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Objection to Planning Application AWDM/0737/26

Land South East Corner of Amberley Drive and Marine Drive, Goring-by-Sea

Introduction

I strongly object to the proposed development at Goring Gap and request that Worthing Borough Council refuse planning permission.

The proposal represents a substantial commercial intensification of use within a sensitive and historically undeveloped coastal location. The application seeks retrospective consent for extensive works already undertaken without planning permission and contains significant omissions, unsupported assertions and apparent inaccuracies which prevent a proper assessment of the proposal.

The application fails to demonstrate compliance with national planning policy, biodiversity legislation, highway safety requirements, environmental protection requirements and the adopted Worthing Local Plan.

1. Retrospective Development and Deliberate Circumvention of the Planning Process

The applicant openly confirms that:

- Works commenced on 1 April 2026.
- Works were completed on 1 June 2026.
- Approximately 90% of the site has already been cleared.
- Grassland has already been formed.
- Vehicle parking areas have already been created.
- Access arrangements have already been established.

The application therefore seeks retrospective approval for significant unauthorised development. It is particularly concerning that extensive site clearance has been undertaken before any ecological or biodiversity surveys were completed. The applicant has effectively altered the site baseline before the planning authority has had the opportunity to assess environmental impacts. Such actions fundamentally undermine the purpose of the planning process and should be afforded significant weight against the development.

2. Previous Planning Refusals Demonstrate Serious Planning Concerns

The application itself confirms:

"The original Lawful Development application was refused by the LPA and appealed to the Planning Inspectorate. That appeal was refused by the Planning Inspector."

The Planning Inspector reportedly concluded:

"there is no actual use of the field that is lawful"

The fact that both the Local Planning Authority and Planning Inspectorate have previously rejected attempts to establish a lawful use of the land is highly material.

The applicant is attempting to present the proposal as a natural continuation of an established use.

The Planning Inspector previously determined the opposite.

The Council should attach significant weight to previous refusals and Inspector findings.

3. Unsupported Claims Regarding Economic Benefits

The application repeatedly claims economic benefits through tourism and support for local businesses. However, no evidence has been supplied.

The proposal states:

- Food and drink provision.
- Campervan parking.
- Tourism promotion.
- Local business support.

However, there is no meaningful commercial centre near the site.

In reality:

- The nearest commercial operation is the Sea Lane Café.
- The location is otherwise predominantly residential and open space.
- No economic impact assessment has been provided.
- No tourism study has been provided.
- No visitor demand assessment has been provided.

The claimed economic benefits therefore remain entirely speculative.

4. Highway Safety and Unauthorised Access onto Marine Drive

The application identifies vehicle access arrangements and parking for approximately 150 vehicles.

However:

- An access onto Marine Drive has reportedly already been created without planning permission.
- No Transport Assessment has been submitted.
- No Road Safety Audit has been submitted.
- No swept-path analysis has been submitted.
- No junction visibility survey has been submitted.

Marine Drive and the Marine Gardens area experience significant seasonal traffic, visitor parking demand, pedestrian activity, cyclists and recreational users.

The applicant claims parking has been "approved" by Sussex Police and licensing officers. These statements are not planning permissions and cannot override the need for proper highways assessment.

The proposal introduces:

- Campervan traffic.
- Food and beverage operators.
- Deliveries.
- Staff vehicles.
- Event visitors.
- Recreational users.

Yet no evidence demonstrates that the local highway network can accommodate these movements safely.

The proposal therefore fails the fundamental test that safe and suitable access can be achieved

5. Parking Provision is Unsatisfactory

The application claims there are already 150 parking spaces on the site and that no increase is proposed.

This assertion appears wholly inconsistent with the site's historic character as undeveloped land.

In addition:

No EV Charging Provision

For a new commercial parking facility of this nature, sustainable transport measures would ordinarily be expected.

The application includes:

- Commercial parking.
- Tourism-related use.
- Campervan facilities.
- Food and beverage operations.

No EV charging strategy is provided.

Any future EV charging infrastructure would likely require additional planning and electrical infrastructure works.

This demonstrates that the parking proposals have not been comprehensively planned or assessed.

6. Trees, Hedges and Vegetation Removal

The application answers "No" in relation to trees and hedges affecting the development.

This is deeply concerning.

The applicant simultaneously acknowledges:

- Extensive overgrown vegetation.
- Dense scrub.
- Self-seeded growth.
- Significant site clearance.

