

From: **Cheryl Bissell**

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Subject: Objection to Planning Application AWDM/0737/26

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

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Objection to Planning Application AWDM/0737/26

Land at the south-east corner of Amberley Drive and Marine Drive, Worthing

Dear Planning Officer,

I am writing to object formally to planning application AWDM/0737/26.

Although the application appears to present the proposal as a community, environmental and tourism initiative, the description encompasses a substantial collection of commercial, leisure and visitor-related uses, including:

- Commercial vehicle parking and overnight camping.
- Food and drink concessions.
- Toilets, showers and baby-changing facilities.
- Shipping containers and associated storage.
- Children's recreational facilities.
- Tourism-related activities.
- Commercial advertising.
- Renewable-energy infrastructure.
- Borehole water extraction.
- Animal attractions and associated facilities.
- Visitor infrastructure and other commercial activity.

When assessed cumulatively, these proposals would introduce a significant commercial leisure and tourism use onto land forming part of the protected Goring–Ferring Gap.

The development would fundamentally alter the open character, appearance, tranquillity and environmental function of the site. It should not be assessed as a collection of minor individual elements, but as a comprehensive and potentially intensive change in the use of the land.

My grounds of objection are set out below.

1. Conflict with the Local Green Gap designation

The application site is within the Goring–Ferring Local Green Gap. The primary purpose of this designation is to maintain the visual and physical separation between settlements, protect openness and prevent the gradual coalescence and urbanisation of the area.

The Planning Inspectorate has previously recorded that this particular site is allocated in the adopted Local Plan as a Local Green Gap intended to prevent settlement coalescence. The Inspector also found that the introduction of leisure activity onto the field would represent a significant change in its character because of the degree of activity introduced.

The proposed commercial concessions, overnight accommodation, parking, containers, recreational installations, advertising, utilities and visitor facilities would be fundamentally at odds with the purpose of that designation.

The fact that individual structures may be described as temporary, moveable, sustainable or community-focused would not remove their collective effect upon the openness, undeveloped character and function of the Gap.

2. Loss of open, natural and undeveloped character

The value of the Goring–Ferring Gap lies not simply in whether it contains permanent buildings, but in its openness, visual simplicity, tranquillity and contrast with the surrounding built-up area.

The proposal would introduce:

- Regular commercial activity.
- Concentrations of visitors.
- Parked cars, vans and potentially campervans.
- Overnight occupation.
- Food and drink outlets.
- Containers and service structures.
- Signage and advertising.
- Lighting and security infrastructure.
- Play equipment and visitor attractions.
- Waste, deliveries and servicing activity.

These features would create the appearance and operational character of a developed leisure destination rather than an open coastal field.

The development would therefore result in the incremental urbanisation and commercialisation of a protected landscape.

3. Excessive cumulative scale and intensity

The proposal must be assessed as a whole.

While any one concession, container, play feature or utility installation might appear modest in isolation, the combined development would amount to a significant mixed commercial and leisure operation.

The cumulative consequences would include:

- Increased traffic movements.

- Increased parking demand.
- Deliveries and commercial servicing.
- Noise from visitors, vehicles, children's activities and entertainment.
- Artificial lighting.
- Litter and waste generation.
- Overnight activity.
- Pressure on neighbouring residential areas.
- Disturbance to wildlife.
- Loss of tranquillity and landscape openness.

The breadth of uses requested also creates uncertainty about the realistic upper limit of activity that could take place on the site. Permission should not be granted on the basis of vague or open-ended descriptions that could subsequently allow the intensity of the use to increase without adequate scrutiny.

4. Harm to wildlife, habitats and biodiversity

The site forms part of a relatively undeveloped coastal green corridor and may provide habitat, feeding, resting or movement opportunities for birds, bats, small mammals, invertebrates and other wildlife.

The introduction of regular human activity, vehicles, overnight camping, food concessions, animals, lighting, noise, waste storage and physical infrastructure could cause significant disturbance and fragmentation.

Particular concerns include:

- Disturbance to nesting and ground-feeding birds.
- Artificial lighting affecting bats and nocturnal species.
- Loss or degradation of grassland and boundary habitat.
- Increased trampling and soil compaction.
- Disturbance caused by children's play and organised activities.
- The attraction of scavenging species through food waste.
- Predation or disturbance associated with domestic animals.
- Potential impacts from animal attractions or livestock facilities.
- Increased pollution from vehicles, generators, waste and wastewater.
- Disruption of ecological connectivity across the Gap.

