

Executive summary

Application AWDM/0810/26 — erection of 10 dwellings following demolition of agricultural barns at Land and Barns, New Salts Farm, New Salts Farm Road, Lancing / Shoreham-by-Sea. We OBJECT and ask the Council to REFUSE permission.

This is, in substance, the same 10-dwelling scheme the Council advised at pre-application stage (PREAPP/0046/25) would be “unacceptable in principle and very likely refused”. Reduced roof heights and added landscaping do not cure the fundamental objections the Council itself identified. Even applying the National Planning Policy Framework (NPPF) paragraph 11(d) “tilted balance” (on which the applicant relies, given the Council's ~3.2-year housing land supply), the harms significantly and demonstrably outweigh the limited benefits of ten open-market houses. The main grounds, cross-referenced to the body of this objection, are:

- **Principle – countryside & Local Green Gap (§1):** housing outside the built-up area, in the countryside and the Lancing–Shoreham Local Green Gap, causing coalescence, contrary to Policies 13 & 14.
- **The Council's own adjacent land purchase (§2):** in 2020 the Council bought the adjacent New Salts Farm to protect it from housing (on flood-risk and green-gap grounds); approving houses immediately beside it would be inconsistent with that decision.
- **Flood risk – Flood Zone 3 (§3):** the Sequential Test is not properly passed — the applicant's own FRA concedes 7 lower-risk sites but discounts them all by defining “the development” around its preferred house type; the Exception Test is not met.
- **Surface-water drainage (§4):** no enforceable long-term maintenance regime or modelled exceedance-flow routes to protect neighbouring land.
- **Landscape & visual harm (§5, §5A):** harm to a sensitive gap, South Downs National Park (SDNP) and A259 views and the Grade II* listed airport setting — reinforced by the Council's own Adur Landscape Character Assessment (LCA 10; A259 View 15).
- **Design & consistency (§6, §6A):** a suburban, flat-roofed estate out of keeping with the historic farm setting; and inconsistent with the “in keeping” controls applied to a neighbour's minor extension at 3 Old Farm Court.
- **Neighbour amenity (§7):** overlooking, loss of privacy and outlook at Old Farm Court from two-storey dwellings, windows and balconies.
- **Ecology & Biodiversity Net Gain (BNG) (§8):** an application form that under-declares the nearby Adur Estuary Site of Special Scientific Interest (SSSI), and an overstated, insufficiently secured “69% net gain” with unreconciled figures.
- **Housing benefit (§9) & land status (§10):** ten large open-market homes (no affordable housing; just below the 11-unit threshold); the site is active agricultural land — not “previously developed” / brownfield.
- **Highways & access (§11, §11A):** traffic and construction loaded onto a narrow, footway-less private road — despite the applicant's own consultants previously advising that residential development here be accessed from the A259.
- **Procedure (§12):** no neighbours in Lancing or across the A259 appear to have been notified.

Our personal perspective as immediate neighbours — loss of privacy, security (there is no buffer, only a low farm fence), outlook, the historic farm setting, and increased light and noise — is set out in full after this summary. A list of the specific actions we ask the Council to take appears at the end.

OBJECTION TO PLANNING APPLICATION

Application ref: AWD/0810/26 (Planning Portal PP-15035967)

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

I write to OBJECT to the above application. I own / occupy a property immediately adjacent to the application site. The objection below is framed around material planning considerations and the development plan for the area, namely the Adur Local Plan (2017) and the National Planning Policy Framework (NPPF). I respectfully ask the Council to REFUSE permission.

*In summary, this is the same 10-dwelling scheme that the Council advised at pre-application stage (PREAPP/0046/25) would be “unacceptable in principle and very likely refused”. The applicant has reduced building heights and added landscaping, but none of the amendments cure the fundamental objections the Council itself identified: the principle of housing in the countryside and Local Green Gap, the flood-risk location, landscape and visual harm, and impact on neighbouring amenity. The claimed benefits do not, on any fair reading, **significantly and demonstrably outweigh** those harms.*

Our personal perspective as immediate neighbours

Before turning to the formal planning grounds, we want to explain briefly how this proposal would affect us as immediate neighbours, since it is our home and our daily surroundings that would be most directly and permanently affected.

