

SITE PLAN

ICKLESHAM

RR/2023/2630/P

Winchelsea Beach Caravan Park  
Pett Level Road  
Winchelsea Beach  
Icklesham



## Rother District Council

Report to - Planning Committee  
Date - 18 April 2024  
Report of the - Director – Place and Climate Change  
Subject - Application RR/2023/2630/P  
Address - Winchelsea Beach Caravan Park,  
Pett Level Road,  
ICKLESHAM  
Proposal - Variation of open season condition imposed on C/60/67 to extend open season to 11.5 months.

[View application/correspondence](#)

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**RECOMMENDATION:** It be **RESOLVED** to **GRANT (FULL PLANNING)**

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**Director: Ben Hook**

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**Applicant:** Sellers Leisure Ltd  
**Agent:** Mr Mark Southerton  
**Case Officer:** Miss Katie Edwards  
(Email: [katie.edwards@rother.gov.uk](mailto:katie.edwards@rother.gov.uk))

**Parish:** ICKLESHAM  
**Ward Members:** Councillors L. Hacking and P.N. Osborne

**Reason for Committee consideration:** Called in by Councillor Osborne due to concerns with sewage and additional usage of site.

**Statutory 8-week date:** 15 March 2024  
**Extension of time agreed to:** 25 April 2024

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### 1.0 SUMMARY

1.1 The proposal relates to an established caravan park used for holiday purposes. It is proposed to allow the caravans to be occupied for holiday purposes between the 1 March in any one year to the 14 February the following year. This is an increase of 3.5 months on the current period of occupancy, bringing it to 11.5 months of the year. This would bring its seasonal occupancy period more in line with other caravan parks in the district. Concerns have been raised from the Parish Council, with regards to drainage, however no concern has been raised by the Environment Agency or Rother District Council. Overall, the proposal would have an acceptable impact on the environment. As such, planning permission should be granted.

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## 2.0 SITE

- 2.1 This application relates to a caravan site hosting 57 static caravans for holiday use. The caravan park has been in existence since the 1960's.
- 2.2 The site is situated to the southern side of Pett Level Road outside of the defined development boundary. It is within a Flood Xone 3b, 3a and 2 as well as the Site of Special Scientific Interest (SSSI) impact risk zone.
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## 3.0 PROPOSAL

- 3.1 This application seeks permission to vary the occupancy condition imposed on C/60/67 in order to extend the occupancy period of the caravans to 11.5 months a year that being from the 1 March to 14 February the following year.
- 3.2 The current occupancy condition states that the caravans can only be occupied between the 1 March and 31 October yearly.
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## 4.0 HISTORY

- 4.1 C/60/67 (Battle Rural DC application) – APPROVED  
CONDITIONAL
- 4.2 RR/76/0411 Use of land for stationing of seven additional caravans –  
APPEAL ALLOWED
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## 5.0 POLICIES

- 5.1 The following policies of the [Rother Local Plan Core Strategy 2014](#) are relevant to the proposal:
- OSS4: General Development Considerations
  - EN1: Landscape Stewardship
  - EN3: Design Quality
  - EN5: Biodiversity and Green Space
  - EN6: Flood Risk Management
  - EN7: Flood Risk and Development
  - EC6: Tourism Activities and Facilities
  - RA2: General Strategy for the Countryside
  - RA3: Development in the Countryside
- 5.2 The following policies of the [Development and Site Allocations Local Plan](#) are relevant to the proposal:
- DEC2: Holiday Sites
  - DEN5: Sustainable Drainage
- 5.3 The National Planning Policy Framework and Planning Practice Guidance are also material considerations.
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## 6.0 CONSULTATIONS

### 6.1 Environment Agency – **NO OBJECTION**

6.1.1 No objection providing that the Local Planning Authority is fully satisfied that the development is for short-term holiday use and not permanent or long-term residential use. consideration should be given to the following issues:

- Adequacy of rescue or evacuation arrangements.
- Details and adequacy of an emergency plan.
- Provision of and adequacy of a temporary refuge.

### 6.2 Environmental Health – **NO OBJECTION**

6.2.1 *“No adverse comments. There is a site licence currently in place, please advise this Department if this application is granted so the licence may be amended”.*

### 6.3 Planning Notice

6.3.1 One letter of **OBJECTION** has been received. The concerns raised are summarised as follows:

- Longer season allows owners to charge higher fees.
- Rother District Council want longer seasons to support tourism.
- Caravan owners want longer seasons to use caravan as main residence.
- Caravans are small and old; it is doubtful they are suited for occupancy over winter and seem vulnerable to winter storms.

