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Planning Statement, including FRA and D&AS

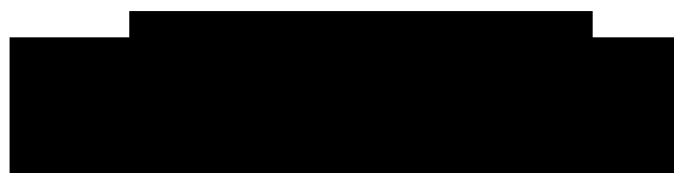
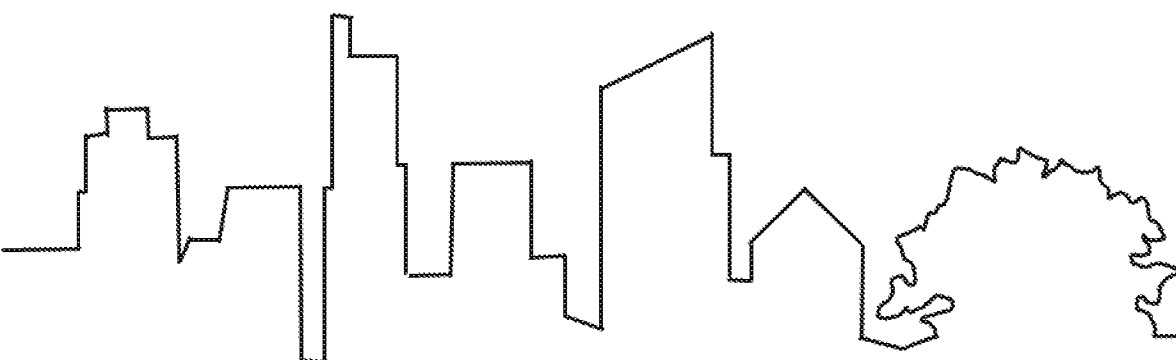
Butlins Resort
Upper Bognor Road
Bognor Regis
PO21 1JJ

New Reception Kiosk & revisions to parking layout

MAY 2022

Walsingham Planning

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I INTRODUCTION

- I.1 Walsingham Planning has been instructed by Bourne Leisure to submit a planning application at the Butlins Resort, Bognor Regis seeking planning permission for the following development:

“New reception kiosk and revisions to car park layout.”

- I.2 This application follows the granting of consent for the same development for a time-limited period of 1 year. This application has subsequently expired, therefore it is necessary to make a new application to ensure the works have consent. The application is retrospective.

- I.3 This Statement has been prepared following an examination of the site and surroundings and relevant planning policy documents.

- I.4 This Statement provides the background information on the site and an assessment of the proposals in relation to planning policy and other material considerations, and is set out under the following sections:

