

From: **Marcus Randall** <

Date: Wed, 15 Jul 2026 at 20:11

Subject: AWDM/0737/26 – Request for Clarification of Existing Lawful Use and Planning Status of the Site

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

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Dear Planning Team,

I am writing further to my formal objection to planning application AWDM/0737/26 relating to the land situated at the south-east corner of Amberley Drive and Marine Drive.

Having reviewed the current planning application, the site's extensive planning history and publicly available information relating to the land, I would be grateful if the Local Planning Authority could provide clarification regarding **the site's existing lawful planning status** and **authorised use**.

I raise these concerns because the planning application process exists to provide transparency, ensure that development proposals are appropriately scrutinised and protect both the lawful use of land and the interests of local residents. In circumstances such as these, it is fundamental that the Local Planning Authority is able to clearly establish what activities are presently authorised on the site and whether they accord with its lawful planning status.

As matters presently stand, I believe the lawful use of the land is open to legitimate question. Previous planning applications seeking permission for substantially similar structures, facilities and commercial activities have been refused, withdrawn or remain undetermined. However, many of those same structures and activities now appear to be physically present on the site and are being actively promoted through publicly available social media content and visitor-related marketing material.

Since submitting my planning objection, I have become aware of publicly available photographs and social media posts showing the site currently being promoted and operated as a visitor destination. The images appear to show:

- Public seating and picnic bench areas.
- Commercially branded parasols and visitor facilities.
- A refreshment and bar trailer advertising beer, coffee and freshly squeezed orange juice.
- Publicly accessible visitor areas.
- Promotional material encouraging members of the public to visit the site.
- References to alcohol licensing arrangements and opening hours.

The accompanying social media commentary promotes the venue as being "open from about 12 midday" and states that "the alcohol licence is only till 8pm".

I fully appreciate that planning permission and alcohol licensing are separate regulatory regimes and that the existence of an alcohol licence would not in itself confer planning permission. Equally, I am not seeking to allege that a breach of planning control has occurred.

However, when considered alongside:

- The site's extensive planning history, including refused and withdrawn applications;
- Previous applications for Certificates of Lawfulness that were refused or dismissed on appeal;
- Previous licensing applications acknowledging that planning consent was still required;
- The current planning application seeking significant commercial and leisure uses of the land; and
- The apparent visitor-related activities currently taking place on the site,

it is difficult to reconcile the current use and operation of the site with the fact that planning permission for many of these uses has not, to my knowledge, been granted.

Whilst I make no allegation that a breach of planning control has occurred, I believe this raises an important and material planning consideration that warrants clarification before any further planning permission is determined.

To do otherwise risks undermining the very purpose of the planning process itself. Residents are entitled to have confidence that development proposals are subject to proper scrutiny and that land is not developed or used, in whole or in part, before the relevant permissions have been lawfully obtained.

I would therefore be grateful if the Council could confirm the following:

1. What is the existing lawful planning use of the site?
2. What planning permissions, lawful uses or consents currently authorise the structures, facilities and activities presently operating or visible on the land?
3. Is the Local Planning Authority satisfied that the current use of the land is lawful?
4. Has the Council considered whether the activities currently taking place on the site constitute a material change of use or otherwise require planning permission?
5. Will the existing use and operation of the site form part of the Council's assessment of planning application AWDM/0737/26?
6. Is the Council undertaking, or intending to undertake, any investigation into the current use of the site as part of its consideration of the application?

Given the scale and nature of the development proposed under application AWDM/0737/26, I believe it would be inappropriate for the application to be determined without first establishing precisely what activities are currently authorised on the land and whether the existing use accords with the lawful planning status of the site.

I would therefore welcome a substantive response to the points raised above and confirmation as to how these matters will be addressed as part of the determination of the application.

I have attached copies of publicly available photographs and social media posts referred to above for ease of reference.

I look forward to hearing from you.

Kind regards,

Marcus Randall

Address: 53 Ferring Lane, Worthing, BN12 6QS

Mobile:

From: Marcus Randall <

Sent: 14 July 2026 23:29

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

Subject: OBJECTION TO APPLICATION AWDM/0737/26

OBJECTION TO APPLICATION AWDM/0737/26

I object to application AWDM/0737/26 and respectfully request that planning permission be refused.

