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Planning Services
Medway Council
Gun Wharf
Dock Road
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Date: 17 May 2023
Our ref: 16104/06/NT/26567425v1

Dear Stephie

Full Planning Application: Proposed Swimming Pool Extension at Allhallows Holiday Park

On behalf of our client, Palmhall Limited, we are pleased to submit this application seeking full planning permission for an extension to the existing swimming pool at Allhallows Holiday Park (ALHP).

The description of development for this application is as follows:

“Partial demolition works and erection of an extension to the existing swimming pool building, new plant and equipment, landscaping and associated works.”

The application has been submitted via the Planning Portal (Ref. PP-11584221) and comprises:

- 1 Completed application form, certificates and notices;
- 2 Application drawings, prepared by Space Place (see Appendix 1);
- 3 Design Statement, prepared by Space Place;
- 4 Sustainability Statement, prepared by Space Place;
- 5 Drainage Details, prepared by Crouch Waterfall;
- 6 External Lighting Statement and drawing, prepared by Descoco;
- 7 Tree Survey and Impact Assessment, prepared by Keen Consultants; and
- 8 Ecological Impact Assessment and Shadow HRA Technical Note prepared by Tyler Grange.

The planning application fee of £5,146.00 has been paid via BACs to the Planning Portal (fee calculated on the basis of 775 sqm GEA of new floorspace: £5,082.00, plus portal fee of £64.00).

Background to the Application

Bourne Leisure, established in 1964, is a significant contributor to Great Britain's tourism economy, operating more than 50 holiday sites. These sites comprise hotels

and holiday resorts; family entertainment resorts; holiday villages; and holiday parks. They are managed by a number of subsidiary companies; Butlins, Warner, and Haven.

Bourne Leisure is the leading operator of holiday parks in the UK. For Bourne Leisure to continue to attract customers and respond to changing market conditions, the Company has to invest regularly to maintain a product, so as to meet increasing customer expectations. In particular, the Company seeks to ensure that the facilities at all of its sites are good quality and well maintained, necessitating a programme of replacing older facilities. Significant investment is required to maintain and enhance the viability and attractiveness of all the Company's operations as "destinations" in their own right. A lack of investment would result in stagnating facilities attracting fewer visitors, and therefore, falling income. This harmful outcome for the Company would, in turn, have wider detrimental effects on the local economy (e.g. reduced employment and local spending).

Bourne Leisure, therefore, has active development programmes for the maintenance and enhancement of all their sites. The proposed development forms part of Bourne Leisure's continuing investment and enhancement of Allhallows, to improve the quality and standard of facilities at the site to meet the expectations of guests and remain an attractive option for tourists in the area.

The Site and Surrounding Area

AHLP is located at the northern end of Allhallows-on-Sea near Rochester in Kent, facing the Thames Estuary. ALHP occupies a stretch of land north of The Brimp and comprises caravan pitches served by an informal grid of access roads, and at the north-eastern part of the site is a cluster of single storey (double-height) ancillary structures, including restaurants, show bars, adventure village play areas and car parking.

The application site, which is the subject of this proposal, covers 0.35 ha of land within the existing central operational area of AHLP. The main existing leisure building at Allhallows comprises two blocks which are oblong with chamfered corners and large pitched roofs. In the external courtyard formed between the different building blocks, there is an outdoor swimming pool. The existing square plan building with the indoor pool has a pyramid-shaped roof form with a glazed lantern at the apex.

Surrounding the existing swimming pool facilities, there are a number of outdoor activities, food and beverage units and holiday park accommodation.

The Scheduled Monument and Grade II* listed Slough Fort lies in the eastern part of ALHP approximately 80 metres to the south of the site. The Fort is an early Victorian gun emplacement, constructed of Kentish ragstone on a D-shaped plan with battery wings to the east and west, the defences raised on a mound to allow surveillance over the estuary.

ALHP is a long-established leisure destination, which was established as a static holiday caravan park in the late 1950s and has grown since this time. ALHP currently consists of the central facilities area and caravans, which are mostly located to the north, south and west of the central facilities area. The whole site, as defined by the red line on the site location plan, is within the ownership of Palmhall Ltd, the applicant, acting for Bourne Leisure.