### 6.4 Icklesham Parish Council – **OBJECTION**

6.4.1 The concerns raised are summarised as follows:

- There is no need for the extra opening hours.
- Would result in overdevelopment of local area.
- Site is currently on cesspits and would increase the amount of tankers in the area which will cause further damage to the roads and local infrastructure.
- The flood risk assessment makes assertions without providing evidence.

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## 7.0 APPRAISAL

### 7.1 Issues for Consideration

7.1.1 The main issues are:

- Principle of Development
- Flood risk
- Sewage
- Ecology
- Impact on the character and appearance of the area
- Impact on the living conditions of neighbours

### 7.2 Principle of development / Policy Context

- 7.2.1 Policy EC6 of the Rother Local Plan Core Strategy offers support for tourism related development, seeking to retain it and also increase supply.
- 7.2.2 The proposal relates to a long-established caravan site. The extension of the occupancy period would enable more tourism to the district whilst still ensuring that the use is for no more than 11.5 months. This would assist along with the other restrictive conditions in maintaining that the site would only be used for holiday purposes. A full unfettered residential use would require other policy considerations to be applied, in particular with regard to internal and external space standards, and the creation of dwellings outside a defined development boundary.
- 7.2.3 Previous occupancy planning applications on local sites include the following:
- RR/2023/1434/P - Sea Spray Caravan Site, Dogs Hill Road, Winchelsea Beach, Icklesham: 1 March to 14 January – Approved Conditional.
  - RR/2022/2977/P - Pett Level Caravan Park, Pett Level Road, Pett: 1 March to 14 February – Approved Conditional.
  - RR/2021/1369/P - Windmill Park Caravan Site, Willow Lane, Icklesham: 1 March to 14 February – Approved Conditional.
  - RR/2019/1442/P - Smugglers End Caravan Park, Pett Level Road, Icklesham: 1 March to 14 January – Approved Conditional.
  - RR/2019/34/P - Winchelsea Sands Holiday Park, Pett Level Road, Winchelsea Beach, Icklesham: 1 March to 14 February – Approved Conditional.
- 7.2.4 The new seasonal occupancy period would be the same or similar to the occupancy period of numerous other caravan sites in both the local area and the wider district. In the absence of any justified reason for refusal, it would be difficult to argue that this particular site would not be acceptable for the same variation of condition application.

### 7.3 Flood Risk

- 7.3.1 Seasonal occupancy conditions are imposed on caravans to ensure that tourism accommodation remains as such but also to prevent use of accommodation at unsuitable times such as when there is a high risk of flooding, i.e. in the winter.
- 7.3.2 The National Planning Policy Framework and Policy EN7 of the Rother Local Plan Core Strategy seek to avoid inappropriate development in areas at risk of flooding.
- 7.3.3 The site is within Flood Zone 3a and b which is defined as having a high probability of flooding from the sea. The Environment Agency has been consulted on the application and have raised no objection provided the caravans are not occupied as a permanent place of residence and that there are evacuation plans in place. These requirements can be secured by planning conditions.
- 7.3.4 The Agent has provided a flood risk assessment and supporting statement. Whilst the site is within a Flood Zone 3a and b, this does not factor in the presence of sea defences. The Applicant has signed up to the Flood Line Alert System and has adopted an evacuation protocol which can be conditioned to be followed should approval be granted. The additional use of

the site will not impact on surface water generation as the same number of caravans will remain in situ irrespective of the length of the open season. As such flood risk does not result in a reason for refusal.

#### 7.4 Sewage

7.4.1 The foul public sewage system in Winchealsea Beach has experienced problems with overloading particularly during wet weather. The caravan site subject to this planning application is not connected to the public sewer, it has its own cesspool. The Agent has stated that the owner cannot gain access to the public sewer due to the distance from the site and land ownership issues. As such the application would have no effect on the public sewer.

7.4.2 The main impact with the proposal would be any potential increase in the number of times the cesspool needs to be emptied and any increase in tanker movements associated with this. The Applicants statement sets out the estimated increase in usage. It is stated that the occupancy levels would be extremely unlikely to be the same year-round such when compared to the summer months. The national statistics submitted show a much lower rate of occupancy during November – February (11% - 22%).

7.4.3 The emptying regime would be adjusted to reflect the likely increase in visitor numbers and the cesspool is fitted with an alarm to prevent any accidental discharge from overflowing. In terms of maintenance, the cesspit is regulated by the Environment Agency with a requirement to keep the cesspit in good repair and ensure that it doesn't leak or overflow. The cesspit has to be emptied by a registered waste handler and should the cesspit not be maintained to the required standard, the Environment Agency can require replacement or repair.