We chose to live here for a specific and, to us, unusual quality: a genuinely rural, open and quiet setting on the edge of the countryside, combined with easy access to the town centre and its services. That balance — **rural character with town-centre proximity** — was one of the key reasons for our decision to buy, and it is precisely the quality this development would erode. Our specific concerns are:

- **Loss of privacy.** The proposed two-storey houses, with first-floor windows and balconies facing our property, would overlook our home and garden in a way the existing single-storey, open-sided barns never have.
- **Loss of the open outlook and rural views.** The uninterrupted views across open land that give this place its character would be replaced by the roofs, cars, lighting and boundary treatments of a housing estate.
- **Loss of the historic farmhouse setting.** The agricultural character that defines this corner would give way to a suburban form of development that has no meaningful relationship to it.
- **Light pollution.** The site is currently dark at night. Ten occupied homes, an internal estate road, external and security lighting and vehicle headlights would introduce night-time light that would fundamentally change what is now a quiet, unlit rural edge — with consequences for both our amenity and the nocturnal wildlife using the adjacent land and ditches.
- **Noise and disturbance.** The change from occasional agricultural use to ten permanently occupied households — with the associated vehicle movements, comings and goings and everyday domestic activity — would be a significant and permanent increase in noise and general disturbance in a location that is presently very quiet.
- **Security.** At present the site is enclosed and little-used. Introducing an estate, additional access and a materially higher level of activity immediately behind our property raises genuine concerns about the security and seclusion we currently rely on. This is compounded by the fact that **there is no buffer separating our property from the proposed development** — the only boundary is a low, waist-height

farm-style fence, which offers no meaningful screening, separation or security once the land immediately beyond it becomes ten occupied houses with their own access and circulation.

We are realistic about how these points are weighed. We understand that our personal reasons for buying, and the loss of a private view in itself, carry limited weight in planning terms. But several of these matters — **overlooking and loss of privacy, light pollution, noise and disturbance, and harm to the character and appearance of the area** — are material planning considerations in their own right, and are addressed as such in the grounds that follow. Taken together, they mean this proposal would cause real, lasting harm to us as neighbours and to the very qualities that make this place what it is.

Grounds of objection

1. Principle of development – countryside and Local Green Gap (Policies 13 & 14; NPPF)

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

The Council's own pre-application response concluded that the development would extend an isolated linear group of buildings and would **contribute to settlement coalescence**, conflicting with Policies 13 and 14. Critically, the officer advised that **even the absence of a five-year housing land supply did not outweigh the policy harm** in this location. Nothing in the submitted scheme changes that analysis.

The applicant argues (Planning Statement §6.10–6.12) that because the Council cannot demonstrate a five-year supply (3.2 years as at March 2026) and the Local Plan is more than five years old, the NPPF “tilted balance” at paragraph 11(d) applies and the boundary is “not fatal”. That is only half the test. The tilted balance still requires refusal where adverse impacts **significantly and demonstrably outweigh** the benefits, and where policies protecting areas of particular importance (including areas at risk of flooding) provide a clear reason for refusing. Both limbs point to refusal here.

2. The Council's own purchase of the adjacent land to protect this gap

This is a distinctive and powerful material consideration. In 2020 Adur District Council purchased the adjacent **70-acre New Salts Farm** for £875,000, expressly to **protect it from housing and return it to natural / wetland habitat**, to conserve and enhance biodiversity, and to preserve the green gap between Lancing and Shoreham (Joint Strategic Committee, 8 September 2020; decision confirmed 29 October 2020).

The immediately preceding proposal on that adjacent land — Hyde New Homes' scheme for around 450–455 dwellings — was **refused / resisted specifically on flood-risk grounds**, and the Council intervened to buy the land rather than see it developed. The application site sits directly beside that protected land and forms part of the same landscape, the same green gap, the same habitat network and the same floodplain.

It would be internally inconsistent for the Council to spend public money protecting the adjacent land from housing on flood-risk and green-gap grounds, while granting permission for a 10-house estate immediately next to it that urbanises the setting, erodes the gap and introduces the very land use the purchase was designed to prevent. I ask the Council to explain how approval could be reconciled with its own strategic position on this land.