The Proposed Development

The application scheme proposes an extension to the existing swimming pool building at ALHP. The existing swimming pool has become tired and is not large enough. Its expansion is proposed to increase the water area and bathing numbers on the site, and to include a range of water attractions for multi-generational activities. This will enhance and expand the existing park facilities to meet the demands and customer expectations for high quality facilities on site. Internal works are also proposed within the existing building – however these works do not require planning permission.

The proposals, subject to this application include:

An extension to the pool facilities to house a confidence pool area and multi-level play structure, located to the south of the existing pool facilities. The extension will allow internal movement from the indoor pool to the new leisure water area.

The pool extension will measure approximately 740 sqm (GEA) and will have a pitched roof to keep the eaves level down and reduce the visual mass of the building.

A new plant room is also proposed as part of the extension, located to the south of the existing outdoor swimming pool. This plant room is proposed to serve the indoor pool, outdoor pool and new water extension as the current plant room is too small to meet the current requirements. The plant room is designed with a flat roof and parapet to enclose the outdoor pool and allow some plant to be located on the roof behind the parapet.

A reduction in the overall size of the outdoor pool is proposed to allow the addition of balance tanks below an area of new external decking. The proposal also includes the addition of a new link corridor structure allowing internal access to the outdoor pool (approximately 35 sqm GEA).

The proposed extension will be finished in a cementitious weather-boarding material in pastel colours to add to the beach feel of the site. The proposed material is long-life and low maintenance, which will help to ensure that the building maintains its new high quality appearance.

Demolition of the existing entrance located to the east of the existing swimming pool facilities and reconfiguration of the existing building to accommodate a new entrance.

Assessment

The Statutory Development Plan for the area comprises the Medway Local Plan 2003 (the Local Plan). The National Planning Policy Framework (NPPF) (2021) sets out the overarching policy priorities for the planning system. The NPPF is a material consideration in the assessment of this application.

The Medway Local Plan Proposals Map details the policy designations for the site. ALHP itself is not subject to any specific designations. However, beyond the boundary of the Tidal Flood Area, the areas to the north, west and east of the site are designated as follows:

Developed Coast;

Flood Zone 1;

South Thames Estuary and Marshes SPA/Ramsar;

Medway Estuary and Marshes SPA/Ramsar; and,

North Kent Marshes Special Landscape Area.

Principle of Development

The NPPF states that sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside, should be supported (Para 84.). It also

supports the investment, expansion and adaptation of businesses and states that planning decisions should place ‘significant weight’ on the need to support economic growth, considering local business needs and wider opportunities for development (para 81)t.

Medway Local Plan Policy ED15 is specifically related to self-catering, caravan and camping sites, and states that new facilities will be permitted provided the scale of the proposal would not affect local amenity or be intrusive; the local highway network can support the scale of the development; and that the facilities should be of a design and scale in keeping with the locality.

The preamble to Policy ED11, relating to existing tourism facilities, states it is essential that existing attractions be retained. Additionally, the preamble to Policy ED12 (New Tourist Facilities) states that new tourist facilities can make a valuable contribution to the local economy provided the site has the capacity to absorb the proposed use and its impact on the surrounding area.

ALHP provides employment opportunities for local people and attracts tourists to the area, resulting in additional spend in the immediate locality and beyond. The continued investment will allow it to remain an attractive employment location and competitive tourist destination, enabling it to continue to deliver positive benefits to the local community and economy in compliance with planning policy.

The proposed development is wholly within the boundaries of the existing ALHP, the character of which is made up of the existing caravans, chalets and other buildings associated with the park. The proposals are located in an underused part of the site within the core of the holiday park. The proposed extension to the existing swimming pool building has an internal floorspace of approximately 712 sqm and does not result in disproportionate additions over and above the size of the existing central facilities and show bar buildings. The proposals will significantly enhance swimming facilities at the site to the benefit of visitors and their health and fitness and it will also will also provide new job opportunities for local people. In this regard it meets the requirements of Policy ED15 in principle.

Overall, the scope of the proposed development is considered suitable within the context of a built-up area of the existing established ALHP. The proposed developments will make an invaluable contribution to the future operation of the holiday park and guest expectations. Further, the proposals are for guest use only, are located within the existing park and are thereby accessible, and are of a good design. As such, the proposals accord with the general aims of Policy ED15 and ED12 as well as policy guidance in the National Planning Policy Framework (NPPF, para. 84) which supports the sustainable growth of the leisure and tourism industry.

