

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 19/07/2026 11:55 AM from Mr Rich Denyer-Bewick.

Application Summary

Address:	Land And Barns New Salts Farm New Salts Farm Road Lancing West Sussex
Proposal:	New development comprising the erection of 10 no. dwellings following the demolition of existing agricultural barns
Case Officer:	Giles Holbrook

[Click for further information](#)

Customer Details

Name:	Mr Rich Denyer-Bewick
Email:	
Address:	54 Orient Road Lancing West Sussex

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Other - Overdevelopment
Comments:	I am writing to object to this application. My objection rests on the following grounds, each of which is drawn from evidence within the applicant's own submitted documents rather than general principle. 1. The Sequential Test has not been independently tested, and its own findings point to better alternatives: The Flood Risk Assessment's Sequential Test (the mechanism specifically intended to prevent housing being built in high flood-risk locations when lower-risk sites exist) was conducted entirely by consultants commissioned and paid by the applicant. It identified seven alternative sites in Adur with lower flood risk than this one. Each was then excluded using judgement calls made by the same paid consultants: three on the basis of unit-count mismatches, three because previous (unbuilt) planning applications on them were for flats or terraces rather than detached houses, and the last (a council-owned site) because it is earmarked for

affordable rather than open-market housing.

None of these exclusions is independently verified, and each has the effect of preserving the applicant's preferred, high-risk site as the only "available" option. Given that Adur has an acknowledged housing shortfall, the council should scrutinise whether these seven lower-risk sites are genuinely undeliverable, rather than accept the applicant's own consultants' conclusion that they are not. The council can meet its housing delivery targets through the sites this Sequential Test itself identified as lower-risk, rather than by accepting the highest-risk of the eight sites assessed.

2. The flood risk to future occupants is severe, and the safety case rests on a worst-case "shelter in place" contingency:

The site sits wholly within Flood Zone 3. The applicant's own modelling shows that, without external tidal defences, flood depths on parts of the site would reach 3.65 metres. The entire safety case for the scheme depends on defences maintained by third parties (the Environment Agency and the council), and even so, the submitted Flood Warning and Evacuation Plan concedes that in the event of a catastrophic defence failure, there may be insufficient warning time for evacuation, and the fallback is for residents to retreat to first-floor "invacuation" refuge and wait. This is not a marginal residual risk footnoted for completeness, it is built into the design as the actual contingency plan. I do not consider this an acceptable level of risk to impose on ten households, particularly when the Environment Agency's own initial review found the applicant's first-draft flood mitigation (300mm freeboard) inadequate and was only revised after the EA indicated it was "likely to object."

3. The ecological assessment is based on a single site visit and conflicts with long-standing resident observation:

The Preliminary Ecological Appraisal rated both barns as having "negligible" suitability for roosting bats and ruled out barn owls due to a lack of suitable ledges. This assessment was based on one site visit in May 2025. Neighbouring residents of over 40 years standing report regular observation of roosting bats and barn owls using the buildings, along with badgers, and seasonal starling murmurations on the barn roofs. Barn owls are a Schedule 1 protected species; if present, their use of the site would require dedicated survey work, not an inference from habitat suitability alone. Given the direct conflict between a one-day professional snapshot and repeated, long-term resident observation, I request that the council require a full seasonal survey (bat activity survey across the active season, and a dedicated barn owl assessment) before determining this application, rather than relying on the single Phase 1 visit.

4. Contamination risk to neighbouring properties has been identified but not resolved:

The applicant's own Flood Risk Assessment references a Phase 1 Contaminated Land Assessment identifying that the site sits on an infilled historical gravel pit, with moderate risk ratings to neighbouring properties from asbestos fibres and

ground gases. Testing of the made ground is deferred to post-permission investigation. I do not consider it appropriate for the council to grant permission before this risk is actually characterised and a mitigation scheme is agreed, given that neighbouring gardens back directly onto the site.

5. The proposal conflicts with the Adur Local Plan's Strategic Green Gap policy:

The site falls within the recognised strategic green gap between Shoreham and Lancing. The cumulative effect of permitting residential development within this gap, regardless of the modest scale of this individual application, risks establishing a precedent that erodes the gap's function over successive applications, contrary to the purpose the designation is intended to serve.

Conclusion

For the reasons above, I do not consider that this application should be approved in its current form. I would ask the council to give particular weight to the fact that the applicant's own Sequential Test identified seven lower flood-risk alternative sites in the district; if Adur's housing shortfall needs addressing, which I accept it does, it should be addressed through those sites, or through an independently verified assessment of why they are genuinely undeliverable, rather than through development of the highest flood-risk site in the comparison set.
