

From: **Teresa Martin**
Date: Sat, 1 Aug 2026 at 20:57
Subject: AWD/0810/26- New salts farm
To: <planning@adur-worthing.gov.uk>

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Building on this flood plain area would further jeopardize the effectiveness of the sewerage system in the area, which is affected by sea water egress as well as water from the downs. Rather than demolish the existing farm buildings, which are an important part of the landscape view, they should be adapted and reused as housing themselves.

The site lies wholly within Flood Zone 3, an area of high probability of flooding, a constraint acknowledged by the applicant's own Design & Access Statement and Flood Risk Assessment. The Council's pre-application advice was that it was "unlikely the Sequential Test and Exceptions Test could be satisfactorily passed," particularly given the availability of lower-risk alternative sites and the limited public benefit of a 10-unit scheme.

On the evidence available, the Sequential Test has not been properly passed. The applicant's own Flood Risk Assessment identifies several alternative sites at lower flood risk, but discounts each of them not because they are unavailable, but because they do not suit the applicant's preferred house type, density or tenure. This inverts the purpose of the Sequential Test, which asks whether the identified housing need can be met on a lower-risk site – not whether a lower-risk site can accommodate the applicant's commercial preferences. Where the Sequential Test is not passed, the application should be refused without the Exception Test needing to be reached; and even judged on its own terms, the Exception Test rests on modest benefits (housing delivery and a small play area) weighed against a scheme that depends on raised sleeping accommodation, evacuation planning and an unproven land-raising strategy – itself an implicit acknowledgement of high residual risk.

With climate change, flood risk at this location is predicted to increase, and even where existing flood defences are taken into account, the site is understood to be at high risk of tidal and surface water flooding. The long-term effectiveness of the proposed drainage strategy depends entirely on ongoing, funded maintenance that has not been demonstrated or secured, and there is no evidence of modelled exceedance-flow routes protecting neighbouring properties, several of which sit at differing ground levels from the application site.

The assessment records that the site lies outside the Built-Up Area Boundary and within the Local Green Gap, that the Local Green Gap is critically important to the landscape setting and distinct identity of both Shoreham-by-Sea and Lancing, and that the land forms part of the landscape setting of local landmarks including the Grade II* listed Shoreham Airport terminal. The SHELAA further records that the site is at high risk of tidal flooding once climate change and existing flood defences are taken into account, and concludes the site is not suitable for residential development unless flood risk can be resolved to the satisfaction of the Council, West Sussex County Council (as Lead Local Flood Authority) and the Environment Agency.

Adur District Council's purchase of the adjacent land (2020): the Council itself purchased the adjoining 70-acre New Salts Farm, expressly to protect it from housing, return it to natural/wetland habitat, conserve and enhance biodiversity, and preserve the green gap between Lancing and Shoreham. That purchase followed the refusal/withdrawal of a much

larger scheme (reportedly around 450 dwellings, promoted by Hyde New Homes) on flood-risk grounds. It would be inconsistent for the Council to have spent public money protecting the adjoining land from housing on flood-risk and green-gap grounds, while permitting a housing estate immediately beside it that introduces the very use that purchase was designed to prevent.

The Council's own pre-application response (PREAPP/0046/25): as set out above, officers concluded a scheme of this kind would be unacceptable in principle and very likely refused, for reasons including countryside and Local Green Gap policy conflict, landscape and visual harm, residential amenity impacts at Old Farm Court, and flood risk. Nothing in the current, only modestly amended, submission overcomes those conclusions.

These adverse impacts significantly and demonstrably outweigh the limited benefits of ten open-market dwellings, and the flood-risk and Local Green Gap policies engaged by this site provide a clear reason for refusal in their own right. I respectfully ask the Council to REFUSE planning application AWDM/0810/26.
regards Teresa Martin