

From: **Jean Feldberg** <

Date: Thu, 30 Jul 2026 at 17:10

Subject: AWDM/0810/26

To: planning@adur-worthing.gov.uk <planning@adur-worthing.gov.uk>

This message was sent from outside Adur & Worthing Councils

[Allow sender](#) | [Block sender](#)

New Sender Alert! You don't often receive emails from this sender.

Dear Sirs,

Your site would not appear to be receiving Comments on Planning Applications. I received a 'Forbidden' notice on submission..

I therefore submit the following and would appreciate your confirmation that it will be added to those Comments already made.

Many thanks.

Jean Feldberg

25 Ravens Road

Shoreham by Sea

BN43 5AJ

Re: Objection to Planning Application AWDM/0810/26

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

Proposal: Demolition of existing agricultural barns and construction of 10 dwellings

Case Officer: Giles David Holbrook

Dear Sir/Madam,

I wish to formally object to planning application AWD/0810/26 and respectfully ask Adur District Council to refuse planning permission.

My comments relate solely to material planning considerations.

1. Planning Policy

1.1 Principle of Development – Countryside and Local Green Gap

The proposed development is located outside the Built-Up Area Boundary, within open countryside and inside the designated Local Green Gap separating Lancing and Shoreham-by-Sea. These areas are protected under Policies 13 and 14 of the Adur Local Plan because of their importance in preventing the merging of neighbouring settlements and maintaining the distinctive character of each community.

A residential estate of ten houses cannot reasonably be regarded as development that requires a countryside location. The proposal would introduce a permanent suburban housing scheme into an area that has historically remained rural.

This issue has already been considered by the Council. During the pre-application process (PREAPP/0046/25), planning officers advised that a development of this nature would be unacceptable in principle and would be very likely to be refused. Their concerns centred on the site's countryside location, its position within the Local Green Gap and the likelihood that extending development here would contribute to the gradual coalescence of Lancing and Shoreham-by-Sea.

Although the applicant has since reduced roof heights and made alterations to landscaping, these changes do not overcome the fundamental planning objection. The principle of introducing residential development in this location remains exactly the same.

The Local Green Gap performs an important planning function. It provides open countryside between the settlements, contributes to the wider landscape setting of both towns and helps preserve their individual identities. Once housing is introduced into this gap, that openness is permanently diminished.

The applicant relies heavily on the National Planning Policy Framework's presumption in favour of sustainable development because of the Council's current housing land supply position. However, paragraph 11(d) of the NPPF does not create an automatic entitlement to planning permission. It still requires decision-makers to weigh the harm against the benefits and allows permission to be refused where the adverse impacts significantly and demonstrably outweigh those benefits. It also recognises that policies protecting important areas, including locations affected by flood risk, can provide a clear justification for refusal.

In my view, both of those circumstances apply in this case.

1.2 Flood Risk – Flood Zone 3

The application site lies entirely within Flood Zone 3, where there is a high probability of flooding. This is not disputed by the applicant and is acknowledged within both the Flood Risk Assessment and Design and Access Statement.

The Council's own pre-application advice expressed significant concern that the Sequential Test and Exception Test would be unlikely to be satisfied because lower-risk sites exist and the limited public benefits of a ten-dwelling scheme would not outweigh the risks associated with this location.

Having reviewed the submitted documents, I remain unconvinced that the Sequential Test has been properly met.

The applicant identifies several alternative sites located in areas of lower flood risk but dismisses them primarily because they do not accommodate the preferred housing mix, density or development model. That approach misunderstands the purpose of the Sequential Test. The test exists to establish whether the proposed development could be located on land with a lower flood risk, not whether alternative sites match an applicant's commercial aspirations.

If the Sequential Test has not been passed, planning permission should not normally be granted and there is no requirement to proceed to the Exception Test.

Even if the Exception Test is considered, I do not believe the proposal satisfies it. The claimed public benefits are relatively limited, consisting mainly of ten new homes and a small area of public open space. By contrast, the development relies upon raised internal floor levels, evacuation procedures and a land-raising strategy which itself demonstrates that the site is inherently vulnerable to flooding.

Climate change is expected to increase flood risk over time. Available evidence suggests that this site remains susceptible to both tidal and surface water flooding, even when existing flood defences are taken into account.

I am also concerned that the proposed drainage arrangements depend upon long-term maintenance without any clear evidence that such maintenance will be secured or funded. Furthermore, I have seen no convincing evidence demonstrating how exceedance flows would be managed in extreme weather events or how neighbouring properties, many of which sit at different ground levels, would be protected from any increase in flood risk.

