

Planning Statement

Land between 36 and 38 Barfield Park,
Lancing, BN15 9DF

Construction of a medical facility with two flats above
along with parking, access, and landscaping

at

Land between 36 and 38 Barfield Park, Lancing, BN15
9DF

Planning Supporting Statement

on Behalf of

The Community Stadium Ltd

March 2026

DMH Stallard LLP
3rd Floor, Origin One
108 High Street
Crawley
West Sussex
RH10 1BD

Tel: 01293 605545
Fax: 01293 246016
Email: Daniel.Frisby@dmhstallard.com

DMH Stallard LLP Ref: 268425-39

Checked by

DRAFT

Prepared by: D. Frisby

Checked by: P. Rainier

Date: 15th January 2026

FINAL

Prepared by: D. Frisby

Checked by: P. Rainier

Date: 19th July 2026

Contents

1.	Introduction	1
2.	The Site and Surroundings	2
3.	Planning History	4
4.	The Scheme	6
5.	Planning Policy Context	9
6.	Scheme Appraisal	13
7.	Conclusions.....	20

1. Introduction

- 1.1 This Planning Statement is written by DMH Stallard LLP on behalf of The Community Stadium Limited ("the Applicant") in respect of a proposed development between 36 and 38 Barfield Park, Lancing comprising the construction of a medical facility with two flats above along with parking, access, and landscaping.
- 1.2 The Application Site comprises land between 36 and 38 Barfield Park which is the curtilage of 37 Barfield Park that has been demolished and now forms predominantly scrub and bramble with close boarded fencing to the boundaries. The Application Site has an implemented planning permission for the construction of 2 no. 2-storey 3-bedroom (9 person) dwellings granted approval under AWDM/2126/21.
- 1.3 It is proposed to erect a medical facility along with two no. 2 bedroom flats above with parking, landscaping and access. The medical facility will provide an MRI suite with medical consulting rooms for use by Brighton & Hove Albion Football Club ("the Proposed Development"). The flats above will be 2-bedroom (3 people) each with their own separate access and parking from Mash Barn Lane. The Proposed Development will be accessed by players and staff of Brighton & Hove Albion Football Club by foot only, served by the adjoining Elite Football Performance Centre ("EFPC").
- 1.4 This statement should be read in conjunction with the following application documents which accompany the Planning Application:
- Proposed Plans and Drawings
 - Landscape Plan
 - Design and Access Statement
 - Planning Statement (this document)
 - Flood Risk Assessment and Drainage Strategy
 - Transport Note
 - BREEAM Evidence
 - Preliminary Ecological Appraisal
 - Reptile Survey Report
 - Mammal Survey Report
 - Biodiversity Net Gain Assessment
- 1.5 The purpose of this Planning Statement is to assess the proposed development against the relevant Development Plan policies, namely the Adur Local Plan 2017, and the material planning guidance contained within the National Planning Policy Framework (August 2026). It demonstrates that the proposed development accords with the Development Plan and represents sustainable development in accordance with the NPPF. The application has been informed by pre-application advice received from Adur District Council.

2. The Site and Surroundings

- 2.1 The site comprises a 0.14 ha. corner plot, consisting of the residential curtilage of 37 Barfield Park which has been demolished along with part of the residential curtilage of 36 Barfield Park and a pedestrian access route from the EFPC.
- 2.2 The site is located between Barfield Park and Mash Barn Lane, within a residential part of Lancing. The area consists of a mixture of detached, semi-detached and terraced houses, chalet bungalows and bungalows. On Barfield Park itself and in the immediate vicinity of the site, the dwellings generally comprise bungalows, whilst those on Mash Barn Lane are more varied in nature and include semi-detached and terraced 2 storey dwellings. It is considered that the surrounding area does not have a cohesive design or a strong sense of character, however the dwellings are broadly of a Sussex vernacular.
- 2.3 The site comprises the residential curtilage of 37 Barfield Park. This dwelling was demolished to construct a foul sewer connection to facilitate the construction of the EFPC and major allocated residential development at New Monks Farm to the east. The site now forms scrub and bramble which is bounded by close boarded fencing. The site immediately adjoins the Elite Football Performance Centre, and it is proposed that a new opening between the site and the EFPC will be created by this proposal to allow for pedestrian access.
- 2.4 36 Barfield Park to the south is within the same ownership comprising a 3-bedroom bungalow. It fronts on to Barfield Park which forms the wider residential area. The site is immediately adjoined by another bungalow to the west (38 Barfield Park) which it is noted has two large dormer windows facing the site. The dwellings on Mash Barn Lane including those opposite the site are 2-storey terrace dwellings.
- 2.5 The site benefits from excellent accessibility. Lancing Railway Station is located approximately 1 kilometre to the west, providing direct services to Brighton, Portsmouth, London Victoria via Hove and Gatwick Airport, and Southampton, with four trains per hour to Brighton on weekdays. The nearest bus stops are located 265 metres to the west on Shadwells Road. Lancing Village Centre is within 1 kilometre and provides a range of key services including a post office, public library, GP surgeries, dental practices, pharmacies, food stores and banks. The A27 Old Shoreham Road lies approximately 1 kilometre to the north, and the A259 Brighton Road is 1.5 kilometres to the south. For these reasons, it is considered that the site is situated within a highly sustainable location, accessible to and from sustainable modes of transport and services.