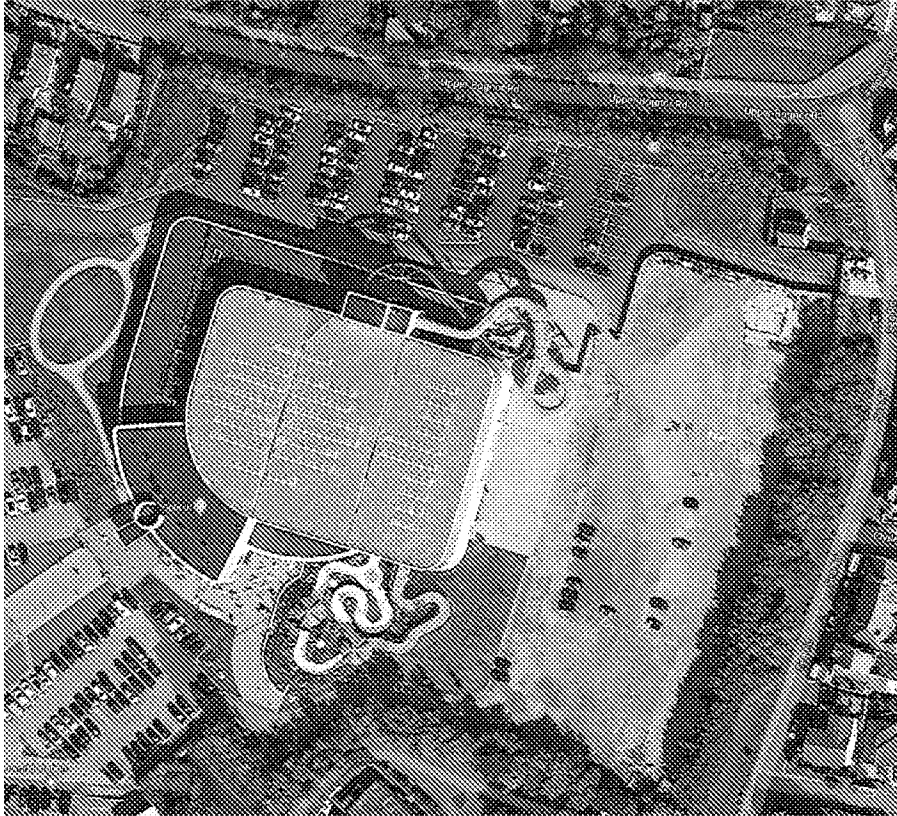
- Chapter 2 provides a description of the site and surroundings;
- Chapter 3 sets out the relevant planning history of the site;
- Chapter 4 sets out the proposals and background for the development;
- Chapter 5 sets out the relevant planning policy and guidance;
- Chapter 6 discusses the planning considerations against these policies;
- Chapter 7 provides a brief Design and Access Statement;
- Chapter 8 provides a brief FRA; and
- Chapter 9 sets out the conclusions.

- I.5 This Statement should be read in conjunction with the following documents submitted in support of the application, in view of the very limited scale :

- Application Form, Certificate, and CIL Form
- Existing and Proposed Drawings
- Butlin’s Splash Level 2 Flood Risk Assessment Sep 2016 (for information/background)
- Queue Management Plan

2 SITE AND SURROUNDINGS

- 2.1 Whilst the application site comprises the Butlins resort at Bognor Regis, for the purposes of this planning application the development site comprises part of the car park to the north of the new Splash pool and the car park to the east of the Splash.



- 2.2 The boundaries of the north car park are landscaped and enclosed in accordance with the details approved under the planning permission for the Splash, Upper Bognor Road lies to the north, there are residential properties lying to the west. The Splash permission approved a decked car park to the east of the pool building together with a phasing plan which shows this area in use for 152 car parking spaces, beyond the boundary a landscaped area and Sea Road there are residential properties facing toward the site.
- 2.3 No buildings on the application site are listed, and the site does not lie in a conservation area.
- 2.4 The site lies just inside the boundary marking the Pagham Harbour Buffer Zone B (5km buffer). The site is within 2km of the Bognor SSSI.

3 RELEVANT PLANNING HISTORY

- 3.1 There is an extensive planning history for the wider Butlins resort site. Of most relevance, in January 2017, planning permission ref: BR/240/16/PL was granted for the demolition of the existing swimming pool building and erection of a new swimming pool complex (known as The Splash) along with associated works towards the east of the Butlins resort site. This new swimming pool complex has been built and replaced outdated staff and guest accommodation.
- 3.2 The car parks now affected by this new proposal were provided as part of the Splash project.
- 3.3 Part of the Splash scheme included a new kiosk which moved the newly arriving guest registration facility further into the site seeking to reduce the potential of queuing cars to impact on the highway network outside of the site, in particular the roundabout on Upper Bognor Road. An amendment to the approved kiosk arrangement was approved under reference BR/212/20/PL.
- 3.4 This arrangement did not prove effective, and a new application for a kiosk in a different location was submitted in December 2020 (ref. BR/307/20). The application was amended during the course of it being live, the principal changes being the submission of a Management Plan and changing the description of development to be temporary for 1 year. Planning permission was granted on 23rd March 2021.
- 3.5 It is this latest application that this application is concerned with, it is a like-for-like resubmission of the proposals that were temporary for 1 year, however consent is sought on a permanent basis.

