

MC/19/1820

Date Received: 8 July 2019

Location: Allhallows Holiday Park Allhallows Caravan Park Allhallows Rochester

Proposal: Upgrading of existing central facilities complex including the provision of a new marina stage bar building, activity hub and outdoor activity centre, creation of a replacement car park and associated access, hard and soft landscaping and associated works/infrastructure

Applicant Palmhall Limited,

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Ward: Peninsula Ward

Case Officer: Majid Harouni

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Recommendation of Officers to the Planning Committee, to be considered and determined by the Planning Committee at a meeting to be held on 4th March 2020.

Recommendation - Approved subject to;

- A. Section 106 agreement to secure:
 - i To secure a deed of variation to the term of the 2011 (MC/11/2330) dated 21/02/2013 legal agreement with respect to the provision of open space at the holiday park.
 - ii To secure the provision of 16 commercial vehicle parking space as shown in drawing 4283-271 Rev B; and

- B. the following conditions:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Drawing Number 4283- 100, 4283- 105, 4283- 111, 4283- 117, 4283- 120, 4283- 121, 4283- 122, 4283- 210 Rev A, 4283- 211 Rev A, 4283-212, 4283-2 13, 4283- 214, 4283- 215 Rev A, 4283- 216, 4283- 217, 4283- 220, 4283- 223, 4283- 230, 4283- 231, 4283- 232, 4283- 233, 4283- 235, 4283- 240, 4283- 250, 4283- 251, 4283- 252, 4283- 253 Rev A, 4283- 254, 4283- 255, 4283- 256, 19-199-D01 and 19-199-D02 received on 08/07/19, 16/07/19 and 03/09/19.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 No development above slab level shall take place until details and samples of all materials to be used externally have been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003.

- 4 Notwithstanding the submitted CEMP, no development shall take place until a Construction Environmental Management Plan (CEMP) that describes measures to control, amongst other matters, hours of working, parking of operatives vehicles, deliveries to the site, noise, dust and lighting arising from the construction phase of the development has been submitted to and approved in writing by the Local Planning Authority. The construction works shall be undertaken in accordance with this approved plan.

Reason: Required before commencement of development in order to minimise the impact of the construction period on the amenities of local residents, wildlife and habitat and with regard to policies BNE2, BNE38 and BNE39 of the Medway Local Plan 2003 and paragraph 170 of the NPPF.

- 5 The development herein approved shall not be occupied until the area shown on the 4283-211 submitted layout as vehicle parking space has been provided, surfaced and drained. Thereafter it shall be kept available for such use and no permanent development, whether or not permitted by the Town and Country Planning (General Permitted Development) Order 2018 (or any order amending, revoking or re-acting that Order) shall be carried out on the land so shown or in

such a position as to preclude vehicular access to this reserved parking space/garaging.

Reason: Development without provision of adequate accommodation for the parking of vehicles is likely to lead to hazardous on-street parking and in accordance with Policies T1 and T13 of the Medway Local Plan 2003.

- 6 Prior to any development above ground floor slab level details of the following mitigation measures shall be submitted to and approved in writing by the Local Planning Authority:

Electric Vehicle charging points with 5% active and 10% passive within the new parking area.

Reason: In the interests of sustainability in accordance with paragraph 110E of NPPF 2018.

- 7 No impact piling shall take place during the wintering birds period (October to March inclusive).

Reason: Required before commencement to ensure satisfactory arrangements are made to safeguard the habitats in the interests of ecology in accordance with Policy BNE37 of the Medway Local Plan 2003 and paragraphs 174 and 176 of the NPPF.

- 8 No development shall take place until a scheme showing details of the disposal of surface water, based on sustainable drainage principles, including details of the design, implementation, maintenance and management of the surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority.

Those details shall include (if applicable):

- i. a timetable for its implementation (including phased implementation where applicable).
- ii. appropriate operational, maintenance and access requirements for each sustainable drainage component are adequately considered.
- iii. proposed arrangements for future adoption by any public body, statutory undertaker or management company.

Reason: To manage surface water during and post construction and for the lifetime of the development as outlined at Paragraph 165 of NPPF.

- 9 No vegetation clearance or construction works associated with the development hereby approved shall take place during the bird nesting and breeding season (February to August inclusive) unless a suitably qualified ecologist has first demonstrated to the satisfaction of the Local Planning Authority that noise from the application site will not have an adverse impact on breeding and nesting birds in

the surrounding area. (nesting bird checks should be carried out within 24 hours of work commencing).