- 2.6 The site falls within the built-up area Boundary of Lancing as defined on the Adur Local Plan Policies Map. It is located within defended Tidal Flood Zone 3, protected by existing flood defences along the River Adur. The site does not fall within or adjacent to any statutory designated nature conservation sites, with the closest internationally designated site being Arun Valley SPA, located approximately 16.9 kilometres to the north-west.
- 2.7 The site comprises predominantly of bramble scrub. Slow Worms are known to be within the site, it is proposed to translocate these to New Monks Farm Country Park prior to construction.

3. Planning History

3.1 In relation to the planning history of the site, the applications relevant to the current proposals are:

- NOTICE/0010/19 – Prior Notification for demolition of detached dwelling.

Status: Prior Approval Not Required

- PREAPP/0400/21 - Pre-application advice in relation to erection of two dwellings

Status: Complete

- AWDM/2126/21 – Demolition of garage and erection of 3 no. 2-storey 3 bedroom (9 person) dwellings.

Status: Approved

- AWDM/1048/22 – Approval of details reserved by condition subject of AWDM/2126/21

Status: Approved

- PREAPP/0134/25 – Erection of private medical centre with 2 flats above

Status: Complete

3.2 The Application Site has relevant planning history which provides important context for the current proposals. Planning permission was previously granted under reference AWDM/2126/21 for the erection of 2 no. dwellings on the site. The pre-commencement conditions for that approval were discharged under AWDM/1048/22 and the application was subsequently implemented by demolition of the garage to Number 36 along with alterations to its access arrangements. That extant permission establishes the principle of residential development at the site and remains capable of implementation. TCSL would have every intention of erecting these dwellings should this application not proceed and therefore this approval is highly pertinent to the current Planning Application.

3.3 The approved scheme under AWDM/2126/21 established several important design principles which have been carried forward and built-upon in the current proposals. The approved layout positioned new dwellings to front onto Mash Barn Lane, allowing for more buffer planting along the western boundary and a greater distance to 38 Barfield Park. The footprint of the

medical centre sits within the footprint of the dwellings previously approved. A reconfiguration of floorspace has allowed a greater separation distance between the proposed development and 36 Barfield Park. The approved scheme enhanced the street scene along Mash Barn Lane with additional vegetation and improved activity and surveillance. The design also improved surveillance of the club's entrance, establishing a more welcoming gateway to the EFPC.

Pre-application (PREAPP/0134/25) advice

- 3.4 A pre-application meeting was held with Adur District Council prior to the submission of this application. Pre-application advice was received from Mr Gary Peck on 8 December 2025. The pre-application officer feedback confirmed several matters. The officer supported the development in principle, provided it retains the number of residential units previously approved under reference AWDM/2126/21, thereby ensuring compliance with the Adur Local Plan by preventing the loss of residential accommodation. The officer confirmed that the revised layout was viewed favourably, specifically noting the increased separation distance from the bungalow to the south, and confirmed that a frontage development onto Mash Barn Lane is appropriate given the sites corner plot and context of the neighbouring training ground entrance.
- 3.5 In relation to the proposed medical facility, the officer noted the importance of the facility's relationship with the nearby training ground but requested that the formal application justify why the facility is located here rather than within the training ground itself. The officer also noted an expectation for a high-quality landscaping scheme, particularly along the site boundaries and frontage, to offset the additional parking provision. As to residential amenity, the design was required to ensure no adverse impact on the residential amenities of neighbours in Barfield Park, particularly regarding the relationship between the site and their north-facing rear gardens.
- 3.6 The current application responds positively to the pre-application advice received. The scheme retains two residential units as required, the layout maintains generous separation to neighbouring properties, incorporating a high-quality landscape scheme including tree planting and wildflower meadows. The need and justification for providing the medical centre outside of the Club's training ground is provided below.

4. The Scheme

- 4.1 The proposed development comprises the erection of a two-storey building accommodating a medical facility at ground floor level and two 2-bedroom, 3-person residential flats at first floor level, together with associated car parking, access arrangements, landscaping and a pedestrian link to the adjacent American Express Elite Football Performance Centre. The building has a total footprint accommodating approximately 242 square metres of medical floorspace and two apartments each measuring 88.1 square metres (approximately 100.2 square metres including the ground floor entrance and storage areas). A full description of the key elements of the proposed development is set out below.