4 PROPOSED DEVELOPMENT

- 4.1 This application is a like-for-like submission of the temporary 1 year approval of the entrance kiosk in a revised location. Permission is sought on a permanent basis, since it is working effectively and without adverse impact to highway safety.
- 4.2 By way of background, and to revisit discussion from the December 2020 application, as a result of Covid a revised method for welcoming and registering guests (approved under the 'main' Splash permission and its amendment) made use of hand held devices from a small kiosk on the entrance drive but this did not function as well as had been anticipated, not least as hard copy welcome packs and keys need to be issued to arriving guests either on checking in or at hotel reception areas. Furthermore, as a response to previous Covid restrictions and current Covid 'best practice' keys are being issued to arriving guests in a manner that provides social distancing and avoids guest family groups queuing in internal hotel reception areas.
- 4.3 The kiosk approved in March 2021 returned the welcome and registration process to an office based exercise in a new kiosk. The check in function previously carried out in hotel receptions can also be completed as guests arrive and whilst they are still in their family groups in their separate vehicles (i.e. fully socially distanced). Keys can be made as guests arrive, including any need to change rooms as may be required.
- 4.4 To ensure there is no vehicle queuing backing up to the site boundary the kiosk has been moved further into the site and onto the new car park area to the north of the Splash pool. The kiosk has 4 service windows so that 4 cars can be processed at a time with room for cars to manoeuvre so that guests who have completed the process can move off and queuing guests can take their place. The location of the kiosk within the new car park means that some 53 cars can queue within the site as shown on plan WOC/MPN/DR/A/0010A and guests who have completed registration have a free route into all of the parking areas in this part of the resort.
- 4.5 As set out above, this application is retrospective and is a resubmission of the previously approved temporary 1 year permission. The kiosk and new queueing arrangements are already in situ and are fully operational, the system works well.
- 4.6 The measures introduced due to Covid restrictions have been found to work very well even with the resort back to operating at full capacity. Getting more cars into the queue within the site has reduced the possibility of any queuing backing out on to the road network.

- 4.7 The all-round advantages are such that the resort is very keen to keep the system in place. Butlins are unaware of any complaints or concerns expressed by the neighbours closest to the new queue and kiosk.
- 4.8 Turning to parking at the resort, there is loss of 30 parking spaces as a result of locating the kiosk in an existing parking area together with the necessary manoeuvring areas, these are more than compensated for in the formalisation of the parking area at the rear (east) of the Splash. Previously approved phasing plan 5128/105C showed 152 spaces in the area east of the Splash in order to maintain the level of parking provision in this part of the resort. Location of the kiosk and other consequent changes results in a loss of 49 spaces but the formalisation of the layout provides 234 spaces, i.e. an overall increase of 33 spaces compared to the approved level of provision as part of the Splash planning approval, please see plans WOC/MPN/BOG/DR/A/0011A & 12A which show the numbers of existing and proposed spaces in each of the car parks (including the unaffected parts of the resort).
- 4.9 The formalisation also completes the circular route around the Splash for guest use thereby enabling guests that have registered at the kiosk to gain access to the full range of parking without conflict with the queuing arrangement.
- 4.10 All of these works have been carried out as per the March 2021 approval.
- 4.11 The planning approval for the Splash showed a decked car park to the east of the building with 225 ground level spaces (and 208 spaces at upper level), future provision of the decked level is not prejudiced by the currently proposed formalisation of the layout in this area.

5 PLANNING POLICY

- 5.1 Section 38(6) of the 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 In this case, the development plan comprises policies from the Arun Local Plan (2018) and the Bognor Regis Neighbourhood Plan (2015).
- 5.3 The National Planning Policy Framework (NPPF) is also of relevance.