Reason: Required before commencement to ensure satisfactory arrangements are made to safeguard the habitats in the interests of ecology in accordance with Policy BNE37 of the Medway Local Plan 2003.

- 10 Within 3 months of the commencement on site of the development hereby granted an ecological enhancement plan (EEP) must be submitted to the Local planning authority for written approval. The approved EEP shall be implemented in full prior to the occupation of the development.

Reason: To ensure satisfactory arrangements are made to encourage wildlife habitats and biodiversity in the interests of ecology in accordance with Policy BNE37 of the Medway Local Plan 2003.

- 11 Notwithstanding the lighting scheme already submitted prior to the installation of any external lighting on the site, details of such lighting shall be submitted to and approved in writing by the Local Planning Authority. Details shall include: height, position, external appearance, any shielding, light intensity, colour, spillage (such as light contour or lux level plans showing the existing and proposed levels and hours of use together with a report to demonstrate its effect on the landscaping of the site, Riverscape, views of the site from the nearby residential properties, bats (including reference to the recommendations of the Bat Conservation Trust)) and of how this effect has been minimised. Any external lighting shall be implemented in accordance with the approved details.

Reason: In order to limit the impact of the lighting on the nearby heritage asset, the landscaping of the site, the surrounding landscape, nearby residents and local wildlife and with regard to Policies BNE1, BNE2, BNE5, BNE20, BNE34 and BNE39) of the Medway Local Plan 2003.

- 12 The submitted landscaping scheme as shown in drawing 19-199-D01 and 19-199-D02 shall be carried out in its entirety within a period of twelve months beginning with the first use of the central facilities or first planting season post completion of the development hereby permitted, whichever is sooner. All trees, shrubs and bushes shall be maintained under wider park landscape management programme for the period of five years beginning with the date of completion of the scheme and during that period all losses shall be made replaced like for like and made good.

Reason: In the interests of the appearance of the area, to minimise the visual impact of the development and to comply with Policies BNE6 of the Medway Local Plan.

- 13 The development ecology mitigation measures and habitat creation shall comply with the approved Shadow Habitats Regulations Assessment report no 12486_R03_NJ_MM produced by Tyloer Grange dated 22/11/2019 and Ecology enhancement drawing 12486 Rev P03 received 09/12/2019.

Reason: To ensure satisfactory arrangements are made to minimise impact on the local ecology and to encourage wildlife habitats and biodiversity in accordance with Policy BNE37 of the Medway Local Plan 2003.

For the reasons for this recommendation for approval please see Planning Appraisal Section and Conclusions at the end of this report.

Proposal

Upgrading and expansion of existing central facilities complex including the provision of a new marina lounge show bar building, activity hub, canopy cover sand play, low ropes, flight tower, bungee trampoline, splash zone, waterfall, Astroturf play area, giant octonet and slide, archery shelter, small mugs (goals and baskets ball), Muga and running track, beach play area, tots play, high ropes, climbing wall, zip wire and zip wire platform and other outdoor activity, sweet treat kiosk, together with removal of 10 static caravans and creation of up to 78 car parking spaces and associated access, hard and soft landscaping and associated works/infrastructure.

Site Area

2.5 hectares (6.17 acres)

Relevant Planning History

- MC/19/2202 Removal of 11no existing hardstanding static caravan bases, reconfiguration of the southwest caravan park layout, the golf course layout and change of use of the southeastern part of the golf course/open space land to extend the caravan park by facilitate installation of 95 individual hardstanding bases for 95 static caravans (net gain of 84) new static caravan bases together with extension and alteration of internal access road, pedestrian footpaths and landscaping together with the provision of 16 parking spaces for commercial vehicles within the land area marked blue (same ownership).
To be determined
- MC/14/1687 Non-material amendment to planning permission MC/11/2333 to make minor changes to the layout of the holiday caravans.
Decision: Approved
Decided: 3 July 2014

MC/11/2330 A hybrid application seeking: A) Outline planning permission with all matters reserved for future consideration except access and layout for the redevelopment and upgrading of the existing central facilities, new waterfront development and riverside shelters. And B) Full Planning permission for the provision of a car park to the eastern side of the centralised facilities and sport /leisure gardens at Allhallows Leisure Park, Allhallows-On-Sea, Rochester.
Decision: Approved
Decided: 21 February 2013

MC/11/2333 Application for variation of condition (viii) of MC/82/771 approved 18/02/83 to provide for a revised layout of caravans at Allhallows leisure Park at Allhallows on Sea, Rochester, Kent
Decision: Approved
Decided: 21 February 2013

