

24 May Close
Climping
BN17 5TF



BY HAND
7 June 2018

FAO Case Officer Michael Eastham

Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF



Dear Mr Eastham

Re: Arun district planning application CM/13/18/OUT

**Location: Land to West of Church Lane, South of Horsemere Green Lane
Climping
Parish: Climping**

I write in order to comment on the above-mentioned planning application by Parker Dann (Suite S10, The Waterside Centre, North Street, Lewes, BN7 2PE) on behalf of Mulgrave Properties LLP (Hawk Creative Business Park, Hawkhill Estate Easingwold, York, YO61 3FE).

Summary

We oppose the above-mentioned application for, briefly, the following reasons:

1. the application proposes to unreasonably and unjustifiably double the parish population size contrary to the agreed local plan for Climping;
2. grant of the application would permanently alter the nature of Climping parish from a rural area to an area comprising a large suburban enclave whose further expansion would be entirely predictable;
3. the application simply ignores the Climping local plan, which is the only authoritative plan with legal basis under the Localism Act 2011 for this area;
4. the application does not provide or plan for the necessary transport infrastructure;
5. the application does not provide or plan for the necessary medical (GP) services and school provision; and
6. The application would necessitate damage to the environment and permanent destruction of valuable farmland.

Size of Parish

According to the most recent census there are 717 residents of Climping parish.

The proposed development is materially unchanged from the previous application and numbers 300 houses.

A conservative, and unreasonable, estimate of an average of two residents per house would therefore nearly double the size of the population of the parish. A more realistic estimate (though still on the low end) of an average of three residents per house more than doubles the population of Climping, i.e. 900 additional residents. While we cannot be certain of the exact number of new residents, it is likely to be approximately 1000 people.

This is not a piecemeal or evolutionary change that is proposed for Climping. This is a revolution that takes a rural area and transforms it by the addition of a large suburban development on which the majority of Climping residents are proposed to live.

Should such a development proceed it will be increasingly seen as reasonable to build up further parcels of land in Climping. That this is likely or certain is simply evidenced by the progress of development in other areas of this county and beyond.

If this is the council's strategic intention – that Climping should change from a rural area to a suburban area, then the residents should be formally informed before any action is taken. Any other course would be high-handed and contrary to the provisions of the Localism Act 2011.

We request that Arun District Council address these issues before making any decision.

Local Plan

The Climping local plan will always be the primary authority for planning matters as intended by the Localism Act 2011. However, as Arun District Council has not yet filed and approved local plan, the Climping Parish Plan is the only authoritative plan with legal basis under the Localism Act 2011.

The application as presently formulated is near identical to a previous application that was rejected. Consequently, the applicants should have been aware of the authoritative nature of the local plan and the egregious incompatibility of the present, and previous, applications with the strategic provisions of the approved and authoritative Climping local plan.

Therefore the current application is contrary to both the letter and spirit of the authoritative local plan and should be rejected as unacceptable on this basis.

Infrastructure – Transport

It is obvious that there is already a significant volume of traffic passing through Climping because of A259, and lesser volume on the approach to the roundabout at the corner of Church Lane and the A259.

The transport infrastructure simply does not exist to accommodate the proposed development. We are sure that it will be suggested that the applicant will provide funds for the necessary upgrades to the infrastructure. This suggestion would be in line with the opinion of a local councillor, whose article was on this subject was published in the Clymping Parish newsletter, that the only way to improve transport links and reduce congestion would be to accept funds for road improvements from developers building on land in Climping.

This effectively holds the residents of Climping to ransom in order for improvements to transport to be made. The irony is that the vast majority of travellers whose journeys would be improved are not from Climping but are merely travelling through the parish. They are not paying for the improvements in any form. In contrast, the residents of Climping would have to pay for the improvements in the form of accepting a radical change in the nature of the parish and would receive scant benefit from this change.

If the council wish to improve the quality of transport links within Climping parish then they should do so but they should not do this in a manner that is beholden to developers and at the obvious cost to residents.

Infrastructure – Local/Community Services

As noted above, the present application effectively proposes that the current population of the parish will more than double in size. This will necessarily mean that greater infrastructure must be provided in terms of, at least, school places and GP medical services.

- Climping village school is small and is currently rated 'good'. As far as I'm aware there are no plans to provide more school places in Climping. Furthermore, doubling the size of the school might well require extending or building a new primary school. Signally, the present application does not consider or address this issue. Failure to address this issue means that pupils at a particularly formative time in their educational careers may be sent long distances to schools with available places. Furthermore, it is particularly noted that the majority of current residents of Climping will live more distantly from the school than *any* of the residents of the proposed development. Accordingly, the proposed development means that the families of current residents are significantly less likely to be able to go to our local school.
- GP services in the Littlehampton area are under astonishing pressure. The closing of Arun Medical Group's East Street surgery has dispersed 7,500 patients to other surgeries in the area and no further GP surgery has been opened in order to close this gap. Only recently, a GP practice rated as "good" has been placed into special measures by the Care Quality

Commission. This is undoubtedly at least partially due to the incredible pressure that GP services in this area currently find themselves under. It is completely unacceptable to consider bringing 1000 new residents to Climping without adequate GP provision. It is absolutely unknown where a new GP practice might be founded now that the former Arun Medical Group East Street surgery has been sold for development.

The services, and others, must be planned, agreed, funded and locked in place with guarantees well in advance of any new residents moving to Climping. Anything less than this degree of provision is disorganised and invites disruption that might in fact be disastrous if GP or school provision falls short. Such outcomes are completely predictable if there is about to be lack of organisation and implementation of the correct facilities. Thus far there has been no explanation from the council as to how these essential additional services might be instituted. It is utterly unreasonable to accept such an application without enforceable guarantees from the council that these essential services will be put in place.

Environment and Farmland

It is most notable that the "Climping Gap" is the last area of coastline east or west for some quite considerable distance that is not extensively built up / developed. It seems short sighted to "fill-in" this gap when the benefits of the gap to the residents of Arun District are so self-evident. Once this gap is gone it will not return. As noted above, approval of this application would effectively be a declaration that this whole area is to be developed. Not so much the thin end of the wedge but rubber-stamping Climping parish for development.

It is also most notable that crops can be grown in this area of Britain that cannot be grown elsewhere. This is because this area receives a good amount of rain and an astonishing amount of sunlight. Furthermore, the land is very good. It is noted that the site of the proposed development is routinely planted with oilseed rape rather than a crop that might make use of the unique qualities of the land and climate in this area. Planting with rape should not be taken as an indication of the potential of the land but rather that the current landowners do not care about the land and are simply underutilising this valuable agricultural land until it can be built on. Any suggestion that the land is of lesser quality because, e.g. 'you can only grow rape on it' is disingenuous at best.

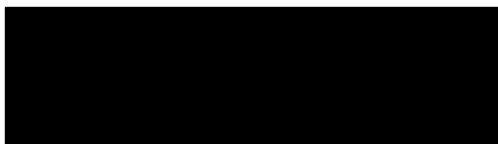
Conclusion

For the reasons set out above we oppose Arun district planning application CM/13/18/OUT and request that it be rejected.

If our understanding is incorrect regarding the law or the planning provisions, we ask to be informed of the correct provisions and the evidence/legal basis for applying these provisions in this instance. It would assist us if the particular article and implementing regulation applied in reaching a decision were explicitly noted as a part of any decision.

We ask that you address our concerns and we await your decision in respect of Arun district planning application CM/13/18/OUT.

Yours sincerely

A large black rectangular box used to redact the signature of David and Lisa Eyre.

David and Lisa Eyre.