with West Sussex County Council as the Lead Local Flood Authority to ensure the proposed drainage strategy meets their requirements. They have a formal pre-app service. It will be important to ensure that sufficient storage is provided on site to ensure flood risk is not increased elsewhere. This may impact on the level of development that can be accommodated on the site.

Highways

You are advised to seek the advice of West Sussex County Council as Local Highway Authority on parking and highway matters relating to the development.

Electric vehicle charging points will be required if new spaces are to be provided, and you are advised to read the “Air quality and emissions mitigation guidance for Sussex authorities” which is on our website at the link below:

<https://www.adur-worthing.gov.uk/environmental-health/pollution/air-quality-and-pollution/air-quality-and-planning/>

Sustainability

Policies 18 and 19 of the Local Plan seek sustainable and energy efficient development and this is supported by the Council’s recent SPD on energy. You are required to incorporate renewable/low carbon energy production equipment to provide at the very minimum 10% of predicted energy requirements. The Council has adopted a Planning and Climate Change Checklist which encourages developers to go further in reducing emissions:

[Adur Planning and Climate Change Checklist - June 2021](#)

Alternative uses

It has been suggested that the barns could be converted to other uses under permitted development. However, this would be subject to a prior approval process where matters such as flood risk would need to be taken into account. For the reasons highlighted earlier, any alternative use would be likely to fail on this point.

Other matters

Protection from railway/airport noise and overheating needs to be considered as part of the design.

Measures to improve biodiversity and achieve a minimum 10% net gain will need to be submitted.

A contribution may be required towards open space provision as set out in the open space study and cost calculator at the link below.

<https://www.adur-worthing.gov.uk/planning-policy/adur/adur-background-studies-and-info/biodiversity-environment/#joint-sport-leisure-and-open-space-study>

Conclusion

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.

Notwithstanding the advice in this letter, should you wish to submit an application, you should provide the following documents:

- Planning, Design and Access Statement
- Landscape Assessment
- Street scene views/CGIs
- Energy/Sustainability Statement
- Biodiversity net gain assessment
- Ecological assessment
- Contaminated land assessment
- Flood Risk Assessment, including Exception and Sequential Tests
- Surface water drainage strategy

- Transport Note
- Noise assessment
- Landscaping plan

In addition, a full planning application would require full drawings (location/block plan, elevations and floor plans).

The Council's full Validation List can be found at the link below:

<https://www.adur-worthing.gov.uk/planning/applications/submit-fees-forms/#validation-list>

Yours sincerely

Peter Barnett
peter.barnett@adur-worthing.gov.uk
01903 221310

Appendix M – LPA Correspondence



Re: PREAPP/0046/25 - Land And Barns New Salts Farm New Salts Farm Road

From Peter Barnett <peter.barnett@adur-worthing.gov.uk>

Date Wed 6/11/2025 2:17 PM

To Emma Rowlands <erowlands@hilsonmoran.com>

Cc Paul Bond <pbond@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>

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Dear Emma

Essentially Mead Realisations Ltd v Secretary of State advises against the use of minimum and maximum size thresholds to automatically exclude consideration of sites (Ground 1 paras 164 -167) and maintains that the more important test is whether a site is capable of accommodating the proposed development (either as a series of smaller sites or part of a larger site).

You should not therefore apply site thresholds and instead consider all identified sites.

The Mead judgement also cautions against a highly specific interpretation of accommodating the proposed development including form, quantum (site area and amount of development) and intended timescales.

Below is a link to our open space policies and background studies:

<https://www.adur-worthing.gov.uk/planning-policy/adur/adur-background-studies-and-info/biodiversity-environment/>

Regards

Peter Barnett

Principal Planning Officer, Development Management
01903 221310

Adur & Worthing Councils

Worthing Town Hall, Chapel Road, Worthing, West Sussex, BN11 1HA

<http://www.adur-worthing.gov.uk>



On Tue, 10 Jun 2025 at 17:10, Emma Rowlands <erowlands@hilsonmoran.com> wrote:

Hi Peter,

Hope you are well. We are currently conducting the Sequential Test for the above site at New Salts Farm. As part of this we are conducting a search of sites on the Adur and Worthing planning portal with planning permission granted or awaiting a decision. The proposed site is 0.58ha in size and will provide 10 dwellings. Please could you confirm a minimum and maximum site area that we should be searching for? We would be grateful if you could also confirm any other requirements for this search.

