

7 July 2026

Planning Department,
Worthing Borough Council

Dear Sir/Madam,



Re:- Planning Application AWD/0737/26

I wish to make my **OBJECTION** to the above Planning Application on the following Grounds:-

It is CONTRARY to the following

a) NPPF Local Plan Policies:-

106. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.

107. The Local Green Space designation should only be used where the green space is:.....

(a) (b) (c) are all relevant.

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

c) maintaining the character of the undeveloped coast.

b) Local Plan Policies:- Worthing Borough Council Local Plan 2023-2030
Adopted SS4, SS5, SS6

*3.41 To ensure that the most valued and sensitive land/seascapes are protected, and that the existing character of Worthing is maintained, **all land outside the Built Up Area Boundary will be designated as ‘countryside and undeveloped coast’ to protect landscape and coastal character including its environmental and recreational value. In addition some areas outside the Built Up Area Boundary are also designated as:***

- Local Gap - to preserve Worthing’s character and identity by preventing settlement coalescence; and/or*

- *Local Green Space* - to protect green areas of particular importance to the local communities they serve.

3.49 *The coastline south of the Built Up Area Boundary, excluding that defined as countryside, will be defined as undeveloped coast for the purposes of this policy.*

f) *The setting of the South Downs National Park and the **Designated International Dark Skies Reserve must be respected** Ferring has no street lights and when combined with Goring Gap it is Dark Skies.*

SS5 LOCAL GREEN GAPS

3.50 *The designation and protection of 'Local Green Gaps' helps to avoid coalescence and preserve the separate characters and identities of different settlements by providing physical and visual breaks. This is particularly important given the compact nature of Worthing and how few and fragile the breaks in development are on the coastal strip between Brighton and Chichester.*

3.51 Four areas are designated as 'Local Green Gaps' - one being between Worthing and Ferring to the west: • a) Goring-Ferring Gap;

..... and will be protected in order to retain the separate identities and character of these settlements.

In the past a planning officer has said ***that the Gap was a 'Glorious oasis in a sea of development'***.

c) **The proposal is CONTRARY to Article 4 Direction - WBCO2 Land west of The Plantation Goring by Sea**

In 1969, an Article 4 Direction was placed on 9ha of the southwest corner of the Goring-Ferring Gap to restrict the scope of permitted development rights. This Article 4 Direction is still in effect to my knowledge.

This means that Planning Approval should be sought PRIOR to ANY development.



Article 4 Direction includes the hatched area.

d) PLANNING HISTORY

AWDM/0614/16 – Change of use of land to caravan and camping site with 46 pitches. Erection of amenity block building comprising toilets and showers, laundry room, store, office and reception. **Construction of vehicular crossover** and provision of parking and bin storage area. **REFUSED**

AWDM/0099/24 – Application for Lawfulness for Sandpit, Gazebo's, Food outlets, CCTV, parking etc. Application: **REFUSED**

AWDM/0394/24 – Application for Lawfulness for Storage Container. Application: **REFUSED**

Appeal A Ref: APP/M3835/X/24/3340940 – Appeal for Sandpit, Gazebo's, Food outlets, parking etc - **APPEAL DISMISSED.**

Appeal B Ref: APP/M3835/X/24/3341674 – Appeal for Container – **APPEAL DISMISSED.**

e) THE SITE is located 'within' the Goring Hall Conservation Area – (latest Appraisal 2024)

The National Planning Policy Framework (NPPF) sets out the government's advice in respect of sustainable development, including that relating to the historic environment in Chapter 16.

*2.9 Development management policies advise local planning authorities to look for opportunities to enhance or better reveal the significance of conservation areas (paragraph 206); and to consider proposals that would harm the significance of the conservation area proportionately, **taking into account the relative significance of the element affected, and its contribution to the conservation area.***

4.3 and

*4.7 To the west of Goring Hall and south of Ilex Avenue, the former agricultural fields are still present..... **the land beyond this to the west and south are flat and open providing views to the sea across fields that continue to be used for agricultural purposes.***

*4.9 Again, although outside of the conservation area, and not within the former designed grounds of Goring Hall, **the Goring-Ferring Gap is an important part of the landscape and acts as a buffer between the two settlements. It is a key area of open space where the distinct settlements can be appreciated. It forms part of the open land which once surrounded Goring Hall and formed its rural setting,** which has now largely been lost by the heavily suburbanised development to the north and east.*

4.22 The fields that now comprise the Goring-Ferring gap appear always to have remained in agricultural use and provide an important area of open green space that reflects the historic situation of Goring as a once small rural village and acts as a buffer to the built form of the settlement of Ferring and allows views to the South Downs to the north.