The previous Inspector's decision concerning this site noted that arguments about the absence of nesting birds were planning-merits matters requiring proper consideration through the planning process. The absence of immediately visible wildlife is not evidence that the land has no ecological value.

Before any decision is made, the application should be supported by proportionate and seasonally appropriate ecological surveys undertaken by a suitably qualified ecologist. These should identify existing habitats and protected or priority species and provide a credible mitigation, management and monitoring plan.

The authority should also be satisfied that the development would achieve all applicable statutory biodiversity requirements, including measurable biodiversity net

gain, rather than relying upon general or unverified claims of ecological improvement.

5. Inadequate assessment of traffic generation

The application does not appear to provide sufficiently reliable information regarding:

- Expected daily and peak visitor numbers.
- The number of parking spaces.
- Campervan and commercial-vehicle movements.
- Staff travel.
- Delivery and servicing movements.
- Seasonal peaks.
- Event-related traffic.
- Vehicle arrival and departure times.
- The duration and frequency of overnight stays.

Without this information, the highway consequences cannot be assessed properly.

A development containing concessions, camping, recreation, animal attractions and tourism activities is likely to generate materially different traffic patterns from an undeveloped field. The site is close to residential streets, the seafront and routes used by pedestrians, cyclists and families accessing the beach.

The applicant should be required to provide a detailed transport statement based on a realistic worst-case operating scenario.

6. Highway and pedestrian safety

The proposal raises significant concerns regarding conflict between vehicles and vulnerable road users.

Marine Drive and Amberley Drive are used by residents, pedestrians, cyclists, dog walkers, families and beach visitors. Additional turning movements into and out of the site could increase risk, particularly during busy summer periods when roadside activity and parking demand are already elevated.

The proposed use could introduce:

- Cars entering and leaving throughout the day.
- Campervans and larger commercial vehicles.
- Delivery vehicles.
- Vehicles manoeuvring close to children's facilities.
- Queuing at the site entrances.
- Informal parking on surrounding roads.
- Reduced visibility caused by parked vehicles.
- Pedestrian movements across Marine Drive towards the beach.
- Increased evening and night-time movements.

The combination of vehicle access, children's recreation, alcohol-related activity and direct proximity to the seafront requires a robust road-safety assessment. It should not be assumed that existing field entrances are automatically suitable for an intensive visitor destination.

7. Insufficient parking provision and risk of displacement

The application should demonstrate that adequate on-site parking can be provided without eroding the open character of the site.

A substantial parking area would itself urbanise the land through vehicle presence, surfacing, signage, lighting and associated access arrangements. Conversely, inadequate parking would be likely to displace vehicles onto Amberley Drive, Marine Drive and neighbouring residential roads.

This could:

- Obstruct visibility.
- Restrict access for residents.
- Make pedestrian crossing more hazardous.
- Impede emergency or service vehicles.
- Increase congestion during peak periods.
- Cause conflict with existing beach users.

The authority should not rely on an undefined or untested parking arrangement.

8. Public-safety implications of alcohol-related activity beside the sea

I recognise that the grant and regulation of an alcohol licence is governed separately under licensing legislation. Nevertheless, the planning authority must consider the foreseeable land-use and amenity consequences of facilitating alcohol sales and consumption at this particular location.

The site is immediately adjacent to the coast and would encourage movement between the premises, the road and the beach. Unlike a controlled town-centre venue, the surrounding seafront and beach constitute a large, open environment where supervision may be limited and lifeguard coverage cannot be assumed.

The combination of alcohol consumption, proximity to the sea, evening activity and an open beach raises legitimate concerns regarding:

- People entering the sea after consuming alcohol.
- Falls or accidents on the beach or shoreline.
- The safeguarding of children and vulnerable visitors.
- Glass, cans and other waste being taken onto the beach.
- Disorder or antisocial behaviour.
- Noise from patrons leaving the site.
- Pedestrians crossing Marine Drive while impaired.
- Increased demand upon police, ambulance, coastguard or other emergency services.

- The effectiveness of supervision once patrons leave the application site.

These concerns should be addressed through a detailed operational and public-safety management plan. This should include proposed alcohol-sale hours, boundaries of consumption areas, staffing, security, glass-management arrangements, incident procedures, safeguarding measures and controls preventing alcohol-related activity from spilling onto the beach and surrounding roads.