We are also aware of Local Plan policies 30 (Green infrastructure) and 32 (Open space, recreation and leisure) and that the proposed community open space in the centre of the site aligns with the aims of these policies. Please can you confirm if there are any other local policies regarding parks or open spaces which we should be referencing in our report?

Many thanks,

Emma

Emma Rowlands | MSc BSc
Senior Consultant - Environment



S +4420 7940 8888

hilsonmoran.com



People. Places. Planet.



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Appendix N – Estate Agents Correspondence



Re: Available Sites in Adur District Council

From Matt Jacobs <mattjacobs@jacobs-steel.co.uk>

Date Mon 6/9/2025 8:01 PM

To Jack Ashby <jashby7523@gmail.com>

Cc Emma Rowlands <erowlands@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Pat Ashby <nsfbarns@gmail.com>

 1 attachment (33 KB)

Outlook-keddbqlr;

Some people who received this message don't often get email from mattjacobs@jacobs-steel.co.uk. [Learn why this is important](#)

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Hi Jack,

Thank you for your email.

Unfortunately, I can confirm we don't have any comparable sites available at the moment. We have recently worked on smaller sites, housing just a few dwellings, but nothing up to 0.58 hectares with a minimum of 10 dwellings.

If I can be of any further assistance please feel free to get in touch.

Best regards,
Matt

Matt Jacobs
Managing Director
Jacobs Steel



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01903 792180

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mattjacobs@jacobs-steel.co.uk

jacobs-steel.co.uk

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From: Jack Ashby <jashby7523@gmail.com>

Sent: 04 June 2025 9:10 AM

To: Matt Jacobs <mattjacobs@jacobs-steel.co.uk>

Cc: Emma Rowlands <erowlands@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Pat Ashby <nsfbarns@gmail.com>

Subject: Available Sites in Adur District Council

Hello Matt,

I trust all is well.

We are currently in the process of developing a planning application for a site in Adur District Council. The proposed development is for 10x residential houses. Due to the fact that the site sits within Flood Zone 3 (high risk of flooding) we need to carry out a Sequential Test which requires developers to demonstrate that there are no reasonably available alternative sites in lower flood risk zones.

To assist with this, would you be able to let me know if Jacobs Steel hold any available land for sale within the Adur Borough which could accommodate a proposed development of 10 dwellings on a minimum 0.58 hectares?

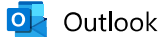
I have copied in the Hilson Moran team who are conducting this survey/test on our behalf.

On a separate note, as we progress further with the site and subject to any successful planning application we would look to engage with you further regarding our exit strategy.

Look forward to hearing from you

Many thanks

Jack



Outlook

RE: Available Sites in Adur District Council

From Wayne Kenward <Wayne.Kenward@baconandco.co.uk>**Date** Wed 6/4/2025 5:58 PM**To** Jack Ashby <jashby7523@gmail.com>**Cc** Emma Rowlands <erowlands@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Pat Ashby <nsfbarns@gmail.com>

Some people who received this message don't often get email from wayne.kenward@baconandco.co.uk. [Learn why this is important](#)

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Good evening Jack

Thank you for proving me with an opportunity to assist you with your proposal for a planning application .

Unfortunately we do not have any suitable land available within the Adur Borough. We are finding that sites for suitable development are extremely hard to come by.

I am currently away for a few days so I will catch up with you after the week-end.

Best wishes

Wayne



Wayne Kenward
Director
wayne.kenward@baconandco.co.uk

72 Goring Road, Goring-by-Sea, Worthing, BN12 4AB
01903 520002

baconandco.co.uk





From: Jack Ashby <jashby7523@gmail.com>**Sent:** 04 June 2025 09:11**To:** Wayne Kenward <Wayne.Kenward@baconandco.co.uk>**Cc:** Emma Rowlands <erowlands@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Pat Ashby <nsfbarns@gmail.com>**Subject:** Available Sites in Adur District Council

Hello Wayne,

I trust all is well.

We are currently in the process of developing a planning application for a site in Adur District Council. The proposed development is for 10x residential houses. Due to the fact that the site sits within Flood Zone 3 (high risk of flooding) we need to carry out a Sequential Test which requires developers to demonstrate that there are no reasonably available alternative sites in lower flood risk zones.

To assist with this, would you be able to let me know if Bacon hold any available land for sale within the Adur Borough which could accommodate a proposed development of 10 dwellings on a minimum 0.58 hectares?

