

From: **Christopher Nevell** < >
Date: Wed, 15 Jul 2026 at 00:10
Subject: Objection to Planning Application AWDM/0737/26
To: planning@adur-worthing.gov.uk <planning@adur-worthing.gov.uk>

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Please take this as a formal objection to the proposed development on Marine Drive AWDM/0737/26:

From: Christopher Nevell, 7 Sea Lane, Goring-by-Sea

Objection

As a local resident, I object to this planning application. Not only is it contrary to elements within the Local Plan (e.g, Spatial Strategy 5 – Protected Gap) and Chapter 15 (paragraphs 187 – 201) of the National Planning Policy Framework (NPPF), it also omits material information, particularly regarding the classification of land, biodiversity and flooding. The development is out of character compared to the surrounding area, contrary to Strategic Option 18 of the Local Plan to maintain and enhance character. The land is identified as not appropriate for development in section 1.37.

There are material considerations to be taken into account as set out in Section 70(2) of the Town and Country Planning Act 1990 (e.g. traffic, noise and character of the area), which the application has not addressed other than, at best, superficially, and there is a risk of precedents being set for future development.

This has been a difficult submission to compile with the Applicant making continual supporting statement submissions throughout the Consultation Period.

Summary

The following points are the main objections. A Statement of Additional Information has been added to expand and provide detail on these points for the benefit of the assessors:

- The vehicular entrance/exit is adjacent to a Classified Road (the C250, aka Marine Drive) but no traffic or risk assessment for the safety of drivers or pedestrians alike, either in the road or on the site, has been provided. This is despite 25% of the land reserved for a car park indicating significant vehicle traffic into the site is anticipated
- The basis for the application uses an inaccurate representation of Land Classification, referring to it as reclaimed land – an unofficial term – rather than Agricultural Land, for which any works must be for the purposes of agriculture. It could be viewed as an attempt to make a material change of use of the land from Grade 2 Agricultural Land (recognised as Best and Most Versatile Land). Also non-compliant with Natural England's Guide to

assessing development proposals on agricultural land (Gov.UK). For example, storage containers can only be used exclusively for agricultural activity and not mixed with any other usage.

- The Town and Country Planning Act Part 6 states no permitted development within 25 metres of a Classified Road (e.g. the aforementioned Marine Drive) and so points towards **any or all** developments on the land requiring planning permission (i.e. no automatic 28 days permitted rights)
- There is no Biodiversity Net Gain assessment in the Application, despite such a requirement being necessary for all applications for this land area since February 2024. A 10% Net Biodiversity Gain assessment is required for this fresh application (Environment Act 2021). Also the Local Plan Vision 3 refers to adding to the Borough's natural capital, but there is no evidence of it here, nor Vision 6 – delivering a net gain in biodiversity. This scheme shows no evidence that this development contributes to either vision.
- The official Local Wildlife Site (LWS) status of the Gap has not been recognised in the Application. DM18 Section e in the Local Plan states “Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a LWS... will not be permitted unless it can be **demonstrated** the benefits of the proposal outweigh the need to safeguard the nature conservation value of the site. Despite this requirement there is an absence of any sensitivity assessment to the immediate environment.
- An incomplete/draft Flood Risk plan has been included (2024) that predates the new strategic developments West Sussex Coastal Flood and Erosion Management Strategy (2025) and so does not refer to it. There may be a need to rewrite the plan in light of that but more importantly the document states 0% impermeable land. That may now be inconsistent as the Applicant has not disclosed the intended car park surface which might be hardstanding. If it is then the application has no relevant Flood Risk plan
- Permitted Development use of the site is already more than the permitted 28 days in 2026 and should cease with immediate effect
- The Flag poles are unnecessarily high and could be interpreted as an attempt to set a height precedence for future development applications. If permitted, a condition should be set to no more than to the permitted 4.9m and carry no advertising or novelty flags
- An overnight camping site has been described but no detail on countering noise (verbal, music and equipment), light pollution or considerations for wildlife in the immediate area

- Public interest is a material consideration that any outcome from an application must be in accordance with. There is little to support the application when assessed in this context. Although use of land has been proposed, in this case it is not its most appropriate use (agricultural), and so the Applicant's references to the Local Plan appear less relevant.
- This is not sustainable development as there is a risk of irreversible damage to the land through compaction.