2. Previous Assessments and Planning Decisions

This site has already been examined several times for residential development, and each assessment has identified significant planning concerns. Those previous conclusions remain highly relevant.

Strategic Housing and Economic Land Availability Assessment (SHELAA)

The Council's Strategic Housing and Economic Land Availability Assessment (March 2026) considered two separate site references relating to New Salts Farm (ADC/160/19 and ADC/106/13). Both were rejected as suitable locations for housing.

The assessment confirms that the land sits outside the Built-Up Area Boundary and within the protected Local Green Gap. It also recognises the importance of the site to the landscape setting of both Shoreham-by-Sea and Lancing and identifies its contribution to the setting of the Grade II* listed Shoreham Airport terminal.

In addition, the assessment records that the site is exposed to a high level of tidal flood risk, particularly when future climate change projections are considered. It concludes that residential development would not be appropriate unless flood risk concerns could be satisfactorily resolved to the satisfaction of the Council, West Sussex County Council and the Environment Agency.

Council Purchase of Adjacent Land

In 2020, Adur District Council purchased approximately seventy acres of adjoining land at New Salts Farm with the stated aim of preventing housing development, restoring wetland habitats, enhancing biodiversity and safeguarding the Green Gap between Lancing and Shoreham.

That acquisition followed proposals for a substantially larger housing development, which were not taken forward because of flood risk and other planning concerns.

It appears inconsistent for the Council to invest public money in protecting the adjoining land from residential development while simultaneously allowing housing immediately adjacent to it. The planning objectives behind that purchase remain directly relevant when considering the current proposal.

Pre-Application Advice

The Council's own pre-application response to this scheme concluded that residential development on the site would be unacceptable in principle and would be likely to be refused.

The concerns identified at that stage included conflict with countryside and Green Gap policies, landscape harm, visual impact, effects on neighbouring residents at Old Farm Court and flood risk.

Although the current application includes relatively modest amendments, I do not believe those changes overcome the planning objections previously identified by officers.

Should the Council ultimately decide that planning permission ought to be granted, I respectfully request that it clearly explains how such a decision can be reconciled with its own recent assessments and previous conclusions regarding this same site.

3. Design, Appearance and Character

The proposal would fundamentally alter the character of this historic farmstead. Rather than replacing the existing agricultural buildings with structures of a similar nature, the application proposes ten permanent two-storey homes arranged around a private estate road. This would transform what is currently an agricultural site into a modern residential development.

Although the applicant has reduced the height of the proposed buildings following pre-application discussions, the submitted drawings indicate that several of the new dwellings would still stand approximately 700mm higher than the tallest of the existing barns. More importantly, the issue is not simply one of height. The existing barns are low-key agricultural buildings with open-sided elevations, whereas the proposed houses would introduce a permanent suburban environment complete with domestic gardens, boundary treatments, parked vehicles, external lighting and associated activity.

In my view, this represents a significant urbanising effect that cannot reasonably be described as a like-for-like replacement.

The proposed architecture also appears out of keeping with the site's agricultural origins. Nearby properties at Old Farm Court successfully retain the appearance and character of converted farm buildings, maintaining a clear visual connection with the area's farming history. By comparison, the proposed detached and semi-detached dwellings adopt a contemporary estate-style layout that could be found almost anywhere. They do little to reflect the local vernacular or reinforce the distinctive rural character that Policy 13 seeks to protect.

There is also a question of consistency in planning decisions. In the immediate vicinity, comparatively modest domestic extensions have been subject to careful control over their height, scale and external appearance to ensure they remain sympathetic to the surrounding farmstead. Against that background, it is difficult to understand how a substantially larger redevelopment involving ten new homes of a very different architectural style could be considered compatible with the same planning principles.

3.1 The Applicant's Description of the Layout

The Design and Access Statement describes the proposal as a collection of modest, well-spaced buildings that would maintain visual openness across the site. Having examined the submitted plans, I do not believe this description accurately reflects what is proposed.

The application site extends to approximately 0.575 hectares. Within that relatively limited area, the development seeks to accommodate ten dwellings together with an internal access road, parking spaces, visitor parking, private gardens, drainage infrastructure and landscaping.

The layout shown on the submitted drawings appears relatively compact, with homes positioned close together around the central access road. Several properties are semi-detached, while others are separated only by garages, driveways or narrow gaps. Taken as a whole, the development reads as a dense residential layout rather than a loose collection of individual rural buildings.