Medical Facility

- 4.2 The ground floor medical facility falls within Use Class E(e) (Medical or Health Services) and comprises the following accommodation:
- A magnet room housing an MRI scanner (30.44 square metres);
 - A control room (15.56 square metres) and equipment room (8.87 square metres);
 - A consultation room (12.15 square metres) and treatment room (12.49 square metres);
 - A waiting area for private patients (33.03 square metres) and a separate player waiting area (11.02 square metres);
 - Staff break room (11.79 square metres) and staff changing facilities; Player changing facilities and an assisted changing room (4.78 square metres);
 - A preparation area, plant room, WC facilities, and a cleaner's utility room.
- 4.3 The internal layout has been rigorously designed with specialist input from Alliance Medical and Imaging Matters to ensure that the Proposed Development meets the technical standards for health facilities. The design has also been informed by seeking to achieve a clear separation between private patients and BHAFC players and staff, ensuring appropriate safeguarding arrangements. The facility will have two distinct entrances, a visitor entrance on the Mash Barn Lane frontage for private patients and a separate player and staff entrance on the eastern elevation, accessed directly from the adjacent EFPC via a dedicated pedestrian link.
- 4.4 The facility will employ 3 staff who day to day will be located and park at the American Express Elite Football Performance Centre, attending the facility for appointments only.
- 4.5 The facility is needed by BHAFC due to the requirement for regular MRI scans as both a preventative and diagnostic measure to improve the health
-

outcomes for their players. This is costly and sometimes difficult to arrange at short notice due to the lack of adequate facilities locally. The proposal will include a state-of-the-art 3T MRI scanner which is necessary to identify fine details to assess future risk of injuries.

- 4.6 Whilst its primary purpose will be to serve the needs of BHAFC, should there be availability in the future, there will be an opportunity to make it bookable for private appointments to the public (either privately funded or funded through insurance). Given the nature of the facility any use for private appointments is anticipated to be limited, 2 no. parking spaces for visitors have been provided to facilitate this use. Whilst the public health benefits will be limited because of this, the proposal will nonetheless establish a best-in-class modern MRI facility in Adur which will help to improve the choice of healthcare facilities within the area. As set out above specialist input has been sought from Alliance Medical and Imaging Matters to ensure that the proposal will meet any regulations for the provision of medical services.

Residential Accommodation

- 4.7 The two 2-bedroom, 3-person flats are located at first floor level. Each apartment is identical in design and provides the following accommodation:
- One double bedroom (15.03 square metres) and one single bedroom (10.22 square metres);
 - An open-plan living, kitchen and dining room (35.67 square metres);
 - One family bathroom (5.54 square metres) and one en-suite (4.42 square metres);
 - Cupboard storage.
- 4.8 At 88.1 square metres, each flat exceeds the nationally described space standards for a 2-bedroom, 3-person dwelling. Each flat also benefits from a ground floor entrance hall and dedicated bin and cycle store (each 3.97 square metres). There will be no private amenity space provided to the flats but given the sites proximity to New Monks Farm Country Park and other surrounding amenities occupants will have good access to areas for recreation.

Access and Parking

- 4.9 Vehicular access to the development is proposed via a new vehicular crossover onto Mash Barn Lane, with visibility splays of 2.4 metres by 43 metres available in both directions. Pedestrian and cycle access is available from both Mash Barn Lane and from Barfield Park via a new footway link along the western boundary connecting the two streets (for use by players and staff of BHAFC only). A private pedestrian link is also proposed along the eastern boundary, connecting the medical facility directly to the EFPC.

- 4.10 The parking provision comprises:
- One car parking space for each of the two residential dwellings, both equipped with electric vehicle charging points;
 - Two car parking spaces for private patients visiting the medical facility;
 - One Sheffield hoop cycle stand at the entrance to the medical facility;
 - Internal cycle stores within each residential unit.

- 4.11 Staff and players utilising the medical facility will use the adjacent training ground car park, accessed via the eastern pedestrian link, thereby minimising parking demand and the impact on the Mash Barn Lane frontage.

Design and Materials

- 4.12 The building features an asymmetrical roof form with dropped eaves and a rear cat-slide roof, creating a contemporary profile that minimises visual scale whilst providing a dynamic presence on Mash Barn Lane. The proposed external materials include light grey brick with horizontal brick banding at ground floor level, a traditional slate roof for the two-storey residential elements and standing-seam metal cladding for the central volume housing the medical centre entrance. Anodised metal dormers provide visual articulation to the roofline. The building frontage is oriented onto Mash Barn Lane, with the dwellings set back from the adjacent fence line to establish an open frontage softened by new trees, shrubs and hedgerow planting.