3. Flood risk – Flood Zone 3, the Sequential Test and the Exception Test (NPPF Section 14; Policy 36)

The site is **wholly within Flood Zone 3** (high probability of flooding). The Council's pre-application advice was that it was **“unlikely the Sequential Test and Exception Test could be satisfactorily passed”**, particularly given lower-risk alternative sites and the limited public benefit of a 10-unit scheme. I endorse and rely on that view.

The Sequential Test has not been passed. The applicant's own Flood Risk Assessment (Hilson Moran, May 2026) concedes that **7 of the 15 alternative sites assessed are at lower flood risk** than the application site. The applicant then discounts all seven — not because they are unavailable, but because they are said not to suit **this particular product**: 10 detached, largely open-market 3- and 4-bed houses with a play area and community space.

This inverts the test. The Sequential Test asks whether the development need can be met on a lower-risk site, not whether a lower-risk site can accommodate the applicant's preferred house types, densities and tenure. In particular:

- Three sites were discounted as too small (6–8 dwellings) — but a genuine housing need does not require exactly 10 large detached houses; smaller schemes still meet housing need.
- Three sites were discounted because previous schemes there were flats or terraces rather than detached houses — a self-serving definition of “the development” built around the applicant's commercial preference.
- The final site (ADC/173/23) was discounted precisely because it is reserved for **affordable housing** for local people on the Council's register — i.e. it meets a real, identified need. Discounting a site because it delivers affordable rather than open-market homes is not a proper basis under the Sequential Test.

Defining the “development need” so narrowly that only this site can meet it is exactly the approach the Planning Practice Guidance warns against. On a proper, proportionate application, **reasonably available lower-risk sites exist and the Sequential Test fails**. If the Sequential Test fails, the application should be refused without needing to reach the Exception Test.

The Exception Test is also not met. Test A (wider sustainability benefits that outweigh flood risk) rests almost entirely on housing delivery and a children's play area — modest benefits for 10 open-market homes. Test B (safe for its lifetime without increasing flood risk elsewhere) depends on a defended-scenario argument, raised finished floor / sleeping levels (5.94m AOD), waterproofing, internal “refuge” stairways and an evacuation plan. Placing ground-floor living with bedrooms pushed to first floor, plus reliance on evacuation routes and “invacuation”, is itself an admission that this is a high-risk location where residents may need to shelter or flee during a flood.

Note too that **the Environment Agency does not apply the Sequential Test — that is the Council's job**. The DAS statement that “the Environment Agency have no objections” therefore does not cure the sequential problem. It is also relevant that, on the adjacent New Salts Farm site, the Lead Local Flood Authority (West Sussex County Council) previously considered that the FRA “**underplays the significant flood risk from groundwater and surface water**”. WSCC's substantive comments as LLFA should be obtained and given significant weight before any decision (the WSP drainage response of 14 July 2026 confirms this is a major application engaging WSCC).

4. Surface-water drainage and long-term maintenance

The drainage strategy relies on permeable paving, a sub-surface attenuation layer, a piped network and a SuDS basin, with roof water connected in. Its effectiveness depends entirely on **continued, funded maintenance** — clearing gullies, pipes, the permeable sub-base and roof connections. Over time these block with silt, moss and leaf litter, at which point rainfall takes uncontrolled overland routes.

The application does not demonstrate, in an enforceable form, **who will maintain the system, how often, how failures are detected, and where exceedance flows go**. Given the site's Flood Zone 3 location and that neighbouring land sits at differing levels (the DAS notes neighbouring ground 2m+ higher in places), the Council should require modelled exceedance-flow routes and a legally secured, adoptable long-term maintenance regime demonstrating that neighbouring properties will not experience worsened flooding,

ponding or runoff. Absent that, the scheme is not shown to be safe for its lifetime “without increasing flood risk elsewhere” as the NPPF requires.

5. Landscape and visual impact (Policy 13; NPPF Chapter 15)

The site contributes to the open, undeveloped character of the Lancing–Shoreham gap and to long-distance and elevated views, including from the South Downs National Park and public rights of way, and forms part of the setting of the Grade II* listed Shoreham (Brighton City) Airport terminal. The applicant's own Landscape & Visual Appraisal (Huskisson Brown, December 2025) acknowledges **several high and medium-high sensitivity viewpoints**, including SDNP panoramas and rights of way with high-susceptibility recreational users.