Large-scale vegetation removal has therefore already occurred.

The application provides:

- No arboricultural survey.
- No tree survey.
- No hedge assessment.
- No ecological assessment of removed vegetation.

The Council cannot properly assess impacts because the baseline ecology may already have been destroyed.

7. Biodiversity Impacts and Failure to Provide Surveys

This is one of the most serious deficiencies.

The site was previously:

- Dense scrub.
- Coastal vegetation.
- Long-established unmanaged habitat.

Such habitats routinely support:

- Nesting birds.
- Bats.
- Reptiles.
- Hedgehogs.
- Invertebrates.
- Other protected species.

Despite clearing approximately 90% of the site, the applicant provides:

- No Preliminary Ecological Appraisal.
- No Protected Species Survey.
- No Breeding Bird Survey.
- No Reptile Survey.
- No Bat Assessment.

- No Habitat Survey.

This is wholly inadequate.

The applicant cannot simply clear a site and then rely upon the reduced ecological value that remains.

The precautionary principle requires ecological impacts to be assessed before development.

8. Biodiversity Net Gain (BNG) Position is Fundamentally Flawed

The application claims Biodiversity Net Gain does not apply because an earlier lawful development application was submitted before February 2024.

This reasoning appears flawed.

The current application is:

- A new planning application.
- Submitted after BNG requirements came into force.
- For a materially different development proposal.

The applicant has submitted:

- No Biodiversity Gain Plan.
- No Biodiversity Metric.
- No habitat baseline assessment.
- No evidence of a 10% net gain.

The application should therefore be considered incomplete until BNG requirements are properly addressed.

9. Contamination Assessment Missing

The applicant answers "No" to contamination questions and provides no supporting surveys.

However the same application claims:

- Historical development works.
- Historic foundations.
- Historic drainage.
- Historic sewage infrastructure.

The site therefore has a complex historical land-use background.

No evidence has been supplied in the form of:

- Phase 1 Desk Study.
- Preliminary Risk Assessment.
- Ground Investigation.
- Contamination Survey.

Without such assessments the planning authority cannot determine whether the site is suitable for public use.

10. Trade Effluent Information is Incorrect

The application states:

"Does the proposal involve the need to dispose of trade effluents or trade waste?" – No.

This appears incorrect.

The proposal includes:

- Food and beverage sales.
- Mobile catering units.
- Campervan users.
- Commercial toilet facilities.
- Showers.
- Baby changing facilities.

These uses will inevitably generate commercial waste streams and wastewater requiring management.

The applicant must provide:

- Trade effluent arrangements.
- Wastewater management strategy.
- Environmental control measures.
- Spill prevention procedures.

The current response is inadequate.

11. Employment and Social Value Benefits are Unsubstantiated

The proposal claims only five full-time jobs.

For a development causing significant environmental and amenity impacts, the economic benefits are minimal.

No information has been provided regarding:

- Local employment commitments.
- Apprenticeships.
- Skills development.
- Community training.
- Social value initiatives.
- Local procurement obligations.

The claimed economic benefits therefore carry very limited weight.

12. Operating Hours are Inappropriate

The proposal seeks opening hours from:

- 08:00 until 23:00 every day.

This is entirely out of character for:

- An undeveloped field.
- A quiet coastal location.
- A residential area of Goring-by-Sea.

Activities include:

- Food and drink sales.
- Campervan use.
- Recreational activities.
- Events.
- Vehicle movements.

Noise, disturbance, lighting and vehicle activity until 11pm will have a significant adverse effect on neighbouring residents and the wider character of the area

Conclusion

This application should be refused because:

1. It is largely retrospective and follows unauthorised works.
2. Previous applications and appeals have been refused.
3. No ecological evidence has been provided.
4. Biodiversity Net Gain requirements have not been satisfied.
5. Significant habitat clearance has already occurred.
6. No contamination assessment has been submitted.
7. Highway impacts have not been properly assessed.
8. The vehicle access arrangements appear unauthorised.
9. Parking proposals are unsupported and potentially unsafe.
10. Trade effluent information appears inaccurate.
11. Claimed economic benefits are unsubstantiated.

12. Community benefits are insufficiently demonstrated.

13. Operating hours are excessive and harmful to residential amenity.

14. The proposal would fundamentally alter the character of this quiet coastal location.

For these reasons, the application conflicts with the principles of sustainable development and fails to provide sufficient evidence to justify planning permission. The application should therefore be refused.

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