
Planning, Design and Access Statement

Bay View Holiday Park, Old Martello Road, Pevensey Bay, Pevensey, BN24 6DX



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TOWN AND COUNTRY PLANNING ACT 1990

PROPOSED SITING OF 71 STATIC HOLIDAY CARAVANS IN LIEU OF 94 TOURING CARAVANS AND RELAYOUT OF THE PARK (RESULTING IN 91 STATIC HOLIDAY CARAVANS IN TOTAL) TOGETHER WITH ENVIRONMENTAL IMPROVEMENTS

BAY VIEW HOLIDAY PARK, OLD MARTELLO ROAD, PEVENSEY BAY, PEVENSEY, BN24 6DX

FOR BAY VIEW PARK LIMITED

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Supporting Documents

- Location Plan (1:1250 at A3)
- Proposed Layout Plan (1:250 at A1) (Ref: CA 19.009-07 Rev 1)
- Detailed Soft Landscape Proposals (Ref: CA 19/009-05 and CA 19/009-06 dated February 2019)
(Prepared by Corsican Associates)
- Preliminary Ecological Assessment (Ref: CA/19/009 dated 13.12.2019 – Rev 3)
(Prepared by Corsican Associates)
- Phase 1 Habitat Survey Plan (1:250 at A1) (Ref: CA/19/009-01 dated December 2019 – Rev 3)
(Prepared by Corsican Associates)

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- Arboricultural Impact Assessment (Ref: CA/19/009 dated 03.12.2019 – Rev 4)
(Prepared by Corsican Associates)
- Arboricultural Impact Assessment Plan (1:500 at A1) (Ref: 19/009-02 dated December 2019 – Rev 4)
(Prepared by Corsican Associates)
- Landscape and Visual Appraisal (Ref: N0562 dated 21.03.19)
(Prepared by Corsican Associates)
- NPPF: Flood Risk Assessment FRA (Ref: SHF.201.076.HY.R.001.B dated December 2019)
(prepared by Enzygo)

1. Introduction

- 1.1. This Planning, Design and Access Statement sets out the principle of this planning application and provides additional information to support the proposed development.
- 1.2. The Planning, Design and Access Statement has been prepared strictly in accordance with the guidance and requirements set out in paragraph 9 (2) of the Development Management Procedure Order 2015.

2. The Site (Bay View Holiday Park)

- 2.1. Bay View Holiday Park is a popular and well established holiday caravan park situated on the Sussex coast. The park is located just 1km south of the coastal settlement of Pevensey Bay and 5km north of the popular seaside destination of Eastbourne with all of its visitor attractions and facilities.
- 2.2. The holiday park itself is set in around 2.5ha (6.0 acres) of land and has planning permission for a total of 20 static holiday caravans and 94 touring pitches. The touring pitches comprises a mixture of seasonal and transient pitches for touring caravans, tents and motorhomes. In addition to the caravan development Bay View Holiday Park also accommodates a number of supporting facilities including a site reception/office building, a 4 bedroom holiday bungalow, warden's accommodation and ancillary facilities such as toilet/shower blocks, recreational areas and children's play areas.
- 2.3. As part of the holiday park development there is an adjoining 9 hole golf course to the west which is in the ownership and control of the park. The 9 hole golf course covers around 13.5ha (33 acres) and is a popular facility open and available to holidaymakers at Bay View, including access to the clubhouse facilities.
- 2.4. The holiday park is situated just a few metres from the beach and benefits from views across Pevensey Bay with its sailing club and marina. The local attractions, including the popular seaside resort of Eastbourne, are a convenient distance away and are accessible via popular walking and cycling routes on the coastal path.
- 2.5. Bay View Holiday Park is an award-winning holiday park and benefits from a 4-star 'Visit England' award in having regard to the high standard of caravan accommodation and facilities on offer. The park also has the benefit of a David Bellamy 'gold award' to reflect the positive contribution the park makes to the environment and nature conservation.
- 2.6. The holiday park itself is split between two Local Authority administrative boundaries; the dividing line of which is a central access road which separates the park. The northern part of the park accommodating the main site facilities, 20 static caravans, 41 touring pitches and the golf course is located within Wealden District Council and the southern part of the park, accommodating 53 touring pitches and a toilet/shower block is located within the administrative boundary of Eastbourne District Council.

