

SITE PLAN

CAMBER

RR/2023/1743/P

Car Park Central  
Coastal Control Centre  
Old Lydd Road  
Camber



## Rother District Council

Report to - Planning Committee  
Date - 16 November 2023  
Report of the - Director – Place and Climate Change  
Subject - RR/2023/1743/P  
Address - Car Park Central, Coastal Control Centre, Old Lydd Road, CAMBER  
Proposal - Extension and internal/external refurbishment of the Camber Central WC's and Coastal Office.

[View application/correspondence](#)

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### RECOMMENDATION: GRANT (FULL PLANNING)

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Director: Ben Hook

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**Applicant:** Rother District Council  
**Agent:** DK-CM  
**Case Officer:** Matthew Jenner  
(Email: [matthew.jenner@rother.gov.uk](mailto:matthew.jenner@rother.gov.uk))

**Parish:** CAMBER  
**Ward Members:** Councillors L. Hacking and P.N. Osbourne

**Reason for Committee consideration:** Director – Place and Climate Change referral: This is a Rother District Council application, which relates to Council owned land.

**Extension of time agreed to: 20 November 2023**

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#### 1.0 SUMMARY

1.1 The redevelopment of this tourist facility within the development boundary of Camber is considered an improvement of the existing site and is an acceptable proposal in principle. The proposal would not have an adverse impact on the character and appearance of the area, harm the amenities of neighbouring properties and would be acceptable in terms of flood risk. Subject to conditions, the proposal is considered acceptable in terms of traffic management, biodiversity and habitat protection.

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#### 2.0 SITE

2.1 The proposal relates to buildings within the Camber Car Park situated adjacent to the beach. The buildings are situated to the western side of the car park and include toilet facilities, a small office and first aid store as well as a garage. The site is within the development boundary for Camber and has

its own allocations Policy CAM2 in the Development and Site Allocations Local Plan (DaSA). To the west of the site are sand dunes and the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI). The site lies within a red impact zone as per the modelled district licence impact map, meaning it is a 'highly suitable habitat' for the presence of Great Crested Newts.

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### **3.0 PROPOSAL**

- 3.1 The application proposes a refurbishment of the Camber Central WCs and Coastal Office. The works would include a new roof connecting the two existing structures, new windows, doors, fixtures and fittings throughout, introduction of a changing rooms, additional toilets and first aid areas, a two-storey extension on the south side of the building to house an improved coastal office facility, RNLI storage, spaces for community hire and a public facing kiosk.
- 3.2 Following concerns raised by Natural England and East Sussex County Council (ESCC) Ecology regarding the impact of the proposal on biodiversity and the designated habitats, amended plans and additional information have been submitted.
- 3.3 The footprint of the original proposal has been reduced in response to these concerns. The application as now proposed would still consist of a two-storey extension on the east side which would have both a flat roof and mono pitched roof design. A roof terrace that was previously proposed has now been omitted from the application.
- 3.4 The current proposal would link the existing structures with a low angle mono pitched roof that would be finished with zinc cladding. An additional single story flat roof extension is also proposed on the west elevation which would provide storage for the RNLI. At ground floor level, the doors and windows of the east elevation would be recessed into the building with columns supporting the first floor above.
- 3.5 The external surfaces of the walls would utilise the existing painted brickwork as well as some areas which would be clad with panels utilising recycled demolition waste from the site. The proposed fenestration would consist of a mix of timber and steel finishes.
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### **4.0 HISTORY**

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|-----|--------------|-----------------------------------------------------------------------------------------------------------------------------------|
| 4.1 | RR/81/0667   | Use kiosk to sell fresh fruit, wrapped confectionery, light refreshments, dry beach sundries and newspapers. APPROVED CONDITIONAL |
| 4.2 | RR/97/636/3R | Demolition of existing hut and construction of a permanent new building on the same site. APPROVED CONDITIONAL                    |
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## 5.0 POLICIES