- 4.13 A detailed landscape plan has been submitted demonstrating the generous buffer to 38 Barfield Park with hedge and tree planting to be provided between both properties. These proposals include provision of wildflower grassland, flowering grassland, hedge and tree planting.

Sustainability

- 4.14 The development adopts a fabric-first approach, with all new homes designed to achieve an Energy Performance Certificate 'A' rating. Key sustainability measures include air source heat pump driven heating and hot water systems, roof-mounted photovoltaic panels, energy-efficient LED lighting, electric vehicle charging points, water-saving measures and sustainable drainage techniques including permeable paving.

- 4.15 As agreed at the Pre-Application meeting given the mixed nature of the building it will be demonstrated that the Medical Facility will meet the "Very Good" energy and water requirements of BREEAM, but a full BREEAM assessment of the proposal will not be undertaken. Evidence to demonstrate that the above targets will be met has been supplied with the Planning Application.

5. Planning Policy Context

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The NPPF reaffirms this principle at paragraph 2, stating that planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise.

5.2 The Development Plan for the purposes of this application comprises the Adur Local Plan 2017, which was adopted by Adur District Council on 14 December 2017. The Adur Local Plan provides a strategy for development in Adur up to 2032, seeking to achieve a balance between meeting development needs and protecting and enhancing the character and features of the district. The following policies of the Adur Local Plan are of relevance to this application:

- **Policy 1 (Presumption in Favour of Sustainable Development)** integrates the NPPF's presumption into the Adur Local Plan, requiring the Council to take a positive approach to development proposals and to approve applications that accord with Local Plan policies without delay.
- **Policy 2 (Spatial Strategy)** provides that development within the built-up area Boundaries of Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate will be permitted subject to compliance with other policies in the development plan.
- **Policy 3 (Housing Provision)** provides that over the period 2011-2032 a minimum of 3,718 dwellings will be developed in Adur, of which 1,538 will be within the built-up area.
- **Policy 15 (Quality of the Built Environment and Public Realm)** requires that 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; 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. Development should also have safe access to the highway network, acceptable parking arrangements, and respect the existing natural features of the site, including landform, trees and biodiversity.

- **Policy 18 (Sustainable Design)** requires that all new dwellings must achieve a water efficiency standard of no more than 110 litres per person per day. Non-domestic floorspace must achieve a minimum standard of BREEAM 'Very Good' with a specific focus on water efficiency.
- **Policy 20 (Housing Mix and Quality)** requires new residential development to incorporate a range of dwelling types, tenures and sizes that reflect and respond to Adur's identified housing needs and demands. Family sized housing should mainly provide 2-3 bedrooms. New dwellings across all tenures will be expected to meet the minimum nationally described space standards. The policy also provides that to maintain the current stock of dwellings, the Council will not generally support proposals which would result in the net loss of residential units.
- **Policy 28 (Transport and Connectivity)** requires that new development should be located and designed to minimise the need for travel, facilitate and promote the use of sustainable alternatives to the private car, and provide or contribute to the necessary infrastructure to serve the development and to mitigate against any adverse impacts to an acceptable level. Where practical, new development should incorporate facilities for electric vehicle charging points. Development should incorporate appropriate levels of car and cycle parking having regard to West Sussex County Council guidance.
- **Policy 30 (Green Infrastructure)** provides that green infrastructure will be protected and enhanced and access to it improved where necessary and appropriate. Developments will be required to incorporate elements of green infrastructure into their overall design, and/or enhance the quality of existing green infrastructure as appropriate.
- **Policy 31 (Biodiversity)** requires that all development should ensure the protection, conservation, and where possible, enhancement of biodiversity, including nationally and locally designated sites.
- **Policy 33 (Planning for Sustainable Communities)** provides that the Council will protect, and support improvements to, social and community facilities. Development which would result in the loss of existing social or community facilities will only be permitted where it can be demonstrated there is no demand, where alternative provision is available, or where the proposed development would provide an alternative facility. The Council will work with healthcare providers to deliver up-to-date healthcare facilities, and with the providers of other social and community infrastructure to deliver appropriate facilities in accessible locations, to meet local needs.

- **Policy 34 (Pollution and Contamination)** provides that development should not result in pollution or hazards which prejudice the health and safety of the local community and the environment, including nature conservation interests and the water environment. New development in Adur will be located in areas most suitable to the use of that development to avoid risks from noise, air, odour or light pollution.
- **Policy 35 (Water Quality and Protection)** provides that development will be permitted provided that it does not have an unacceptable impact on the quality and potential yield of local water resources and the water environment; it protects and enhances groundwater, surface water features and controls aquatic pollution; and it has an adequate means of water supply, sufficient foul and surface water drainage and adequate sewage treatment capacity.

