



have to move out of the statics and bring on a tourer for 4 weeks after which they can move back into the vacant static and have the tourer towed off site. Tourers are not well suited to winter occupation and certainly not as sustainable to run whilst the additional unnecessary caravan towing movements bringing worker touring vans onto the site is not sustainable by comparison to using the otherwise empty hire fleet static caravans. The better insulation of the static vans also cuts down any noise arising from the use of the site whilst reducing slow caravan towing movements benefits all road users. Making people move out and into a tourer for February seems perverse and effectively makes some of them stay in tourers in winter because of the hassle of moving between tourers and statics during their stay is too much bother/added expense. The maximum number of worker units remains the same at 18 and otherwise empty vans are put to good use at a quiet time of the year for holiday makers. Such use does not detract from the holiday offer here as there is limited demand in February. Enhancing winter income is important to the business and especially in providing year round employment.

The key issue here is one which has been largely overlooked (so creating a misleading impression of the current situation) being the way in which the site can and does operate under the terms of the existing permission. The site will continue in this way as allowed by the extant consent unless more appropriate conditions can be put into place as is being sought by the current application. This request to amend the conditions will not just benefit the park operator and other businesses who use the park to provide affordable worker accommodation when needed but also that what is being sought represents a more appropriate starting point in terms of material planning considerations such as enhanced sustainability, reduced impact on local residents, improved safety/free flow of traffic on the road network, etc - significant planning gains and no demonstrable harm!

The remaining extant conditions still prevent any form of residential use and overall levels of use of the site will not change (with the 18 unit maximum remaining in force) whilst significant planning gains will result and general sustainability will be enhanced.

If the matter is refused it will give rise to an appeal and most likely a claim for costs. I am struggling to see any appropriate justification for the approach being adopted but hope that doesn't end up having to be tested at appeal.

DPHEH: The points made above have been addressed in the main report.

## **RECOMMENDATION UNCHANGED**

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**East Peckham                      15/00394/WORKM**  
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No supplementary matters to report