- 2.7. In addition to Bay View Holiday Park the site owners also own and operate Crowhurst Park which is a 5-star luxury mixed static and holiday lodge park in Battle, East Sussex. The Crowhurst Park site is a very popular site for holidaymakers and includes a new development area called 'Pelham Gates' which is an exclusive development of 2, 3 and 4 bedroom Scandinavian eco-homes.

3. The Planning Application

- 3.1. The subject planning application is simplistic and seeks consent for the provision of 71 static holiday caravans in lieu of the 94 touring pitches currently provided at Bay View Holiday Park. The development will be a continuation to the existing phase of 20 static holiday caravans on the northern section of the park (also previously in lieu of touring pitches) and, subject to a re-layout of this already approved area, will result in a total of 91 static holiday caravans across the park as a whole.
- 3.2. In addition to the removal of 94 touring caravan pitches (many of which are seasonally sited) the development will result in the removal of permanent features within the park such as the toilet/shower blocks.
- 3.3. The planning application has been made very much as an investment by the owners of Bay View Holiday Park to improve the overall quality of holiday accommodation on offer and to address the continued demand/enquiries for this type of 'static' holiday caravan accommodation; not only on site but also in the wider area.
- 3.4. Importantly, and within the context of this planning application, the proposed development does not seek to extend beyond the permitted boundaries of Bay View Holiday Park or to provide holiday caravans in locations that have not already been found acceptable in planning and land use terms. The 71 static holiday caravans will therefore be very much provided in lieu of the existing touring caravan pitches at Bay View and will take advantage of the services and infrastructure that is already in place.
- 3.5. Similarly, the existing boundaries of the site will be retained (and reinforced where necessary) and this will include retention of the earth embankments and landscape planting which helps to screen the park and act as a means of enclosure.
- 3.6. The subject planning application is therefore a commitment by the applicant to provide a high quality holiday park environment and to enhance the economic sustainability of the park as a rural tourism business and employer.
- 3.7. The full planning application comprises the following documentation:
- Completed Application Form and Ownership Certificate
 - Planning, Design and Access Statement (January 2020)
(Prepared by Savills (UK) Limited)
 - Location Plan (1:1250 at A3)

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- Proposed Layout Plan (1:250 at A1) (Ref: CA 19.009-07 Rev 1)
 - Detailed Soft Landscape Proposals (Ref: CA 19/009-05 and CA 19/009-06 dated February 2019)
(Prepared by Corsican Associates)
 - Preliminary Ecological Assessment (PEA) (Ref: CA/19/009 dated 13.12.2019 – Rev 3)
(Prepared by Corsican Associates)
 - Phase 1 Habitat Survey Plan (1:250 at A1) (Ref: CA/19/009-01 dated December 2019 – Rev 3)
(Prepared by Corsican Associates)
 - Arboricultural Impact Assessment (AIA) (Ref: CA/19/009 dated 03.12.2019 – Rev 4)
(Prepared by Corsican Associates)
 - Arboricultural Impact Assessment Plan (1:500 at A1) (Ref: 19/009-02 dated December 2019 – Rev 4)
(Prepared by Corsican Associates)
 - Landscape and Visual Appraisal (Ref: N0562 dated 21 March 2019)
(Prepared by Corsican Associates)
 - NPPF: Flood Risk Assessment (FRA) (Ref: SHF.201.076.HY.R.001.B dated December 2019)
(Prepared by Enzygo)
- 3.8. It is noted that Bay View Holiday Park is divided between two Local Authority areas, these being Wealden DC and Eastbourne DC. The largest section of the park (to the north) is under Wealden DC and contains the main site facilities including the site reception/office, 20 static holiday caravans, 41 touring pitches, recreational facilities and the golf course. The southern section of the park lies within Eastbourne DC (see 1:1250 Location Plan).
- 3.9. It is therefore considered that Wealden DC, as a Local Planning Authority, will act as the lead on this planning application in terms of processing and the determination of the application itself with Eastbourne DC (to the south) acting as key consultee on the application as neighbouring Local Authority.

