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WALSINGHAM PLANNING

SPECIALIST PLANNING & DEVELOPMENT CONSULTANTS

Planning Statement

Butlins Resort
Upper Bognor Road
Bognor Regis
PO21 1JJ

Temporary Stage Building

DECEMBER 2020

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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:

“Erection of temporary buildings to accommodate performance stage and seating for a period of up to 3 years.”

- I.2 This Statement has been prepared following an examination of the site and surroundings and relevant planning policy documents. The application is submitted following informal pre-application discussions with Arun District Council, which confirmed that a planning application was required for the development and the necessary supporting information in order for the Council to determine the application.

- I.3 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;
- Chapter 5 sets out the need for the development;
- Chapter 6 sets out the relevant planning policy and guidance;
- Chapter 7 discusses the planning considerations against these policies; and
- Chapter 8 sets out the conclusions.

- I.4 This Statement should be read in conjunction with the following documents submitted in support of the application:

- Application Form
- Existing and Proposed Drawings
- Design & Access Statement
- Flood Risk Assessment and Drainage Strategy Report
- Noise Impact Assessment
- CIL Form

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 the former swimming pool building and the surrounding hardstanding towards the southwest corner of the site.



Former swimming pool building - Butlins Resort, Bognor Regis

- 2.2 The former swimming pool building already has consent to be demolished as part of a 2017 planning permission to provide a new swimming pool complex towards the east of the site.
- 2.3 To the south of the former swimming pool is Promenade Road, beyond which is the Butlins fenced site boundary and the Promenade. To the north and east are resort buildings. To the west is a parking area and visitor accommodation.
- 2.4 No buildings on the application site are listed, and the site does not lie in a conservation area.
- 2.5 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 It was intended for the space vacated by the former swimming pool building to be landscaped until a separate, future application to redevelop the area for accommodation to replace that lost in the demolitions is forthcoming.

Pre-application Advice

- 3.3 Informal discussions with the Council about the proposed development took place in November 2020. The Council confirmed that the proposed temporary stage buildings would require planning permission and that a noise report and flood risk assessment would be required to accompany the application.

4 PROPOSED DEVELOPMENT

- 4.1 In response to the Covid-19 pandemic, there is a pressing need to erect temporary entertainment venues at all three of Butlins' UK holiday resorts, including Bognor Regis.
- 4.2 It is necessary to be pragmatic, so the proposal is for the proposed temporary entertainment venues to remain in place for up to 3 years.
- 4.3 In order to be ready for the start of the holiday season, construction will need to begin in March at the latest.
- 4.4 Submitted are drawings which show the proposed temporary structures. The main structure will measure 65m in length, 40m in width and 10m in height at its highest point (the roof has a shallow pitch). The structure will accommodate a stage, 172 tables each with 5 chairs to accommodate an audience of 860 guests in separate groups.
- 4.5 A smaller supporting structure will also be provided to the east of the main venue. It will measure 20m x 20m x 9.4m and will house a bar and additional WCs.
- 4.6 The temporary structures will be made of aluminium columns supporting a Kingspan fixed panel system in shades of grey and PVC and glass frame side panels. The roof will be made of aluminium trusses and white PVC fabric.
- 4.7 The structures will be raised approximately circa 180mm off the ground. Ramps will be provided at exits to allow for disabled access.
- 4.8 A fenced area to accommodate the back of house area for the performers and utility compound will be to the rear (south) of the main structure.
- 4.9 The proposals follow previous temporary outdoor stages which were in place during the shortened 2020 summer season. These stages were removed as the weather deteriorated making them impractical for guest use.
- 4.10 The intention is that the temporary buildings will not be used beyond 23:00 and will not be used for Butlins' 'Adult Weekend' activities.