Whilst the proposal is described as regenerated land incorporating community green space and biodiversity benefits, it is, in reality, a

substantial commercial leisure and tourism development comprising vehicle parking (including overnight camping), food and drink provision, toilets and shower facilities, storage containers, children's recreational facilities, commercial advertising, renewable energy infrastructure, water extraction, animal attractions and associated visitor activity.

When considered cumulatively, the proposal would fundamentally change the character of this open coastal land and is wholly inappropriate for this location.

My objections are as follows:

1. Conflict with Worthing Local Plan Policy SS4 (Countryside and Undeveloped Coast)

The site lies outside the Built Up Area Boundary and within the countryside and undeveloped coast designation. The applicant has failed to demonstrate why such an extensive commercial leisure development requires this countryside location. Many of the proposed uses could be located within the existing built-up area of Worthing.

The scale and intensity of the proposed activities would adversely affect the character, tranquillity and openness of the site.

2. Conflict with Worthing Local Plan Policy SS5 (Goring-Ferring Local Green Gap)

The Goring Gap is specifically protected to preserve the physical and visual separation between settlements and to safeguard its environmental and landscape value.

This proposal introduces a significant number of commercial and operational elements including:

- Vehicle parking and overnight camping.
- Shipping containers.
- Food and drink concessions.
- Mobile toilet and shower facilities.
- Advertising structures.
- Children's play areas.
- Animal attractions.
- Renewable energy installations.
- Borehole water extraction.
- Tourism-related activities.

The cumulative impact of these proposals would urbanise the site and materially erode the openness and character of the Local Green Gap.

3. Overdevelopment of the Site

This is not a simple community green space proposal. It is a multi-use commercial leisure and tourism destination incorporating numerous independent uses and structures.

The applicant appears to have sought to package a wide range of commercial activities under the banner of biodiversity and community benefit. However, planning applications must be assessed on what is physically being proposed, not the terminology used to describe it.

The scale and diversity of uses proposed constitute overdevelopment of this open coastal site.

4. Highway Access and Parking Concerns

The proposal includes vehicle parking and overnight camping, yet there is insufficient information regarding:

- The number of vehicles anticipated.
- Parking arrangements.
- Vehicle access and manoeuvring.
- Peak visitor numbers.
- Deliveries and servicing arrangements.
- Emergency vehicle access.
- Measures to prevent overspill parking.

Without this information it is impossible to properly assess the impact on local highways or neighbouring residential areas.

5. Loss of Amenity, Noise and Light Pollution

The proposed combination of camping, food and drink provision, recreational activities, visitor facilities and commercial uses would inevitably increase:

- Noise levels.
- Visitor activity.
- Traffic movements.
- Light pollution.
- Waste generation.
- Disturbance to local residents and wildlife.

The application fails to adequately address how these impacts will be managed.

6. Insufficient Detail

The application description is extremely broad and lacks important detail. It remains unclear:

- How many visitors the site is expected to accommodate.
- The hours of operation.
- The scale of camping activities.
- The nature and size of temporary structures.
- The precise renewable energy proposals.
- The extent of food and drink provision.
- The operational management arrangements for the site.

Planning permission should not be granted for such a wide-ranging commercial proposal without clear and detailed information being provided.

7. Planning History

There is a significant planning history associated with this land, including applications that have been refused, withdrawn or dismissed on appeal.

The Local Planning Authority should give considerable weight to the cumulative planning history when determining this application and assess whether this proposal simply seeks to reintroduce previously unacceptable forms of development under alternative descriptions.

Conclusion

The proposal represents a substantial commercial leisure and tourism development that is wholly inappropriate within the Goring-Ferring Local Green Gap. It conflicts with the adopted Worthing Local Plan, would urbanise and intensify the use of open coastal land, and has failed to provide sufficient detail to properly assess its impacts.

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

Signed

Mr Marcus Randall

53 Ferring Lane

Worthing

Bn12 6qs

Sent from my iPhone