A number of neighbouring residents have reached the same conclusion in their own representations, commenting that the proposed footprint is tightly arranged and would introduce a level of overlooking and enclosure that is very different from the current arrangement of widely spaced agricultural barns.

The applicant also suggests that the development would preserve long-distance views through the site. Again, I find this difficult to reconcile with the submitted plans. Ten occupied dwellings, each with roofs, gardens, fences, driveways and domestic paraphernalia, will inevitably create a much greater visual presence than the three existing agricultural barns.

I would therefore encourage the Council to assess the submitted drawings carefully and rely on the physical layout rather than the applicant's descriptive language when considering the visual effects of the proposal. For the same reason, I believe the conclusions reached within the Landscape and Visual Appraisal should be treated with appropriate caution where they appear inconsistent with the plans themselves.

4. Highway Safety, Traffic and Parking

New Salts Farm Road is a narrow lane with no footways along the section serving the application site. It is understood to be largely unadopted and already accommodates traffic travelling between the A259 and the A27.

Residents have consistently reported that vehicles frequently travel along this road at excessive speed despite its restricted width and the absence of pedestrian facilities. Anyone walking along the lane, including children, dog walkers and cyclists, is required to share the carriageway with vehicles because there is no pavement.

The proposed development would inevitably increase traffic movements along this access. Based on the parking provision shown within the application, it is reasonable to expect a significant increase in the number of vehicles using New Salts Farm Road on a daily basis, together with additional visitor traffic, deliveries and service vehicles.

Several neighbouring residents have also expressed concern that delivery vehicles, refuse lorries, utility contractors or vehicles waiting to access the development could obstruct the lane. Given its limited width, such obstructions could delay emergency vehicles if access were required.

Construction traffic presents a further concern. Heavy goods vehicles, construction plant and delivery vehicles would all need to use New Salts Farm Road throughout the building period,

placing additional strain on what is understood to be a privately maintained road funded by neighbouring residents.

Before any permission is considered, I believe the Highway Authority should specifically assess whether New Salts Farm Road is capable of safely accommodating both the construction phase and the permanent increase in traffic generated by the development. Particular attention should be given to the suitability of this access route, rather than focusing solely on the wider highway network.

5. Noise, Disturbance and Residential Amenity

The current use of the site generates relatively limited levels of activity associated with agricultural buildings. Replacing that use with ten permanently occupied family homes would inevitably lead to a substantial increase in day-to-day noise and disturbance.

Vehicle movements, visitors, deliveries, refuse collection, outdoor recreation and general domestic activity would all become regular features of what is currently a quiet rural location.

In addition, the introduction of external lighting, security lights and vehicle headlights would permanently alter the character of the area after dark. Several neighbouring residents have already highlighted the impact this would have on what is presently an unlit rural setting. This change would affect not only neighbouring occupiers but could also have implications for local wildlife.

The construction phase would inevitably result in significant temporary disturbance for nearby residents through noise, vibration, dust and increased traffic.

If the Council is nevertheless minded to approve the application, I would ask that robust planning conditions are imposed to minimise these impacts. These should include restrictions on construction working hours, controls on construction noise, and the submission and approval of a detailed Construction Traffic Management Plan before works begin.

6. Overlooking, Privacy and Loss of Outlook

The proposed development would have a noticeable impact on the living conditions of neighbouring residents, particularly those at Old Farm Court whose properties directly adjoin the application site.

At present, the existing agricultural barns are low in height and open-sided, with only a simple farm-style fence separating them from neighbouring homes. The proposed development would replace those buildings with two-storey dwellings containing first-floor windows, balconies and private gardens. This would create a very different relationship

between the new development and existing residents, introducing overlooking and a much greater perception of being overlooked.

Although the applicant refers to separation distances of approximately 22 metres between certain buildings, this measurement appears to relate only to selected parts of the site. Other relationships between proposed dwellings and neighbouring gardens or boundaries appear significantly closer.

I therefore ask the Council to assess the privacy implications on a plot-by-plot basis rather than relying solely on the maximum separation distance quoted within the application documents.

The proposal also includes a publicly accessible nature walk and open space immediately adjacent to existing residential boundaries. While public open space can be a positive feature, its location in this instance would introduce additional pedestrian activity close to gardens that currently enjoy a relatively peaceful and private setting.

