

Planning and Regeneration Services
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Date: 10 May 2021

Our ref: 04051/68/NT/IY/19159384v3

Your ref: PP-09293589

Dear Sir, Madam

Arun District Council: Application for Planning Permission to Erect an Arrivals Lodge at Church Farm Holiday Village, Pagham, Bognor Regis

On behalf of our client, Haven Leisure Limited, a subsidiary of Haven Holidays Ltd, please find enclosed an application for planning permission to erect an Arrivals Lodge at Church Farm Holiday Village.

The application, submitted via the Planning Portal (Ref: PP-09293589), comprises this cover letter along with the following:

- 1 Completed application form and notices prepared by Lichfields;
- 2 CIL Additional Information Requirements Form prepared by Lichfields;
- 3 Application drawings (Annex 1 of this letter) prepared by A&M Architectural Partnership LLP;
- 4 CGI of Arrivals Lodge; and
- 5 Arrivals Lodge Proposed Materials (Annex 2).

A payment of £234 to cover the Council's application fee plus the Planning Portal's administrative fee has been made by bank transfer. The application fee has been calculated on the basis of the erection of a new building (23.7 sqm GEA) ('Minor Development').

Background to the Proposal

Haven Holidays Ltd (Haven) has, like many businesses during 2020/21, had to rapidly adapt its operation to cope with the risk of COVID-19 to guests and team alike. A wide range of measures have been introduced at the Haven holiday parks and the measures were instrumental in enabling a significant number of people to enjoy a holiday during the main summer season. Whilst the capacity of the parks was reduced, various activities were curtailed and some facilities closed, the measures helped the parks to operate and create a wide range of benefits. These included the economic benefits that arise from the operation of each park including via employment creation, spending by guests in the local area, and the use of local suppliers and services.

The importance of tourism has been referred to throughout 2020/21, including in the statement by MHCLG Secretary of State Robert Jenrick (14 July 2020).

He noted “....*tourism industries are vitally important to the economy and the communities they serve...*” and for caravan and holiday parks specifically “...*These parks are the mainstay of their local economies, providing employment and supporting local services and businesses.*”

One measure that Haven introduced to ensure a safe operation involved a radical new approach to guest arrival and check-in. The long established practice has been for guests to arrive at a holiday site, park in a car park and then queue in a reception building, often with many other people. The new approach undertaken in 2020 was to specify an arrival time (a one hour slot) for guests and for a team member to meet the guests at an outdoor “arrival” point within the park. The guest would be checked in and given keys/directed to their accommodation. The response from guests has been very positive indeed and the team at each park recognise that the process is significantly more efficient.

The intention is to establish this new approach as the standard operation in the future, starting in 2021. In addition to the underpinning operational efficiency of this approach, it is also anticipated that COVID-19 will impact guests’ behaviour and expectations for some time and Haven needs to ensure each park is able to operate successfully and safely, both for guests and team members, during the holiday season. It will be appreciated that this is important to enable the parks to operate as efficiently as possible with all the resulting benefits.

However, there is a need to address an important issue that arose in 2020; this concerned the lack of adequate facilities for team members. At the parks, various forms of temporary structure had to be erected to provide a degree of shelter from the elements as well as somewhere to keep material needed to undertake the arrival process. Accordingly, the decision has been taken to provide each park with a new Arrivals Lodge. The building is described below.

Whilst the development, the subject of this application, is very modest in terms of scale and structure it is, functionally, essential and will help to ensure a consistent arrivals experience across all Haven parks.

The Site

Church Farm Holiday Village is located between Pagham Lagoon (to the south east) and Pagham Harbour (to the west) within the westernmost area of Arun District Council (ADC), in West Sussex. It is approximately 6.5km to the south west of the centre of Bognor Regis. Pagham beach is 300m to the south west. The Park is an important contributor to the local tourism economy, providing a high quality tourist and leisure facility.

The application site consists of an area of pebbled concrete and soft landscaping on the left hand verge of the main access road within the holiday village. The location for the proposed Arrivals Lodge in this area is defined in the application drawing by a zone. The zone extends to 132 sqm. The precise location of the Arrivals Lodge within this zone will be determined on site at the commencement of construction.