- 5.1 The following policies of the adopted Rother Local Plan Core Strategy are relevant to the proposal:
- OSS3: Location of Development
  - OSS4: General Development Considerations
  - EN3: Design Quality
  - EN5 Biodiversity and Green Space
  - EN6: Flood Risk
  - EN7: Flood Risk and Development
  - EC6 Tourism Activities and Facilities
  - CO1 Community Facilities and Services
  - CO2 Provision and Improvement of Healthcare Facilities
  - CO6 Community Safety
  - TR4 Car Parking
- 5.2 The following policies of the Development and Site Allocations Local Plan are relevant to the proposal:
- DCO1: Retention of Sites of Social or Economic Value
  - DEN1: Maintaining Landscape Character
  - DEN6: Land Stability
  - DIM1: Comprehensive Development
  - DIM2: Development Boundaries
  - CAM2: Land at the Central Car Park, Old Lydd Road, Camber
- 5.3 The Camber Village Supplementary Planning Document (2014), National Planning Policy Framework and National Planning Practice Guidance are also material considerations.
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## 6.0 CONSULTATIONS

### 6.1 Camber Parish Council – **SUPPORT**

- 6.1.2 The application was considered by Councillors at their meeting on 19 September. Camber Parish Councillors support the application in principle with six of seven councillors voting in support of the planning application which was proposed by Cllr Cawte and seconded by Cllr Clarke but with comments and reservations to be submitted to the Planning Authority for consideration. The following concerns were raised:
1. Toilet block: The proportionality of the allocation of space provided for toilet facilities. Comments were that the area for unisex toilets was too great in relation to the male and female toilets. Questions were raised about how 'family friendly' this area would be, and that the layout should consider the safety of users at all times.
  2. Provision of a lift: Concerns were raised that by providing community space at high level gave the need to provide a lift to this area but that the cost of the lift may be better spent elsewhere in the refurbishment.
  3. Overbearing design: Comments were made that the design was overbearing, and that the footprint was increased along with the height.
  4. Clarity on use of space provided: Some councillors were confused about how the community space and the kiosk space would be used and more details would be welcomed by them.

5. Extended use of spaces provided: The use of space was queried such as the first aid area, storage of RNLI equipment etc and that this space may only be utilised for a short time each year. It would be helpful to hear plans for year round use of these facilities
6. Community gain: The Parish Council welcomes the refurbishment of the facilities and the investment in the village by RDC, but it would be helpful to receive some more details on how the local community can benefit directly from the redevelopment in this planning application.

6.2 Marine Management Organisation – **NO OBJECTIONS RECEIVED**

- 6.2.1 Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the Applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

6.3 ESCC Ecology – **RECOMMEND FOR REFUSAL DUE TO INSUFFICIENT INFORMATION**

- 6.3.1 Insufficient information has been provided to assess the potential impacts on biodiversity and to inform appropriate mitigation, compensation, and enhancement. Further advice will be provided upon receipt of additional information.

6.4 Natural England – **FURTHER INFORMATION REQUIRED TO DETERMINE THE IMPACTS ON DESIGNATED SITES**

- 6.4.1 As submitted, the application could have potential significant effects on Dungeness, Romney Marsh and Rye Bay SSSI, Special Protection Area (SPA) and Ramsar Site. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

6.5 Environment Agency – **NO OBJECTION**

6.6 Nature Space – **NO OBJECTION**

- 6.6.1 It is considered that the proposed development would present a low risk to great crested newts and/or their habitats. As the development is within the red Impact Risk Zone, as modelled by district licence mapping, an informative note is recommended.

6.7 Public Notice

- 6.7.1 One letter of support summarised below:
  - In favour of toilet block being demolished and a new block put in place with better facilities.
  - However, concerns raised over height of the building and its impact on wind/sand deposits, drain on resources and concern over the restricted access of new coastal office.
- 6.7.2 One letter of objection (representing seven neighbouring properties) summarised below:
  - Concerns over the boundary of the site with the entrance to our Car Park.

- The RNLI ‘hose down area’ will be in front of the car park entrance and will present access issues.
- Health and safety concerns over RNLI manoeuvring into storage space at the back of the building.
- Addition of a ‘tower’ at the west end of the building will add a big bulk to the building.
- Concerns raised over first floor terrace, creating a source of nuisance, overlooking and nesting of seagulls.
- Puzzled by the location of the clock and tide indicator on the south face which would not be visible to people entering the beach.
- We hope that the clock tower will not be illuminated.