4. Use

- 4.1. In terms of their use, all 91 static holiday caravans that are to be accommodated, including the proposed 71 in lieu of 94 touring caravans, will be strictly occupied for holiday purposes only.
- 4.2. The operating season will be for 11 months a year running from 1st March in any one year to 31st January the following year. The applicant would be willing to accept a commensurate planning condition to this effect.
- 4.3. In order to ensure the caravans are solely occupied for holiday purposes we would also suggest that the industry standard (model) planning conditions to enforce holiday occupancy are included. These are as follows:

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The development shall be implemented and occupied in accordance with the following:

- i. The static caravans shall be occupied for holiday purposes only;*
- ii. The static caravans shall not be occupied as a person's sole, or main place of residence;*
- iii. The owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual static caravans on the site, and of their main home addresses and shall make this information available at all reasonable times (9.00am – 5.30pm Monday to Friday) to the Local Planning Authority. The register shall be collected by the caravan site licence holder or his/her nominated person.*

- 4.4. The 20 static caravans already permitted at Bay View Holiday park do not have any seasonal restriction on occupancy; nor do they have any restriction as to whether they can be occupied for either holiday or residential purposes. The permission in place under WD/96/1510/F is therefore open and unrestricted. It is therefore beneficial that this open permission will be replaced and superseded by this scheme.
- 4.5. Likewise, the touring caravans permitted on the southern section of the site under EB/85/184 do not have any planning restriction in place that refers to a defined holiday season. These touring caravans can therefore be sited all year round with no restriction as to length of stay.

5. Amount

- 5.1. The application site is shown edged in red upon reference to the 1:1250 Location Plan provided and amounts to some 2.16 hectares (5.34 acres) in total. The wider balance of the applicant's land ownership is shown via the blue land.
- 5.2. The number of static holiday caravans proposed is 71 and these will be sited in lieu of the 94 touring pitches at Bay View Holiday Park. There is no extension to the approved boundaries of Bay View Holiday Park required in which to accommodate the development and, in addition to the 20 static holiday caravans already sited and approved (which will be re-laid out as part of this scheme), this will result in a total of 91 static holiday caravans across the site as a whole.
- 5.3. The 71 static holiday caravans will meet the statutory definition of a 'caravan' as defined within the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968.

6. Character (Layout, Scale and Appearance)

- 6.1. The proposed development and layout of the total 91 static holiday caravans is shown upon reference to the Proposed Layout Plan (1:250 at A1) (Ref: CA 19.009-07 Rev 1). This illustrates the overall layout of the 91 static holiday caravans in question and that the development will be confined to the existing limits of Bay View Holiday Park with the static caravans being sited on the footprint of the existing touring caravans.

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- 6.2. The layout of the static holiday caravans is informal and has been based upon the existing internal access road which will be retained and realigned in certain areas to accommodate the development; the layout itself taking advantage of existing site services and the level topography of the site.
- 6.3. The static holiday caravans will be provided to modern day pitch standards with individual car parking spaces for occupants and external decking to provide level access throughout.
- 6.4. The development involves the siting of 41 static caravans in lieu of 50 touring caravan pitches on the southern section of the site and 30 static caravans in lieu of 44 touring caravans on the northern section of the park. This does not include the 20 static caravan already permitted on the northern element of the park. All three of these areas together total 91 caravans and the site will be redesigned to accommodate this number at equal spacing.
- 6.5. A major planning benefit of this planning application is the reduction in caravan numbers on the park, representing a less intense use of the land and a more orderly layout of units compared to the current random appearance of touring caravans. We would also add that there is a highway benefit in the cessation of touring caravans in favour of static pitches.
- 6.6. The static holiday caravans will be provided at a more generous 6m separation spacing (compared to the industry standard of 5m spacing). The scale of the development is therefore beneficial in these terms and provides for a reduction in both density and the number of holiday caravans being accommodated within the site.
- 6.7. In having regard to the appearance of the site and the setting of the development in the wider landscape we have commissioned, and produced as part of this planning application, a full Landscape and Visual Appraisal (LVA) report. The LVA as it relates to this development is considered below.
- 6.8. The overall Character (layout, scale and appearance) of the development is positive in planning terms and in having regard to the following benefits from this proposal:
- A reduction in the number of holiday caravan units from 114 (94 tourers and 20 statics) to 91;
 - An overall reduction in the amount of traffic using the site;
 - The development being contained within the defined boundaries of the park without the need for any lateral expansion or increase in site area;
 - The introduction of a more ordered site layout as an improvement to its current random/disorganised appearance;
 - The introduction of beneficial landscaping areas throughout.

7. Landscape and Visual Appearance

- 7.1. To support this planning application we have produced a Landscape and Visual Appraisal (LVA) (Ref: N0562 dated 21 March 2019 which has been undertaken by Corsican Associates.