Associated application relevant planning history

MC/11/2595 Retrospective application for installation of clubhouse (twin unit caravan) with decking and access ramp, paved approach areas, access road, car park, implement store and amenity land in connection with clubhouse
Also on this agenda

MC/11/2333 Application for variation of condition (viii) of ME/82/771 Approved 18/02/83 to provide for a revised layout of caravans
Also on this agenda

MC2009/0077 Construction of 39 caravan bases with balconies & associated car standing; new road layout; river walk & landscaping
Decision Refusal
Decided: 20 July 2009

MC2000/0036 Construction of a nine-hole golf course
Decision Refusal
Decided 06/10/2000
Appeal - Allowed subject to conditions
Decided: 3 October 2001

95/0519 Proposed indoor swimming pool with, link/extensions to existing entertainments, building and realignment of private access, road

	Decision: Approval with Conditions Decided: 6 September 1995
88/128	Proposed relocation of 44 caravans due to the re-allocation of landscaped areas Decision: Approval with Conditions Decided: 6 February 1989
82/771/F	Details of siting of caravans pursuant to outline, approval ME/82/771 Decision: Approval with Conditions Decided
82/771/E	Details pursuant to outline for phase 3 of, proposed leisure centre (family room &, amusements) Decision: Approval with Conditions Decided: 29 July 1986
82/771/D	Details of the development of the caravan site, pursuant to condition (viii) of the outline, planning permission for the formation of a holiday caravan park Decision: Approval with Conditions Decided: 26 February 1986
82/771/C	Details pursuant to condition (viii) (development, of caravan site) of outline planning permission Decision: Approval with Conditions Decided
82/771/B	Details pursuant to outline for phase one of, proposed leisure centre (revised scheme) Decision: Approval with Conditions Decided: 8 March 1984
82/771/A	Phase one of the proposed leisure centre Decision: Approval with Conditions Decided: 17 October 1983
82/771	Outline permission for a holiday caravan, park, including the provision of 16 twin unit, residential caravans for wardens and the phased, development of a central entertainments complex Decision: Approval with Conditions Decided: 18 February 1983

Representations

The application has been advertised on-site and in the press and by individual neighbour notification to the owners and occupiers of neighbouring properties.

Three letters of representation have been received from the local residents raising the following points:

- External lighting /floodlighting at the activities centre and impact on the nearby residential properties.
- The noise level during the construction phase and noise from the proposed activity centre
- The Park has a policy of not allowing commercial vehicles not entering the site. As these commercial vehicles park at Avery Way they obstructing the highway and impact on the local residents' amenities.

Allhallows Parish Council comment as follows:

While the parish council welcome enhancements to facilities at the holiday park, access to these is severely limited to local village residents who suffer pressure on their local infrastructure, especially during the summer, but throughout the 10-month occupation. Recently rules have been enforced that do not allow large vans and Lorries onto the site and these have been left in the entrance road and Avery Way causing nuisance and risks to vehicles and pedestrians. It is common for caravan owners to rent their vehicle out to local contractors outside and sometimes within the peak periods.

We would request an amendment to the application to include a suitable off-street site within the holiday park's ownership for the large vehicles generated by this site.

Submission of additional parking within the park ground for commercial vehicles.

Parish Council's and local residents were re-consulted following receipt of the proposal for 16 no commercial parking spaces within the Park.

One letter has been received from the local resident welcoming the proposed 16 commercial parking spaces.

The Allhallows Parish Council also welcome the proposed 16no commercial vehicle parking spaces and agreed to remove their objection to the application subject to confirmation that these parking provisions will be available to users of the caravans/chalets on site and not just vehicles of Bourne Leisure. The ban on such vehicles entering the site will also form part of the s106 agreement of MC/19/2202.

Southern Water

Has not raised any objection and has stated that the applicant should contact the Southern Water before the commencement of the development.

Natural England

The development proposal is adjacent to The South Thames Estuary & Marshes SSSI and the Thames Estuary & Marshes SPA and Ramsar and could result in indirect impacts to the designated sites in particular; bird disturbance, construction noise and lighting both during and after construction. We, therefore, recommend a further assessment of the potential impacts that may result in the designated sites is provided by the applicant. Where impacts are likely to occur, details of the avoidance and mitigation measures proposed should also be provided. Upon submission of this information, Natural England will be pleased to provide further advice to the Council.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

The applicant provided further information regarding Habitats Regulation Assessment and Natural England has stated that provided there is no impact piling is involved during the construction of the development and the construction works are not carried out during the birds breeding and nesting season they have no objection to the proposal.

