

From: **Andrew Young**

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Subject: Objection to AWDM/0737/26 - Response to additional commentary

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

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Objection to Planning Application AWDM/0737/26

Land South-East Corner of Amberley Drive / Marine Drive, Goring Gap, Worthing

Andrew Young

12 Ilex Way, Goring by Sea

13/08/26

To the Planning Case Officer, Adur & Worthing Councils

Re: Objection to Planning Application AWDM/0737/26 – Land South-East Corner of Amberley Drive/Marine Drive, Goring Gap

I am writing to formally object to the above application. I live locally and use the Goring-Ferring Gap regularly - for walking, for the open sea views it preserves between Worthing and Ferring, and simply as one of the few remaining stretches of undeveloped coastal land in this part of the borough. I have followed this application, and its predecessors on the same parcel of land, closely, and I want to set out why I believe it should be refused.

I am aware that other local residents have already raised detailed objections to the applicant's most recent submission, in particular its reliance on Brooklands Park as a comparator. I share those concerns, but rather than repeat them I want to draw the Council's attention to three further matters which I believe are directly relevant to determining this application: the actual policy status of Brooklands Park, the Council's own recent management direction at Brooklands, and the planning history of this specific site - which I do not think can be set aside when assessing what is currently being proposed.

1. The policy correction: this is an SS5 matter, not an SS4 matter

For the avoidance of doubt, the relevant development plan policy is Policy SS5 (Local Green Gaps), not Policy SS4 (Countryside and Undeveloped Coast). The adopted Worthing Local Plan text is explicit that the Goring-Ferring Gap, Chatsmore Farm, Brooklands Recreation

Area and abutting allotments, and land east of the Upper Brighton Road development are the four designated Local Green Gaps, and that:

“Outside of those areas designated as Local Green Space, all applications for development... within Local Green Gaps must demonstrate that individually or cumulatively: (i) it would not undermine the physical and/or visual separation of settlements; (ii) it would not compromise the integrity of the gap; (iii) it conserves and enhances the benefits and services derived from the area's Natural Capital; and (iv) it conserves and enhances the area as part of a cohesive green infrastructure network.” (Worthing Local Plan 2020–2036, Policy SS5, as confirmed in the Council's Schedule of Main Modifications, adur-worthing.gov.uk)

This application must be judged against those four tests, on this site, not against a general proposition that recreation is supported somewhere in the Local Plan.

2. Brooklands is not just a different site - it sits under a different, and stricter, policy altogether

This is the point I think has been missed so far, and it matters. The same Local Plan text that designates Brooklands Recreation Area as a Local Green Gap under Policy SS5 also designates it, separately, as Local Green Space under Policy SS6 - and Policy SS6 states plainly:

“Brooklands Recreation Area is designated as Local Green Space. Any proposals for development within this area will be considered in accordance with national planning policy for Green Belt.” (Worthing Local Plan 2020–2036, Policy SS6, adur-worthing.gov.uk)

That is a materially stronger protection than the four SS5 tests alone, since national policy on Green Belt (and land treated equivalently to it) requires “very special circumstances” before inappropriate development is permitted. Indeed, the wording of Policy SS5 itself carves Local Green Space out of its own general test - the SS5 criteria above apply “outside of those areas designated as Local Green Space.” In other words, Brooklands is not simply “a Green Gap where recreation happens to be tolerated.” It is a site with an additional, higher tier of protection that this application site does not have and is not claimed to have.

Any facility that exists or has been consented at Brooklands has therefore had to clear a materially higher bar than the one the applicant is asking this Council to apply here. Relying on Brooklands as evidence that SS5 alone can accommodate a commercial leisure use gets the comparison backwards.

3. The Council's own direction of travel at Brooklands has been to remove built leisure infrastructure, not add it

It is also worth the Council noting what has actually been happening at Brooklands in recent years, because it cuts against the applicant's argument rather than supporting it. The Council's own current description of Brooklands Park no longer centres on the built commercial attractions historically associated with the site; it now describes a café, an

adventure play area, a multi-use outdoor space, a contemplative garden along Teville Stream, an accessible circular pathway and fitness trail, and - significantly - “glades on former golf course,” including a community garden, a play-and-build zone and nature glades, created as part of restoration works to the lake and Teville Stream. (Brooklands Park and Lake, adur-worthing.gov.uk)

In other words, where Brooklands previously had a golf course, the Council's own recent investment has been to naturalise it back into habitat and informal green infrastructure, not to intensify built commercial leisure use. That is the opposite trajectory to the one proposed for this application site. If Brooklands demonstrates anything about the Council's approach to development within a Local Green Gap, it demonstrates a preference for reducing built leisure infrastructure in favour of habitat and passive recreation - not for introducing a new commercial leisure operation onto previously open land.

4. The planning history of this specific site is directly relevant, and should not be set aside

Government guidance is clear that “the planning history of a site may be a relevant consideration in the determination of an application” (Determining a planning application, gov.uk). I would ask the Council to apply that principle here, because the history of this particular parcel is unusually informative.