The Goring-Ferring Gap is an important landscape buffer between the historic estate of Goring Hall and the village.....

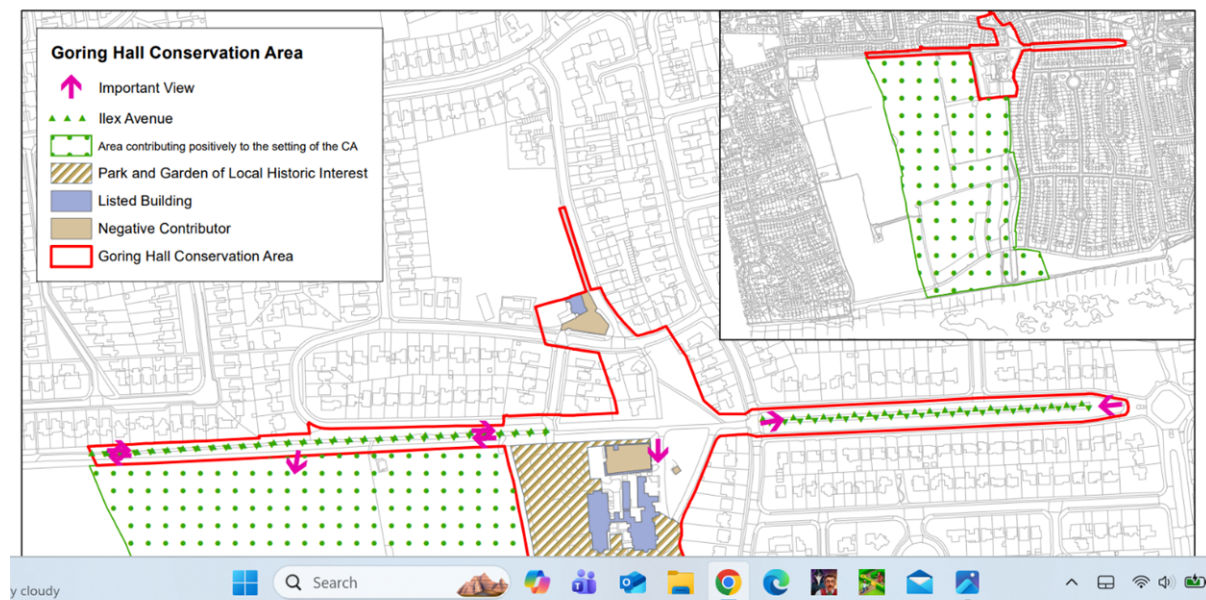
5.10 As well as providing a rural buffer, the Goring-Ferring Gap makes an important contribution to the setting of the conservation area by allowing long views to the South Downs National Park beyond and the adjoining Highdown Conservation Area.

The Goring-Ferring Gap can also be seen when looking from Highdown Conservation Area, which contributes to the historic character of the wider area. The coastal plains were once used for agriculture by the settlers at Highdown and views between these areas provide a sense of this former relationship.

6.5 The most significant threat to the conservation area going forward is that associated with development pressure within the setting of the conservation area, particularly on the site of the Goring-Ferring Gap. As demonstrated above, this space provides an important rural context to the conservation area in both near and far views, and its incremental development would be harmful to the significance of the conservation area as derived from its setting.

7.10 Development on the fields south and west of Goring Hall and the Ilex Avenue should be strongly resisted.....

The green setting of the conservation area to the south and southwest should remain undeveloped to conserve the rural context of the historic Goring Hall Estate and the remnants of the historic context of Goring itself.



The Site is located within an '**Area contributing positively to the setting of the Conservation Area**', as shown on the map above.

f) ACCESS TO SITE

Historical Google Maps show there were **NO ACCESS/GATEWAYS into the Site prior to 2024.**

In 2016 a Planning Application was submitted:-

AWDM/0614/16 Planning Application for a Caravan Site (REFUSED) states:-

A vehicular access into the site was **proposed** off the north side of Marine Drive, in a position approximately 25 metres from the east boundary of the site.

Why would this ACCESS be required if one already existed?

The Council's own website when looking at Article 4 Directions has a map which clearly shows there were NO GATEWAYS before 2024.

Google Earth historic maps show NO GATEWAYS before 2024.

On 22 June 2026 Mr Dixon installed a MIRROR on the banked verge to the west side of the gateway. The following week it appeared that WEED KILLER had been sprayed round the entrance (against all ecological logic). This proves that the vision splays are insufficient to exit the site safely.