KCC Ecology

We advise that the submitted information provides a good understanding of the ecological interest of the site and sufficient information has been provided.

Reptiles

The submitted information has detailed that a precautionary approach will be used to move the reptile population from the proposed development site to the retained habitat. We advise that this is not appropriate and a reptile translocation will have to be carried out. However, as there is sufficient habitat within the wider site to retain the population we accept that the additional information can be submitted as a condition.

Bats

A bat survey has been carried out as part of this application and it has concluded that bats are not roosting within the site but are foraging/commuting within the site, therefore, any lighting proposed may have a negative impact on bats. We advise that there is a need for a bat sensitive lighting plan to be produced to minimise light spill on to the vegetated

boundaries. We advise that any **lighting condition** includes a requirement for the plan to be designed to minimise impacts on foraging bats.

Designated Sites

The proposed development is adjacent to the Thames Estuary and Marshes Ramsar and SPA.

A shadow HRA has been submitted for this application and NE have provided detailed comments.

We highlight that NE has made no reference to the lighting impacts on the designated sites but the Shadow HRA has detailed that there will be no light spill on to the designated sites. We are unable to find a clear lighting plan but due to the distance of this development from the designated sites we are satisfied that the development is unlikely to impact the designated sites due to an increase in lighting– we do not require further information on this point.

We advise that while the applicant has submitted the information to inform the HRA – Medway Council must adopt the submitted HRA.

Ecological Enhancements

An ecological enhancement plan has been submitted. We note that the plan states potential bat box, bee brick and bug hotel and we advise that while there is scope to move the location of these features the number depicted on the plan must be incorporated into the site.

The submitted information has made a number of recommendations to enhance the site (including the creation of a wetland area) but it's not clear what recommendations will be implemented. We advise that if planning permission is granted there is a need for an ecological enhancement plan to be submitted as a condition.

Southern Gas networks

There is not a gas pipeline within the application site.

UK power networks

There are no power UK power network cables within the application site.

The Environment Agency

Made no comment.

Development Plan

The Development Plan for the area comprises the Medway Local Plan 2003 (the Local Plan). The policies referred to within this document and used in the processing of this application have been assessed against the National Planning Policy Framework 2019 and are considered to conform.

Planning Appraisal

Background

As the planning history of the site reveals planning permission for the central facilities and leisure/recreational activities surrounding the facility was granted in 2011.

This application relates to the redevelopment and improvement/expansion of the central facilities and recreational space surrounding that facility. This proposal is part of the applicant's desire to comprehensively upgrade and enhance the holiday park to meet the needs of modern-day holidaymakers.

The proposals will result in an overall increase of 2,409sqm floor-space to the existing central facilities complex in the form stated below to provide Bar and Activity Hub buildings including:-

- 1- Erection of new Marina Stage Bar – 2,113sqm (GEA)
- 2- Erection of Activity Hub – 366sqm (GEA)
- 3- Replacement of existing external sports pitches and informal leisure space with new activity facilities including:
 - Multi-Use Games Areas (MUGAs) and sports areas
 - Mini-Golf course
 - Zip Wire
 - Sand play area
 - Water play areas
 - Miniature 4 x 4 course
 - High ropes; and
 - Climbing walls and frames
- 4- Provision of new 78 space surface car park to replace those on the site of the new Stage Bar;
- 5- Installation of plant equipment; and,
- 6- Other associated landscaping, drainage and infrastructure works.

The application site is surrounded from the east, west and south by the statics caravan pitches and from the south by leisure use facilities.

The proposal would lead to loss of a very small and limited open space grass area along the river frontage.

Both KCC ecology and Natural England have been consulted and they have considered the applicant proposed habitat mitigation measures to be acceptable subject to appropriate conditions ensuring the implementation of the ecological measures as stated in the ecology enhancement plan drawing 12486/P03 dated September 2019, landscape master plan drawing 19-199-D01 dated June 2019 and CEMP dated September 2019

Principle

Tourism can bring many broader benefits that will contribute to the economic and social well-being of local communities as well as to individuals. The revenue generated by tourism can help to support and enhance local services and facilities such as shops and pubs, particularly in rural areas. It can also underpin the quality of the local environment and facilitate further enjoyment of it by residents and visitors. In terms of Medway, tourism makes a significant contribution to its annual economy and employs many thousands within the Borough. Tourism has been identified as one of Medway's target economic growth sectors.