5 NEED

- 5.1 Butlins' resorts have been severely impacted by the Covid crisis that unfolded during 2020 with closures of all of their resorts, staff on furlough (with no resort staff facing redundancy for Covid related reasons) and many guests disappointed by the postponement or cancellation of their holidays.
- 5.2 Happily, it was possible to re-open the resorts during the latter part of the summer season but this needed to be with reduced capacity. Whilst family groups could maintain social distancing in their respective apartments or hotel rooms, attractions such as the swimming pools and entertainments together with the restaurants and other activities all also required social distancing to be maintained.
- 5.3 The usual capacity of the Bognor Regis resort at c. 5,500 guests was limited for the reduced 2020 summer season to a maximum c.3,200 so that safe social distancing could be ensured throughout the resort. But the social distancing of even reduced numbers of guests simply requires additional space for some entertainments/facilities.
- 5.4 Hence, an outdoor stage was provided at the resort during 2020 summer to enable family groups to enjoy the good range of the entertainments for which Butlins is renowned and which form an important part of guest expectations. The outdoor stage provided additional entertainment capacity whilst maintaining social distancing by spreading guests over the enlarged facilities.
- 5.5 However, whilst the outdoor stage was immensely important in allowing the successful limited capacity re-opening this summer, it was not suitable for use in inclement weather and was removed at the end of September.
- 5.6 Despite the very recent encouraging news that a vaccine may soon become available, Butlins need to make robust plans for 2021 and beyond so that the risk of having to limit operations and disappoint more guests next year and beyond can be minimised. Therefore, it is proposed to provide an additional stage in a temporary building. This will enable the resort capacity to be raised from the c. 3,200 figure in the summer of 2020 to c.4,000 for 2021.
- 5.7 Given the continued uncertainties about Covid and post-Covid requirements and guest expectations, a temporary period of 3 years is sought for the buildings to avoid the need to

repeat this exercise seeking a renewal of planning permission that might be necessary if a shorter period were approved.

- 5.8 The proposed venue does not increase the capacity of the resort. It would allow Butlins to get closer to the normal resort capacity (albeit still well below pre Covid normal capacities) and operate to a more viable level of business, whilst allowing guests to enjoy their stay in a socially distanced manner, including during periods of inclement weather when an outdoor stage would not be attractive.
- 5.9 There is no increase in overnight guest accommodation and other factors continue to limit overall guest numbers under Covid (and perhaps under post-Covid) conditions), hence there is no need for additional parking and no additional traffic generation.
- 5.10 Accommodating the additional stage within a building will avoid the need for an outdoor stage, as was required in summer 2020, and provide a better and weather-proofed facility for guests whilst increasing the ability to attenuate any noise from entertainments.
- 5.11 Increasing the safe and sustainable capacity of the resort from summer 2020 levels will help more guests enjoy a holiday break, secure additional employment, economic benefits to the area and bring the business closer to its normal operating viability.
- 5.12 At the time of writing, the resort is closed under the second “lockdown” requirements, so that staff have been returned to furlough.
- 5.13 If the resort can reopen for the 2021 summer season with the, still limited but increased guest capacity facilitated by the proposed temporary stage building, it is estimated that staffing levels can return to c.1,190. This represents an increase compared to summer 2020 of c.340.
- 5.14 The opportunity will be taken to fulfil the long-held wish to remove the old swimming pool building, as was granted planning approval at the time the new Splash swimming pool complex was permitted. This means that existing services can be re-used, there is no increase in impermeable areas (hence no implications for flooding or surface water drainage) and there will be no loss of car parking.
- 5.15 The new temporary buildings must be in place in advance of the early May Bank Holiday (sooner if at all possible, depending on demolition of the old swimming pool). The erection of the buildings is scheduled to take c.3 weeks, but this assumes that the site is ready to accept it. This means that there will be site preparation works starting in March or as soon as

demolition of the old pool allows with erection of the building starting by 22/3/21 at the latest if the readiness for Spring Bank holiday is not to be compromised.

- 5.16 In order to make that prompt start on 22/3/21, supplier orders will need to be placed in advance. Furthermore, there will be no real scope for the discharge of pre-commencement or pre-occupation planning conditions so that any additional detailed information needs to be agreed prior to decision so that any planning conditions can simply require compliance.
- 5.17 Butlins also need to be assured that the buildings will be open and ready for use in time for Spring Bank holiday well in advance as this impacts on their ability to accept guest reservations. It is sincerely hoped that the Council will deal with this application as expeditiously as possible with the earliest possible indication that a successful outcome can be anticipated.

6 PLANNING POLICY

- 6.1 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.
- 6.2 In this case, the development plan comprises policies from the Arun Local Plan (2018) and the Bognor Regis Neighbourhood Plan (2015).
- 6.3 The National Planning Policy Framework (NPPF) is also of relevance.

Arun Local Plan

- 6.4 Policy SD SPI states that the Council will take a positive approach to proposals, reflecting the NPPF and its support of sustainable development.
- 6.5 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.
- 6.6 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.
- 6.7 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.
- 6.8 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.

- 6.9 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.
- 6.10 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.
- 6.11 Policy T SPI requires development to be have acceptable transport impacts.
- 6.12 Policy ENV SPI requires the preservation, restoration and enhancement of biodiversity and the natural environment, particularly designated sites, including Pagham Harbour.
- 6.13 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.
- 6.14 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.
- 6.15 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

- 6.16 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..."