I have copied in the Hilson Moran team who are conducting this survey/test on our behalf.

On a separate note, as we progress further with the site and subject to any successful planning application we would look to engage with you further regarding our exit strategy.

Look forward to hearing from you

Many thanks
Jack



Re: Availability of Sites in Adur District Council

From Jack Ashby <jashby7523@gmail.com>

Date Tue 6/10/2025 4:38 PM

To Chris Trott <chris.trott@ccreasestate.co.uk>

Cc nsfbarns@gmail.com <nsfbarns@gmail.com>; wayne.kenward@baconandco.co.uk <wayne.kenward@baconandco.co.uk>; Emma Rowlands <erowlands@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>

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Hi Chris,

Thank you for reaching out with this response.

Much appreciated

Best
Jack

On Tue, 10 Jun 2025 at 16:32, Chris Trott <chris.trott@ccreasestate.co.uk> wrote:

Dear Jack

Further to your enquiry to if we have any sites or land for development within the Adur Borough, I am afraid we do not.

Unfortunately, we are finding sites and land for development (especially smaller sites) are very scarce at the moment.

If I can be of any assistance in the future, please feel free to ask.

Kind Regards

COAST & COUNTRY
— REAL ESTATE —**CHRIS TROTT** | MNAEA*Director*

Tel | 01903 298980

Mob | 07717 132269

Email | chris.trott@ccrealestate.co.ukWeb | ccrealestate.co.uk

305 Goring Road

Worthing

West Sussex

BN12 4NX

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Emma Rowlands

From: Jack Ashby <jashby7523@gmail.com>
Sent: 29 May 2026 16:09
To: Emma Rowlands; Paul Bond
Subject: Fwd: Availability of Sites in Adur District Council

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----- Forwarded message -----

From: **Chris Trott** <chris.trott@ccrealestate.co.uk>
Date: Mon, 16 Mar 2026 at 10:08
Subject: RE: Availability of Sites in Adur District Council
To: Jack Ashby <jashby7523@gmail.com>
Cc: nsfbarns@gmail.com <nsfbarns@gmail.com>, wayne.kenward@baconandco.co.uk <wayne.kenward@baconandco.co.uk>, Emma Rowlands <erowlands@hilsonmoran.com>, Paul Bond <pbond@hilsonmoran.com>, Andy Lam <alam@hilsonmoran.com>

Hi Jack

Thanks for your email.

I can confirm that Coast & Country do not currently have land for sale within the Adur Borough to the criteria of a proposed development of 10 houses or a minimum of 0.58 hectares.

Kind Regards

COAST & COUNTRY

— REAL ESTATE —

CHRIS TROTT | MNAEA

Director

Tel | 01903 298980

Mob | 07717 132269

Email | chris.trott@ccrealestate.co.uk

Web | ccrealestate.co.uk



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From: Jack Ashby <jashby7523@gmail.com>

Sent: 12 March 2026 22:06

To: Chris Trott <chris.trott@ccrealestate.co.uk>

Cc: nsfbarns@gmail.com; wayne.kenward@baconandco.co.uk; Emma Rowlands <erowlands@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>

Subject: Re: Availability of Sites in Adur District Council

Hi Chris,

I trust all is well.

We are nearing completion of our planning application and need to update our records on available sites in the area to understand if there has been any change since you last responded in June 2025.

Would you mind re-confirming if Coast & Country Real Estate hold any available land for sale within the Adur Borough which could accommodate a proposed development of 10 dwellings on a minimum of 0.58 hectares?

Many thanks

Jack

On Tue, 10 Jun 2025 at 16:37, Jack Ashby <jashby7523@gmail.com> wrote:

Hi Chris,

Thank you for reaching out with this response.

Much appreciated

Best

Jack

On Tue, 10 Jun 2025 at 16:32, Chris Trott <chris.trott@ccrealestate.co.uk> wrote:

Dear Jack

Further to your enquiry to if we have any sites or land for development within the Adur Borough, I am afraid we do not.

Unfortunately, we are finding sites and land for development (especially smaller sites) are very scarce at the moment.

If I can be of any assistance in the future, please feel free to ask.