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## 8.0 APPRAISAL

- 8.1 The main issues to consider in the determination of this application include:
- The principle of the development.
  - The impact of the proposal on the character and appearance of the locality.
  - Biodiversity and designated habitats.
  - Flood risk.
  - Traffic management.
  - The impact of the proposal on neighbouring amenities.

### 8.2 The principle of development

- 8.2.1 The site is specified in the DaSA by Policy CAM2 as being ‘allocated for a comprehensive mixed-use scheme to include an improved public realm with tourism, commercial and operational uses’.
- 8.2.2 The proposed improvement of tourism and safety facilities is considered an improvement to the site. The proposal would be limited to a relatively small footprint within the allocated site and would therefore not impede its future development.
- 8.2.3 The site is within the development boundary for Camber and therefore the proposal would comply with Policy OSS2 of the Rother Local Plan Core Strategy which favours new development within a development boundary.
- 8.2.4 Policy EC6 of the Rother Local Plan Core Strategy states that proposals relating to tourism activities and facilities will be encouraged where they accord with the following considerations, as appropriate: *(i) It provides for the enhancement of existing attractions or accommodation to meet customer expectations and (ii) It supports active use along the coast, consistent with environmental and amenity factors.*
- 8.2.5 Policy CO1 of the Rother Local Plan Core Strategy states that the availability of community facilities to meet local needs will be achieved by: *(i) Permitting new, improved or replacement community facilities in appropriate locations where they meet identified community needs, having regard to population characteristics, Local Actions Plans and recognised standards of provision.*

8.2.6 The proposal is considered to be an enhancement of the existing toilet facility which serves visitors at this tourist location along the coast and would therefore comply with Policies EC6 and CO1 of the Rother Local Plan Core Strategy. Additionally, the proposal would comply with Policies CO2 and CO6 of the Rother Local Plan Core Strategy which seek to improve community safety and healthcare facilities.

8.2.7 For the reasons stated above it is considered that the proposal is acceptable in principle, subject to the consideration of the following matters.

### 8.3 **Character and appearance of the locality**

8.3.1 Policy DEN1 of the DaSA states that *'The siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it is to be located, based on a clear understanding of the distinctive local landscape characteristics.* Policy EN3 of the core strategy advises that *development must contribute positively to the character of the site and surroundings* and Policy OSS4(iii) states that *development must respect and not detract from the character and appearance of the locality.*

8.3.2 The proposed redevelopment of the site would only increase a moderate amount of the existing footprint following the amended plans that have been received.

8.3.3 Camber has a varied mix of buildings in terms of design, massing and materials. The building as proposed would not appear overly domestic in appearance. Its overall design would be reflective of its purpose as a tourist facility in this location. The proposed materials which consist predominately of cladding, retained brickwork and a zinc roof are therefore also considered acceptable in this location.

8.3.4 Part of the building would increase from one storey to two storey. However, this would only be a small section on the south side of the building. It is not considered that this would harm the character and appearance of the existing building or on the site as a whole and or its surroundings, given its acceptable design.

8.3.5 For the reasons stated above it is not considered that the proposal would harm the character and appearance of the area.

### 8.4 **Biodiversity and designated habitats**

8.4.1 Policy EN5 of the Rother Local Plan Core Strategy and Policy DEN4 of the DaSA seek to conserve and enhance habitats and biodiversity.

8.4.2 Policy CAM2 of the DaSA makes specific reference to avoiding adverse impacts on the adjacent designated sites of importance for biodiversity (i.e. the Dungeness, Romney Marsh and Rye Bay SSSI, the Dungeness Romney Marsh and Rye Bay SPA and Ramsar site and the Dungeness SAC, including the sand dunes), as well as supporting the implementation of the Sustainable Access and Recreation Management Strategy (SARMS) as appropriate adjacent Natura 2000 Site.