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- 7.2. The LVA is a detailed document with supporting figures and appendices. The LVA interrogates the planning context of the development together with the landscape and visual context of the existing site. The LVA then assesses the proposed level of development and provides a subsequent appraisal of both the landscape character and visual observations arising from the proposed siting of static holiday caravans in lieu of touring caravans.
- 7.3. The LVA advises that the landscape character of the area is heavily influenced by tourism and recreational activities and that the overall landscape sensitivity is considered to be 'low' with the capacity to accommodate new development as being 'high'.
- 7.4. It is further confirmed that as Bay View is an established caravan park the proposals offer the opportunity to improve the landscape character of the immediate area by providing new landscaping areas and an improved layout of (static) caravans in a more orderly appearance whilst reducing the movement of vehicles.
- 7.5. In having regard to the landscape character of the development paragraph 7.6 of the LVA positively states that *"overall there is a negligible impact on the landscape character of the area as a result of the proposals"*. Paragraph 7.8 further states that *"on balance, the proposals will result in a benefit to the landscape of the park"*.
- 7.6. The LVA assesses those viewpoints into Bay View Holiday Park from the north, east, south and west and identifies visual receptors associated with the development.
- 7.7. It is confirmed that views from the north will remain largely intact. Receptors such as the beach front and sailing club already experience developed holiday parks in the area and it is considered that once the development is complete the landscaping will enhance views from the north. Further north along the beach it is considered there will be no discernible change in view.
- 7.8. From the east views include those from the rear of beachfront residential properties. It is stated within the LVA that views into the site of the completed development from the rear of these properties will be similar to the existing visual context. The new planting, particularly the trees through both parcels of the site, will minimise impact and break up any mass of caravans. Due to the level of existing activity at Bay View and the seaward aspect of the residential properties the level of impact is considered to be 'low' on the completion of the development.
- 7.9. Views from the south are dominated by the Sovereign Harbour residential complex which will remain the primary impact. It is considered that as the core use of the site will remain as a holiday park any perception of change will be barely experienced. In this respect, the change from touring to static caravans will result in a *"positive and beneficial impact upon the receptors of the beach frontage"*.
- 7.10. From the west there will be little change and once the development is complete it is considered there will be a *"negligible change"* in the view from the west. The hedgerow boundaries will screen the majority of views of the new static caravans, with only a small number visible from the direct road frontage.

- 7.11. In conclusion the LVA states that there will be little change in longer views into the site and that the inter-visibility between the Martello Towers will be retained. With regard to any closer views into the application site, the rationalisation of the layout, lower level of holiday units and new planting will contribute to break up the mass of the park which, together with the reduction in the movements of caravans, will provide a benefit to sensitive visual receptors.
- 7.12. On balance it is considered that the proposals *“will result in low, beneficial impacts on the sensitive receptors of the area”*.

8. Ecology

- 8.1. This planning application is supported by a Preliminary Ecological Assessment (PEA), dated 13.12.2019, which has been prepared by Corsican Associates.
- 8.2. The PEA was commissioned by the applicant to assess the likely ecological effects of the development proposals and any mitigation or compensation measures that may be required. The report also provides an analysis and recommendations for any additional survey work that is necessary with opportunities for the project to deliver any ecological enhancement where possible.
- 8.3. As an overall summary the PEA confirms that Bay View Holiday Park comprises largely managed amenity grassland with areas of hardstanding, and, as a result, holds low ecological value for protected species.
- 8.4. The proposed development is considered to have no impact to features of low to moderate ecological value located in and around the site boundary. Similarly with regard to off-site areas no ecological impact is anticipated.
- 8.5. With regard to individual species assessments, the Phase 1 Habitat Survey (section 9) confirms that the presence of roosting bats on site is considered to be low with regard to both trees on site and available buildings. It is confirmed that there are no further survey works required for great crested newts, dormice, otter and water voles, reptiles, birds, badgers or any rare or threatened plants.
- 8.6. As a precautionary measure, it is recommended that any clearance of shrub and ruderal vegetation bunds around the site boundary should be completed in a two stage approach (first cut to 10 cm, second cut to 2 cm) to encourage any reptiles to disperse into the surrounding landscape.
- 8.7. The PEA concludes that no further ecological surveys are recommended given the negligible potential for ecological impact from the proposed development.
- 8.8. In addition to the PEA, Corsican Associates also undertook an Arboricultural Impact Assessment (AIA) (December 2019) to support this planning application.
- 8.9. The AIA confirms that Bay View Holiday Park itself has very little tree and hedgerow planting within the developed site with the main tree and hedgerow planting areas being confined to boundary features to help contain and screen the caravan site.