Arun Local Plan

- 5.4 Policy SD SPI states that the Council will take a positive approach to proposals, reflecting the NPPF and its support of sustainable development.
- 5.5 Policy SD SPIa seeks to promote and enable development which supports Bognor Regis' role as a main service, employment, retail and social centres. It specifically supports development that will benefit Bognor Regis as a holiday centre.
- 5.6 Policy SD SP2 sets out that development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of the Local Plan.
- 5.7 Policy EMP SPI promotes the sustainable growth of the District's economy to meet the varying needs of different economic sectors, support job creation and (inter alia) leisure development, especially in Bognor Regis. The policy supports and promotes a high quality visitor economy.
- 5.8 Policy TOU SPI supports sustainable tourism development which protects the Council's main tourism assets. It sets out that proposals for visitor related development will be determined by Arun's capacity to absorb growth. This means tourism growth which:
- a. Encourages long-term visitor interest / activity;
 - b. Ensures a viable visitor economy;
 - c. Provides benefit to local people;
 - d. Extends the visitor season; and
 - e. Protects and enhances the natural and built environment of Arun.

- 5.9 Policy TOU DMI states that proposals for development, including expansion, which are likely to attract visitors (such as leisure facilities) will be supported provided that they:
- a. are in accessible locations;
 - b. are accompanied by workable and realistic travel plans;
 - c. address visitor management issues; and
 - d. achieve good design.
- 5.10 Policies D SPI and D DMI requires all development to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.
- 5.11 Policy T SPI requires development to be have acceptable transport impacts.
- 5.12 Policy ENV SPI requires the preservation, restoration and enhancement of biodiversity and the natural environment, particularly designated sites, including Pagham Harbour.
- 5.13 Policy ENV DM2 requires development which is within Zone B (0-5km) of Pagham Harbour and likely to have an impact on it to make a contribution towards its management and to create easily accessible new green spaces for recreation within or adjacent to the development site in order to accommodate the predicted increases in demand for local walking, including dog walking.
- 5.14 Policy W SPI and W DM2 require a site specific Flood Risk Assessment to demonstrates that development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.
- 5.15 Policy QE DMI states that new noise generating development must be supported by a noise report. It must demonstrate that the development meets appropriate national and local standards for noise, and that mitigation measures ensure noise can be managed at an acceptable level.

Bognor Regis Neighbourhood Plan

- 5.16 Policy 8d which concerns the Butlin's Resort, states that the "enhancement and development of this major tourist destination on this site will be encouraged subject to compliance with other policies in this plan..."

- 5.17 Policy 7 states that *“where proposals comply with other policies in this plan, development of new and existing tourist facilities will be supported, as a crucial part of improving Bognor Regis as a visitor destination.”*

The NPPF

- 5.18 At the heart of the NPPF is a presumption in favour of sustainable development; development proposals that accord with the development plan should be approved without delay.
- 5.19 The NPPF states how planning should drive and support sustainable economic development (para.17 3rd bullet), and goes on to state (para.19) that the planning system should do everything it can to support sustainable economic growth and that economic growth should be given “significant weight”.
- 5.20 LPAs “should approach decision making in a positive way to foster the delivery of sustainable development” and they “should look for solutions rather than problems”. LPAs “should seek to approve applications for sustainable development where possible” and they “should work proactively with applicants” (paras. 186 & 187).

6 ASSESSMENT

- 6.1 Planning permission is sought for the entrance kiosk and alterations to the queuing system and vehicle circulation on site. These elements are already in situ and fully operational, and the application is made retrospectively due to the 1 year time limit having recently expired.
- 6.2 The following sections of the planning statement will rehearse the discussion from the December 2020 application which ultimately gained approval.

Principle of Development

- 6.3 The kiosk is associated with and located on an existing leisure site within the built-up area of Bognor Regis. It provides an improved facility which will help the resort to support Bognor Regis' visitor economy and role as a holiday centre in accordance with policies SD SP2, SD SPIa, EMP SPI, and 7, and in response to the Covid pandemic.
- 6.4 The proposal will retain the current significant benefits it delivers. The kiosk will not increase the capacity of the resort. It allows Butlins to improve visitor experience at check in, enhance the initial reception of guests, enable social distancing of guests as they check in and get their keys whilst increasing the potential vehicle queuing capacity within the site in accordance policies TOU SPI and TOU DMI.
- 6.5 The principle of the development is therefore wholly in accordance with the development plan.