The proposal replaces open-sided agricultural barns with **ten two-storey, flat / mono-pitch domestic dwellings** with first-floor balconies, garages, driveways, EV chargers, an internal estate road, private gardens and boundary treatments. Even on the applicant's own figures, the reduced ridge heights still leave the dwellings **up to 700mm higher than the largest existing barn (and around 500mm higher than the smallest)**, so the scheme is not a like-for-like or lower replacement in height terms. Combined with the introduction of a permanent, lit, domestic, estate-style form, this is a fundamentally more urbanising and visually complex presence than the agricultural structures it replaces. Sedum roofs and perimeter planting soften but do not neutralise that change; and landscape mitigation takes 10–15 years to establish.

The LVA's conclusion of only “slight adverse” / “no change” effects should be treated with caution: it is an applicant-commissioned appraisal that adopts a “medium” landscape sensitivity and expressly **excludes private residential views and discounts the very receptors most affected** (neighbouring residents; site users). It also relies heavily on baseline winter views and on maturing planting to reach a benign “Year 15” position.

5A. The Council's own landscape evidence base – Adur Landscape Character Assessment (Sheils Flynn)

The Council's adopted landscape evidence base reinforces the objection, and does so in the applicant's own terms — the applicant's Landscape & Visual Appraisal expressly relies on the **Adur Landscape Character Assessment (Sheils Flynn)** and its viewpoint annex, yet adopts only the conclusions that suit it.

First, the application site does not sit in undifferentiated “countryside”. It lies within a discrete, named character area — **LCA 10: New Salts Farm** — which the Council's assessment identifies as part of the sensitive open landscape between Lancing and Shoreham-by-Sea. The assessment expressly recognises the strong emphasis on the character and sensitivity of views, including from the South Downs National Park and recreational routes, across this part of the coastal plain.

Second, and importantly, the **October 2023 update to the assessment specifically added a new viewpoint — View 15, from the A259 looking north over LCA 10 (New Salts Farm)**. The Council therefore formally recognised, after review, that the view across this very land from the A259 Brighton Road is an important and sensitive one worthy of separate analysis. That directly undermines the applicant's contention that views of the site are limited or distant, and it is squarely relevant to the notification concern at Section 12 (residents on and across the A259 have a recognised visual interest in this land).

Third, the assessment includes a dedicated **Local Green Gaps landscape analysis (Annex C)** underpinning Policy 14. This is the evidence base the Council itself uses to judge coalescence and gap function. The applicant's LVA reaches a convenient “medium sensitivity / no change” conclusion on the Local Green Gap and SDNP, but it is an applicant-commissioned appraisal that (as noted at Section 5) discounts the most affected receptors and relies on winter baselines and 15-year planting. The Council should weigh its own landscape evidence — which treats this land as a sensitive, named part of the gap with recognised A259 and SDNP views — ahead of the applicant's selective reading of it.

6. Design and character – not in keeping with the historic farm setting

Existing nearby residential development, notably Old Farm Court, reads as a sympathetic barn-style conversion that retains a visible connection to the agricultural origins of the site. A development of ten contemporary flat-roofed detached and semi-detached houses arranged around an internal estate road introduces a suburban form and layout that does not respond to that historic farm character. The objection is not that the houses are modern, but that their scale, roof form, layout and architectural language are imposed on the site rather than derived from its agricultural context, contrary to Policy 13's requirement to reinforce local distinctiveness and vernacular.

6A. Inconsistency with the treatment of neighbouring householder development (3 Old Farm Court)

A recent planning application at **3 Old Farm Court** for a single-storey extension is understood to have been granted subject to conditions controlling its **design, height/scale, materials and visual relationship to the established character of the site**. If that is confirmed, it is directly relevant to the consistency of the Council's decision-making here.