- 8.10. It is confirmed that the proposed development offers a well-designed upgrade to Bay View Holiday Park and that the proposals have been designed to have little impact on the arboricultural values of the site.
- 8.11. Any tree removal that is required to enable the construction of the proposed development (i.e. the 71 static holiday caravans in lieu of 94 touring caravans) will be mitigated through the inclusion of more suitable and/or sustainable tree species and these details are provided within the supporting landscape proposals.
- 8.12. It is confirmed that a hedgerow on the southern boundary of the site requires an element of trimming (via a management process) to accommodate the development and that there is generally no requirement to deviate from standard construction methods for arboricultural reasons. The AIA includes an Arboricultural Method Statement to support the development it is concluded that the development will not have any detrimental effect on existing trees or hedgerow planting or indeed the setting of Bay View Holiday Park within the wider landscape.
- 8.13. Indeed, there are opportunities to both improve and mitigate the overall appearance of the site within the landscape and to offer a higher level of amenity for holidaymakers staying on site.

9. Flood Risk

- 9.1. A Flood Risk Assessment (FRA) has been by Enzygo (Ref: SHF.201.076.HY.R.001.B dated December 2019) to support this planning application and this includes an assessment of the surface water drainage requirements of the proposed static holiday caravans, together with details of the level of flood risk and how, where necessary, this can be managed and mitigated to allow the site to be developed.
- 9.2. The FRA advises that the application site is defended up to a 1 in 400 year tidal flooding event but would potentially be affected by tidal flooding following an allowance for climate change. The defined tidal flood risk zone as it affects Bay View covers the very south eastern limits on the site.
- 9.3. There is considered to be a low to moderate risk of surface water flooding and a low to moderate risk of groundwater flooding at the site.
- 9.4. The proposed mitigation measures for the above sources of flooding are as follows:
- The existing Flood Evacuation Management Plan (FEMP) is to be modified to enable the safe evacuation of the site prior to tidal flood occurring.
 - Static holiday caravans by design already have floor levels a minimum of +600mm above external ground levels and are anchored to ensure they do not move during an inundation event.
 - Static holiday caravans affected by localised surface water and groundwater flooding should be vacated and occupants relocated.
- 9.5. A formal surface water drainage strategy for the static holiday caravans is not considered necessary. Roof water from the static holiday caravans will be managed informally by shedding directly to surrounding landscaped areas.

- 9.6. The current foul drainage system at Bay View is considered suitable to accommodate the proposed foul flows from the static holiday caravan development. Foul flows will marginally increase to 0.47 l/s; an insignificant increase of 0.03l/s to existing foul flows from the site.
- 9.7. The FRA demonstrates that the proposed development would be operated with minimal risk from flooding and would not increase flood risk elsewhere. The FRA positively concludes that the development should not be precluded on the grounds of flood risk and/or drainage.

10. Access To, From, and Within the Site

- 10.1. Bay View Holiday Park is accessed via the A259 which is a primary coastal route in West Sussex connecting coastal resort towns such as Eastbourne and Bexhill-on-Sea. The A259 in the vicinity of Bay View Holiday Park has been recently improved and upgraded to support a nearby housing development and also a popular leisure development located at Sovereign Park & Harbour which is to the south.
- 10.2. Access to Bay View Holiday Park is directly from the A259 via a wide splayed junction and onto an access road (Old Martello Road) which leads south east to the seafront. Old Martello Road provides access to Bay View Holiday Park, Bay View Golf Course, Pevensey Bay Sailing Club and a number of residential properties overlooking the beach.
- 10.3. Old Martello Road provides two separate entrance points to Bay View Holiday Park which are located to the north and south of the road, with Old Martello Road itself acting as the administrative boundary between Wealden DC and Eastbourne DC (see 1:1250 Location Plan).
- 10.4. All of the internal site roads at Bay View Holiday Park are privately owned and maintained and do not form part of the adopted public highway.
- 10.5. Bay View Holiday Park is in a sustainable location with convenient access to a choice of modes of transport thereby reducing use and reliance upon the private car. There is a bus stop located adjacent to the access onto the A259 which provides regular daily connections to the nearby towns and service centres of Eastbourne, Bexhill-on-Sea and Hastings. There are also popular and accessible coastal routes, footpaths and cycling paths available all of which are within close proximity to the park.
- 10.6. With regard to overall highway safety we would comment that the proposed scheme will offer a material highway benefit through the cessation of 94 touring caravans using the site throughout the holiday season with their more complicated towing movements (and also a reduction of this traffic using the local highway network) in favour of 71 static holiday caravans and the comparative traffic associated with this reduced use.