In terms of this application, there are a number of development plan policies that need to be carefully considered and balanced. These range from, but are not limited to, countryside protection policies and concerns related to biodiversity and the impact on ecology and protected species, especially in relation to the adjoining Thames Estuary and Marshes RAMSAR and Special Protection Area and the North Kent Marshes, Special Landscape Area to the potential economic benefits of the development and the effect of the development on the open space provision within the site that is secured currently by a legal agreement as well as impact on the setting of Fort Slough ancient monument situated beyond the rows of caravans to the south of the application site.

The starting point for consideration must be the site location and the Councils adopted Countryside protection policies. The application site is located outside of the confines of the village settlement as set out on the adopted Local Plan. Therefore, Policy BNE25 of the Medway Local Plan 2003 is relevant. This policy seeks to protect the countryside from built development outside of the confines of existing rural centres/villages. However, in this case, it should be noted that the proposed development is an upgrading of the Park's existing entertainment and recreational facilities and these would be located well within the boundaries of the existing holiday park and would be surrounded on three sides by existing caravans, chalets and other buildings associated with the park use/activities. The proposal, therefore, would not result in encroachment on to the countryside and harm to the local landscape or rural character of the area.

Part of the application site is defined as protected open space and Policy L3 of the Medway Local Plan 2003 controls development to ensure that designated open space is protected. However, this Policy also allows for development where sports and recreation facilities can be best implemented and enhanced through the redevelopment of a small part of the site

Policies BNE45 and BNE46 of the Medway Local Plan seek to improve public access to the river and Policy BNE45 (Undeveloped Coast) supports such proposals where the scenic, heritage or scientific value is maintained and where consistent with this, and where practical, public access is enhanced.

The proposal also has to be balanced against the relevant development plan policies that support the provision and improvement of tourist facilities.

The NPPF in paragraph 83 a) and c) offers guidance in relation to supporting a prosperous rural economy and states Planning policies and decisions should enable:-

- a) The sustainable growth and expansion of all types of business in rural areas, both through the conversion of existing buildings and well-designed new buildings.
- c) Sustainable rural tourism and leisure developments which respect the character of the countryside;"

In terms of the adopted Local Plan, the preamble to policy ED11 (Existing Tourism Facilities) states at Paragraph 4.5.24:-

"...it is essential that existing attractions are 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 proposed use, the capacity of the site to absorb it and its impact on the surrounding area."

Policy ED15 of the Medway Local Plan 2003 also supports proposals for new facilities where the development is of a scale that would not adversely affect local amenity, nature conservation interests or be an intrusive element in the surrounding landscape; where the local highway network is capable of supporting the scale of development and where the facilities would be of a design and scale that is in keeping with the locality.

It is considered that the aims of the Government guidance and the above-mentioned policies are clear and in this instance, the proposed central facilities section of the holiday park forms a significant part of the site and is an important feature in the promotion of the Park as a tourist attraction and marketing of the site. Clearly, the above-mentioned policies need to be weighed against the landscape protection and biodiversity policies that are discussed further below.

It is considered that as a result of the existing development within the holiday park and that the proposal would be located within the same, this proposal would not represent and encroach into the surrounding countryside or result in detrimental harm to its appearance.

It is further considered that the application site river frontage is poor, not well used.

The proposals incorporate a 4m wide landscaped area along the northern boundary of the site to integrate the proposals with the riverfront.

The proposed scheme will retain the existing public footpaths which are also the route of the proposed England Coastal Path.

As such the improvements proposed to riverside area and to locate the entertainment and leisure facilities in this location would improve public access to the river and upgrade the quality of the area, therefore it is considered that the loss of the area of open space to the development of tourist facilities, as proposed can be justified on this occasion, particularly as the park will continue to retain substantial open space along the northwest part of the Park defined as the golf course.

Moreover, as part of MC/19/2202 legal agreement overall plan, the retention of the remaining proposed Open Space” would be secured via a variation to the existing legal agreement.

Overall, the uses and scope of the proposed development are considered suitable within the context of a built-up area of the existing established Allhallows Holiday Park (ALHP) and would modernise and improve the central entertainment areas of the site thereby improving user experience.

It is therefore considered that the development proposed is acceptable in principle, provided the development is also acceptable with regard to other material considerations as set out below.

Design

The proposals would enhance and complement the existing leisure central facilities in the Park.