Residents would also experience a permanent change in outlook. Views currently dominated by open agricultural land and traditional farm buildings would instead comprise modern housing, boundary fencing, parked vehicles, lighting and increased domestic activity. Taken together, these changes would materially reduce the level of residential amenity currently enjoyed by neighbouring occupiers.

7. Trees and Landscape Buffer

The application documents acknowledge that no detailed arboricultural survey has been undertaken for the trees on the site.

This is of particular concern because the established trees along the eastern boundary provide an important visual and environmental buffer between the proposed development and neighbouring properties at Old Farm Court. They also contribute to the rural appearance of the site and help soften views of the existing buildings.

The submitted proposals appear to assume these trees can simply be retained, yet there is little evidence demonstrating how they will be protected during construction or whether excavation, changes in ground levels or service installation could damage their root systems.

Given the importance of these trees for screening, privacy and landscape character, I respectfully request that a comprehensive arboricultural survey is required before any planning permission is granted. This should include an assessment of root protection areas together with a detailed Arboricultural Method Statement setting out how retained trees will be safeguarded throughout the construction process.

Without this information, it is impossible to be confident that the existing landscape buffer will remain intact once development begins.

8. Heritage Assets and Landscape Setting

Although the site itself is not designated as a heritage asset, it forms part of the wider landscape setting of the Grade II* listed Shoreham Airport terminal building. This nationally important building derives part of its significance from its relationship with the surrounding open landscape, including the Green Gap between Shoreham and Lancing.

The Council's own Strategic Housing and Economic Land Availability Assessment recognises that this land contributes to the setting of the listed airport terminal as well as the wider landscape character of the area.

Similarly, the Council's adopted Landscape Character Assessment identifies this location within Landscape Character Area 10 (New Salts Farm). Following the 2023 review of that assessment, a dedicated viewpoint looking north across this land from the A259 was introduced, demonstrating that these views are recognised by the Council as being particularly important and worthy of specific consideration.

While the applicant's Landscape and Visual Appraisal concludes that the visual effects would be limited, I note that this assessment relies heavily on winter photographs, long-term planting assumptions extending fifteen years into the future and a selective assessment of viewpoints.

In my opinion, considerably greater weight should be given to the Council's own adopted landscape evidence, which recognises the importance of preserving the openness of this area and its contribution to the setting of the listed airport building.

The replacement of a small group of agricultural barns with a permanent estate of ten two-storey dwellings would inevitably alter the appearance of this part of the Green Gap and reduce the rural setting that currently contributes to the significance of the surrounding landscape and heritage assets.

For these reasons, I consider the proposal would result in harm to both the character of the landscape and the setting of the Grade II* listed Shoreham Airport terminal, and that this harm should be given substantial weight when determining the application.

9. Ecology and Protected Species

The potential presence of protected species is a significant material planning consideration and should be given appropriate weight in determining this application. This is not simply an environmental concern; it is a legal and policy matter.

All bat species are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981. Barn owls are also protected under the Wildlife and Countryside Act 1981. In addition, Chapter 15 of the National Planning Policy Framework, together with the biodiversity duties introduced by the Environment Act 2021,

require that protected species and their habitats are properly identified, assessed and safeguarded before planning permission is granted.

I therefore ask the Council to ensure that these statutory obligations are fully addressed before reaching any decision.

A number of local residents with extensive knowledge of this site have submitted evidence describing repeated sightings of protected and notable species over many years. These include observations from a member of the Shoreham District Ornithological Society Council, an experienced local ornithologist with British Trust for Ornithology (BTO) and BirdTrack records, together with neighbouring residents who overlook the barns on a daily basis.

Their representations describe barn owls regularly entering and leaving the existing barns carrying prey, behaviour that is strongly suggestive of nesting or breeding activity during 2026. Residents have also reported frequent sightings of bats, including pipistrelle and brown long-eared bats, together with records of slow worms, grass snakes, badgers and hedgehogs using the site and surrounding land.

These first-hand observations appear difficult to reconcile with the applicant's Preliminary Ecological Appraisal, which concludes that the barns offer little or no potential for barn owls because of their construction and exposure to light and wind. Likewise, the assessment concludes that the buildings have negligible suitability for roosting bats, despite relying only on a daytime inspection and without undertaking dusk emergence or dawn re-entry surveys.

Given the evidence submitted by local residents, I do not believe it is appropriate to conclude that protected species are absent on the basis of a single daytime inspection alone.

In my view, the precautionary principle should apply. Before this application is determined, the applicant should be required to commission independent, appropriately licensed ecological surveys carried out at the correct time of year. These should include dusk emergence and dawn re-entry bat surveys together with a dedicated barn owl survey to establish whether the buildings are currently being used for nesting or roosting.