The Access that Mr Dixon installed north side of Marine Drive is only wide enough for one vehicle to pass through at a time. Will vehicles waiting to enter the site add to the congestion at busy times and affect safety? How are pedestrians, children especially, meant to navigate vehicles entering/exiting the Site safely and cross the road to the Greensward?

g) BOREHOLE

For a Use that can ONLY be used 28 days per year WHY would a Borehole be necessary? What is the water quality, how would it be 'sanitised'? Has the farmer been consulted with regard to any water extraction from below his fields? How would this Borehole affect the water table? Where will waste water go? Where are the drains.

h) Retention of land for biodiversity use

It is a huge pity Mr Dixon did not think of biodiversity before decimating the field, ripping out hedgerows and destroying the nesting sites of birds and mammals in the rough grass.

i) Use of land to produce natural green energy, for example solar.

Without drawing/information as to what exactly is proposed this is difficult to equate.

j) Provision of vehicle parking use (including overnight camping use for kite surfers and sea swimmers).

There are no drawings showing size of and siting of parking provision/different parking areas i.e., camping or parking. Also, where are the temporary structures going to be situated, what size are they. The Mobile Toilets/Showers, size and placement on the site. The Caravan Sites & Control of Development Act 1960 prohibits the USE of a caravan/motorhome without a Site Licence.

k) 2 x 6m flag poles. This would go against all Green Gap principals.

l) Two recessed shipping containers for site storage and use. Mr Dixon has already had Planning REFUSED and an Appeal DISMISSED I do not need to reiterate the reasons contained therein. There is no site plan showing location and size thereof. I can only imagine it would have to be a very large underground area, lined with impermeable material (tanking to prohibit rust) an ecological nightmare. Again, no drawings as to size and placement, merely a 'sketch' of a vague idea.

m) Tree shaded sandpit and tumble-down mound for young children and toddlers to use. In my experience children at the seaside do NOT want to be 'contained', they want to explore rockpools, the shingle, build with the stones, paddle in the sea, climb all over the groynes, run free! The foxes would have a field day in the sandpit and mound, not very hygienic for any child.

n) Animals to use for entertainment purposes, for example Shetland ponies. Again, there is no drawing showing where these might be situated or showing shelter for the ponies from inclement/hot weather. Where are the safety precautions in case of a 'bolting pony'. We don't use animals for entertainment these days! Worthing Council states:- ***1st May to 30th September: You may ride on the sand before 10am and after 8pm.***

o) A decorative flowerpot boat at site entrance. Bin storage use. No sizes on any drawing, just a vague placement. How is the bin storage going to be 'hidden' from public view. The boat could soon become an unsightly mess like the Advertising trailer.

p) A wheeled advertising trailer, measuring approx. 5 metres by 2.5 metres located within the site boundary to promote Worthing, local events and tourism. This is a 'blight on the landscape', initially when installed on site the spotlights blinded drivers on Marine Drive. It is unkempt and looks appalling.

Mr Dixon states in other correspondence that he will be composting waste 'on site'. The area has a huge fox population, given the proximity of the plantation/Ilex Way. How will this compost be secured from foxes who would likely distribute said rubbish all around the area? There is already an accumulation of rubbish on the roadside, a household bin had been placed on the grass verge by the gateway yesterday.

The Caravan Sites & Control of Development Act 1960 prohibits the USE of a caravan/motorhome without a Site Licence.

There is a document on the Planning Web Site:- **FLOOD RISK ASSESSMENT**
9480 Land at Marine Drive, Goring, Sussex. Flood Risk Assessment 5 November 2024

3 PROPOSED DEVELOPMENT

3.1 Proposals

3.1.1 The proposed development involves the construction of a residential nursing home, housing and a café.

I can only assume this document proves Mr Dixon's true future intentions for the Site.

The Appeal Inspector's DECISION states:

Notwithstandingthe use itself would be a material change of use amounting to development, for which planning permission would be required. This would be the case even though the leisure use would be temporary and the use would not benefit from any permitted development provided by the Town and Country Planning (General Permitted Development)(England) Order 2015 (the GPDO).

It is my understanding that, according to his Liquor Licence Mr Dixon has a right to use the land for 28 days per year. This does not give him the right to park vehicles on the land on a permanent basis. Mr Dixon has been trading since the early May Bank Holiday 2026.

For the above reasons I respectfully request this planning application is REFUSED.

Yours faithfully,

S F Brown