Design & Appearance

- 6.6 Comments on the design of the kiosk are set out in chapter 7 below. The design is functionally efficient and suitable to its location which is well-contained and screened by existing buildings in accordance with policies D SPI and D DMI.

Amenity

- 6.7 The kiosk does not generate any new noise or other activity, it simply relocates and reorganises the check in process in a more efficient and Covid compliant manner.

Transport & Highways

- 6.8 No Transport Assessment/Statement is submitted as the proposals do not increase guest numbers. The kiosk is only to improve the check in arrangements and should reduce any potential for queuing traffic to obstruct the highway. The kiosk and check in arrangements have no adverse impact on transport or the highways in accordance with policy T SPI.
- 6.9 Formalisation of the car park (in the area already approved for car parking) has increased spaces available on site beyond the level agreed to be necessary for the current level of accommodation within the resort.

Flood Risk & Drainage

- 6.10 For obvious reasons, the proposed development needs to be on the existing Butlins site. A Sequential Test exercise is therefore futile. There is only a small part of the resort outside of flood zone 3 and this is occupied by other buildings so there is equally little merit in considering alternative locations from a flood protection point of view. Furthermore, the kiosk is optimally located in relation to the access and to facilitate free vehicular movement within the site. As the proposal is for “less vulnerable” development used only by staff, albeit in flood zone 3, there is no requirement for an Exception Test.
- 6.11 A very brief Flood Risk Assessment is included in chapter 8 of this Statement, this demonstrates that development will be safe without increasing flood risk in accordance with policies W SPI and W DM2 and NPPF guidance.

Ecology

- 6.12 The site lies just inside the boundary marking the Pagham Harbour Buffer Zone B (5km buffer). However, the kiosk does not increase the capacity of the resort or result in any additional disturbance on the Harbour. It does not therefore have any adverse impact on the protected area and does not incur a Pagham Harbour contribution in accordance with policies ENV SPI and ENV DM2.
- 6.13 The site is within 2km of the Bognor SSSI. However, for the same reasons as above, the kiosk has not caused any increased adverse impact on the SSSI and wildlife in general.
- 6.14 No ecology assessment is required, as no demolition is proposed as part of this application.

Heritage

- 6.15 No buildings on the application site are listed, and the site does not lie in a conservation area. The Bognor Regis Hotham Park Conservation Area is located to the north west of the Butlins site, but the kiosk is not visible from the Conservation Area owing to the presence of existing buildings.