8.4.3 Natural England and ESCC Ecology were consulted on the application as originally proposed. Both consultees have requested additional information following concerns over the potential impact on biodiversity and the designated sites. Following these concerns, amended plans and additional information have been received. However, at the time of writing this report a response has not been received from either Natural England or ESCC Ecology. It is anticipated that the amendments received, reducing the scope of the development, will have addressed the concerns and that conditions can be applied to mitigate any impact of the proposal on biodiversity and the designated sites. However, confirmation from Natural England and ESCC Ecology must be received before concluding this.

8.4.4 The site is within the Red Impact Zone for the protection of Great Crested Newts. This indicates that there is suitable habitat and a high likelihood of great crested newt presence. However, in this case the Sussex Newt Officer (Naturespace) is satisfied that if the development was to be approved, it would present a low risk to GNCs and their habitats. An imitative note is recommended to advise the Applicant of the best practices for development in this instance.

8.4.5 For the reasons stated above, there are no objections to the proposal on the grounds of biodiversity and designated habitats.

## 8.5 **Flood risk**

8.5.1 Policy CAM2 states that development will only be permitted where: *'(iv) a site specific flood risk assessment has been undertaken which demonstrates that the development will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall'*.

8.5.2 The site as a whole is within flood zones 1, 2 and 3. As required by Policy CAM2 a Flood Risk Assessment has been submitted with the application.

8.5.3 The report confirms the following:

- The proposed planning application is for the reconfiguration and repurposing of the existing toilets and Coastguard Office and extension to the existing toilets. Accordingly, it is considered that the vulnerability of the site will not increase post development.
- The development will use the confines of the existing structure. Finished floor levels of the extension will be set no lower than existing floor levels.
- Flood proofing of the development will be incorporated as appropriate.
- The Applicant will register with the free Environment Agency Floodline Warnings Direct service.
- Due to the small scale of the development, a full Surface Water Drainage Strategy is not required at this stage of planning. The proposed development will utilise the existing drainage arrangements on site.

8.5.4 For the reasons set out above, it is concluded in the flood risk assessment that the proposed application is suitable in terms of flood risk.



## 8.6 Traffic management

- 8.6.1 Policy CAM2 states that development will only be permitted where: *'(iii) a traffic management scheme is submitted to manage traffic impacts arising from the development, both during and after the construction period. The scheme shall include an assessment of the impact on public car parking provision throughout the year and demonstrate that appropriate provision will be retained in the village during the winter period (October to March)'*.
- 8.6.2 The site is within the Central Camber Car Park, which is extremely busy in peak season, and the number of visitors causes issues for residents.
- 8.6.3 The proposal would not result in the loss of any parking spaces within the site. However, a traffic management plan has not been submitted as required by Policy CAM2. This can be secured by a condition to manage traffic impacts arising from the development, both during and after the construction period

## 8.7 Neighbouring amenities

- 8.7.1 The application closest neighbouring properties to the site are the terrace of coastal cottages to the south-west and the buildings to the north on Old Lydd Road.
- 8.7.2 In terms of massing, loss of light and overbearing it is not considered that the proposal, would cause harm given the reasonable separation distance between the application site and neighbouring properties.
- 8.7.3 A roof terrace was initially proposed with the application but following the submission of amendments, this has been removed from the proposal. The amended proposal is therefore not considered to have an impact in terms of overlooking.
- 8.7.4 For the reasons stated it is not considered that the proposal would have an impact on neighbouring amenities.

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## 9.0 PLANNING BALANCE AND CONCLUSION

- 9.1 The redevelopment of this tourist facility within the development boundary of Camber is considered an improvement of the existing site and is an acceptable proposal in principle. The proposal would not have an impact on the character and appearance of the area or harm the amenities of neighbouring properties and would be acceptable in terms of flood risk. Subject to conditions the proposal is considered acceptable in terms of traffic management. Also, subject to no objection being received from Natural England and ESCC, and with the imposition of conditions to secure mitigation, there should be no harm to biodiversity and habitat protection. An update in this regard is anticipated before the Planning Committee meeting on the 16 November 2023.
- 9.2 For the reasons explained, the proposal would comply with the Rother Local Plan Core Strategy and DaSA policies. The application is therefore recommended for approval.