The proposed new Marina Stage Bar would be single-storey building, about 8.75m to the ridge. In response to the land topography and undercroft plant and storage area has also been incorporated into this building. Internally the building will provide entertainment stage, dance floor, bars, food areas and deck lounges. The north and east aspect/elevation of the building would incorporate climbing section to further multi-purpose this building and add to the attraction of the entertainment centre. This building would be viewed within the context of the existing buildings to the south and be commensurate with the scale of the existing Huffkin of Hoo Bar building, Restaurant Building, Blowing Green, Heated indoor swimming pool, indoor play area and min market building which are of similar scale and appearance.

The proposed central activity hub building would be a permanent structure located along the northern boundary of the site. It is a single storey with pitched roof, eave and ridge

height of 3.3m and 6.2m respectively. The building will have a total external floor area of about 430m².

The activity hub building will relate well with its surrounding context and uses.

The external finish materials of the Marina Stage Bar and activity hob buildings would comprise brick slip facing, weatherboarding and polyester powder coated aluminium doors and windows. These are considered to be acceptable in principle, however, a condition is recommended to ensure these materials interns of their colour and quality match the external finish of the existing buildings.

The proposed new zip wire platform, flight tower and other play equipment, enclosures and small buildings will be viewed in the context of the existing entertainment and amusement facilities and wider park development and as such would not appear incongruous, prominent or visually harmful to the character and appearance of the beachfront setting and will relate with their surroundings.

The proposed additional car parking spaces proposed to the south of central facilities, mini market and close to the reception office would assist with internal parking arrangement and access to these facilities more readily available to all the holidaymakers as well as more convenient for those checking in and out during the arrival and departure process. It is considered the proposed additional car parking would make a positive contribution to the operation of the park.

Policy BNE1 of the Local Plan is relevant in this regard. This policy states that a concerted effort will be made to improve the appearance, design, safety and ambience of the public realm. Simply, the public realm can be defined as the public face of buildings, the spaces between frontages and the activities taking place in and between these spaces.

Overall, it is considered that the proposed extension of the central facilities would respect the scale, form and design of existing buildings and would preserve the character and setting of the holiday park. It is therefore considered, on balance the proposed development would be in accordance with Policies BNE1,

Amenity

The proposed new buildings and entertainment/amusement facilities would be away from the nearest residential properties by over 450m away and as such it is considered that there would not be significantly greater harm and impact on the amenities of the nearby properties. However, as there will be a greater number of outdoor activities in the proposed facilities in it is recommended that a noise assessment condition be imposed.

During the application, consideration representations were received from the local residents and the Parish Council about potential noise from the proposed giant screen and the Park's policy banning commercial vehicles entering the site. To address these

issues the applicant agreed to withdraw the giant screen from the proposal and to provide 16 new parking spaces for commercial vehicles close to the access point to the park.

The investigation also reveals that the reason for the Park banning commercial vehicles entering the Park related to Park's caravan site licence restriction which is due for review in the near future by the Council's licencing section.

The question has also been raised by a local resident about potential light pollution from the proposed development. The application is accompanied by a light scheme report which is discussed below. It is however considered that the proposed lighting would not cause harm to the amenities of the residential dwellings to the south-east of the central facilities area that are over 450m away.

The applicant has submitted a CEMP with the application. This document proposes the Construction hours will be restricted to between the following:

- 7:00 am to 19:00pm (Monday to Friday)
- 8:00am to 15:00pm (Saturday)
- 8:00 am to 15:00pm (Sunday - only if required and by agreement with the Council.
- There will be no bank holiday working.

The arrival of local contractors at the site is proposed to be programmed for 8:00 am.

- 9:30 am to 16:30pm (Monday to Friday)
- 8:00 am to 15:00pm (Saturday and Sunday)

Due to the sensitivity of the qualifying bird species of the Thames Estuary and Marshes SPA, any construction works that are likely to increase disturbance levels on the adjacent SPA (such as piling, if required) would be timed to occur outside of the wintering period (1 October until 1 April).

The applicant has stated that the development would not involve any piling. However, to ensure this, a condition is recommended.

With regard to the noise issue, the submitted CEMP states to minimise noise level during the construction period temporary acoustic screens with a mass of at least 10kg/m² should be utilised. The screens should be imperforate, extend at least 1 metre either side of the activity and up to the height of 1 metre above the source of the noise.

There should be no gap between such screens and the ground.

The use of acoustic barriers could further reduce the potential impact from noise levels onto adjacent habitats which support overwintering birds.

Access

Construction traffic will access the Site via Avery Way. It is considered that as all traffic to the park will be via Avery Way where there are a number of residential properties close to the entrance to the park the proposed start time in the morning and Sunday working

involving movement of commercial vehicles would be harmful to the amenities of the occupiers of these properties. As such notwithstanding the CEMP submitted, it is proposed a CEMP condition be imposed to allow the applicant to reconsider their proposed working hours.