The point is one of proportion and consistency. If the Council considered it necessary to impose conditions to ensure that even a **modest, single-storey domestic extension** to an existing house remained subordinate, appropriate in height and scale, and sympathetic in materials and appearance to the surroundings, then it cannot reasonably reach a more relaxed conclusion on a far larger and more prominent proposal — **ten new two-storey dwellings, up to 700mm taller than the largest existing barn, of flat/mono-pitch contemporary form arranged as an estate** — immediately adjacent. What was required of a single homeowner extending one dwelling should apply with much greater force to a ten-unit redevelopment of open countryside in the Local Green Gap.

7. Residential amenity of neighbouring occupiers

The pre-application response identified **unacceptable impacts on neighbouring residents at Old Farm Court from reduced separation distances and loss of outlook**. The submitted layout shows separation distances to the eastern boundary as close as roughly 8–18m at fence-to-plot points, with the claimed 22m figure applying only to certain building-to-building relationships in the north-east. The plots along the eastern side are two-storey with first-floor windows and balconies (frameless glass balustrades) facing the existing dwellings. The Council should scrutinise the actual window-to-window and window-to-garden relationships plot by plot for overlooking, loss of privacy and loss of outlook, rather than accepting the single most favourable separation figure.

8. Ecology and biodiversity net gain – overstated and insufficiently secured

The application form answered “No” to whether protected species, designated sites or biodiversity features are present on or near the site. That is contradicted by the applicant's own Preliminary Ecological Appraisal (The Ecology Partnership), which identifies **four statutory designated sites within 2km** — including the **Adur Estuary SSSI approximately 380m east** — confirms the site lies within the **SSSI Impact Risk Zone**, and records ditches on and around the site that feed into the estuary. The Council should treat the form's “No” as an error and assess the SSSI / IRZ position properly, including construction-phase pollution control secured by condition.

The headline “**69.23% biodiversity net gain**” **should be treated with real caution**. It rests heavily on soft, hard-to-secure elements: private residential gardens (which contribute a significant share of the post-development units yet depend on individual homeowners and cannot realistically be secured or monitored for 30 years), sedum green roofs (condition- and maintenance-dependent), and 35 newly planted “urban

trees” that take a decade to reach target condition. Strip out the gardens and green roofs and the claimed gain is far less compelling.

There are also internal inconsistencies in the metric that warrant a formal query:

- The BNG report states the site is **0.69 ha**; the application form and Design & Access Statement state **0.57 ha**. BNG outputs are highly sensitive to area, so the correct red line and baseline must be confirmed.
- The baseline habitat table totals **0.68 ha** but the post-development table totals **0.74 ha** — the site appears to “grow” by ~600 m² after development, which needs explaining.
- The baseline table records only ~0.09 ha as “area enhanced”, while the enhancement table claims **0.261 ha of grassland enhanced** — these figures do not reconcile.

The baseline also rests on a **single condition-assessment visit (4 September 2025)**, late in the season, with the report's own disclaimer acknowledging no allowance for seasonal variation. Any net-gain figure and Habitat Management & Maintenance Plan should be secured and enforceable for the full 30-year period before any weight is given to “biodiversity enhancement” as a benefit.

A “net gain” on a spreadsheet is also not the same as protecting the wildlife actually present. The open land in and around the site currently supports a range of species we regularly see — **foxes, squirrels, pheasants, kestrels and other birds of prey, owls, bats and hedgehogs**. These are animals of open fields, rough grassland, ditches and hedge-lines; they will not simply relocate into the enclosed private gardens of a ten-house estate. The applicant's own Preliminary Ecological Appraisal in fact confirms that the surrounding open pasture is used by foraging and commuting mammals including foxes and hedgehogs, and that the ditches provide foraging habitat — the very features the development and its lighting, fencing and activity would degrade or sever.

On bats specifically, the “protection” offered is minimal and rests on a single daytime visit. The ecologist inspected the open-sided barns once, judged them of “negligible” roost suitability, and on that basis carried out **no dusk emergence or dawn re-entry activity surveys at all**, concluding no further bat survey was needed. Yet the report simultaneously acknowledges the site lies in a landscape whose ditches offer bat foraging and commuting habitat. The only measures actually proposed for bats are **generic lighting recommendations and optional bat boxes** — no emergence surveys to establish what is really using the site at night, and no securing of a genuinely dark, connected foraging corridor. Given that the scheme would convert a currently unlit rural edge into a lit residential estate (see our personal perspective, above), we consider the bat assessment inadequate and ask the Council to require proper dusk/dawn activity surveys in the active season, and a secured sensitive-lighting and dark-corridor scheme, before determination.