Kind Regards

COAST & COUNTRY

— REAL ESTATE —

CHRIS TROTT | MNAEA

Director

Tel | 01903 298980

Mob | 07717 132269

Email | chris.trott@ccreasealestate.co.uk

Web | ccreasealestate.co.uk



305 Goring Road

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Emma Rowlands

From: Jack Ashby <jashby7523@gmail.com>
Sent: 29 May 2026 16:10
To: Emma Rowlands; Paul Bond
Subject: Fwd: Available Sites in Adur District Council

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----- Forwarded message -----

From: **Matt Jacobs** <mattjacobs@jacobs-steel.co.uk>
Date: Mon, 16 Mar 2026 at 16:16
Subject: Re: Available Sites in Adur District Council
To: Jack Ashby <jashby7523@gmail.com>
Cc: Emma Rowlands <erowlands@hilsonmoran.com>, Paul Bond <pbond@hilsonmoran.com>, Pat Ashby <nsfbarns@gmail.com>

Hi Jack,

Thanks for your email and sorry for the delay, I was away the back end of last week,

I can confirm we don't currently have any sites for sale suiting this description.

Please let me know if you require any further information.

Best regards,
Matt



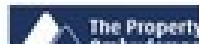
Matt Jacobs
Managing Director

☎ 01903 792180
✉ mattjacobs@jacobs-steel.co.uk

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Jacobs Steel & co ltd 05856391 & Jacobs Steel Ltd
Registered at 2/4 Ash Lane Rustington



From: Jack Ashby <jashby7523@gmail.com>
Sent: 12 March 2026 10:16 PM
To: Matt Jacobs <mattjacobs@jacobs-steel.co.uk>
Cc: Emma Rowlands <erowlands@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Pat Ashby <nsfbarns@gmail.com>
Subject: Re: Available Sites in Adur District Council

Apologies - slight correction in my email as below!

Hi Matt,

I Trust all is well.

We are finally nearing completion of our planning application and as part of this we need to update our records on availability of sites within the area since you last responded in June 2025.

Would you mind re-confirming if **Jacobs Steel** hold any available land for sale within the Adur Borough which could accommodate a proposed development of 10 dwellings on a minimum of 0.58 hectares?

Many thanks

Jack

On Thu, 12 Mar 2026 at 22:12, Jack Ashby <jashby7523@gmail.com> wrote:

Hi Matt,

I Trust all is well.

We are finally nearing completion of our planning application and as part of this we need to update our records on availability of sites within the area since you last responded in June 2025.

Would you mind re-confirming if Bacon hold any available land for sale within the Adur Borough which could accommodate a proposed development of 10 dwellings on a minimum of 0.58 hectares?

Many thanks

Jack

On Mon, 9 Jun 2025 at 20:01, Matt Jacobs <mattjacobs@jacobs-steel.co.uk> wrote:

Hi Jack,

Thank you for your email.

Unfortunately, I can confirm we don't have any comparable sites available at the moment. We have recently worked on smaller sites, housing just a few dwellings, but nothing up to 0.58 hectares with a minimum of 10 dwellings.

If I can be of any further assistance please feel free to get in touch.

Best regards,
Matt



Matt Jacobs
Managing Director
Jacobs Steel

01903 792180
mattjacobs@jacobs-steel.co.uk
jacobs-steel.co.uk
Worthing



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From: Jack Ashby <jashby7523@gmail.com>
Sent: 04 June 2025 9:10 AM
To: Matt Jacobs <mattjacobs@jacobs-steel.co.uk>
Cc: Emma Rowlands <erowlands@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Pat Ashby <nsfbarns@gmail.com>
Subject: Available Sites in Adur District Council

Hello Matt,

I trust all is well.

We are currently in the process of developing a planning application for a site in Adur District Council. The proposed development is for 10x residential houses. Due to the fact that the site sits within Flood Zone 3 (high risk of flooding) we need to carry out a Sequential Test which requires developers to demonstrate that there are no reasonably available alternative sites in lower flood risk zones.

To assist with this, would you be able to let me know if Jacobs Steel hold any available land for sale within the Adur Borough which could accommodate a proposed development of 10 dwellings on a minimum 0.58 hectares?

I have copied in the Hilson Moran team who are conducting this survey/test on our behalf.

On a separate note, as we progress further with the site and subject to any successful planning application we would look to engage with you further regarding our exit strategy.

