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Fwd: objection to application AWDM/0737/26

1 message

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10 July 2026 at 16:13

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

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From: **stephen king** <[REDACTED]>
Date: Fri, 10 Jul 2026 at 15:56
Subject: objection to application AWDM/0737/26
To: planning@adur-worthing.gov.uk <planning@adur-worthing.gov.uk>

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Dear Planning Officer,

I am writing to object to planning application **AWDM/0737/26**, which seeks permission for a wide-ranging commercial, recreational and leisure use of this currently undeveloped coastal land, including vehicle parking and overnight camping, food and drink sales, shipping containers, toilets and showers, children's play facilities, animals used for entertainment, flagpoles, advertising, solar-energy infrastructure and a borehole.

My objection is based on material planning considerations and the conflict between the proposed development and the adopted Worthing Local Plan. Under section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework is also a material consideration.

The proposal should be assessed as a whole. Although aspects of it are described as temporary, mobile, recessed or community-focused, the cumulative effect would be to introduce a substantial commercial and recreational operation into an open and sensitive coastal landscape.

Principle of Development and the Local Green Gap

The application site lies within the **Goring–Ferring Local Green Gap**, which is specifically protected by Policy SS5 of the Worthing Local Plan. Development within the gap must not undermine the physical or visual separation of settlements, compromise the integrity of the gap or fail to conserve and enhance its natural capital and green infrastructure.

Policy SS4 also protects the countryside and undeveloped coast. Although appropriate coastal recreation may be supported, the policy states that associated built facilities should normally be located within the adjacent built-up area and that development should not generate activity that adversely affects the character or biodiversity of the countryside or undeveloped coast.

The combination of overnight vehicle parking and camping, commercial food and drink provision, toilets and showers, storage containers, an advertising trailer, flagpoles, play structures, animals, waste storage and renewable-energy equipment would represent a significant intensification of the site. It would change the land from an open coastal green space into a managed commercial leisure destination.

The use of the term "regenerated land" in the application description does not alter the site's development-plan designation or its existing open character. The relevant question is whether the proposed use and associated structures preserve the function, openness, appearance and environmental value of the Local Green Gap. In my view, they plainly do not.

Previous Planning Inspectorate decisions relating to this site established that the proposed leisure activities represented a material change of use and that a substantial storage container constituted development requiring

express planning permission. Although those decisions concerned lawfulness rather than the planning merits, they confirm that these activities and structures cannot reasonably be regarded as merely incidental or inconsequential.

Design and Landscape Character

The proposed development would be out of keeping with the open, undeveloped and predominantly natural character of this part of the coastline.

The two shipping containers, two six-metre flagpoles, five-metre advertising trailer, mobile toilets, shower facilities, food structures, bin storage, play facilities, solar installations and other equipment would collectively create substantial visual clutter. Recessing the containers may reduce part of their height, but it would not remove their visual impact or the engineering works, access arrangements and activity associated with them.

The advertising trailer and flagpoles would introduce overtly commercial features into a landscape where openness and visual separation are central to the planning designation. The development would materially urbanise the site and erode its tranquillity and distinctive undeveloped coastal character.

Policy DM5 requires development and changes of use to respect and enhance local character, respond positively to the surrounding landscape and avoid unacceptable effects arising from noise, vehicle movements and activity. The National Planning Policy Framework states that development that is not well designed should be refused, particularly where it fails to reflect local design policies and landscape character.

The application should be supported by a comprehensive **Landscape and Visual Impact Assessment**, including verified viewpoints from the beach, Marine Drive, Amberley Drive, public paths and the wider Goring Gap. The assessment must consider the complete development during both daytime and night-time conditions, rather than considering each individual structure in isolation.

Highways, Parking and Access

The proposal would generate additional vehicle movements associated with visitors, overnight campers, kite surfers, sea swimmers, staff, food and drink deliveries, waste collection, toilet servicing, animal transport and site maintenance.

The coastal location already attracts pedestrians, cyclists, dog walkers, beach users and other vulnerable road users. Introducing a vehicle parking and overnight camping facility without clearly defined traffic and pedestrian controls creates a significant risk of conflict between vehicles and people accessing the beach and surrounding green space.

The application description does not provide sufficient clarity regarding:

- the number of vehicle and camping spaces;
- expected daily and peak visitor numbers;
- the duration and frequency of overnight stays;
- access and exit arrangements;
- visibility splays and vehicle manoeuvring;
- pedestrian crossings or segregated pedestrian routes;
- disabled access;
- cycle parking;
- delivery and servicing arrangements;
- emergency-vehicle access;
- management of queues or vehicles waiting to enter;
- management during busy summer periods or local events.