Statement of Additional Information:

Land Classification

Natural England (the official classification site) identifies the land as Grade 2 Agricultural Land, i.e. "Very good quality land with minor limitations." It falls into the term "Best and Most Versatile (BMV)." This has a profound impact on the ability to develop the land for the uses sought. **Any works must be for the purposes of agriculture.** Any land classed at Grade 3A or better is considered first rate.

"Agricultural" has a specific definition, covering the use of land for agriculture, including horticulture, fruit growing, seed growing, dairy farming, livestock breeding and keeping, grazing, meadow land and market gardens. It doesn't automatically include equestrian use, tourism, or diversified non-farm enterprises (Source: AgLand)

The Application is centred on leisure, not agriculture, and could be interpreted as **an attempt to make a material change of use from its officially recorded land classification. The proposed activity does not relate to primary agricultural use, nor genuinely required.**

Agricultural land has no permitted development rights within 25 metres of a classified road, i.e. Marine Drive which is the C250.

It must comply with Part 6 of the Town and Country Planning Act.

Although the applicant refers to it as regenerated land and largely unused for approximately 90 years, (and has completed the form on those lines, stating use ended on 3rd September 1939), this is a considerable factual error. It was used to grow crops up to the 1980s and later maintained with regular ploughing by Langmeads. A family member of the previous farmer has substantiated this and provided a list of crops grown. While there has been a period of it being fallow and then rewilded, the classification remains in place.

It is now owned by a pension company, Dentons, as a pension scheme for an individual.

Although planning history indicates that this land was to be built on nearly a century ago, this should be viewed in the context of there being many other land development options at that time in Worthing. Today, it is the lack of availability of those other options that requires scrutiny of any land use here as the status as a strategic gap is even more important in terms of space for wellbeing and prevention of an extended conurbation. Hence its recognition as such in the Local Plan.

Temporarily putting aside the 25m rule on permitted development, it must be **non-material compared to agricultural use but the activity in 2026 has not been, and exceeded 28 days already.**

The National Planning Policy Framework (NPPF) sustainable objectives include a need to demonstrate various factors including the environment impact (e.g. minimum impact to the landscape and ecology), but other than passing mentions by the applicant, there is no independent impact report, covering, for example biodiversity, which is required for applications from 2024. A number of the applicant's claims appear to be positive (new trees) but are not substantiated with any detail or method of measurement, and so not convincing.

Any development must avoid BMV land, and any loss justified, which the application does not address as it is based on an alternative premise termed "regenerated land," which is not consistent with the Local Plan's identification.

Traffic, Access and Car Park

The field is adjacent to Marine Drive, which is a classified road (the C250, from South Ferring to George V Avenue). The road is particularly busy in the Summer, with the local greensward opposite being a popular destination for both out of town visitors and local residents.

This application does not address the following risks:

- The field's only vehicular access with the road is an existing gateway. This is narrow, only allowing movement for one vehicle at a time, whether arriving or departing. The same gateway is also the closest access point for anyone crossing over from the greensward. Although an obvious safety risk, the application contains no risk assessment or plan on how to keep traffic flowing and prevent queues forming. No mitigations are offered for the risk to pedestrian safety, either inside or outside the site, other than mention of another entrance on the plan, but that is further away from the greensward.
- The site plan indicates a large refuse bin next to the gate, potentially obscuring the view of departing motorists. This needs to be relocated away from the gateway.
- The road conveys South Ferring residents to Worthing Hospital in an emergency (whether by ambulance or by private car), and so impacted by any congestion, but this has not been taken into consideration.
- The application states that 25% of the site is reserved for car parking but there is no mention of what the surface will be. If a hardstanding area (e.g. concrete or tarmac) then that is not consistent with the separate flood risk document which states that 0% is impermeable. Any impermeable surface can lead to a greater risk of flooding to the rest of the site or surrounding area. In this case more likely as the parking area is situated at the higher end of the site and so water will run away from there.
- There is no layout plan for the car park and so no indication of safety, e.g. how separated from other paths, traffic flow, visibility, size of bay, landscaping, etc. Overall no evidence that the Town and Country Act 1990 has been complied with.