National Planning Policy Framework 2026

5.3 The National Planning Policy Framework was revised in August 2026, replacing the December 2024 version. This Planning Statement has been prepared with reference to the August 2026 Framework, which introduces several changes relevant to this application. In particular:

- Strong in-principle support for development within settlements: Policy S4 provides that development proposals within settlements should be approved unless the benefits of doing so would be **substantially** outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework.
- **Substantial weight for using previously developed land:** Policy L2(1) gives substantial weight to the benefits of development which makes effective use of previously developed land and buildings, remediates degraded or contaminated land, or makes better use of vacant and under-utilised land.
- **Policy encouragement for mixed-use and efficient densities:** Chapter 12 encourages optimising sites through mixed-use schemes that include community facilities and housing to reduce the need to travel, and policy L3 requires development to make efficient use of land, with development within settlements contributing to an increase in density.
- **Substantial weight for new community/health facilities:** Policy HC4(1) provides that substantial weight should be given to the benefits where new or improved public service infrastructure or community facilities would be provided, and where development proposals would make a demonstrable contribution towards promoting good health, preventing ill-health or reducing health inequalities.

- **Sustainable transport and accessible location expectations:** Policy TR3 requires development to support sustainable patterns of movement, with proposals that could generate significant amounts of movement located where they limit the need to travel and offer a genuine choice of transport modes.

5.4 As set out above, the NPPF 2026 confirms that the default position for development within settlement boundaries is that proposals should be approved unless the benefits are substantially outweighed by adverse effects. This represents strong policy support for the proposed development.

6. Scheme Appraisal

6.1 It is considered that the following issues comprise the main material considerations in respect of the scheme:

- Principle of the Development
- Housing Delivery
- Design
- Flood Risk and Drainage
- Ecology
- Noise and Amenity
- Sustainability
- Community and Economic Benefits

Principle of the Development

6.2 The application site is located within the Built-up area Boundary of Lancing as defined on the Adur Local Plan Policies Map. Policy 2 of the Adur Local Plan confirms that development within the Built-up area Boundaries will be permitted subject to compliance with other policies in the development plan. The site comprises previously developed land, having formerly accommodated a residential bungalow which has since been demolished. The NPPF at policy L2(1) gives substantial weight to the benefits where a development proposal would make effective use of previously developed land and buildings, or make better use of vacant and underutilised land within settlements.

6.3 The principle of residential development on this site has already been established through the grant of extant planning permission AWDM/2126/21 for two dwellings. The current proposals retain the same quantum of residential accommodation, providing two 2-bedroom, 3-person flats, thereby ensuring no net loss of residential accommodation in accordance with the Adur Local Plan. The Council's pre-application response confirmed support for the principle of development, provided the number of residential units previously approved was retained.

6.4 The addition of the medical centre at ground floor level represents an appropriate complementary use which is supported by policy. Policy 33 of the Adur Local Plan support the provision of community facilities and states that the Council will work with healthcare providers to deliver up-to-date

healthcare facilities to meet local needs. The NPPF at policy HC4(1) provides that substantial weight should be given to the benefits where new or improved public service infrastructure or community facilities would be provided. The medical facility falls within Use Class E(e) (Medical or Health Services), providing 242 square metres of new medical floorspace which will meet the needs of BHAFC and, should availability allow, the wider public through private patient appointments. Whilst the benefits of this are slightly tempered by this being a private rather than NHS facility, it will nonetheless improve access and choice of healthcare facilities to the public.

- 6.5 The medical facility is proposed at this location, rather than within the training ground itself, for two main reasons. Firstly, a location outside of the EFPC is required in order that the facility could be made available for private appointments in the future. This would not be practicable if the medical facility was located inside of the EFPC due to safeguarding issues and duty of care that the Club have in relation to their playing staff, particularly U-18's. Secondly, all available space within the training ground is currently occupied and there is no space where an MRI scanner could be located. The Application Site is therefore ideal to meet this shared function and would mean that the benefits of this significant investment by TCSL would benefit others who require a best of its kind MRI facility within Adur.
- 6.6 The separation between private patients and club players has been incorporated into the design of the scheme so that it would comfortably facilitate both types of users whilst meeting the safeguarding requirements of BHAFC.
- 6.7 The proposal therefore accords with the principle of sustainable development as articulated in Policy 1 of the Adur Local Plan and the presumption in favour of sustainable development set out in policies S3 and S4 of the NPPF, delivering both residential accommodation and a healthcare facility on a brownfield site within the built-up area. There is also substantial weight provided in favour of granting permission through making efficient use of underutilised land.