Look forward to hearing from you

Many thanks

Jack

Emma Rowlands

From: Jack Ashby <jashby7523@gmail.com>
Sent: 29 May 2026 16:11
To: Emma Rowlands; Paul Bond
Subject: Fwd: Available Sites in Adur District Council

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----- Forwarded message -----

From: **Wayne Kenward** <Wayne.Kenward@baconandco.co.uk>
Date: Mon, 16 Mar 2026 at 11:50
Subject: RE: Available Sites in Adur District Council
To: Jack Ashby <jashby7523@gmail.com>
Cc: Emma Rowlands <erowlands@hilsonmoran.com>, Paul Bond <pbond@hilsonmoran.com>, Pat Ashby <nsfbarns@gmail.com>, Andy Lam <alam@hilsonmoran.com>

Good morning Jack

Thank you for your enquiry as to whether we have any land available within the Adur Borough.

I can confirm that Bacon and Company do not currently have land for sale or are aware of any land available within the Adur Borough for a proposal development of 10 houses or a minimum of 0.58 hectares.

Kind Regards

Wayne

72 Goring Road, Goring-by-Sea, Worthing, BN12 4AB
01903 520002

baconandco.co.uk



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From: Jack Ashby <jashby7523@gmail.com>

Sent: 12 March 2026 22:02

To: Wayne Kenward <Wayne.Kenward@baconandco.co.uk>

Cc: Emma Rowlands <erowlands@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Pat Ashby <nsfbarns@gmail.com>

Subject: Re: Available Sites in Adur District Council

Hi Wayne,

I Trust all is well.

We are finally nearing completion of our planning application and as part of this we need to update our records on availability of sites within the area.

Would you mind re-confirming if Bacon hold any available land for sale within the Adur Borough which could accommodate a proposed development of 10 dwellings on a minimum of 0.58 hectares?

Many thanks

Jack

On Wed, 4 Jun 2025 at 17:57, Wayne Kenward <Wayne.Kenward@baconandco.co.uk> wrote:

Good evening Jack

Thank you for providing me with an opportunity to assist you with your proposal for a planning application .

Unfortunately we do not have any suitable land available within the Adur Borough. We are finding that sites for suitable development are extremely hard to come by.

I am currently away for a few days so I will catch up with you after the week-end.

Best wishes

Wayne

and company
bacon

Estate and letting agents

72 Goring Road, Goring-
01903 520002

From: Jack Ashby <jashby7523@gmail.com>
Sent: 04 June 2025 09:11
To: Wayne Kenward <Wayne.Kenward@baconandco.co.uk>
Cc: Emma Rowlands <erowlands@hilsonmoran.com>; Andy Lam <alam@hilsonmoran.com>; Paul Bond <pbond@hilsonmoran.com>; Pat Ashby <nsfbarns@gmail.com>
Subject: Available Sites in Adur District Council

Hello Wayne,

I trust all is well.

We are currently in the process of developing a planning application for a site in Adur District Council. The proposed development is for 10x residential houses. Due to the fact that the site sits within Flood Zone 3 (high risk of flooding) we need to carry out a Sequential Test which requires developers to demonstrate that there are no reasonably available alternative sites in lower flood risk zones.

To assist with this, would you be able to let me know if Bacon hold any available land for sale within the Adur Borough which could accommodate a proposed development of 10 dwellings on a minimum 0.58 hectares?

I have copied in the Hilson Moran team who are conducting this survey/test on our behalf.

On a separate note, as we progress further with the site and subject to any successful planning application we would look to engage with you further regarding our exit strategy.

Look forward to hearing from you

Many thanks

Jack

Appendix O – SuDS Proforma

Surface Water Drainage Proforma

West Sussex County Council (WSCC) as Lead Local Flood Authority recommends this proforma is completed and submitted to support any planning application for a major development. The information contained in this form will be used by WSCC officers in their role as 'statutory consultee' on surface water drainage. The proforma should accompany the site-specific Flood Risk Assessment and Drainage Strategy submitted as part of the planning application.

1. Site Details

No.	Requirement	Answer	Application Type
1.1	Address including postcode	New Salts Farm Barns, Shoreham by sea, BN43 5FE	Outline & Full
1.2	OS grid reference (easting and northing)	TQ 20346 04704	Outline & Full
1.3	Planning application reference		Outline & Full
1.4	Total site area (hectares)	0.6	Outline & Full
1.5	Pre-development use	Agricultural land (Brownfield site)	Outline & Full
1.6	Proposed design life	100 years	Outline & Full
1.7	Have agreements in principle for discharge been provided (where applicable)? (YES/NO)	N/A Infiltration	Outline & Full
1.8	Topographic Survey Plan showing existing site layout, site levels and drainage system	YES	Outline & Full

2. Discharge Hierarchy/Methods of Discharge¹

No.	Requirement	Answer	Application Type
2.1	Store rainwater for later use (reuse) (YES/NO)	YES	Full
2.2	Infiltration techniques such as soakaways, permeable paving, etc (YES/NO)	YES	Outline & Full
2.3	Hybrid (YES/NO)	NO	Outline & Full

¹ Runoff may be discharged via one or multiple methods.