11. Accessibility

- 11.1. The internal access roads will provide access to all areas of the park with individual car park areas being provided for the benefit of each static holiday caravan. The internal access road will follow the existing vehicular road(s) and will be finished in a sympathetic material in order that pedestrians and vehicles can travel easily within the site.
- 11.2. The topography of the site is such that no levelling or re-modelling of the application site is necessary. To this effect the necessary infrastructure is already in place at Bay View to enable the simple conversion of touring to static caravan pitches.
- 11.3. As the static holiday caravans to be provided are legally defined as 'caravans' in planning law (and not buildings) the internal floor layout and access arrangements for each unit are specifically designed to accommodate any disabled access that might be required. This includes single level access to all rooms and living accommodation within the caravan unit, with an external veranda area providing the necessary level access to all door openings in and around the unit.
- 11.4. The proposed development is therefore ideally situated to cater for all restricted accessibility needs and this is fully supported throughout the subject planning application.

12. Community Safety

- 12.1. The layout of the static holiday caravans will be developed in line with the Secretary of State's Site Licence Model Standard Conditions. The layout illustrated on the Proposed Layout Plan (1:250 at A1) (Ref: CA 19.009-07 Rev 1) has been designed in conjunction with these Site Licence requirements.
- 12.2. A speed restriction is in force throughout Bay View Holiday Park for the safety and benefit of all holidaymakers staying on site.
- 12.3. Bay View Holiday Park has the benefit of a full time warden with on site management being available 24/7 to provide security and assistance where required. All machinery and equipment used for the maintenance and upkeep of the site is stored away in secure units away from public access.

13. Economic Sustainability

- 13.1. Bay View Holiday Park is a well-established holiday park which is in need of investment to ensure that it maintains its viability as a rural business and tourism destination.
- 13.2. It is important that the park is able to react to market conditions and provide high quality caravan accommodation to meet consumer demand for larger holiday caravans of improved quality. The provision of static holiday caravans would allow Bay View to compete with other static caravan parks in the Sussex coastal region. This is already demonstrated through the popularity of the 20 static holiday caravans provided at Bay View.

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- 13.3. The development of 71 static holiday caravans in lieu of 94 touring caravans will provide a more reliable income for the business as the use of static caravans is less reliant on weather conditions and the time of year and this would remove the unpredictability that comes with operating the seasonal tented camping, motorhomes and touring caravan pitches; particularly in the summer months.
- 13.4. To this effect, the use and occupation of static holiday caravans during the year is generally higher compared to the transient touring pitches that are accommodated and again this would remove unpredictability for the business that comes with accommodating seasonal touring units.
- 13.5. The comparative income streams from the 94 touring pitches to the replacement 71 static holiday caravans results in a neutral position in terms of the related economic spend from the site. The more secure income stream to the business that the static holiday caravans provide and, in turn, those employed at the park, will create a beneficial economic position overall.
- 13.6. The BTA Tourism Intelligence Quarterly estimates that for every one direct job in tourism, half an indirect job is created elsewhere in the economy (BTA Tourism Intelligence Quarterly, 2016). Other research has shown that every 2 static holiday caravan pitches support 1 job in the local economy via direct and indirect tourism spend. The development of 71 new static holiday caravans and the supporting site improvements will help to create further employment in the area for local tradesman and contractors associated with the new pitch construction process and, thereafter, through the ongoing maintenance and upkeep of the park.
- 13.7. This highlights the importance of holiday caravan parks such as Bay View to the local economy and demonstrates the positive economic sustainability credentials of this planning application.