9. Housing benefit and affordable housing

Housing supply is a material benefit, but its weight here is limited and must not be overstated. The scheme is **ten large open-market houses (seven 4-bed, three 3-bed) with no on-site affordable housing**. At 10 units the scheme sits immediately below the Local Plan Policy 18/21 threshold of 11 dwellings at which 30% affordable housing is sought, and offers only a commuted sum.

The proposal should therefore **not be credited as addressing the district's acute affordable housing need**. Large detached open-market homes are not affordable housing. If affordable need is being used to justify development in this sensitive, flood-risk location, the applicant should be required to state the number, tenure and securing mechanism of any affordable provision — and, as noted above, the applicant's own Sequential Test discounts a genuinely affordable alternative site (ADC/173/23) precisely because it is not open-market. The Council should give the housing benefit only the modest weight appropriate to 10 open-market units.

10. The site is greenfield agricultural land in active use — not "previously developed land"

The applicant repeatedly characterises the site as "brownfield" or "previously developed" to downplay the countryside and Local Green Gap objections. That characterisation is wrong, and it matters, because much of the applicant's landscape and green-gap case is built on it.

The NPPF definition of previously developed land expressly *excludes* land in agricultural use and buildings occupied by, or last used for, agriculture. These are agricultural barns in agricultural use, on agricultural land, in the open countryside. The applicant itself acknowledges (as reported in the local press) that they are agricultural buildings, and that a Class R agricultural-to-commercial route would otherwise be available. On the plain terms of the NPPF, the site is greenfield, not brownfield.

This is not merely our view: the applicant's own Flood Risk Assessment (Hilson Moran, May 2026) repeatedly classifies the site as a greenfield site — stating that '[since] the site is occupied by agricultural buildings only, it is classified as a greenfield site' (Section 3), and repeating that classification in its Baseline Conditions (Section 4). The applicant therefore cannot maintain a 'brownfield / previously developed' framing in one part of its case while its own flood evidence treats the land as greenfield in active agricultural use.

That conclusion is put beyond argument by the history of the site. From our direct local knowledge, the application site and its barns remain in active agricultural use — for the keeping of cattle and the storage of hay — and have been in continuous, settled agricultural use for at least the last ten years, throughout our time living here. The wider agricultural activity continues around it, with sheep grazing and hay-making on the adjacent Council-owned land. This is a long-established, working agricultural setting, not the marginal, incidental or lapsed use the "brownfield" label implies. A decade or more of unbroken agricultural use means the site is unambiguously a greenfield agricultural site, and the "brownfield" framing that underpins much of the applicant's case should be rejected outright.

The same history also undermines the applicant's related suggestion that the barns are "diminished" in use or "likely to become redundant". A use that has run continuously for over ten years is plainly a viable, functioning operation, not one naturally reaching the end of its life. We would therefore, respectfully and while making clear this is our understanding rather than something we can state as confirmed fact, invite the Council to look carefully at *why* the applicant presents the agricultural use as declining or soon to end. We understand locally that the relationship with the farmer who uses the land has become strained, including in connection with the rent, and that pressure may be being applied that could bring the current agricultural use to an end. If that is so, any resulting "redundancy" of the barns would be a situation of the applicant's own making rather than a genuine, independent loss of agricultural viability — and it would be wrong to allow it to count in the applicant's favour as justification for residential redevelopment in this protected location.

This matters for two reasons. First, it confirms the site is genuinely agricultural land in active, long-established use, which puts beyond doubt that it is not "previously developed land" and cannot be treated as such. Second, if the agricultural use is in fact live and ongoing, the applicant's premise that the barns are redundant or soon redundant falls away — and the loss of a functioning agricultural unit in the Local Green Gap becomes an *additional* harm, not the neutral "tidying up" of a disused site the application implies. We therefore ask the Council to verify the current use on site, and to treat any claimed present or future redundancy with caution, rather than accept the applicant's characterisation of it.