The Proposal

The proposed Arrivals Lodge will consist of a building (21 sqm GIA) comprising two main elements: (i) the kiosk area where the welcome staff and security team will be stationed, and (ii) a covered open-sided area where guests will briefly stop, in their cars, to be checked in. The canopy provides appropriate shelter from the elements for team members. Also, guests can visit the Lodge at any time during the day to ask for advice from staff. This area will include a park map to help guests with orientation.

The proposed building will be a maximum height of 3.4m, 7.7m in length and 3.4m wide. The two parts of the building each have pent-style roofs that slope in opposite directions. The west elevation facing the road will include a door enabling access to and from the kiosk for welcome staff and security, and a window for staff to



speak to guests from within the kiosk. A window is also proposed on the south and north elevations of the kiosk so that staff can speak to guests from each direction.

A sign displaying the Haven brand will hang from the roof canopy.

A single bollard will be positioned at the front of the building adjacent to the road.

The northern elevation of the covered open-sided area will incorporate a toughened/laminated glass panel with steel fittings, with the upper part of the elevation consisting of timber panelling from the base of the roof.

External lighting details are included on the enclosed drawings (Ref: 4502-310 Rev B). These will be minimal and discrete, comprising 2 directional luminaires embedded within the roof canopy.

Assessment

The statutory development plan is the Arun Local Plan, adopted July 2018. The National Planning Policy Framework (NPPF) (2019) sets out the overarching policy priorities for the planning system. The NPPF is a material consideration in the assessment of this application.

(i) Principle of Development

Church Farm currently provides 900 static caravan pitches as well as a wide range of tourist guest facilities. Local Plan Policy TOU DM1 (Tourism Related Development) is supportive of new tourism facilities where they address, inter alia, visitor management issues. The proposal would provide an ancillary facility to the Park's main tourism use, helping improve and streamline the Park's check-in procedure. This, in turn, will help maintain the attraction of Church Farm Holiday Village to tourists and the associated economic benefits for the local area, in accordance with the core principles of Policy TOU SP1 (Sustainable Tourism and the Visitor Economy).

The proposed Arrivals Lodge, despite its discrete nature, will make an invaluable contribution to the future operation of the holiday park. Covid-19 has had a significant impact on the leisure and tourism industry and on the way Haven has needed to operate its parks to ensure compliance with social distancing measures and the safety of its guests and staff. These measures will need to be in place for the foreseeable future and, indeed, have led to a way of operating that guests have responded well to and would like to see become a permanent feature.

As such the proposal is important to meeting guest expectations, even beyond COVID-19, and accords with Local Plan Policies TOU DM1 and TOU SP1 as well as policy guidance in the National Planning Policy Framework (NPPF, para. 83) which supports the sustainable growth of the leisure and tourism industry.

(ii) Transport Statement

The zone where the Arrivals Lodge will be located has been carefully defined to be:

- 1 Conveniently located on the main road within the Park; and
- 2 Located sufficiently into the site to avoid effects at the entrance/junction with the public highway. The provision of a defined arrival slot for a guest means that the arrivals profile is smoothed out across the arrival day. Also, the check-in process will only last 20-30 seconds per car to keep the arrivals traffic flowing into the site. If guests require further assistance, they will be directed to an existing parking area within the Holiday Village where they will be offered further assistance. This process has been very effective over the peak summer season last year.



(iii) Landscape/Amenity Statement

The Arrivals Lodge zone has been defined to:

- 1 Avoid trees of note and root protection areas;
- 2 Form part of the main core of the established park where it will not materially change the appearance of the site; and
- 3 Avoid any external impacts on views and neighbouring amenity.

(iv) Biodiversity Statement

Given the proposed location for the Arrivals Lodge, it is not considered that there will be any material effect on biodiversity.

(v) Flood/Drainage Statement

The Arrivals Lodge 'zone' includes land that is within Flood Zone 3A. A Flood Zone 3 designation classifies the site as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year. The most significant flood risk is flooding from the Pagham Rife west of the site, Pagham Lagoon to the south and beyond that the English Channel.

The NPPF states that a Flood Risk Assessment is required to be submitted for all proposals for new development at risk from flooding from all sources, including minor development. The Planning Practice Guidance states that the flood risk assessment should be proportionate to the risk and appropriate to the scale, nature and location of the development (para 031 ID: 7-031-20140306 rev. 06.03.2014) and this is reflected in the scope of information provided in this statement.