Policy DM15 requires development to provide safe and suitable access, appropriate parking and priority for sustainable and active travel. Paragraphs 115–118 of the National Planning Policy Framework similarly require safe and suitable access for all users, priority for pedestrians and cyclists and the minimisation of conflict between vehicles and vulnerable road users. Development may be refused where there would be an unacceptable impact on highway safety.

The application should not be determined without a proportionate **Transport Assessment or Transport Statement**, parking-capacity assessment, pedestrian-safety assessment and detailed site-management plan. These assessments should examine peak summer use and the cumulative impact of parking, camping, commercial activity and beach-related traffic.

Public Safety and Security

The proposal involves overnight camping, food and drink provision, showers, toilets, children's facilities and animal-related activities on a site that is currently poorly lit and has limited controlled access.

There is an inherent conflict between providing sufficient lighting to make the site safe for overnight and evening users and retaining the dark, undeveloped character of the site. The application does not demonstrate how visitors, including children and vulnerable users, would safely move between the site, parked vehicles, facilities and the beach without extensive external lighting.

There also needs to be clear information regarding site supervision, emergency procedures, first-aid provision, fire safety, emergency access, safeguarding, security, hours of operation and arrangements for dealing with antisocial behaviour or unauthorised overnight occupation.

The absence of these details prevents the council and local residents from properly assessing whether the proposed use can operate safely.

Residential Amenity, Privacy, Light and Noise

The principal amenity concerns are noise, artificial lighting, vehicle headlights, late-night activity and the intensity of the proposed use.

Overnight camping, vehicle arrivals and departures, food and drink provision, children's play, animals, showers, waste collection, deliveries and general visitor activity have the potential to produce noise during the early morning, evening and night. Even where individual activities appear modest, their combined and repeated impact could substantially alter the existing quiet character of the area.

Vehicle headlights and any lighting associated with parking, toilets, showers, catering structures, advertising, security and pedestrian routes would introduce artificial light into an area that is currently characterised by relatively low levels of illumination.

Policy DM22 states that development should not result in unacceptable pollution from noise or artificial light and requires appropriate assessments and mitigation where impacts may arise. Paragraph 198 of the National Planning Policy Framework requires development to minimise noise, protect tranquil areas and limit the effect of light pollution on local amenity, intrinsically dark landscapes and nature conservation. Government planning guidance also recognises that artificial lighting can affect wildlife, landscape character and highway safety.

The council should require:

- a professional Noise Impact Assessment covering daytime and night-time activity;
- a detailed Lighting Impact Assessment with lux-contour plans;
- details of the number, height, direction, colour temperature and operating hours of all lights;
- an ecological lighting assessment;
- proposed operating hours and visitor-capacity limits;
- controls over amplified sound, events, generators, deliveries and waste collection;
- details of how vehicle headlights would be screened without enclosing or urbanising the landscape.

Without this information, the council cannot reasonably conclude that neighbouring amenity, tranquillity or the night-time environment would be protected.

Ecology, Biodiversity and Wildlife

The Goring–Ferring Gap forms part of an important area of green infrastructure, and the wider gap is identified in the Local Plan as **Local Wildlife Site W12**. The application therefore requires particularly careful consideration of ecological effects.

Potential effects include disturbance from people, vehicles, dogs, overnight occupation, artificial lighting, noise, animals, ground excavation, containers, drainage works, soil compaction and the proposed borehole. These activities may affect nesting and foraging birds, bats, reptiles, invertebrates, small mammals, vegetation and the wider function of the site as a wildlife corridor.

Describing part of the land as being retained for biodiversity does not demonstrate that the development would protect biodiversity. The council must assess the effect of the entire operation, including increased visitor pressure and disturbance around any retained habitat.

Policy DM18 requires applications to be supported by relevant and up-to-date ecological information and applies the mitigation hierarchy: harm should first be avoided, then mitigated and only as a last resort compensated. Policy DM19 requires the protection and enhancement of green infrastructure. Paragraph 193 of the National Planning Policy Framework states that permission should be refused where significant biodiversity harm cannot be avoided, adequately mitigated or compensated.

Before the application is determined, the council should require:

- an up-to-date Preliminary Ecological Appraisal;
- any necessary protected-species surveys undertaken during appropriate survey seasons;

- an assessment of impacts on the Local Wildlife Site and ecological connectivity;
- a Biodiversity Net Gain assessment and statutory metric, where applicable;
- a long-term habitat-management and monitoring plan;
- an ecological lighting strategy;
- details of measures to prevent disturbance, pollution, trampling and habitat fragmentation.

The council also has a statutory duty to have regard to conserving and enhancing biodiversity when exercising its planning functions.