11. Highways, construction access and the private road

New Salts Farm Road is a narrow, shared-surface rural lane with **no footway**. The applicant's own Transport Statement records low existing flows and treats the uplift as modest (~200 two-way daily person trips; ~56 vehicle trips). However:

- The road is understood to be a **private road, not adopted or maintained by the Highway Authority**, historically surfaced and maintained at residents' own cost. Construction traffic (HGVs, plant, deliveries) would risk damaging the surface, verges and drainage, and imposing reinstatement costs on residents.
- The absence of any footway raises a genuine **pedestrian-safety concern during the construction period** and thereafter.
- The access improvements (the “safe radius” works at the junction) rely on the applicant “being understood to benefit from a right of access” shown only “**indicatively**”. The Council should confirm that the applicant controls, or has an enforceable right over, all land required for the access works, and that the works fall within the red line — otherwise deliverability is not demonstrated.

If (contrary to the above) the Council were minded to approve, robust conditions / a legal agreement should secure: a Construction Traffic Management Plan; construction-phase pedestrian safety measures; vehicle size, routing, timing and parking controls; wheel-washing / mud control; a pre-commencement road-condition survey agreed with residents; monitoring; and a binding obligation to reinstate the private road to at least its pre-construction condition, including full resurfacing where necessary.

11A. The Hyde New Homes transport assessment of the adjacent scheme – access and network capacity

The transport evidence prepared for the adjacent New Salts Farm scheme is directly relevant and, tellingly, was prepared by the **same transport consultancy (Motion) that acts for the current applicant**. A Statement of Common Ground on transport, agreed between Motion (on behalf of Hyde New Homes) and West Sussex County Council in January 2017, concluded that the much larger ~455-dwelling scheme on the adjacent land could be accommodated — but on two conditions that count against the present application:

- **Access was to be taken directly off the A259 via a new dedicated turn lane**, with junction modelling required — not via New Salts Farm Road. In other words, when significant residential traffic was proposed in this location, the professional judgement (Motion's own) was that it should be served from the strategic road, because the local lane was not the appropriate access. The present scheme instead loads all its traffic and construction traffic onto the narrow, **footway-less, privately maintained New Salts Farm Road** (see Section 11).
- The Statement of Common Ground accepted development in this wider area only up to around **1,830 dwellings, and only subject to strategic junction mitigation** at identified pinch points (including the A259/A283 grade-separated junction and the A259/A2025 mini-roundabout). The local highway network here is therefore acknowledged — in evidence agreed with the highway authority — to be **capacity-constrained**, not free of impact. This context sits uneasily with the third-party supporting comment's assertion that the road is “more than capable” of absorbing the traffic.

The point is not that 10 dwellings generate the same traffic as 455 — plainly they do not. The point is twofold: (i) the applicant's own transport consultants previously advised that residential development in this location should be accessed from the A259, not New Salts Farm Road; and (ii) the wider network's acknowledged sensitivity, and the history of flooding-and-transport concerns that led to the adjacent scheme's refusal and the Council's purchase of that land, all reinforce that this is not a location where further housing can simply be waved through on access grounds. The Council should ask why the access rationale that applied next door does not apply here.

12. Procedural concern – scope of neighbour notification

The Council's Neighbours Notified list (13 July 2026) covers only properties on New Salts Farm Road (Old Farm Court, Brooklands and a handful of named dwellings). **No properties in Lancing, or across the A259 Brighton Road, appear to have been notified**, despite the application being described in Council correspondence as

being at “... New Salts Farm Road, Lancing” and despite the acknowledged visual effects on receptors including the A259 and wider gap. Given the strong community interest in this green gap (evidenced by the consultation surrounding the Council's 2020 purchase), I ask the Council to review and widen the consultation, and to ensure the statutory publicity (site notice / press notice for a major application in Flood Zone 3) has been properly carried out, so that affected residents on both sides of the gap have a fair opportunity to comment.