Economy

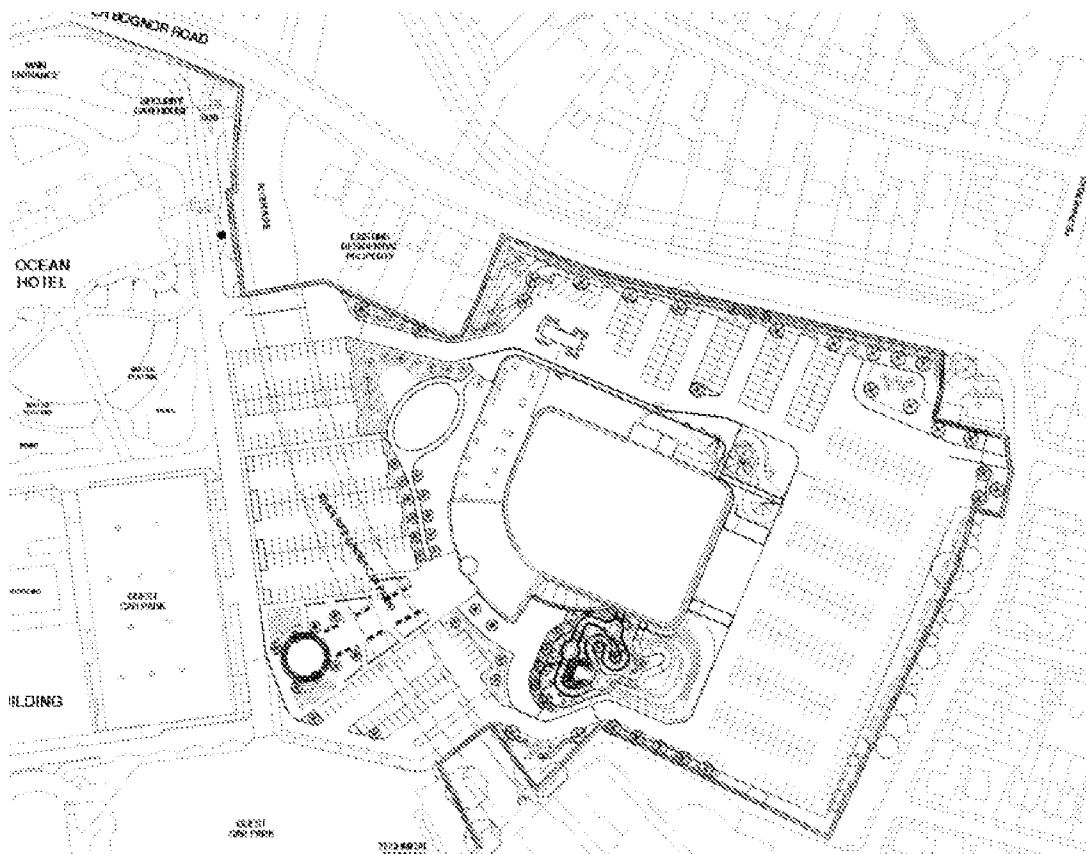
- 6.16 The economic benefits of the resort are huge and the kiosk assists the resort to operate better – to the benefit of guests, staff and the local community, it will also play a significant part in enabling the resort to operate safely in a Covid and post-Covid environment. The Butlins resort makes a significant contribution to the local economy through the employment of local people and linked spending outside of the resort within Bognor Regis and the District.

7 DESIGN & ACCESS

- 7.1 This Design and Access Statement is submitted on behalf of Butlins Skyline Ltd in support of the proposal for a Kiosk at Butlins - Bognor Regis. The site is located in Butlins holiday resort on the south coast of England, in West Sussex.
- 7.2 The purpose of this statement is to communicate to the Local Planning Authority and other interested parties the process that has led to the development proposals and the design response.
- 7.3 The project objective is for a new Kiosk in Butlins Resort to enable cars to be processed faster and take them off the surrounding roads.

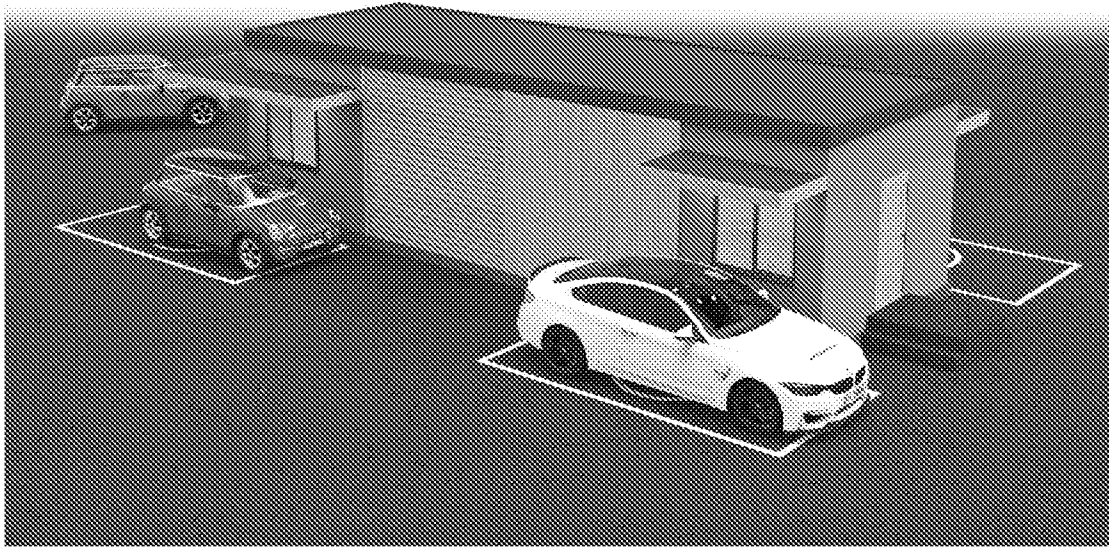
Location

- 7.4 The Kiosk is located in the existing car park on the north side of the Splash pool.