7.4.4 It is considered that the proposal would result in a modest increase in wastewater generated on site so a minimal increase in tanker movements. The Applicant has outlined how measures are in place to prevent any leaking and to maintain a good functional cesspit. As such it is not considered that the increase in occupancy would harm the local area in terms of sewage impacts and this would not justify a reason for refusal.

#### 7.5 Ecology

7.5.1 The Caravan Park is within an SSSI impact risk zone, meaning care must be taken to protect the area. The increase to the season would not harm the ecology of the site, as the caravans are already in-situ, and no additional caravans are proposed.

#### 7.6 Character and appearance

7.6.1 The increase to the season would not change nor detract from the character and appearance of the area as the caravans are already in-situ, and no additional caravans are proposed.

## 7.7 Neighbour amenity

- 7.7.1 There would be very minimal if any impact on neighbouring amenity due to no physical changes to the site and winter occupancy is likely to be lower than in the busy summer period.
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## 8.0 **PLANNING BALANCE AND CONCLUSION**

- 8.1 It is recognised that tourism contributes significantly to the local economy. National and local policies support tourism activities and facilities across the district provided they are compatible with other policies especially those that protect environmental character, amenities, biodiversity, and flooding.
- 8.2 The proposal relates to an established caravan site used for holiday purposes and would bring its seasonal occupancy period in line with other caravan sites locally and in the wider district. The proposal would not result in an increased risk of surface water flooding and the Applicant has demonstrated that there would not be any risks in relation to sewerage. Subject to conditions restricting occupancy – required to prevent the loss of tourist accommodation and prevent an unacceptable risk to life in the event of a flood – conditional planning permission is recommended.
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## **RECOMMENDATION: GRANT (FULL PLANNING)**

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### **CONDITIONS:**

#### **Condition as amended under RR/76/0411**

1. The total number of caravans stationed on the site shall at no time exceed 57.  
Reason: To safeguard the character and appearance of the locality and to control occupancy in the interest of the amenities of the site, in accordance with Policies OSS4 and EN1 of the Rother Local Plan Core Strategy 2014 and Policies DEN1 and DEC2 of the Development and Site allocations Local Plan.

#### **Varied Condition:**

2. The caravans on the site shall not be occupied except during the period 1 March in any one year to the 14 February the following year.  
Reason: To ensure that the caravans are not used for unauthorised permanent residential occupation, which would result in the loss of tourist accommodation and would present an unacceptable risk to life in the event of a flood in accordance with Policy EC6 (vi) of the Rother Local Plan Core Strategy and Policy DEC2 of the Development and Site allocations Local Plan.

#### **New Conditions:**

3. The caravans are to be occupied for holiday purposes only and shall not be occupied as a person's sole or main place of residence.  
Reason: To ensure that the approved holiday accommodation is not used for unauthorised permanent residential occupation in accordance with Policies OSS4 (iii) EC6 and RA3 of the Rother Local Plan Core Strategy.
4. The owners/operators shall maintain an up-to-date register of the names of all owners and/or occupiers of individual caravans on the site, and of their main

home addresses, and shall make this information available at all reasonable times to the Local Planning Authority.

Reason: To ensure that the approved holiday accommodation is not used for unauthorised permanent residential occupation in accordance with Policies OSS4 (iii) EC6 and RA3 of the Rother Local Plan Core Strategy.

5. The development hereby approved shall be implemented strictly in accordance with the flood warning and evacuation plan stated in Appendix 1 of the Flood Risk Assessment (dated 14 December 2023) by Mark Southerton, as already submitted with the planning application and agreed in principle with the Local Planning Authority prior to determination.

Reason: To ensure the safety of the occupants of the holiday caravans if flooding occurs, as it is located within a Flood Zone and in line with paragraph 167 of the National Planning Policy Framework and Policies EN6 and EN7 of the Rother Local Plan Core Strategy.

**NOTE:**

1. The Applicant is advised that a new caravan site licence may be required. Please contact Rother District Council Licensing by e-mail [licensing@rother.gov.uk](mailto:licensing@rother.gov.uk) or by phone 01424 787550 regarding this matter.

**NATIONAL PLANNING POLICY FRAMEWORK:** In accordance with paragraph 38 of the National Planning Policy Framework the Council has worked in a positive and pro-active way and has imposed planning conditions to enable the grant of planning permission.