Planning balance and conclusion

Even applying the NPPF paragraph 11(d) “tilted balance” on which the applicant relies, this application should be refused. The benefits — ten open-market houses (no secured affordable housing), a children's play area, and contested biodiversity and landscape claims — are limited. Against them stand cumulative, serious and largely unmitigated harms:

- Housing in the open countryside and Local Green Gap, contributing to settlement coalescence, contrary to Policies 13 and 14;
- A Flood Zone 3 location where the Sequential Test is not properly passed and the Exception Test is not met;
- Unresolved surface-water and long-term drainage risk to neighbouring land;
- Landscape and visual harm to a sensitive gap, elevated and SDNP views, and the setting of a Grade II* listed building;
- Design that fails to respond to the historic agricultural character;
- Harm to neighbouring amenity at Old Farm Court;
- Overstated, insufficiently secured biodiversity claims and an application form that under-declares the nearby SSSI; and
- Inconsistency with the Council's own 2020 decision to buy and protect the adjacent land from housing on flood-risk and green-gap grounds.

These adverse impacts **significantly and demonstrably outweigh** the benefits of the scheme, and the flood-risk and green-gap policies provide a clear reason for refusal. The applicant has not overcome the objections the Council itself set out at pre-application stage.

I respectfully request that the Council REFUSE application AWD/0810/26. At the very least, the Council should require the further evidence and legal securing set out below before determination.

Requested Council actions

1. Obtain and give significant weight to the substantive comments of West Sussex County Council as Lead Local Flood Authority before determination.
2. Require a properly, proportionately applied Sequential Test that does not discount lower-risk sites merely because they suit a different (smaller, denser or affordable) form of housing; and, on the evidence, find the Sequential Test failed.
3. Require modelled surface-water exceedance-flow routes and a legally enforceable, long-term (adoptable) drainage maintenance regime demonstrating no worsening of flood risk to neighbouring land.
4. Require landscape and visual evidence that assesses private residential and site-user receptors and does not rely on best-case winter baselines and Year-15 planting.
5. Require a plot-by-plot assessment of overlooking, privacy and outlook impacts on Old Farm Court.

6. Require a corrected, reconciled BNG assessment (single agreed site area and baseline), and secure any net gain and the 30-year Habitat Management & Maintenance Plan by condition / planning obligation before crediting biodiversity benefit.
7. Require confirmation of affordable housing provision, tenure and mechanism; if none is secured on-site, do not treat the scheme as meeting affordable need.
8. Confirm land control / enforceable rights over all land required for the access works and that they lie within the application red line.
9. Widen neighbour notification to Lancing and properties across the A259, and confirm statutory publicity for a major Flood Zone 3 application has been properly carried out.
10. Give significant weight to the potential precedent for further erosion of the Lancing–Shoreham gap, and explain how approval would be consistent with the Council's 2020 purchase and protection of the adjacent land.
11. Assess the proposal against the Council's own Adur Landscape Character Assessment (Sheils Flynn), including the character and sensitivity of LCA 10 (New Salts Farm), the A259 View 15 added in the October 2023 update, and the Local Green Gaps analysis in Annex C — rather than the applicant's selective reading of that evidence.
12. Have regard to the January 2017 Statement of Common Ground on transport (Motion for Hyde New Homes, agreed with West Sussex County Council), in which residential development in this location was to be accessed from the A259 (not New Salts Farm Road) and the wider network was accepted as capacity-constrained subject to strategic junction mitigation; and require West Sussex County Council (Highways) to comment on the suitability of New Salts Farm Road to serve the proposed and construction traffic.

Key documents referred to in this objection: Adur Local Plan (2017), Policies 13, 14, 18, 21 and 36; National Planning Policy Framework; the applicant's own Planning Statement, Flood Risk Assessment & SuDS Strategy (Hilson Moran), Preliminary Ecological Appraisal and BNG Feasibility Assessment (The Ecology Partnership), Landscape & Visual Appraisal (Huskisson Brown) and Transport Statement (Motion); Adur District Council pre-application response PREAPP/0046/25; and Adur & Worthing Councils Joint Strategic Committee decision of 8 September 2020 (Purchase of New Salts Farm, Lancing).

Additional documents (later revision): Adur Landscape Character Assessment, Adur Local Plan area (Sheils Flynn; Annex B viewpoints updated October 2023), including LCA 10 (New Salts Farm), View 15 from the A259, and Annex C (Local Green Gaps landscape analysis); and the Statement of Common Ground on Transport for New Salts Farm (Motion on behalf of Hyde New Homes, agreed with West Sussex County Council, January 2017).

Signed: _____ **Date:** 18/07/2026

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