Kiosk Design

- 7.5** The kiosk is of timber construction and is 4m wide by 12.5m long and 3.1m high. It includes two desk points along each side, positioned next to sliding windows to facilitate the delivery of information to arriving guests. The kiosk is clad in a mix of treated redwood shiplap timber and anthracite grey Trespa flat panels.



Access

- 7.6** Staff access the kiosk by foot via the existing footpath surrounding the splash building. Given the use of the building, access is restricted to Butlins staff only. At peak times this is up to five people. However for the majority of the time, out of peak hours, it hosts two or three people who operate the two check in windows on the northern side of the kiosk. The building includes two entrances, one at each end. These entrances are for staff only and are stepped access with a mobile ramp kept inside the Kiosk to accommodate disabled access.
- 7.7** No guests are allowed to access the kiosk by foot.
- 7.8** Guests arrive at the kiosk by car to be given their welcome packs and then to proceed on to their allocated parking location.
- 7.9** As there are no additional accommodation units proposed as part of this application, there will not be any increase of traffic to the resort.

8 FLOOD RISKASSESSMENT & DRAINAGE

- 8.1 The proposed development consists of a single storey kiosk within land currently occupied by a recently built car park. The car park was constructed as part of the January 2017 planning application for the erection of the Splash Pool complex with the associated parking and access infrastructure.
- 8.2 The existing car park was constructed under the approved planning application and is drained by a series of linear channel drains that capture runoff from the car park surface before directing the flow to the underground drainage pipework leading to a large cellular storage attenuation tank. The tank then drains via a vortex flow control device to the nearby drain that flows into the Aldingbourne Rife at reduced rates approved within the Flood Risk Assessment (FRA2017) written for the approved January 2017 planning application.
- 8.3 The FRA2017 (copy included in this submission for information only) stated:

Flood Risk – To the Development

There is considered to be no risk of flooding to the proposed development from artificial sources.

Flood risks to the proposed development from tidal and fluvial flooding have been assessed as low.

Overall flood risk to the proposed development from pluvial and sewer sources are considered to be low.

There is considered to be a high risk of flooding from groundwater.

Flood Risk – From the Development

The increased fluvial and surface water flood risk from the proposed development is considered to be negligible.

Flood Risk Mitigation

The site is protected against tidal flooding by the sea defence wall. In the event of a breach or wave overtopping the defences, the maximum predicted tide level for a 1 in 200 year return period event is 4.5m AOD, which is higher than the level of the ground floor and plant rooms that are situated within the basement. The main structure of the swimming pool will be designed to resist loads imposed by floodwater in order to ensure that it does not collapse in the event of a tidal breach. Plant rooms will be constructed within concrete walls with flood gates to protect plant against flooding during any breach or overtopping. It is also recommended to locate electric power points above 4.5m AOD flood level, where possible, and to use an appropriate circuit breaker system to trip off the power system during flood events.

It is recommended that a Flood Emergency Plan be developed, which will detail the route of egress in the event of a flood to enable occupants of the swimming pool will be evacuated to

areas within the swimming pool building, or other areas of the Holiday Centre that are elevated above the maximum predicted flood level (4.5m AOD). It is also recommended that the swimming pool signs up to receive Flood Alerts issued by the Environment Agency, to ensure that the evacuation plan can be implemented with as much forewarning as possible.