Housing Delivery

- 6.8 The Adur Local Plan recognises a significant shortfall in housing delivery against its objectively assessed housing need. The Local Plan identifies an objectively assessed need of 6,825 dwellings over the plan period but can only deliver a capacity-based target of 3,718 dwellings, leaving a shortfall of 3,107 dwellings. The most recent assessment of the Council's housing land supply indicates that only 3.2 years can be demonstrated. This underlines the importance of every contribution to housing supply, however modest, being recognised as a material benefit.
- 6.9 The proposed development will deliver a net gain of two residential units, contributing to the housing supply target set out in Policy 3 of the Adur Local

Plan. The NPPF at policy HO13(1) emphasises the importance of significantly boosting the supply of homes, stating that land with permission should be developed without unnecessary delay. Policy 20 of the Adur Local Plan identifies that family-sized housing should mainly provide 2-3 bedrooms, and the proposed 2-bedroom, 3-person flats directly respond to this identified need.

- 6.10 Each apartment is designed to 88.1 square metres (approximately 100.2 square metres including the ground floor entrance and storage areas), exceeding the nationally described space standards. This ensures compliance with Policy 20 of the Adur Local Plan which requires new dwellings across all tenures to meet the minimum nationally described space standards. Each flat benefits from one double and one single bedroom, an open-plan living, kitchen and dining room, one family bathroom and an en-suite. The proposed dwellings will provide high quality and sustainable accommodation.
- 6.11 The delivery of two additional homes, whilst modest in scale, makes a meaningful contribution to housing supply within a district where land supply is severely constrained and housing need significantly exceeds capacity. This is a matter to which substantial weight should be attached.

Design

- 6.12 The Design and Access Statement prepared by ECE Architecture provides a comprehensive assessment of the scheme's design rationale. The proposed development comprises a two-storey building with an asymmetrical roof form designed to minimise visual scale, featuring dropped eaves and a rear cat-slide roof which provides a contemporary profile. The design creates a more dynamic presence on Mash Barn Lane whilst remaining sympathetic to neighbouring properties.
- 6.13 The scheme has been designed to enhance the approach to the training ground by introducing architectural variety and textural depth. Key features include dormer windows and bespoke brick detailing referencing the local context, creating a building that is both contemporary and sympathetic to the character of the area. The proposed materials include light grey brick with horizontal brick banding at ground floor, a traditional slate roof for the two-storey elements, and a standing-seam metal cladding for the central volume housing the medical centre entrance. Anodised metal dormers add visual articulation to the roofline.
- 6.14 The layout proposes frontage onto Mash Barn Lane, which avoids direct overlooking to No. 38 Barfield Park. The proposal achieves significant separation distances from this adjoining property with significant planting, including new hedge and tree planting to between the two properties. The new dwellings are set back from the adjacent fence line to establish a more open frontage along Mash Barn Lane, with new trees and shrubs softening the footpath. This approach was confirmed as appropriate at the pre-

application stage, given the context of the neighbouring training ground entrance.

The design therefore accords with Policy 15 of the Adur Local Plan, which requires development to be of high architectural quality, respecting and enhancing the character of the site and the prevailing character of the area in terms of proportion, form, massing, siting, layout, materials, detailed design features and landscaping. The design therefore accords with Policy 15 of the Adur Local Plan, which requires development to be of high architectural quality, respecting and enhancing the character of the site and the prevailing character of the area in terms of proportion, form, massing, siting, layout, materials, detailed design features and landscaping. It also responds positively to policy DP3 of the NPPF, which requires development proposals to respond to their context so that they integrate with and enhance their surroundings. Policy DP3(3) provides that substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals, and that proposals which, without clear justification, conflict with the policy or relevant design principles should be refused.

Flood Risk and Drainage

- 6.15 The Flood Risk Assessment prepared by The Civil Engineering Practice demonstrates that the proposed development is suitable, safe and will not increase flood risk elsewhere. The site is located within defended Tidal Flood Zone 3 and will remain defended beyond the future year 2125. Both the medical and residential elements of the proposed development are classified as 'More Vulnerable' uses. Whilst More Vulnerable development is ordinarily appropriate only in Flood Zones 1 and 2, the site is defended against tidal flooding by two forms of tidal flood defence, and residential accommodation will be located at first floor level at approximately 6.65 metres AOD, approximately 1.25 metres above the predicted 2125 1:200-year flood level.
- 6.16 Flood resilient construction will be undertaken at ground floor level to a depth of 300 millimetres above the predicted 2125 1:200 flood level of 5.393 metres AOD, to a level of 5.693 metres AOD. The site is not at risk from any other source of flooding, and there are no historic records of flooding from any source affecting the site.
- 6.17 A suitable SuDS drainage system is proposed which accords with the requirements of national and local policy. Surface water runoff generated by the proposed development can be attenuated on site for all rainfall events up to the 1:100-year event, including an allowance for a 45% increase in rainfall intensities to account for climate change. The surface water drainage design incorporates permeable paving and meets the required pollution mitigation treatment levels. Foul water will be discharged to the existing public foul sewer located beneath Barfield Park.