In the absence of such information, the authority cannot be satisfied that the development would operate safely or without unacceptable effects upon the surrounding area.

9. Noise, disturbance and loss of residential amenity

The proposal has the potential to generate noise from:

- Customers and groups gathering outdoors.
- Children's recreation.
- Animals.
- Music or amplified sound.
- Vehicles, doors and engines.
- Deliveries and waste collection.
- Generators or mechanical equipment.
- Overnight campers.
- Patrons leaving after food or alcohol service.

Noise from outdoor uses is particularly difficult to contain. The exposed coastal location could also allow sound to travel towards surrounding homes.

The application should clearly establish:

- Opening and closing times.
- Hours of alcohol and food service.
- Hours for deliveries and waste collection.
- Whether music or events are proposed.
- Maximum visitor and camping capacity.
- Quiet hours.
- Procedures for managing complaints and antisocial behaviour.
- The location and specification of mechanical equipment.

Without a noise-impact assessment and enforceable operational controls, there is an unacceptable risk of harm to nearby residential amenity.

10. Artificial lighting and harm to landscape and wildlife

Commercial concessions, parking, camping, toilets, security, pathways and evening activities are all likely to require external lighting.

Artificial lighting could:

- Make the development conspicuous within the open Gap.
- Harm the site's dark and undeveloped character.
- Cause glare or light spill towards neighbouring properties.
- Affect drivers on surrounding roads.
- Disturb bats, birds and other nocturnal wildlife.
- Extend the effective operating hours of the site.

A full lighting assessment should be required, showing the position, height, intensity, colour temperature, direction and operating hours of every light source.

A general commitment to "low-level" or "ecological" lighting would not be sufficient.

11. Waste, litter and pollution

Food and drink concessions, overnight camping, toilets, animal facilities and visitor attractions would generate substantial and varied waste streams.

There is a foreseeable risk of:

- Food packaging and single-use waste.
- Glass bottles and cans.
- Litter reaching the beach or sea.
- Overflowing bins.
- Animal waste.
- Wastewater and sewage.
- Odour.
- Vermin and scavenging wildlife.
- Commercial waste-collection vehicles.
- Pollution from generators, vehicles or stored materials.

The coastal location makes litter control particularly important because lightweight waste can readily be carried by wind towards the beach and marine environment.

A comprehensive waste-management plan should be provided before determination, rather than left to be resolved after permission is granted.

12. Toilets, showers, drainage and wastewater

The proposal includes toilets, showers and baby-changing facilities, but it is unclear how foul water and grey water would be collected, treated and disposed of.

The authority should require clear evidence regarding:

- Connection to mains drainage or an alternative system.
- Capacity and maintenance.
- Disposal of shower and cleaning water.
- Prevention of contamination of soil or groundwater.
- Arrangements for emptying tanks.
- Flood-resilient siting.
- Management during periods of high visitor demand.

The use of temporary, portable or tank-based facilities does not remove the need to demonstrate that the arrangements would be safe, hygienic and environmentally acceptable.

13. Borehole extraction and groundwater implications

The proposed borehole raises additional questions about water supply, abstraction, water quality, groundwater conditions and environmental impact.

The application should explain:

- The intended volume and purpose of extraction.
- Whether regulatory consent is required.
- The effect upon groundwater and nearby water features.
- How water quality would be tested and maintained.
- Whether the supply would be used for drinking, food preparation, washing, animals or visitor facilities.
- How contamination would be prevented.
- What infrastructure would be required to pump, store and distribute the water.

Permission should not be granted without evidence that the borehole is feasible, lawful and environmentally sustainable.

14. Flood risk, surface-water drainage and coastal resilience

The site's coastal position requires careful consideration of flood risk, surface-water drainage, groundwater and resilience to extreme weather.

The development could introduce compacted parking areas, structures, containers, pathways, utilities and areas of concentrated footfall. These could alter drainage patterns or increase localised surface-water problems.

Camping, electrical infrastructure, waste storage, animal facilities and visitor accommodation could also be vulnerable during severe weather.

The authority should require an appropriate flood-risk and drainage assessment demonstrating safe operation, safe evacuation, resilient infrastructure and no increased flood risk elsewhere.

15. Animal welfare, odour and environmental impacts

The reference to animal attractions and associated facilities is insufficiently defined.

The application should identify:

- The species and number of animals.
- The duration and frequency of their presence.
- Housing and shelter arrangements.
- Waste and manure management.