- 6.17 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

- 6.18 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.
- 6.19 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”.
- 6.20 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).

7 ASSESSMENT

Principle of Development

- 7.1 The proposed development is located on an existing leisure site within the built-up area of Bognor Regis. It will provide a temporary facility which would 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.
- 7.2 As already stated, the proposals will not increase the capacity of the resort. They would allow Butlins to get closer to the normal resort capacity (albeit still well below pre Covid normal capacities) and operate at a more viable level of business, whilst allowing guests to enjoy their stay in a socially distanced manner in accordance with policies TOU SPI and TOU DMI. The proposals will allow the resort to continue to operate, attract visitors, contribute to the visitor economy and provide employment to local people.
- 7.3 The principle of the development is therefore wholly in accordance with the development plan.

Design & Appearance

- 7.4 The design of the proposed buildings reflects their temporary need and nature and must be considered in this context. They are appropriate in their size and make efficient use of a previously developed area of the site, which is well-contained and screened by existing buildings in accordance with policies D SPI and D DMI.

Amenity

- 7.5 Unlike the previous temporary stages which were in place for summer 2020, the proposal is for a stage within a temporary building. This will obviously increase attenuation and reduce noise impact. The proposed wall system delivers a minimum 27db reduction. The proposals will continue to operate within the requirements of the adopted Noise Management Plan, which has been agreed with the Council.
- 7.6 Entertainment schedules for 2021 have not yet been developed but these will be prepared considering the noise attenuation properties of the temporary buildings and the need to abide by the terms of the existing Noise Management Plan.

- 7.7 The proposals are accompanied by a specialist Noise Impact Assessment which concludes that noise can be managed at an acceptable level in accordance with policy QE DMI.

Transport & Highways

- 7.8 No Transport Assessment/Statement is required because the proposals do not increase guest numbers. The additional buildings are only to facilitate social distancing due to the Covid pandemic. The proposals will therefore have no adverse impact on transport or the highways in accordance with policy T SPI.

Flood Risk & Drainage

- 7.9 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. As the proposal is for “less vulnerable” development, albeit in flood zone 3, there is no requirement for an Exception Test. Nonetheless, had an Exception Test been required the applicants would submit that there are very substantial sustainability benefits to increasing the resort capacity and employing c.340 additional staff whilst not incurring any additional flooding risks – as set out in the accompanying Flood Risk Assessment.
- 7.10 A Flood Risk Assessment accompanies the application and demonstrates that development will be safe, including access and egress, without increasing flood risk in accordance with policies W SPI and W DM2 and NPPF guidance.

Ecology

- 7.11 The site lies just inside the boundary marking the Pagham Harbour Buffer Zone B (5km buffer). However, the proposed development will not increase the capacity of the resort or result in any additional disturbance on the Harbour. It is a temporary measure to allow Butlins to get closer to the normal resort capacity (albeit still well below pre Covid normal capacities). It would not therefore have any adverse impact on the protected area and would not incur a Pagham Harbour contribution in accordance with policies ENV SPI and ENV DM2.
- 7.12 The site is within 2km of the Bognor SSSI. However, for the same reasons as above, it would not cause any increased adverse impact on the SSSI and wildlife in general.
- 7.13 No ecology assessment is required, as no demolition is proposed as part of this application.

Heritage

- 7.14 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 application site is not visible from the Conservation Area owing to the presence of existing buildings.

Economy

- 7.15 The economic benefits of the proposal are huge. 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. The proposed development will allow for visitor numbers to return closer to pre-Covid levels which will make the resort more viable, secure local employment and boost the local economy.

8 CONCLUSION

- 8.1 It is proposed to erect temporary buildings to accommodate a performance stage and audience seating. The structures would be in place for up to 3 years and in the location of the former swimming pool building.
- 8.2 The proposal is in response to the Covid-19 pandemic and the need for the resort to operate at a viable level and ensure its guests can socially distance.
- 8.3 The proposal will not increase the capacity of the resort. It would allow Butlins to get closer to the normal resort capacity with social distance measures in place.
- 8.4 The principle of the development is supported by the development plan.
- 8.5 The buildings will provide greater sound attenuation than the temporary summer 2020 stages. The site's Noise Management Plan would be adhered to and performances would stop at 23:00.
- 8.6 The temporary venue is in-keeping with the overall scale and proportion of existing surrounding buildings on the site.
- 8.7 As set out in the accompanying FRA, the proposal will not add to flood risk on site or in the surrounding area.
- 8.8 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.