- 6.18 The Flood Risk Assessment therefore demonstrates full compliance with Policy 36 of the Adur Local Plan, which requires development to be appropriately flood resilient and resistant, to not increase flood risk elsewhere, and to give priority to the use of SuDS. The proposals also accord with policies F7 and F8 of the NPPF, which require that development in areas at risk of flooding is safe throughout its lifetime and that flood risk is not increased elsewhere, and that development proposals incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff.

Sequential Test

- 6.19 Whilst the Sequential Test would normally need to be applied in respect of this document, the site already has a deliverable permission to provide 2 no. 3 bedroom (6 bedroom) houses which could be erected immediately. This means that each house would provide accommodation for at least 6 people with 12 people housed across the site. The number of residential occupiers now proposed would be 4, removing 8 users that would be classified as 'more vulnerable' in flood risk terms. With the addition of the medical facility, it is anticipated that this would be occupied by 3 no. permanent staff, 1 GP and 2 assistant (although day to day these staff members will be covering duties at the AEFPC only attending the medical centre for appointments). At any one time there will be a maximum of 1 patient being seen with 1 patient waiting. A breakdown of the anticipated use is shown below.

Extant Scheme	
3 bed house (3 doubles)	6 people
3 bed house (3 doubles)	6 people
Total	12

Proposed Scheme	
2 bed flat (1 double, 1 single)	3 people
2 bed flat (1 double, 1 single)	3 people
Temporary Medical Facility Staff	3 people
Temporary Medical Facility Visitors	2 people
Total inc Residents and Temporary	10 people
Total Residents	6 people

- 6.20 Overall, the number of additional people using the site (when it is fully occupied) as a more vulnerable user will be approximately 2 fewer than the consented houses. Importantly, the number of people permanently residing at the site as residential occupiers will be 6 fewer than the consented scheme. The proposals are therefore a betterment from a flood risk perspective. It is worth noting that there is a clear and realistic proposition of the extant permission being implemented as the Applicant has made it clear that they would seek to build the extant permission out immediately if this proposal did not proceed.

- 6.21 The Council's flood risk advisers were consulted in respect of the pre-application request and agreed that a Sequential Test would not be necessary in this case.

Ecology and Biodiversity

- 6.22 The Preliminary Ecological Appraisal prepared by The Ecology Partnership provides a thorough assessment of the ecological value of the site and any constraints arising from the proposed development. The site does not fall within or adjacent to any statutory designated nature conservation sites. There are no internationally designated sites within 15 kilometres. Whilst the site lies within an SSSI Impact Risk Zone, no impacts are anticipated due to the small scale of the proposed works.
- 6.23 The habitats identified on site are largely common and widespread throughout the local area and the UK and are of site value only. The native hedgerow along the northern boundary is classified as a priority habitat, and sections will be lost for new access, these sections will be replaced by planting of new native hedgerows within the Site.
- 6.24 A Reptile Survey identified a 'good' population of slow worms on the site, and a mitigation strategy involving reptile translocation has been recommended to avoid harm during development works. A Mammal Hole Monitoring Report found no evidence of active badger setts during the survey period. Further ecological recommendations include a sensitive lighting scheme for commuting and foraging bats, removal of scrub and hedgerow outside the breeding bird season, and the creation of log piles for reptiles.
- 6.25 The proposed development will achieve a minimum 10% biodiversity net gain as required by the Environment Act 2021. The pre-development biodiversity value of onsite habitats has been calculated at 0.89 biodiversity units. The proposed landscaping within the series of amenity spaces will encourage and improve ecological diversity. A net gain will be achieved through the purchase of credits from a nearby net gain site.

The proposals therefore accord with Policy 31 of the Adur Local Plan, which requires all new developments to take account of and incorporate biodiversity features at the design stage. They also comply with policy N2(1)(f) of the NPPF, which requires development proposals to minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs.

Noise and Amenity

- 6.26 The Noise Technical Memo prepared by Anderson Acoustics Ltd assesses the acoustic implications of the proposed development. The existing noise climate is predominantly characterised by local and distant road traffic noise,

with additional contributions from distant railway activity and occasional overhead aircraft movements.

