

From: **Claire Hunt** <claire.hunt@worthing.gov.uk>
Date: Wed, 1 Jul 2026 at 13:02
Subject: AWDMM/0737/26
To: Planning - <planning@adur-worthing.gov.uk>
Cc: Ian Davey <ian.davey@worthing.gov.uk>, Jasmine Watkins
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Hi there

I tried to submit this via the Planning Portal but during submission it said 403 Forbidden and then submission was greyed out? Please accept this as my objection to the above application and please ensure it shows on the online portal (!)

I objected as a Councillor and under Design, Highways Access and Parking, General Amenity, Other and Over Development

1. I believe the applicant is misinterpreting the Worthing Local Plan 2020-26. He cites page 20 1.44 which refers to unlocking the potential of key development sites some of which have been vacant or in poor condition for a number of years. He claims that his proposal represents 'the sustainable regeneration of a long-vacant site'. However, the Local Plan identifies exactly where key development sites are, having been established by evidence, consultation and strategic considerations. The applicant's site is not one of them so he is not, as stated, responding positively to the objectives of the Local Plan. My reading of the Local Plan pages 58-60, in particular SS4 and SS5, is that the application is actually contrary to and risks undermining the relevant policies.

2. SS4 clearly states that land outside the Built Up Area Boundary is defined as 'countryside and undeveloped coast'. The applicant's site is therefore within countryside and only development where a countryside location is essential to the proposed use should be considered. A countryside location is clearly not essential for the recreational uses proposed by the applicant, e.g. selling of food and drink, boules, croquet, sandpit, associated storage and power, management of waste, parking, overnight accommodation, advertising etc.

3. The applicant is asking for facilities and overnight camping for coastal recreation including kite surfers and sea swimmers, but SS4 states that built development to support recreation uses on the coast must be located within the adjacent Built Up Area Boundary and this site is not within those boundaries. Whilst the Applicant is proposing temporary structures rather than permanent buildings, planning case law has apparently established that even temporary or intermittent uses can be as much a material change of use of land as built/permanent uses if they significantly alter the character of the use of the land.

4. SS4 states that any development in the countryside should not result in a level of activity that has an adverse impact on the character or biodiversity of the area. I believe the uses proposed by the Applicant will have an adverse impact on the character and biodiversity of the area, which is an open green space much

appreciated and visited by residents and visitors (a form of low-impact public recreation), adjacent to a Local Wildlife Site.

5. SS5 defines the Goring-Ferring Gap as a local Green Gap informed by the Council's evidence base, especially the Landscape and Ecology Study, and a high proportion of respondents at each consultation stage. The applicant claims that his proposal is 'making best use of the town's unique seafront setting' but in my view his proposal for 'recessed' shipping containers, an Advertising trailer, car park for 150 cars, camper vans, food and drink structures, recreational facilities, toilets etc would start to undermine the visual character of the Green Gap as an open undeveloped space and to chip-away at its integrity as a distinct visual and physical break between Worthing and Ferring.

6. SS5 states any development in the Green Gap must conserve and enhance the benefits and services derived from the area's Natural Capital. The applicant wrongly states that the site is not adjacent or near to any Designated biodiversity sites failing to acknowledge that it is next to a designated Local Wildlife Site. He claims that his proposal will not affect any protected or priority species nearby but provides no evidence. He claims that his proposal will enhance biodiversity but mentions no baseline from which to measure that. In fact, he says he has cleared 90% of the original vegetation and retained only 10%. He refers to existing neglected and overgrown vegetation like brambles and scrub, failing to recognise their potential habit and wildlife benefit and providing little evidence of how he will conserve or improve on it except for the mention of additional tree and flower planting but with no detail. (The applicant claims that the application is exempt from Biodiversity Net Gain requirements giving the reasons that it is retrospective and that he made a Lawful Development Application before Feb 2024, an application which was refused. These legal points will no doubt be assessed and determined by the planning officers.)

7. It is my understanding that temporary and intermittent change of use applications that need planning permission must consider reversibility, impact on long-term land use, policy alignment, evidence of temporary need and design and quality. It is doubtful to me if the land will and can be successfully returned to its original condition, and the uses conflict with the long term strategic objectives for the land as part of both the councils' Local Plan and its Vision for Nature'. There is no evidence of need for this temporary use, on the contrary key local community groups and hundreds of local residents have expressed their opposition to this kind of development here. The existing public function of the land as part of the visual respite and low-key recreational pleasure of the area will be displaced and cannot coexist with the proposed use. The very simple sketch provided with the application and lack of precise detail about all the elements of the proposal make it very hard to guarantee final design and quality or even the number and position of stalls, vans and structures. Having visited the site, I doubt that 150 cars could be parked in the area marked on the sketch and when asked where the camper vans would go the same area was indicated 'or anywhere', indicating a lack of clarity and potential for vehicles moving around the licensed area of the site where the sandpit and children's activities are.

8. In my view the applicant selectively interprets the character of the site and its surroundings, the planning history and historical context. He stresses the land was

vacant, underused and neglected to support his faulty interpretation of it as a site suitable for regeneration and development, whereas the land functions as an open greenspace. Notwithstanding plans in the 1930s and the existence of some drainage and roads, the site has never had any actual residential development on it and there is documentary evidence that planning applications for housing in 1951 and 1954 were refused and upheld on appeal. It is my understanding that a) the latest Conservation Area Appraisal (produced for the council by an independent expert who gathers documentary and historical evidence) clearly states that the land use is and was agricultural and recreational and b) The planning team's rejection of the application for a Certificate of Lawfulness clearly stated that the application would 'involve a material change of use of the land, which was formerly agricultural'.

9. The applicant acknowledges the site is in a Flood Risk Zone but claims his proposal, which includes parking for 150 vehicles compacting the ground, will not increase flood risk elsewhere. He has no stated intention to dispose of surface water using Sustainable Urban Drainage but only through the 'existing water course'. I have not seen any assessment in the application of whether extracting water from a bore hole would have an adverse effect on the area's hydrology and we are in a water-stressed region.

10. The applicant claims the proposal will reduce parking pressure in the area but the provision of parking space will attract drivers, actually generating increased traffic on often congested Marine Crescent and adjacent roads.

11. Introduction of overnight camping will have a visual impact as stated above, and may also encourage additional roadside overnighting, which is already on the increase, and risks increasing incidents of waste disposal from camper vans into water courses and the sea.

Many thanks

Claire

Councillor Claire Hunt

Goring Ward

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