Landscaping, Trees and Soils

The development cannot simply be made acceptable through additional screening. Dense planting, fencing or bunding intended to hide the containers, parking and commercial structures could itself change the open character of the Local Green Gap and interfere with important views through the landscape.

The proposed tree-shaded sandpit, tumble-down mound, recessed containers, vehicle areas and borehole may involve excavation, imported material, changes to levels and soil compaction. These works require proper assessment.

A detailed landscaping scheme should identify existing and proposed trees, planting species, changes in ground levels, hard surfacing, boundary treatments and long-term maintenance. Any planting should use suitable native species and must not be relied upon to justify development that is fundamentally inappropriate in this open coastal location.

Borehole, Water Resources and Drainage

The proposed borehole and extraction of natural water could potentially affect groundwater levels, groundwater quality and water-dependent habitats. No information is provided about the depth, anticipated extraction volume, purpose, pumping equipment or potential effects on nearby land and ecology.

The showers, toilets, food and drink operations, animals and overnight camping would also generate foul water, surface water and potential sources of contamination.

Policy DM21 requires development to protect groundwater, water quality, water resources and aquatic ecology. The application should therefore be supported by a hydrogeological assessment, drainage strategy and details of water supply, foul-water disposal, toilet servicing, spill prevention and pollution-control measures.

Given the coastal location and proposed overnight occupation, the council should also establish whether a site-specific Flood Risk Assessment and emergency evacuation plan are required.

Waste, Servicing and Animal-Related Impacts

Food and drink sales, overnight camping, toilets, showers and animals would create general waste, food waste, sanitary waste and potentially animal waste. These activities could result in odour, litter, pests and additional servicing movements unless carefully controlled.

The application should provide a detailed operational-management plan covering waste storage and collection, toilet and shower servicing, cleaning, animal numbers and accommodation, manure management, delivery hours, pest control and restoration of the land.

Animal welfare legislation and other licensing regimes are separate from planning control. Nevertheless, the land-use consequences of keeping animals—including shelters, fencing, feed storage, waste, noise, visitor activity and vehicle movements—are directly relevant planning considerations and must be assessed.

Advertising Trailer and Flagpoles

The wheeled advertising trailer measuring approximately five metres by 2.5 metres, together with the six-metre flagpoles, would introduce prominent commercial signage into an open coastal landscape.

Policy DM6 requires advertisements to respect the character and appearance of their surroundings and not create a public-safety hazard. The trailer and flags could create visual clutter and potentially distract road users close to the site access.

The applicant should provide scaled elevations, materials, colours, wording, illumination details and visibility assessments. Any requirement for separate advertisement consent should also be addressed.

Lack of Clarity and Enforceability

The application description contains vague and open-ended terminology, including:

- “commercial use”;
- “recreational and leisure use”;
- “overnight camping use”;
- “temporary structures”;
- “animals to use for entertainment purposes”;
- “for example solar”;
- “local events and tourism”.

It does not define the maximum number of visitors, camping vehicles, structures, animals or events; the proposed operating hours; the frequency of commercial activity; or whether amplified music, generators or evening events are anticipated.

Planning permission must be based on clear, accurate and enforceable proposals. The current description appears capable of accommodating a much wider and more intensive operation than may be suggested by the term “community green space”.

The council should not grant an open-ended permission and attempt to resolve fundamental uncertainties through conditions. The applicant should first provide a precise schedule of activities, scaled plans, operational limits and all necessary technical assessments, followed by further public consultation.

Conclusion

The claimed community, recreational and renewable-energy benefits do not outweigh the substantial conflict with the adopted development plan or the likely harm arising from the development.

The proposal would:

- undermine the purpose, openness and visual integrity of the Goring–Ferring Local Green Gap;
- urbanise and commercialise a sensitive section of undeveloped coastline;
- introduce inappropriate structures, advertisements and visual clutter;
- generate additional traffic and create potential conflict with pedestrians and other vulnerable road users;
- introduce noise, vehicle headlights and artificial lighting into a relatively tranquil and dark environment;
- risk disturbance and harm to wildlife, habitats and ecological connectivity;
- raise unresolved concerns regarding drainage, groundwater, waste, servicing and public safety;
- provide insufficient detail to allow its effects to be properly assessed or controlled.

I therefore respectfully request that planning application **AWD/0737/26 be refused** as being contrary to Policies **SS4, SS5, DM5, DM6, DM15, DM18, DM19, DM21 and DM22** of the Worthing Local Plan and the relevant provisions of the National Planning Policy Framework.

Should the council not be minded to refuse the application at this stage, it should at minimum defer determination until the applicant has submitted comprehensive landscape, transport, ecological, lighting, noise, drainage, groundwater, flood-risk and operational-management assessments and these have been subject to further public consultation.

Stephen King

Neighbour

30 sea Lane

Ferring