This is not the first attempt to establish a commercial use on this land, and it has not, on the public record, proceeded smoothly:

- In 2016, a change of use application for a 46-pitch caravan and camping site on this same land was refused, following what the Ferring Conservation Group has recorded as over 400 objections from residents (Ferring Conservation Group).
- Two Planning Inspectorate appeals relating to the lawful use of this land - references APP/M3835/X/24/3340940 and APP/M3835/X/24/3341674 - were both dismissed, with the decision issued on 17 December 2024, as recorded in the Council's own committee papers (Adur & Worthing Councils democracy documents).
- A further application, AWDM/0099/24, seeking permission for a large children's sandpit, gazebos, boundary fencing, food and beverage concessions, CCTV and parking on this land, was refused by the Council on 18 March 2025.
- Despite that refusal, works reportedly began on site on 15 May 2025 - including excavation for a sandpit, and installation of a tumble mound, a boules area, a bar facility and flagpoles - prompting the Council to write to the landowner “for clarification about what he is doing there” and to state it would “consider whether any enforcement action is necessary” (Sussex Express, 16 May 2025).

I raise this not to make an accusation, but because it is directly relevant to how the Council should read the current application. The pattern on this site has been: works proceed, sometimes ahead of or despite a decision, and permission is then sought or re-sought to

formalise what is already, or is becoming, established fact on the ground. I do not think the Council can properly assess whether this proposal is “modest,” “seasonal” and “largely reversible” without also weighing that history, and without satisfying itself that what is currently operating on the site is lawful before considering whether to permit more.

5. What is actually operating on the site now should inform the Council's assessment

On that point, I would ask the Council to look at what the operator's own public-facing material currently describes, because it goes well beyond the modest characterisation used in the application. As of this month, the operator's own website advertises a seasonal bar and hospitality operation open Friday to Sunday, offering a bar serving beer, wine, spirits and cocktails, coffee, ice cream and soft drinks, on-site catering, parking for up to 150 vehicles, toilet facilities, CCTV and on-site security, and ticketed public events (goringgap.co.uk). That is a substantial, actively marketed commercial leisure and hospitality operation, not an incidental or trial use. I would ask the Council to test the application's description of impact against that reality, rather than against the more limited description put forward in the planning statement.

6. Conclusion

The applicant's Brooklands comparison does not withstand scrutiny. Brooklands benefits from an additional layer of protection - Local Green Space status under Policy SS6, assessed against national Green Belt policy - which this application site does not have. The Council's own recent investment at Brooklands has, if anything, been to reduce built commercial leisure infrastructure in favour of habitat and passive green infrastructure. And the planning history of this specific site - a refused 2016 application, dismissed 2024 lawfulness appeals, a refused 2025 application, works reported to have proceeded regardless, and a now well-established commercial operation trading on the strength of successive applications - is, by the Council's own guidance, a material consideration that should weigh against this application, not be set aside in favour of it.

I would ask the Council to:

- Refuse this application as contrary to Policy SS5, for the reasons set out above and in other residents' objections;
- Give the Brooklands comparison little or no weight, given that Brooklands is subject to a materially different and stronger policy protection under SS6;
- Treat the planning history of this site, including the outcome of the 2024 Planning Inspectorate appeals and the 2025 refusal of AWDM/0099/24, as a material consideration in determining this application, in line with government guidance; and
- Satisfy itself as to the lawfulness of the activity currently taking place on the site, including through enforcement inquiries if necessary, before determining whether to permit further or expanded use.

I would be grateful if you could confirm receipt of this objection and keep me informed of the progress of the application.

Yours faithfully,

Andrew Young

Sources referred to above

- Worthing Local Plan 2020–2036, Policy SS5 and Policy SS6 - [adur-worthing.gov.uk/media/Media,167313,smxx.pdf](https://www.worthing.gov.uk/media/Media,167313,smxx.pdf)
- Brooklands Park and Lake, Adur & Worthing Councils - [adur-worthing.gov.uk/parks/find/worthing/brooklands-park](https://www.worthing.gov.uk/parks/find/worthing/brooklands-park)
- Goring Gap caravan and camping site application (2016, refused), Ferring Conservation Group - feringconservationgroup.co.uk/goring-gap-caravan-and-camping-site-planning-application/
- Appeal Decisions APP/M3835/X/24/3340940 & 3341674, Adur & Worthing Councils committee papers - democracy.adur-worthing.gov.uk
- “Goring Gap works: Council asks landowner for clarification...”, Sussex Express, 16 May 2025
- Goring Gap operator's website (current facilities, hours, events) - goringgap.co.uk
- “Determining a planning application”, [GOV.UK](https://www.gov.uk) Planning Practice Guidance - [gov.uk/guidance/determining-a-planning-application](https://www.gov.uk/guidance/determining-a-planning-application)

