

Gary Peck

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Sir,

OPENING STATEMENT – BACKGROUND – PLANNING APPLICATION
AWDM/0737/26

1. **The Goring Gap** (also called the Goring-Ferring Gap) straddles across the boundary of **Arun** and of **Adur/Worthing** districts.
2. The **Arun Local Plan (2018)** includes policies on “gaps between settlements” within spatial strategy. These policies are supportive of an intent to keep settlements separate and protect open land between them as in this case between Ferring and Goring. Local input implies that development of the gap is excluded “in principle” on the Arun side.
3. The **Adur/Worthing Local Planning Context** - Adur is just East of Worthing, but the Gap is mainly addressed in Worthing’s policies which Adur & Worthing jointly administer. I note that:
 - a. The Gap (Goring – Ferring) is formally identified as a “Local Green Gap”
 - b. Local Green Gaps are designated to:
 - i. Keep villages and towns physically separate.
 - ii. Protect landscape character, openness and green infrastructure.
 - c. Parts of the Gap are also treated as “Local Green Space” with extra protection like the Green belt.
 - d. Worthing/Adur planning policy explicitly designates the Goring Gap as protected open land to prevent development of urban sprawl.
 - e. The **Worthing Local Plan**¹ 2020-2036 (adopted March 2023) is the statutory development plan used to determine this application and as such it sets policies on:
 - i. Land use and regeneration
 - ii. Environmental protection and biodiversity
 - iii. Open space and coastal areas
 - iv. Sustainable transport and energy

¹ Hereinafter **referred** to as the WLP (2023)

4. **Combined Effect.** As a result of the intent of both plans across both sides of the boundary:
- a. The Goring-Ferring Gap is deliberately protected land.
 - b. Its main planning purposes are:
 - i. Prevent merging of settlements (coalescence).
 - ii. Maintain open coastal landscape.
 - iii. Provide green infrastructure and biodiversity value.
 - c. Development is heavily restricted and generally resisted in principle.

THE APPLICATION AWDM/0737/26 – GENERAL COMMENTS

5. The application provides an extensive list of potential uses, activities and intents with a complementary list of possible equipment and infrastructure developments needed to operate and maintain the site.
6. There are no explanatory diagrams of the site location, proposed plans, current or future elevations to substantiate, illustrate or explain his application. The applicant's supplementary statement provides his view of the impact of the application on the Adur/Worthing Local Plan (**WLP 2023**). Consequently, it is extremely difficult to accurately assess the coherence and practicability of this application. See my comments and rational objections below:

OBJECTIONS AND REASONS FOR REFUSAL – Reference WLP 2023

7. Objection 1 – Harm to Undeveloped Coast (Policy SS4)

- The proposed development, by reason of the introduction of a wide range of built form and uses including vehicle parking, overnight camping, shipping containers, mobile structures, advertising trailer, and associated operational development, would result in the **intensification and urbanisation of a site within the undeveloped coastal area**.
- This would fail to conserve the **open, undeveloped character of the coast**, which is identified as a protected spatial designation under the Worthing Local Plan (**WLP 2023**).
- The proposal is therefore **contrary to Policy SS4 (Countryside and Undeveloped Coast)** of the **WLP (2023)**, which seeks to protect such areas from inappropriate development.

8. Objection 2 – Loss of Openness and Harm to Green Space (Policies SS5 and SS6)

The development introduces a range of permanent and semi-permanent structures and mixed commercial and recreational uses which would materially reduce the openness of the site and alter its character from open land to an intensively used mixed-use destination.

The proposal would therefore:

- erode the openness and function of the site as part of the wider green infrastructure network, and
- introduce uses that are not compatible with the protection of open space.
- As such, the proposal is **contrary to Policies SS5 (Local Green Gaps) and SS6 (Local Green Space) of the WLP (2023)**, which seek to **retain openness and prevent inappropriate development within such areas**.

9. **Objection 3 – Poor Design Quality and Visual Harm (Development Management Policies)**

- The cumulative impact of the proposed development, including shipping containers, temporary structures, advertising trailer, flagpoles, and associated infrastructure, would result in a **visually cluttered, incoherent and low-quality form of development**.
- The proposal fails to demonstrate a **well-designed, cohesive scheme that responds positively to the character of the coastal environment**, resulting in harm to the visual amenities of the area and local distinctiveness.
- The development is therefore **contrary to the design and place-making objectives of the WLP (2023)**, as set out within its Development Management policies, which require high-quality and contextually appropriate design.

10. **Objection 4 – Unjustified and Incompatible Mix of Uses**

- The proposal incorporates a wide range of uses, including commercial activity, recreational space, overnight camping, parking, animal entertainment, and food and drink provision, without demonstrating that these uses are **functionally related, compatible, or appropriate to this coastal location**.
- The scale and diversity of uses would result in an **over-intensive and incoherent form of development**, failing to respect the character and function of the site.
- The proposal is, therefore, **contrary to the spatial strategy and overall development principles of the WLP (2023)**, which require development to be appropriate to its location and contribute positively to the planned pattern of land uses.

11. **Objection 5 – Unsustainable Development and Transport Impacts (Policy SP2)**

- The proposed provision of car parking and overnight camping would encourage **increased private vehicle use and on-site activity in a sensitive coastal location**, without sufficient justification in sustainability terms.

- The proposal fails to demonstrate that it would deliver a **sustainable pattern of development**, having regard to its transport implications and environmental impact.
- It is, therefore, **contrary to Policy SP2 (Climate Change)** of the **WLP (2023)**, which seeks to ensure development contributes to sustainable development and addresses environmental constraints.

12. Reason 6 – Failure to Protect Environmental Quality

The Local Plan seeks to **protect and enhance the valued qualities of the environment**, including coastal landscapes and open spaces.

By virtue of the scale, intensity, and form of development proposed, the application would:

- fail to conserve the environmental quality of the site, and
- introduce harmful visual and functional impacts inconsistent with its coastal setting.
- The proposal is therefore **contrary to the overarching environmental objectives of the WLP (2023)**.

Summary of my Objections and Proposed Reasons for refusal

In summary I object to the application, with reference to **WLP 2023**, due to:

- **Conflict with spatial protection of the undeveloped coast (SS4).**
- **Loss of openness of green land (SS5 / SS6).**
- **Poor design and visual harm.**
- **Over-intensive and incoherent mix of uses.**
- **Unsustainable transport and environmental impacts.**
- **Failure to Protect Environmental Quality.**

Yours sincerely

Mark Turner (Ferring Resident), Sunflower House, Sea Lane Ferring BN12 5

01 July 2026