- 6.27 An environmental noise survey has been completed on site to establish appropriate plant noise targets and input into the selection and mitigation options required to suitably control noise from external plant at the nearest noise-sensitive receptors. The nearest noise-sensitive receptors comprise existing residential properties along Barfield Park and Mash Barn Lane. A full noise impact assessment will be completed when the final plant selection has been confirmed, and this can appropriately be dealt with by way of a planning condition to discharge requirements relating to plant noise.
- 6.28 The assessment has been carried out with reference to the Planning Noise Advice Document for Sussex and Approved Document E of the Building Regulations. The acoustic assessment confirms that, with suitable mitigation measures such as acoustic enclosures, the impact of the development on nearby residential amenity can be suitably controlled. It is noted that all plant for the MRI facility will be located internally.
- 6.29 The design of the building has been carefully considered to minimise impacts on residential amenity. The layout avoids overlooking No. 38 Barfield Park through the orientation of the building frontage onto Mash Barn Lane. The increased separation from the western boundary and the wide buffer planting zone are with tree and hedge planting protects neighbouring residential amenity. The orientation of buildings and aspect of the main habitable rooms allows for good levels of daylight within the dwellings, with natural ventilation to all habitable rooms.
- 6.30 The proposal therefore complies with Policy 34 of the Adur Local Plan, which requires development not to result in pollution or hazards prejudicing health and safety, and with Policy 15, which requires development not to have an unacceptable impact on adjacent properties, particularly residential dwellings, including unacceptable loss of privacy, daylight, sunlight or outlook.

Sustainability

- 6.31 The Design and Access Statement sets out a comprehensive sustainability strategy for the proposed development. The approach to development and housing will be through a fabric-first emphasis, with all new homes designed to achieve an Energy Performance Certificate 'A' rating. The specification of the building fabric and thermal envelope, including insulation, glazing and air permeability, is designed to minimise energy consumption and reduce running costs. The medical facility will meet the "Very Good" requirements in both the Water and Energy sections of BREEAM.
- 6.32 The scheme incorporates high efficiency air source heat pump heating and hot water systems, energy-efficient LED lighting, and roof-mounted photovoltaic panels to generate a proportion of electrical demand on site.

Electric vehicle charging points will be provided for each dwelling. Water consumption will be reduced through the use of water-saving measures, including flow restrictors, reduced bath volumes, water-efficient white goods and dual flush cisterns. Sustainable drainage techniques, including permeable paving and soakaways, will be used to manage surface water.

- 6.33 High quality materials are proposed that will age gracefully and require minimum maintenance, with materials specified where possible to minimise travel distance to site and sourced from recognised sustainable sources with appropriate certification. Refuse and recycling bins for residents are accommodated within dedicated stores for each unit.
- 6.34 The proposal therefore accords with Policy 18 of the Adur Local Plan, which requires sustainable design standards for residential and non-residential development. It also responds positively to policies CC1 and CC2 of the NPPF, which require a proactive approach to mitigating climate change and supporting the transition to net zero by 2050. Policy CC2 requires development proposals to support climate change mitigation through sustainable movement, energy and resource conservation, and the use of low carbon energy sources.

7. Conclusions

- 7.1 This Planning Statement has been prepared in support of a full planning application for the erection of a medical facility with two 2-bedroom, 3-person flats above, along with associated parking, access and landscaping, including pedestrian access from the American Express Elite Football Performance Centre, at land between 38 and 36 Barfield Park, Lancing. The application has been submitted on behalf of The Community Stadium Limited and has been informed by pre-application advice received from Adur District Council.
- 7.2 This statement has demonstrated that the proposed development accords with the relevant policies of the Development Plan, namely the Adur Local Plan 2017, along with material planning guidance contained within the National Planning Policy Framework (August 2026). The principle of residential development on this site is established by the extant planning permission AWDM/2126/21, and the current proposals retain the same quantum of residential accommodation. Policy S4 of the NPPF requires that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.
- 7.3 The application is supported by a comprehensive suite of technical documents. The Design and Access Statement demonstrates a high-quality, design-led scheme that respects and enhances the local character whilst providing a contemporary and sustainable addition to the streetscape. The Flood Risk Assessment confirms that the development is safe, will not increase flood risk elsewhere and incorporates appropriate SuDS drainage measures. The Transport Note demonstrates that the development will have no measurable impact on the local highway network and provides appropriate access and parking arrangements. The Noise Technical Memo establishes that the acoustic impact of the development can be suitably controlled through appropriate mitigation. The ecological surveys confirm that, with appropriate mitigation and net gain measures, the development will not result in significant adverse ecological effects. It has been demonstrated that there are no adverse effects which would justify a decision other than in accordance with Policy S4 of the NPPF.
- 7.4 The proposed development delivers clear social, economic and environmental benefits. Socially, it provides two high-quality homes addressing identified housing needs along with a medical facility which would enhance the District's healthcare infrastructure. Economically, it creates employment opportunities, generates construction activity and makes efficient use of a brownfield site within the Built-up area.

- 7.5 Environmentally, the scheme achieves EPC 'A' ratings through a fabric-first approach, incorporates renewable energy technologies, provides biodiversity net gain and implements sustainable drainage.
- 7.6 Having regard to the above assessment, the proposed development fully accords with the Adur Local Plan 2017 and represents sustainable development in accordance with the NPPF. In accordance with Policy 1 of the Adur Local Plan and policy S3(1)(c) of the NPPF, planning permission should be granted without delay. We therefore respectfully request that Adur District Council resolve to approve this application.