Design

The NPPF (para. 126), states that good design is a key aspect of sustainable development. The creation of high quality buildings and places is fundamental to what the planning and development process

should achieve. Local Plan Policy BNE1 outlines that the design of development should be appropriate in relation to the character, appearance and functioning of the built and natural environment by:

“(i) being satisfactory in terms of use, scale, mass, proportion, details, materials, layout and siting; and

(ii) respecting the scale, appearance and location of buildings, spaces and the visual amenity of the surrounding area; and

(iii) where appropriate, providing well structured, practical and attractive areas of open space.”

The proposed development responds to the character, appearance and function of the existing built environment in ALHP. The massing of the new extension has been carefully considered and designed to be sensitive to the surrounding area. The proposed play structure located within the new extension building requires an internal height which is higher than the existing pool hall. The floor levels of the extension also sit higher than the existing building floor levels, due to the rise in ground levels to the south. However, the impact of this is minimised by use of a pitched roof on the main leisure water extension and by staggering the internal floor levels of the plant space to ensure that the parapet line is constant. Massing studies were carried out as the design proposals emerged, to ensure that the impact on the site was minimised.

Overall, the proposed design of the development is acceptable in relation to the existing built form on site and the impact on the character and appearance of the surrounding area in general. The proposal is therefore acceptable in terms of the NPPF and Policies BNE1 of Local Plan.

Amenity

Policy BNE2 of the Local Plan seeks to secure the amenities of future occupiers and protect those amenities enjoyed by nearby and adjacent properties. As the proposals relate to improvements to existing facilities within a holiday park, this development will not lead to any unacceptable or different impacts on amenity.

Given the location of the application site within the confines of the ALHP boundaries and within the core of the holiday park there would be no detrimental impact on the amenities of occupiers of any of the properties adjoining ALHP which are approximately 360m in distance from the application site. The proposal accords with Policy BNE2 of the Local Plan.

Flood Risk and Drainage

The NPPF states that “development in areas at risk of flooding should be avoided” (para 159). The proposed site is within a coastal area that is protected by flood defences, and is within Flood Risk Zone 1 as defined by the Environment Agency. The proposed development is suitable for construction within Flood Risk Zone 1 without any special measures being undertaken. A separate Flood Risk Assessment document has been produced to accompany the application. On the basis of what is proposed in relation to drainage, and given the site is within Flood Zone 1 and is at low risk of flooding, the development is in accordance with the NPPF and Local Plan Policy CF13.

Ecology

The Medway Local Plan 2003 shows that the site is separated from the Thames Estuary and Marshes SPA and Ramsar and the South Thames Estuary and Marshes SSSI by the northern part of the golf course. Policy BNE35 requires that development does not materially harm these designations directly or indirectly. Policy BNE39 also restricts development where it harms statutorily protected species and their habitats.

The proposal has been designed to avoid adverse impacts on the nearby SSSI, SPA and Ramsar, and where possible, net gains will be achieved. An Ecological Impact Assessment report has been prepared by Tyler Grange Group Ltd. This report contains a Phase 1 Habitat Survey and a Preliminary Bat Roost Assessment. A low number of suitable features for roosting bats were identified during the Preliminary Bat Roost Assessment on buildings within the site. A single dusk emergence survey was therefore completed in May 2023 and no bats were found. The report confirms that with the implementation of landscaping and nesting bird avoidance measures, it is considered that the proposed development would conform with relevant legislation, national planning policy.

As agreed with Kent County Council, the finding of the Shadow Habitat Regulation Assessment (HRA) conducted for planning applications (MC/19/1820) have been used to produce a HRA technical note which assess impacts on Thames Estuary and Marshes Ramsar, SPA and South Thames and Marshes SSSI by this latest planning application. No adverse impacts are anticipated on statutory designated sites given the nature and scale of the proposed development and the large distance between the proposed development area and the closest statutory designated sites.

In the light of the above this development accords with Policies BNE33, BNE35, BNE36, BNE37, BNE38 and BNE39 of the Local Plan.

Transport

The NPPF states that planning applications should explain how safe and suitable access to the site can be achieved (para. 110). Local Plan Policy T1 outlines that a proposal will be permitted provided that:

“(i) the highway network has adequate capacity to cater for the traffic which will be generated by the development, taking into account alternative modes to the private car;

(ii) the development will not significantly add to the risk of road traffic accidents;

(iii) the development will not generate significant H.G.V. movements on residential roads; and

(iv) the development will not result in traffic movements at unsociable hours in residential roads that would be likely to cause loss of residential amenity.”