No.	Requirement	Answer	Application Type
2.4	Attenuation with restricted discharge to watercourse (YES/NO)	NO	Outline & Full
2.5	Attenuation with restricted discharge to surface water sewer (YES/NO)	NO	Outline & Full
2.6	Attenuation with restricted discharge to combined sewer (YES/NO)	NO	Outline & Full

3. Calculation Inputs

No.	Requirement	Answer	Application Type
3.1	Area within site which is drained by SuDS ² (hectares)	0.2472	Outline & Full
3.2	Impermeable area drained pre-development ³ (hectares)	0.3726	Outline & Full
3.3	Impermeable area drained post-development ³ (hectares)	0.2472	Outline & Full
3.4	Urban Creep (hectares)	0.02472 (10%)	Outline & Full
3.5	Climate change factor applied (1 in 30 and 1 in 100) (percentage)	45%	Outline & Full

4. Infiltration Feasibility/Ground Investigations

No.	Requirement	Answer	Application Type
4.1	Has winter groundwater monitoring and infiltration been undertaken? (YES/NO)	YES	Outline & Full
4.2	Period of winter groundwater monitoring (from/to)	26th November 2025 to 1st April 2026	Outline & Full
4.3	Depth to highest recorded groundwater level (mAOD)	0.8 (a 1m unsaturated zone will be provided beneath proposed SuDS)	Full
4.4	Infiltration rate	3.94 x 10 ⁻⁴ m/s	Outline & Full

² Impermeable area should be measured pre and post development. Impermeable surfaces include roofs, pavements, driveways and paths, where runoff is conveyed to the drainage system.

³ 10% Urban Creep should be added to the volumes required for storage and not increase discharge rates.

No.	Requirement	Answer	Application Type
4.5	Depth of infiltration structure (mAOD)	1.80	Full
4.6	Safety factor used for sizing infiltration storage	5.0	Outline & Full

5. Calculation Outputs: Greenfield Runoff Rates⁴

No.	Requirement	Answer	Application Type
5.1	Qbar (l/s)	0.6	Outline & Full
5.2	1 in 1 year rainfall (l/s)	0.5	Outline & Full
5.3	1 in 30 year rainfall (l/s)	1.4	Outline & Full
5.4	1 in 100 year rainfall (l/s)	1.9	Outline & Full

6. Calculation Outputs: Brownfield Runoff Rates (including Urban Creep) (if applicable)

No.	Requirement	Answer	Application Type
6.1	1 in 1 year rainfall (l/s)		Outline & Full
6.2	1 in 30 year rainfall (l/s)		Outline & Full
6.3	1 in 100 year rainfall (l/s)		Outline & Full

7. Calculation Outputs: Volume Control/Infiltration Provision

No.	Requirement	Answer	Application Type
7.1	Infiltration (m ³)	99.2	Outline & Full
7.2	Attenuation (m ³)	N/A	Outline & Full
7.3	Separate volume designated as long-term storage ⁵ (m ³)	N/A	Full
7.4	Total volume control (sum of inputs for 7.1 to 7.3) (m ³)	99.2	Full

⁴ Flows within long term storage areas should be infiltrated to the ground or discharged at low flow rate of maximum 2 litres per second per hectare (l/s/ha).

⁵ In calculations and for the avoidance of doubt FEH shall be used FSR is not acceptable, and CV values must equal 1.