The site is located within a high risk area for groundwater flooding and the ground floor slab will be installed above the highest anticipated groundwater level. To mitigate the risk of groundwater seepage, the slab and basement plant room will be constructed using concrete mixes with an appropriate water resistant specification. Measures will also be taken in the foundation design to stop deeper groundwater from migrating upwards to the perched groundwater level. Pile design and construction methods will mitigate against the formation of a conduit between the two levels of groundwater.

Surface Water Drainage Strategy

A surface water drainage system has been proposed, which will incorporate Sustainable Drainage Systems in the form of porous paving within car parks, shallow cellular storage on the deck of car park and geo-cellular storage below landscaped areas surrounding the swimming pool. These features will enable water quality to be improved and they will provide sufficient attenuation storage to enable the peak discharge during rainfall events with a return period of up to 1 in 100 years plus 40% climate change to be restricted to the mean annual runoff, Q_{bar} .

The proposed surface water drainage network will reduce flood risk to and from the proposed development, as the proposed Sustainable Drainage Systems will enable runoff rates to the Aldingbourne Rife to be reduced, whilst permitting excess surface water generated during extreme events to be stored within Sustainable Drainage Systems constructed as an integrated part of the development.

- 8.4 The kiosk has been constructed on the area already occupied by the recently constructed car park. Therefore, the kiosk does not generate any additional surface water drainage nor does it amend the drainage regime within the Splash site.
- 8.5 The linear drainage channel located under the kiosk has been cut short and re-provided with a new outlet gully located north of the kiosk in a manner to allow future maintenance, together with a new connection to the nearby recently constructed drains that currently already receive the runoff from the same area of car park.
- 8.6 A new gully has been installed on the opposite side (south side) of the kiosk to capture any residual runoff and direct it to the nearby drains, again mimicking the regime of drainage currently in operation on site. The runoff from the small roof of the kiosk will drain directly to the surrounding car park surface where it will find its way into either the gully or the channel drain described in above.

- 8.7 The discharge rate of surface water from the Splash site remains unchanged by the works to the kiosk as the drainage alterations were only be made to the local drains within the immediate vicinity of the kiosk, all upstream of the flow control device and the main attenuation tank beneath the proposed kiosk.
- 8.8 The kiosk foundations solution has been detailed to ensure that it does not adversely affect the attenuation tank located under the kiosk. With a cover depth of over 1.4m for a tank originally designed to accept HGV loading in the car park area, the solution does not result in an overly complicated construction process.
- 8.9 Therefore, the construction of the kiosk within the existing car park has not altered the regime of drainage and has not result in increased risk of flooding to the site of the surrounding properties.

9 CONCLUSION

- 9.1 This retrospective application seeks planning permission for the new entrance kiosk at the Butlins Resort that has been in situ and operating effectively for over a year following the grant of temporary planning permission in March 2021 for a time-limited period of 1 year.
- 9.2 This application is a resubmission of the previous application, and consent is sought on a permanent basis.
- 9.3 The proposed development (retrospective) is to erect a new kiosk to improve the check in and registration at the resort, it is also needed to ensure that the resort can follow best practice and help guests to maintain social distancing. The proposal has the wider benefit of having been found to operate more successfully for guests and for the community in getting cars into the site efficiently to reduce the possibility of off-site queuing.
- 9.4 The kiosk has not increased the capacity of the resort. It simply allows the resort to operate more efficiently and provides a better and safer experience for guests. It has had no impact on the nearby areas of special ecological and habitat interest as guest capacity is not increased.
- 9.5 The principle of the development is supported by NPPF and the development plan.
- 9.6 The kiosk design is appropriate for its function and location and is located in the optimum position to enhance queuing capacity, minimise loss of parking and maximise post check in flexibility for guests finding a parking space, it meets the policies of the Development Plan. Formalisation of the car park (in the area already approved for car parking) has increased spaces available on site beyond the level agreed to be necessary for the current level of accommodation within the resort.
- 9.7 As set out in the FRA chapter of this Statement the proposal has not added to flood risk on site or in the surrounding area.
- 9.8 In summary, the proposed development complies with the Development Plan and the provisions of the NPPF such that a favourable decision should be reached as expeditiously as possible.