- Veterinary and welfare arrangements.
- Noise and odour impacts.
- Biosecurity.
- Public interaction and safeguarding.
- Arrangements during extreme heat, storms or flooding.

Animal attractions could materially increase the intensity of the use and may create additional noise, odour, waste, traffic and ecological impacts. These matters cannot reasonably be left undefined.

16. Advertising and visual clutter

Commercial advertising, signs, flags, menu boards, directional signs and promotional displays would contribute to the visual commercialisation of the site.

Even where individual signs are modest, their cumulative presence alongside concessions, containers, parked vehicles and visitor facilities would erode the open and undeveloped character of the Gap.

The authority should assess the likely full signage strategy rather than treating advertisements as an unrelated future matter.

17. Insufficient definition of the proposed use

The application appears to seek permission for a broad range of activities without clearly defining their maximum scale, location, frequency or duration.

It does not adequately establish:

- Maximum visitor capacity.
- Maximum number of overnight campers or vehicles.
- Number and dimensions of concessions and containers.
- Number and type of animals.
- Frequency and scale of events.
- Opening and closing hours.
- Alcohol-service arrangements.
- Delivery and servicing hours.
- Lighting requirements.
- Seasonal operating periods.
- Staffing and security arrangements.
- Waste, drainage and water infrastructure.
- Long-term landscape and ecological management.
- The intended duration of any allegedly temporary structures or uses.

A planning permission must be sufficiently precise to enable the authority, residents and future operators to understand what has been authorised and to allow compliance to be monitored and enforced.

The proposal is too broad and insufficiently defined for its full impacts to be assessed reliably.

18. Previous planning and appeal history

The planning history of this site is directly relevant.

Previous proposals concerning leisure activity, food and drink sales, parking, children's facilities and a storage container were found to require planning permission. The Planning Inspectorate dismissed the relevant appeals in December 2024.

In that decision, the Inspector concluded that introducing the proposed leisure use would create a significant difference in the character of the field by introducing a degree of activity that had not previously occurred.

The present application appears to be substantially broader and potentially more intensive than the activities considered in those earlier proceedings. That history reinforces the need to assess the current proposal as a major change in the character and use of the land, rather than as incidental management or regeneration.

19. Risk of an undesirable precedent and incremental development

Approval could establish an undesirable precedent for further commercial development within the Local Green Gap.

The concern is not that every planning permission automatically determines another application, but that accepting this intensity of commercial and leisure activity would weaken the practical protection afforded to the Gap.

Once parking, utilities, access, drainage, containers, visitor facilities and commercial activity have become established, they may be relied upon to justify further intensification or additional permanent development.

The authority should resist this piecemeal process of urbanisation.

20. Claimed benefits do not outweigh the identified harm

Community access, recreation, renewable energy and biodiversity enhancement may be positive objectives in principle. However, such descriptions do not remove the need for the development to comply with the development plan or avoid unacceptable environmental, landscape, highway and amenity impacts.

Many of the claimed benefits have not been supported by sufficiently detailed, measurable or enforceable proposals.

There is a fundamental distinction between sensitively managing an open green space and establishing a commercial leisure, camping, hospitality and tourism destination within it.

In this case, the claimed benefits do not outweigh the harm that would arise from the scale, breadth and intensity of the proposed development.

Conclusion

The proposal would result in an unacceptable change in the character and use of this protected coastal site.

It would introduce a substantial concentration of commercial, recreational and visitor activity into the Goring–Ferring Gap, with consequent harm to:

- The openness and purpose of the Local Green Gap.
- Landscape character and visual amenity.
- Wildlife, habitats and ecological connectivity.
- Highway and pedestrian safety.
- Parking conditions.
- Residential amenity.
- Coastal tranquillity.
- Public safety.
- The local environment and marine setting.

The application also lacks the detailed ecological, transport, parking, drainage, flood-risk, noise, lighting, waste, water-supply and operational evidence required to assess its effects properly.

I therefore respectfully request that planning permission for application AWDM/0737/26 be refused.

If the authority is not presently satisfied that it has sufficient evidence to refuse the proposal, determination should at minimum be deferred until the applicant has provided all necessary surveys, impact assessments and precise operational details, followed by appropriate public consultation upon that additional information.

The Goring–Ferring Gap should remain an open and clearly defined separation between settlements. It should not be subjected to piecemeal commercialisation or incremental urbanisation.

Yours faithfully,

Cheryl Bissell