## **RECOMMENDATION: GRANT (PLANNING PERMISSION)**

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### **CONDITIONS:**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
Reason: In accordance with section 91 of the Town and Country Planning Act 1990(as amended by section 51 of the Planning and Compulsory Purchase Act 2004).
2. The development hereby permitted shall be carried out in accordance with the following approved plans and details:  
Location Plan- 2215-S4-000, dated 09.10.23  
Proposed Site Plan- 2215-S4-001, dated 09.10.23  
Proposed Ground Floor Plan- 2215-S4-100, dated 09.10.23  
Proposed First Floor Plan- 2215-S4-101, dated 09.10.23  
Proposed Roof Plan- 2215-S4-102, dated 09.10.23  
Proposed East Elevation- 2215-S4-200, dated 09.10.23  
Proposed West Elevation- 2215-S4-201, dated 09.10.23  
Proposed Short Elevations- 2215-S4-202, dated 09.10.23  
Proposed S-N Section- 2215-S4-300, dated 09.10.23  
Proposed W-E Sections- 2215-S4-301, dated 09.10.23  
Proposed W-E Sections- 2215-S4-302, dated 09.10.23  
Design and Access Statement (Prepared by DK-CM), final issue dated 17.08.23  
Flood Risk Assessment for Planning (Prepared by UNDA)- 93150-DKCM-CamberCentralPC, dated July 2023  
Preliminary Ecological Appraisal (Prepared by The Ecology Partnership), dated August 2023  
Reason: For the avoidance of doubt and in the interests of proper planning.
3. The materials to be used in the construction of the external surfaces of the development hereby permitted shall be in accordance with that described in the application unless an alternative finish is first submitted to and approved in writing by the Local Planning Authority.  
Reason: To maintain the characteristics of the existing building in accordance with Policies OSS4 (iii) of the Rother Local Plan Core Strategy.
4. Traffic Management Plan: no development shall take place, including any ground works or works of demolition, until a Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to in full throughout the entire construction period. The Plan shall provide details as appropriate but not be restricted to the following matters:
  - i. The anticipated number, frequency and types of vehicles used during construction.
  - ii. Delivery and construction phase working hours.
  - iii. The method of access and egress and routing of vehicles during construction.
  - iv. The parking of vehicles by site operatives and visitors.
  - v. The loading and unloading of plant, materials and waste.
  - vi. The storage of plant and materials used in construction of the development.

- vii. The erection and maintenance of security hoarding, including provision to protected identified landscapes.
- viii. The provision and utilisation of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders).
- ix. Scheme for the control of noise and dust.
- x. Details of public engagement both prior to and during construction works.
- xi. The erection and maintenance of security hoarding to the Public Right-of-Way to ensure continued safe access to this route during construction.
- xii. The Applicant should detail measures to manage flood risk, both on and off the site, during the construction phase. This may take the form of a standalone document or incorporated into the Construction Management Plan for the development.

Reason: Pre-commencement condition for works to ensure that the amenities of existing occupiers are protected and in the interests of and for the safety of persons and vehicles using the local road network serving the site, having regard to National Planning Policy Framework paragraphs 174 and 185, and Policy OSS4(iii) of the Rother Local Plan Core Strategy and Policy CAM2 of the Rother Development and Site Allocations Local Plan.

5. ANY NECESSARY ECOLOGICAL RELATED MITIGATION CONDITIONS SUGGESTED BY NATURAL ENGLAND OR ESCC ECOLOGIST

**NOTE:**

1. The Applicant is reminded that, under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), it is an offence to (amongst other things): deliberately capture, disturb, injure, or kill great crested newts; damage or destroy a breeding or resting place; intentionally or recklessly obstruct access to a resting or sheltering place. Planning permission for a development does not provide a defence against prosecution under this legislation. Should great crested newts be found at any stage of the development works, then all works should cease, and a professional and/or suitably qualified and experienced ecologist (or Natural England) should be contacted for advice on any special precautions before continuing, including the need for a licence.

**NATIONAL PLANNING POLICY FRAMEWORK:** In accordance with the requirements of the National Planning Policy Framework (paragraph 38) and with the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern within the application (as originally submitted) and negotiating, with the Applicant, acceptable amendments to the proposal to address those concerns. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.