8. Calculation Outputs: Attenuation/Restricted Discharge

No.	Requirement		Answer	Application Type
8.1	Proposed discharge rate (critical storm)	1 in 1 (100%) AEP (m/s)	N/A Infiltration	Outline & Full
		1 in 30 (3.33%) AEP (m/s)	N/A Infiltration	Outline & Full
		1 in 30 (3.33%) AEP plus climate change (m/s)	N/A Infiltration	Outline & Full
		1 in 100 (1%) AEP (m/s)	N/A Infiltration	Outline & Full
		1 in 100 (1%) AEP plus climate change (m/s)	N/A Infiltration	Outline & Full
8.2	Calculations show critical storm durations (both by max height and max discharge) for 1 in 1, 1 in 30, 1 in 30 plus climate change, 1 in 100 and 1 in 100 year plus climate change allowance can be accommodated on site (YES/NO)		YES	Outline & Full
8.3	Has treatment of potential contaminants been considered? (YES/NO)		YES	Outline & Full
8.4	Demonstration of source control features with substantive evidence why these cannot be used if not (YES/NO)		YES	Full
8.5	If discharging into a watercourse, piped system or the sea, has the proposed drainage network been modelled against predicted top water levels for the 1 in 100 year storm event plus climate change allowance, within the existing system? (YES/NO)		N/A	Full

9. Other Supporting Details

No.	Requirement	Answer	Application Type
9.1	Plan detailing location of groundwater monitoring and infiltration testing	YES	Outline & Full
9.2	Detailed drainage design layout	YES	Full
9.3	Maintenance strategy	To be provided at Discharge of Condition stage	Full

No.	Requirement	Answer	Application Type
9.4	Detailed development layout	YES	Full
9.5	Impermeable area plan	YES	Full
9.6	Phasing plan?	N/A	Full
9.7	If ground levels are being raised over 300mm above existing levels and is unavoidable, have detailed plans been provided, together with drainage proposals, to address any potential drainage related issues?	N/A	Full

The above form should be completed using evidence from information which should be appended to this form. The information being submitted should be proportionate to the site conditions, flood risks and magnitude of development. It should serve as a summary of the drainage proposals and should clearly show that the proposed discharge rate and volume as a result of development will not be increasing. Where there is an increase in discharge rate or volume, then the relevant section of this form must be completed with clear evidence demonstrating how the requirements will be met.

This form is completed using factual information and can be used as a summary of the surface water drainage strategy on this site.

Form completed by	Emma Rowlands
Qualification of person responsible for signing off this proforma	MCIWEM
Company	Hilson Moran
On behalf of (client's details)	Jack Ashby
Date	01/05/2026

REFERENCES

- i Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework. July 2021.
- ii West Sussex County Council (2010) -West Sussex Strategic Flood Risk Assessment
- iii Adur and Worthing Councils (2024) - Level 1 Strategic Flood Risk Assessment
- iv Ministry of Housing, Communities and Local Government (2021). Planning Practice Guidance – Flood Risk and Coastal Change – refer to <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.
- v Adur District Council (2017) – Adur Local Plan
- vi Environment Agency (2019) – Shoreham Adur Tidal Walls Flood Defence Scheme Information Trail.
- vii HM Government (2010) – Drainage and waste disposal, Approved Document H
- viii HM Government (1991) - Water Industry Act, HMSO.
- ix HM Government (1990) - Environmental Protection Act, HMSO.
- x HM Government (2010) - Flood and Water Management Act, HMSO.
- xi DEFRA (2025) - National standards for sustainable drainage systems (SuDS)
- xii British Geological Survey (2025) - Geology Viewer
- xiii Cranfield Soil and Agrifood Institute - Soilscales website: <https://www.landis.org.uk/soilscales/>
- xiv Environment Agency (2019) - <https://magic.defra.gov.uk/MagicMap.aspx>
- xv Environment Agency (2019) - Manual for the production of Groundwater Source Protection Zones
- xvi Environment Agency (2025) - Flood Map for Planning (<https://flood-map-for-planning.service.gov.uk/>);
- xvii Environment Agency (2025) - Check the long-term flood risk for an area in England (<https://www.gov.uk/check-long-term-flood-risk>);
- xviii CIRIA C753 (2015) – The SuDS Manual
- xix Department for Communities and Local Government (2007) - Improving the Flood Performance of New Buildings: Flood Resilient Construction. CLG, London. Available at: http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf
- xx Adur and Worthing Councils (2025) - Strategic Housing Land Availability Assessment & Employment Land Availability Assessment Update
- xxi Refer to <https://caselaw.nationalarchives.gov.uk/ewhc/admin/2024/279>
- xxii Adur and Worthing Councils (2024) - Level 1 Strategic Flood Risk Assessment: Methodology in support of Performing the Sequential Test
- xxiii Adur and Worthing Councils (2025) - Adur Five Year Housing Land Supply 2024-2029 (with a 20% buffer)
- xxiv Adur District Council (2024). Housing Delivery Test Action Plan, December 2024.



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