The proposed Arrivals Lodge – by its very nature – needs to be located within the boundary of the caravan park so that it can serve visitors of Church Farm Holiday Village. Given that the majority of the caravan park falls within Flood Zone 3, in line with the sequential test requirements set out by the NPPF (paragraphs 157 and 158) and Local Plan Policy W DM2 (Flood Risk), it is concluded that no alternative sites exist within a lower flood risk area which could practically and feasibly accommodate the Arrivals Lodge. It is also noted that the Arrivals Lodge would, in accordance with Planning Practice Guidance (paragraph 067 ID: 7-067-20140306 rev. 06.03.2014), be classed as a 'less vulnerable' use which is considered to be suitable within a Flood Zone 3 location.

Furthermore, the proposal will not increase the level of flood risk at the site or to neighbouring sites - in accordance with national policy guidance and Local Plan policy - and rainwater falling on the roof of the proposed Arrivals Lodge would soakaway into the ground.

On this basis the proposed Arrivals Lodge complies with Local Plan Policy W DM2 and the NPPF guidance as it is considered suitable development within Flood Zone 3 and will not increase the level of flood risk to surrounding properties. It is, therefore, acceptable in flood risk terms.

(vi) Historic Environment

There are some listed buildings situated within and adjacent to the Holiday Park. The proposal site is located nearby to the Grade II listed Becket's Barn (c100m west) and Scheduled Monument (Beckett's Barn and adjoining earthworks).

The proposed Arrivals Lodge would not be in direct sight of Becket's Barn or the Scheduled Monument due to a thick line of trees, hedging and other vegetation between the application site and the historic environment. The distance between the two sites, and the intervening landscape features that separate them, will mean there is no material harm to the significance of the designated heritage assets or their setting. It is also relevant to note that the prevailing character of the immediate and wider area is that of a caravan holiday park, which the proposed development would complement.

Accordingly, it is concluded that there will be no material harm to the designated heritage assets or their setting and the proposal accords with NPPF guidance and Local Plan policies HER SP1 (The Historic Environment) and HER DM1 ('Listed Buildings').

(vii) Public Rights of Way

The proposal is planned to be situated adjacent to Public Footpath 111, which runs along the main entrance road into the Park to connect with Church Lane. Given that the footpath is situated along an existing road, measures are already in place to direct pedestrians along the pavement throughout the Park. The proposal will not disrupt the current access to pedestrians and therefore we consider that the development is acceptable and accords with Local Plan Policy T DM1 ('Sustainable Travel and Public Rights of Way').

Summary and Concluding Comments

Overall, it is therefore concluded that the application is in accordance with the Development Plan and national guidance. Accordingly, we trust that the Council will be able to support the application and that planning permission will be granted.

The Arrivals Lodge is needed urgently to ensure the appropriate facilities are in place as soon as possible given the tourism season has already started and the Government has outlined their roadmap for when various restrictions will be lifted in the lead up to 21 June. We would therefore be grateful if this application could be determined as a matter of priority so that the building works can start as soon as possible. In view of this time pressure we would like to avoid any pre commencement conditions. Accordingly if there is some further information required please let me know and we will try to address it during determination, or please consider a condition requiring the submission of a detail(s), say, 2-3 months after the date of the decision notice.

We look forward to receiving confirmation that the application has been validated. If you require any further information in the meantime, please contact me or my colleague James Burman.

Yours faithfully



Ian York
Associate Director



Annex 1: Application Drawings

Drawing Title	Drawing Reference	Scale
Site Location Plan	4502-CF-100	1:1250 @A1
Block Plan	4502-CF-110	1:500 @A1
Proposed Plans and Elevations	4502-310 Rev B	1:20 & 1:50 @ A1



Annex 2: Arrivals Lodge Proposed Materials

- 1 External walls – CEDRAL C104 (colour: Light Oak)
- 2 Roof – Tata Colourcoat ‘urban’ profiled metal sheeting (colour: dark grey) or EPDM rubber roof membrane (colour: dark grey)
- 3 Fascia – Grey UPVC / RAL 7016
- 4 Rainwater goods / gutters and downpipes – Black UPVC
- 5 Doors and windows – Grey UPVC / RAL 7016