The proposed development does not increase visitor accommodation. It relates solely to improving the leisure offer for existing visitors. As such, in line with Local Plan Policy TR1, there will be no impact on the local highway network in terms of capacity, risk of accidents, HGV movements or movements in unsociable hours on residential roads. With regard to Local Plan Policy TR2, it is noted that no changes are proposed to the access to ALHP from the site.

Overall, it is concluded that neither the construction phase nor the proposed development itself will have a severe impact on the local highway network and the application is acceptable having regard to relevant national and local policy.

Heritage

The Scheduled Monument and Grade II* listed Slough Fort lies in the eastern part of ALHP approximately 80 metres to the south of the site. Local Plan Policy BNE18 Setting of Listed Buildings does not permit development that would adversely affect the setting of a listed building and Policy BNE20: Scheduled Ancient Monuments does not permit development which would be detrimental to their setting.

The proposals include an extension to the existing swimming pool facilities located within the centre of the park and no works are proposed to the fabric of the listed building or Scheduled Monument. The proposed development is similar in height to the those buildings which exist currently at the central cluster of the Park. The long-distance views to the surrounding landscape and estuary would remain clear.

In supporting the continued viability of ALHP, the proposals will indirectly assist in revealing the significance of the asset by bringing visitors to the site. The statutory requirement to preserve the special interest of the listed building can be met. Overall, it is considered that the proposed development will ensure the conservation of the surrounding heritage assets and their settings. It is, therefore, considered that the proposed development is in full accordance with local and national policy requirements relating to the conservation of the historic built environment.

Trees

Medway Local Plan Policy BNE43 requires development sites to retain trees that provide a valuable contribution to the local character. The proposed development recognises the importance of retaining trees and seeks to retain these on site where possible. A Tree Survey and Impact Assessment has been carried out by Keen Consultants. The assessment confirms that the proposed development will result in the loss of the 5 trees which are of low quality and value. All other trees within, and directly adjoining, the site boundary can be retained unharmed. The report confirms that new and replacement tree planting will provided as part of these development proposals – details of which can be agreed via planning condition. This new cohort of trees can provide a diverse portfolio of tree cover to ensure sustainability of green infrastructure in the future.

The Tree Assessment confirms that the trees to be removed do not provide a valuable contribution to the local character, therefore, when considered alongside the mitigation proposed the proposal complies with Local Plan Policy BNE43.

Summary and Concluding Comments

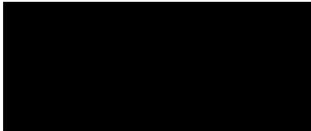
Overall, it is concluded that the application is in accordance with the Development Plan. Accordingly, we trust that the Council will be able to support the application and that planning permission will be granted.

LICHFIELDS

The proposed development will play a vital role in the continued investment at Allhallows Holiday Park to improve and enhance the facilities at the park.

We look forward to receiving confirmation that the application has been validated. If you require any further information in the meantime, please do not hesitate to contact me.

Yours sincerely



Tara Johnston
Senior Planner

Annex 1: Drawings

Drawing Title	Reference
Site Location Plan	3893 – ASP- ZZ-XX-DR-A-0821 DR P01
Site Plan - as existing	3893 – ASP- ZZ-GF-DR-A-0822 DR P01
Site Plan - as proposed	3893 – ASP- ZZ-GF-DR-A-0823 DR P01
GA Building Plan – as existing	3893 – ASP- B1-00-DR-A-0830 DR P01
GA Building Plan - as proposed	3893 – ASP- B1-00-DR-A-0831 DR P01
Demolition Plan	3893 – ASP- B1-00-DR-A-0832 P01
Roof Plan - as existing	3893 – ASP- B1-R1-DR-A-0840 DR P01
Roof Plan - as proposed	3893 – ASP- B1-R1-DR-A-0845 DR P01
Elevations - as existing	3893 – ASP- B1-XX-DR-A-0850 DR P01
Elevations - as proposed	3893 – ASP- B1-XX-DR-A-0855 DR P01
Sections - as existing	3893 – ASP B1-XX-DR-A-0860 DR P01
Sections - as proposed	3893 – ASP B1-XX-DR-A-0865 DR P01