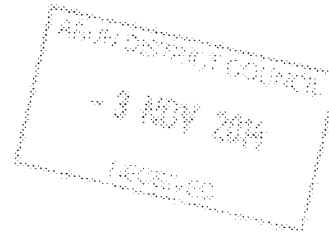


31st October 2014

Our Ref: SWLC.LPC.479

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF



For the attention of Ms A Gardner

Dear Ms Gardner

Town and Country Planning Act 1990
Re: Continued residential use of
Orchard Caravan Park, Worthing Road, Rustington, West Sussex

Further to our recent discussions in respect of the above, and particularly as outlined in my email of 2nd October 2014 please find enclosed a planning application to formalise the caravan park's established residential use.

The enclosed application is made on a without prejudice basis as it is of course commonly understood that the caravan park has been operated as a residential site for decades. However, the paper trail is rather convoluted and it is hoped therefore that the grant of a retrospective permission will simply tidy matters up. Indeed it would of course be open to my client to make a Certificate of Lawfulness application to confirm the position, however given the number of properties and the length of time involved such an approach is felt to be an unnecessary disproportionate and expensive exercise.

However, as agreed, the enclosed application does include a bundle of information intended to informally corroborate the established position and thus provides a material consideration in favour of the grant of permission.

I have listed below a full schedule of all the current residents. It is of course open to you to confirm this list from the electoral register, which in itself obviously supports the residential nature of the occupants listed. The register can't of course be copied otherwise I would have exhibited it myself.

Unit No	Name
1	Mr Fewtrell
2	Mr and Mrs Welford
3	Mr Oldfield
4	Mr and Mrs A Finch

LPC (Trull) Ltd
Trull • Tetbury
Gloucestershire
GL8 8SQ
www.lpc-trull.com

5	Mrs V Foggin
6	Mr Moran
7	Ms J Willcox
8	Mr and Mrs Healy
9	Mrs M J Burtenshaw
10	Mrs Scott
11	Miss P Carter
12	Mr Jackson and Ms Fulcher
13	Mr T Sutcliffe
14	Mr Tuffrey
15	Mr T A Garrett
16	Mr Carpenter
17	Mr G Leaman
18	Mrs I G Smith
19	Mr Attreed
20	Miss Persaud
21	Mr Gosnell
22	Mr J K Harman
23	Mrs Funnell
24	Mrs O'Keefe
25	Mr R Wilson
26	Mrs Whiteman
27	Mr N G Chitty
28	Mr and Mrs L Whittlesey

More specifically though I have included as part of the enclosed application bundle 27 No pro-forma letters signed by those residents my client has been able to contract, confirming, inter alia, the length of time they have lived at Orchard Park, paying Council Tax (which I assume you can also check internally) and which doctor's surgery etc. they belong to.

Taken in the round I hope you will agree the enclosed letters provide a clear corroboration of the true residential nature of the caravan park. It may be possible to drill down into the continuous electric and water billing at the site for instance but based on the relevant test; 'on the balance of probability' I hope you would agree that all those residents who have completed and signed the pro-forma letters clearly indicate that they are, and have been for many years, in residential occupation, which is, of course also not actually in dispute.

In that regard, by way of background you will be aware that the most recent application at this site was also intended to tidy up the paperwork in respect of the anomalous position regarding the historic condition imposed in 1983, which wasn't removed in 1991 (see application reference R/127/12)

Quoting from your committee report in respect of this application you did of course note quite succinctly that,

'The condition in question was imposed when the year round occupation was restricted. This condition has now subsequently been removed. It would therefore appear superfluous and an anomaly to be unrestricted (my emphasis) permission which has subsequently been granted on the site'.

Moreover, it was confirmed that, *'The site has operated with a continuous residential occupation for a number of years'.* With regard to the planning merits of that position it was also stated that, *'In 1991 (R/144/91) granted permission to remove condition 2 of R/133/82 to allow all year occupation of 28 caravans. No conditions were attached to this permission. The loss of tourist accommodation (DEV35) cannot therefore be considered as part of this proposal since it has previously been agreed'.* Additionally the physical impact of the caravan park was considered, and the report stated that, *'The continued use of the site for all year round residential occupation and the length of leases has no adverse impact on the visual amenities of the locality'.*

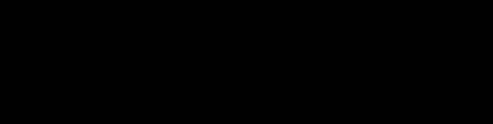
The enclosed application, as said above, merely seeks to confirm the established position and does not trigger any new planning considerations which indicate that the status quo should not be confirmed. The area's visual amenities will be unchanged, along with all the site's externalities. This is not a protected tourist resource either.

In fact there are no material considerations which weigh against the grant of permission for the site's residential use to continue unchanged. The mix of accommodation available comprises relatively low cost units and serves a valuable housing function already, there will be no change in service requirements or other impacts.

I hope this submission is as straightforward as our discussions concluded, however, if there are any new matters arising, not previously addressed, please do not hesitate to contact me to confirm your support.

Finally, in addition to the duly completed application forms, the enclosed application includes a site location plan to identify the extent of the caravan park and the planning fee, in the sum of £385 to confirm, in retrospect, its ongoing use.

Yours sincerely



Simon Chambers
Director

Enc.