Should planning permission ultimately be granted, any demolition should only proceed outside the bird breeding season and should be subject to appropriate ecological safeguards. Suitable replacement nesting and roosting provision should be fully established before the existing barns are removed, rather than being provided afterwards.

I also note that the planning application is understood to indicate that no protected species, designated wildlife sites or significant biodiversity features are present on or near the site. However, the applicant's own ecological documentation identifies the Adur Estuary Site of Special Scientific Interest within the relevant Impact Risk Zone.

Given this apparent inconsistency, together with the biodiversity net gain claims made in support of the proposal, I respectfully ask the Council to independently verify the ecological evidence before placing significant weight upon it.

9.1 Proposed Bat Mitigation

I also have concerns regarding the proposed bat mitigation.

The Design and Access Statement states only that bee bricks, bird boxes and integrated bat boxes will be incorporated into the new buildings. However, the submitted documents do not specify how many bat boxes are proposed, what type they will be, where they will be located or whether they would be suitable for the species believed to be using the existing barns.

Without this information, it is impossible to assess whether the proposed mitigation would adequately compensate for the loss of any established bat roost. Equally, it would be difficult for the Council to impose meaningful planning conditions if the mitigation has not been properly defined.

Guidance published by the Bat Conservation Trust makes clear that successful bat mitigation depends on much more than simply installing individual boxes. Bat boxes should be provided in appropriate numbers, positioned at suitable heights, face different directions, receive varying levels of sunlight and be located close to the landscape features that bats naturally use for navigation, such as hedgerows and mature trees.

The application does not demonstrate that these important considerations have been addressed.

The same guidance also explains that bats often require considerable time to discover and begin using newly installed roosting features. In some cases this may take many months or even several years.

This raises a further concern. If the existing barns are demolished before replacement roosting features have become established, there is likely to be a period during which displaced bats have no suitable alternative accommodation.

Integrated bat boxes cannot be installed until the new houses are substantially complete, meaning they will not be available when the existing barns are first demolished. The application therefore appears to leave an unresolved gap between the loss of the existing roost and the availability of any functioning replacement.

I respectfully ask the Council to require the applicant to provide a detailed mitigation strategy identifying the number, design, location and orientation of all proposed bat boxes, supported by appropriate ecological survey work. Consideration should also be given to temporary roosting provision, installed well in advance of demolition, so that continuity of

habitat is maintained and protected species are not placed at unnecessary risk during construction.

Conclusion

For the reasons set out above, I respectfully object to planning application AWDM/0810/26 and ask the Council to refuse planning permission.

This proposal would introduce a residential development into open countryside within the designated Local Green Gap, on land that lies wholly within Flood Zone 3 and has repeatedly been identified as unsuitable for housing. It is also immediately adjacent to land that the Council itself acquired to safeguard from residential development, protect biodiversity and preserve the important separation between Lancing and Shoreham-by-Sea.

In my view, the proposal would erode the openness and character of the Green Gap, urbanise a historic farmstead, and cause unacceptable harm to the wider landscape, including the setting of the Grade II* listed Shoreham Airport terminal. It would also have adverse effects on neighbouring residents through overlooking, loss of privacy, increased traffic, noise and disturbance, while placing additional pressure on a narrow access road that is already constrained.

I remain unconvinced that the applicant has demonstrated that the Sequential Test has been properly satisfied or that the proposed drainage and flood mitigation measures adequately address the long-term risks associated with developing this site. These concerns are particularly important given the site's location within Flood Zone 3 and the increasing flood risk associated with climate change.

I am also concerned that the ecological information submitted with the application does not provide sufficient certainty regarding the presence of protected species. The consistent observations made by local residents, together with the limited scope of the applicant's surveys, indicate that further independent ecological assessment is required before any planning decision can be made. In my view, it would be premature to grant permission until the Council is satisfied that its legal duties in relation to protected species and biodiversity have been fully met.

When all of these issues are considered together, I believe the adverse impacts of the proposal clearly and demonstrably outweigh the relatively limited public benefits arising from the provision of ten open-market dwellings. Furthermore, the conflict with adopted Local Plan policies relating to the countryside, the Local Green Gap and flood risk provides clear and compelling planning reasons for refusing the application.

I therefore respectfully request that Adur District Council refuses planning application AWDM/0810/26.

Thank you for taking the time to consider my representation.