The proposal shows roadways and parking provision for all of the static caravan units and central facilities. The applicant has been clear that access arrangements to the units will be compliant with the Disability Discrimination Act. In addition, the proposed improvements to the river-walk area will allow greater access to the river frontage than currently provided. The existing situation consists of a grassed strip to the river frontage and a roadway, thus making it difficult for people with impaired mobility or pushing prams to access the river frontage. The proposal to provide a hard surface within the development site, along the frontage, will ensure access for all users.

Overall it is considered that the site already contains various open-air activities and other similar additional entertainment facilities would not have an unacceptable impact on the residential amenity compared to the existing use.

The submitted CEMP does not provide firm commitment with regard to the steps proposed and uses words such as should and could. As such therefore it is recommended, notwithstanding the submitted CEMP a condition be imposed seeking submission of a CEMP.

It is considered that subject to the above conditions the development would be in accordance with Policy BNE2 of the Local Plan and the aims and objectives of paragraphs 174 and 176 the NPPF.

Highways

The transport impacts of this development are considered to be minimal as the proposal does not increase visitor accommodation but updates the entertainment offered within the park. It is noted that 78 no new car parking spaces would be installed to replace the existing car park area due to the redevelopment as part of this application. To ensure that the proposed parking spaces are made available prior to the use of the new entertainment facilities a condition is recommended.

It is noted that no electric charging points have been provided by the applicant, and therefore a condition would be attached for these to be provided prior to occupation/first use of the new facilities, the new car park shall be made available.

It is considered that subject to the above conditions, no objections to this development would be raised from a highways viewpoint and the application confirms to Policy T1, T2 and T13 of the Medway Local Plan 2003 and Paragraph 109 and 110E of the NPPF 2019.

Lighting

The application has been accompanied by a lighting scheme report which proposes the following:-

Bollards lighting

- To illuminate the pedestrian walkways to and from the building to the respective car parking areas.
- Using a 1000mm high die-cast aluminium, graphite grey bollard to IP65 using an LED lamp with a long rated life.
- To provide an average of 5 lux over a 1m² area with the light spillage being controlled by an acrylic lens and cap complying with ILE 2011

Lighting column and lanterns

- To illuminate the open car park space and driveway.
- Using single lanterns for driveway and double-headed pole top lanterns for the car park, using 8 metres high poles to a protection class of IP65 with an LED lamp.
- To provide an average light level of 15 lux for the car park and the driveway to the car park. The anodised aluminium reflector controls the downward light output to comply with ILE 2011.

Decorative column and lanterns

- To illuminate the pedestrian walkways.
- Using single lanterns using 38.5W LED Lamp providing 2238lm output on a 5m high column.

With regard to the lighting of the MUGA sports provision, it is proposed to light this area with LED on 8m columns.

The proposed lighting is not too dissimilar to the lighting provision currently provided for the existing central facilities and the holiday park. However, there is no indication in the submitted report that the proposed lighting scheme has given any due regard to the bat foraging in the area. Therefore notwithstanding the lighting report submitted with the application, it is considered appropriate to impose a lighting condition seeking a bat sensitive lighting scheme.

Drainage

The application has been accompanied by a Flood Risk Assessment and surface water drainage strategy report. The submitted report was revised and additional information submitted during the consideration of the application. However, it is considered that the proposed car park swale will reduce runoff towards the main building and the swale

alongside the main building is to ensure it picks up the building drainage and the footpath into the building to keep those dry.

At a detailed design stage, the applicant should submit an exceedance/overland flow map to showing the routes of water and detailed cross-sections of the swales with proposed volumes and this should be compared to runoff volumes from the site. To secure that above, an appropriate condition is recommended.

Subject to recommended condition the proposed drainage arrangement is considered to be acceptable and in compliance with paragraph 165 of the NPPF.

Heritage

Slough Fort (a Grade II* Listed Building and Scheduled Ancient Monument) is situated beyond the existing rows of static caravans and the central facilities to the south of the application site.

Paragraph 190 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal and when considering the impact of a proposal on a heritage asset, it should seek to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

The proposed upgrade central facilities would be situated in the same location as the existing central facilities which is some distance away from the Slough Fort.

The development has the buffer of the existing rows of static caravans and buildings forming part of the southern part of the central facilities. It is therefore considered that the proposed development would not cause a significantly greater impact on the setting of Slough heritage asset.