- The provision of such a large car park appears unnecessary given the existing level of business on site. Cars should be restricted to a far smaller area to reduce the impact of continually compacting the agricultural soil. Both this and hard surfacing, can irreversibly damage it, contrary to sustainable development aims.
- This is agricultural land and so must be developed for that. A car park intended for commercial vehicle parking does not equate to a yard for farm operations.

Overnight Camping

A submission has been made by the applicant for overnight camping. This implies the movement of vehicles on and off the site 24 hours a day as the gate will presumably be kept open with no lock-in.

There is no indication of staff remaining on the site and so no enforcement of any rules set on noise, BBQs or light pollution. The objections to this part of the application are:

- This is inconsistent with the application listing 23:00 as closing time.
- The gap is a dark area with no local lighting. This is the setting for local wildlife but presumably lighting will be maintained for the safety of campers. This will have an impact on the wildlife but no biodiversity report has been presented by the Applicant and so the impact has not been measured but assumed detrimental.
- The gap can be seen from the South Downs National Park and so presumably added light will be visible not only locally but further afield. The Park has a dark skies policy but although the Gap is not in the Park, a change to the local night view beyond its boundary may yet be inconsistent with that policy.
- Noise can carry a great distance across open fields and so there will be an impact on local residents when faced with campfires, music, shouting, etc.
- The visual appeal to the site will be impacted. Camper vans may come and go but the continual presence of large vehicles is akin to a permanent visual impact even if the components vary. Indeed although termed short stay, there is no indication that a visitor cannot have a continual sequence of short stays, driving round the roads and returning on the same day
- The proportion of the site reserved for this activity, and the traffic flow within the field are not stated

Flood Risk

The document provided (Stephen Wilson Partnership Ltd) is dated November 2024 and appears to relate to a past application, or an unfinalised draft with references to "X" and a nursing home. It shows existing flood risk in the immediate location (Level 2 & Level 3) but adds to it with photos of other local collected water not evident in the assessment. Though 2024 is relatively recent, there are omissions:

- The West Sussex Coastal Flood and Erosion Management Strategy has been issued (July 25). On page 43 of that document it refers to Sustained Development Systems (SuDS) which must be considered for both major and minor developments to be used unless there is evidence it is not appropriate. This application provides no evidence and so there is an important omission here.
- As previously mentioned, the potential of a hardstanding car park covering 25% of the land is too far removed from a Flood Risk Assessment being based on 0%

Environment and Biodiversity

The Application states that the land area is 2 Hectares and so requires a 10% Net Biodiversity Gain assessment (Environment Act 2021), which has not been provided. Absent are the Biodiversity metric, the Biodiversity Gain Plan and Onsite Irreplaceable Habitats. Gain may be difficult to achieve on land in which the Applicant explicitly refers to clearance of 90% of vegetation and rubbish on the land (presumably the bulk being what is referred to as “overgrown vegetation.” Preservation of 10% in the application, with trees and some grass added cannot be considered to meet this requirement, without independent assessment, as required. Instead, the Applicant should be requested to commission the necessary Biodiversity assessment and explain how a 10% net gain will be created with this development, as required, and also given the past clearance incident, how this will be continually measured.

While the Applicant has stated that this application is a continuation of the past one which was prior to the introductory date for this requirement, it is not. The previous application was dismissed. This is a fresh one.

The Applicant entered a negative response on the Form when completing whether there are any existing trees or hedges. However this is not the case. There is existing vegetation around the perimeter, i.e. hedging.

Although he states that 10% of the land is to be kept retained as overgrown vegetation, a condition to any approval should be the preservation of the perimeter vegetation, and for it to be maintained as it is, with no thinning out, to preserve the existing landscaping that, importantly, restricts the view of the existing commercial activity from the Greensward.