

Objection to Planning Application [AWDM/0737/26]

Land South East Corner Of Amberley Drive Marine Drive Worthing West Sussex

Dear Planning Department,

I am writing to formally object to the above application. Having reviewed the submitted proposals, I consider that the development conflicts with the adopted development plan and would cause material harm to a designated and highly valued open space. My objection rests on planning grounds, set out below.

1. Conflict with the adopted development plan -Local Green Gap

The application site lies within the ****Local Green Gap**** as designated in the adopted Worthing Local Plan. The purpose of this designation is to keep the land between Goring and Ferring open and undeveloped, to prevent the two settlements coalescing, and to preserve their separate identities. This protection was carefully considered and confirmed through the Local Plan examination, where it was retained as a green gap following independent scrutiny.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The proposals are, in my view, fundamentally at odds with the development plan. They would introduce a concentration of commercial activity, built structures and intensified use onto land whose designated function is precisely to remain open and free from such development. I am aware of no material consideration that would justify a departure from the plan in this case.

2. Loss of openness and cumulative urbanisation

The application seeks consent for a wide range of structures and uses, including vehicle parking and overnight camping, food and drink provision from temporary units, mobile welfare facilities, recessed shipping containers, an advertising trailer, six-metre flagpoles, decorative features, a sandpit and play mound, animal-based visitor attractions, solar installations and a borehole.

Assessed individually, some elements may appear minor. The correct planning test, however, is their cumulative effect -and taken together they amount to the progressive urbanisation of an open, undeveloped site. *Openness* is the defining quality the Local Green Gap exists to protect, and it is harmed by the introduction of structures, vehicles, overnight occupation and commercial paraphernalia regardless of whether each item is individually modest. The proposal would, in combination, transform open green space into a commercial leisure operation. I would ask that the cumulative impact be assessed in the round rather than as a series of isolated features.

3. Landscape character and the setting of the South Downs National Park

The site forms part of the open coastal-plain landscape that provides the visual break

between Goring and Ferring and contributes to the setting of the South Downs National Park, including views from Highdown Hill. The proposed structures and installations - containers, an advertising trailer, flagpoles, catering units and associated clutter - would introduce a distinctly commercial and engineered appearance into an area that currently reads as open and natural.

This would erode the landscape character the designation is intended to preserve and would be harmful to the setting of the National Park. The NPPF requires great weight to be given to conserving landscape and scenic beauty in and around National Parks, and the cumulative visual intrusion here runs directly counter to that.

4. Biodiversity and ecological impact

While the application refers to retaining land for biodiversity, the activities proposed are likely to harm local habitats and wildlife rather than support them. Increased visitor numbers, vehicle movements, overnight stays, artificial lighting and sustained human activity would be expected to cause habitat disturbance, light pollution, noise and pressure on existing wildlife.

The proposed use of animals as a visitor attraction within the gap is of particular concern from an ecological standpoint, introducing further disturbance into a sensitive open environment. I would expect a proposal of this nature to be supported by a proper ecological assessment and a demonstrable biodiversity net gain; the application does not provide the information needed to show that habitats and protected species would be safeguarded.

5. Highways, parking and overnight occupation

The proposal to provide vehicle parking and overnight camping aimed at recreational visitors would generate additional traffic on local roads that are not suited to it, with associated concerns regarding highway safety, congestion, noise, waste and littering, and conflict with existing users of the area. Local traffic impact has already been recognised as a material concern in relation to development pressure on this gap. The application contains no adequate transport or management information to demonstrate how these impacts would be controlled or mitigated.

6. Residential amenity

The intensification of use -overnight occupation, commercial operation, vehicle movements and outdoor activity -is likely to give rise to noise, disturbance, light pollution and waste-management issues affecting the amenity of nearby residents and the tranquillity of the area. These impacts are not addressed in any meaningful way within the submission.

7. Insufficient information to assess the proposals

A recurring and significant weakness of the application is the absence of supporting detail. The reference to generating "natural green energy, for example solar," provides no

information on the scale, infrastructure, siting, operation, visual impact or environmental implications of any installation. The borehole proposal is similarly unsupported by hydrological or environmental detail. The same lack of design information, technical justification and implementation detail applies across several elements of the scheme.

This is itself a sound planning reason for concern: where the submitted information is inadequate to allow the likely impacts to be properly assessed, the Council cannot be satisfied that the development would be acceptable, and on a precautionary basis the proposal should not be supported.

8. Incremental erosion of a protected gap

The Local Green Gap performs its function only while it remains open. Permitting a cluster of commercial and built uses of this kind would represent a material step in the incremental erosion of that openness and risks setting a precedent for further intensification on land the development plan intends to keep undeveloped. The permanence and cumulative direction of travel of such changes is a legitimate planning consideration in assessing the application.

Conclusion

The cumulative effect of the proposed activities would be to convert protected open green space into a commercial leisure destination, contrary to the purpose and policy of the Local Green Gap designation, harmful to landscape character and the setting of the South Downs National Park, and damaging to biodiversity, tranquillity and openness. The application is also unsupported by the information needed to assess several of its key elements.

For these reasons I object to the application and respectfully request that the Council refuses permission and upholds the protection afforded to this land by the adopted Worthing Local Plan.

Yours faithfully,

Andrew Young
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