Economic and employment

Economic Development seeks to support applications that clearly support and further the economic growth and regeneration of the local economy. Tourism is a significant economic driver and as stated above is one of the Medway key sectors. Encouraging existing businesses to invest and grow is also one of the Council's priorities and key objectives in job creation.

Tourism data gathered by the United Kingdom Tourism Survey (UKTS) indicates that the parks industry accounts for nearly 90 million tourist bed nights which represents approximately 22% of the UK total. This introduces spending in excess of £3 billion per annum (approximately 14% of the UK total).

The applicant states that the proposal would involve a substantial investment. The estimated construction cost of the Central Complex equates to circa £8 million and the

proposal for an additional 94 Caravan Base project is circa £2.3 million. The construction value can be used to approximate the amount of construction employment that would be created by the scheme. Applying the ratio to the estimated construction cost implies project would support approximately 25 construction jobs per year on average over the construction period.

Construction also involves acquisitions from a number of suppliers, who in turn purchase from their own suppliers through the supply chain. The relationship between the initial direct spending and total economic effects is known as the 'multiplier effect', which demonstrates that an initial investment can have much greater indirect benefits as this spending is diffused through the economy. In respect of this project, the construction stage is projected to support approximately 65 supply chain jobs per year.

The proposed development represents a significant new capital investment at the site and will raise the overall level of economic activity and expenditure in the locality.

Operational and expenditure benefits

The proposed new Central Complex is expected to provide a substantial increase in operational jobs at the site during the season the park is open. Some indirect employment would also be created by the additional spending on goods and services by the employment-generating elements supported at the site. The wage expenditure of workers employed directly at the site would also support further 'spin-off' jobs in shops, services, and other businesses in the local economy.

The proposed new caravans under MC/192202 will also support the potential for an increase in visitors to the site specifically and local area in general. This will contribute to increased expenditure locally beyond that already arising from existing visitors.

The NPPF attaches great importance to economic growth and the economic benefits of developments are an important material consideration to which significant weight must be attached.

The proposed scheme will provide a number of economic benefits comprising economic growth and generate new employment opportunities. It is therefore concluded that the proposed development will make a significant positive economic contribution to the local economy and wider area in line with the Local Plan policies and paragraph 83 and 84 of the NPPF.

Ecology

The site is situated along the southern edge of Thames Estuary. An ecology report has been submitted with respect to the impact of the proposal on the local ecology and Bat which have been considered by Natural England and KCC ecology. Both sought further clarification and additional information relating to impact mitigation and biodiversity enhancement pursuant to paragraph 170 of the NPPF.

Neither Natural England nor KCC Ecology has any objection to the proposal subject to implementation condition restricting the use of impact piling on-site and no construction works during the birds nesting and breeding season. The issues can be controlled as part of the Construction Environmental Management Plan. In addition, conditions have also been recommended with regard to bats sensitive lighting, submission of details with regard to reptile translocation within the wider park, submission of ecology enhancement plan and full implementation of the submitted HRA.

In addition, NE as asked that conditions be imposed preventing the use of impact piling during the birds breeding and nesting season.

It is considered that subject to the above condition the proposal would be acceptable and in compliance with policies BNE38, BNE39 and ED15 of the local plan and paragraph 174 and 176 of the NPPF.

Local Finance Consideration

None

Conclusions and Reasons for Approval

The application for the additional central facilities and car parking would respect the character and appearance of the area in terms of design and layout and would not result in detrimental harm to the amenities of the neighbours that are some distance away from these facilities.

It is considered that the proposal would not cause any additional impact on the Slough Fort heritage building and subjection to the implementation of the ecological mitigating measures proposed the development would not cause an adverse impact on the local wildlife habitat.

It is also considered the potential investment involved would make the Park more attractive and bring more tourism to the Park. The proposal also would improve employment opportunities and support the local economy.

It is considered that the proposal broadly complies with local planning policies and the NPPF and the economic and employment benefits would outweigh limited harms, to the local landscape and ecology. Also, the additional 16no parking space for commercial vehicles would enhance the amenities of the local residents living close to the Park's entrance point.

The application would normally be determined under delegated powers but is being referred for Committee determination due to the number of representations received expressing a view contrary to officer's recommendation/at the request of Councillor.

Background Papers

The relevant background papers relating to the individual applications comprise: the applications and all supporting documentation submitted therewith; and items identified in any Relevant History and Representations section within the report.

Any information referred to is available for inspection in the Planning Offices of Medway Council at Gun Wharf, Dock Road, Chatham ME4 4TR and here <http://publicaccess1.medway.gov.uk/online-applications/>