14. Planning Policy

- 14.1. In order to support this planning application we have had regard to both National and Local Planning Policy Guidance.
- 14.2. At a national policy level the National Planning Policy Framework (NPPF) of February 2019 provides material planning guidance on all forms of development. The NPPF is the Government's formal guidance on planning in England and sets out how the Government expects planning policies to be applied and planning decisions to be made.
- 14.3. Paragraph 10 states that *"at the heart of the NPPF is a presumption in favour of sustainable development"* and that this should apply to both the plan-making and decision-taking process. The NPPF therefore places a heavy reliance upon and presumption in favour of sustainable development.

- 14.4. Paragraphs 8-11 of the NPPF provides guidance as to how sustainable development is achieved. Paragraph 8 states that there are three dimensions to sustainability; being (1) an economic objective, (2) a social objective, and (3) an environmental objective. The economic objective is defined as being development that builds a strong, responsive and competitive economy to support growth, innovation and improved productivity. The social objective is the need to support strong, vibrant and healthy communities by creating a high quality built environment with accessibility to local services and which support communities' health, social and cultural wellbeing. The environment objective focuses on the requirement to protect and enhance our natural, built and historic environment through improving biodiversity and natural resources; including making an effective use of land.
- 14.5. With particular regard to the rural economy, which is relevant to this planning application, paragraph 83 states that;
- “Planning policies and decisions should enable:*
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
 - b) the development and diversification of agricultural and other land-based rural businesses;*
 - c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*
 - d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”*
- 14.6. The scenarios within clauses (a) to (c) of paragraph 83 are relevant to this application and the proposals to invest in Bay View Holiday Park as a local tourism business in order to improve the quality holiday caravan accommodation on offer and to support the growth of a local business which respects the setting and character of the environment in which it is sited. To achieve this aim our development does not seek to extend beyond the permitted boundaries of the site or to provide holiday caravans in locations which have not already been found previously acceptable in planning terms.
- 14.7. The NPPF places strong emphasis on good design, and the creation of high quality buildings and places. Paragraph 124 states: *“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
- 14.8. Paragraph 128 further states that *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important”.*
- 14.9. Having had consideration to both national and local planning policy, the proposed development fully complies with the objectives of the NPPF.

- 14.10. As the application site sits across the administrative boundaries of both Wealden District Council and Eastbourne Borough Council, due regard has been given to the adopted development plans for both areas.
- Wealden Core Strategy Local Plan (adopted February 2013)
 - Saved policies of the Wealden Local Plan (adopted 1998)
 - Eastbourne Borough Plan (adopted 2003)
 - Eastbourne Core Strategy (adopted February 2013)

Wealden District Council

- 14.11. The Development Plan used for determining planning applications within Wealden District is the Wealden Core Strategy (adopted 28 November 2012) and the saved policies of the 1998 Local Plan.
- 14.12. We are advised that the emerging Wealden Local Plan has recently been quashed following examination by the Planning Inspectorate due to it failing to meet one of the requirements for legal compliance; the Duty to Co-operate.
- 14.13. The Council's Tourism strategy as defined within the adopted Core Strategy 2013 highlights tourism as making a significant contribution to the local economy. The strategy specifically encourages and supports tourism businesses "to adapt to change, and to provide the opportunity to extend the length and frequency of tourist visits". The redevelopment and improvement of Bay View Holiday Park for a totality of static holiday caravans, together with an 11 month holiday season, will contribute to this objective.
- 14.14. However, as well as strategic objectives, the NPPF requires local authorities to set out 'non-strategic' policies in their local plans that are more detailed for development management purposes. Such detailed policies should also be consistent with national policy. Whilst the 1998 Local Plan provides these detailed policies and has been 'saved' in certain areas, its policies are now inconsistent with the more recent advice within the NPPF (as per paragraphs 212 and 213 of the NPPF), or indeed the LPA's more updated positive stance on tourism which is clear within the adopted Core Strategy, as well as the emerging Local Plan before it was quashed.
- 14.15. Although the emerging Wealden Local Plan is no longer being taken forward, it is important to consider the direction that was being taken in regards to tourism development in the district. In this sense, draft policy RAS 6 (Tourism in the Countryside) of the Submission Local Plan addressed tourism development proposals of this nature and by comparison was more positive than the previous saved policy TM5 (1998 Local Plan) thereby demonstrating consistency with the NPPF. Although the new Local Plan will be started afresh, there is currently no reason to believe that the Council's positive stance on tourism will significantly change as the policies in the NPPF remain material.
- 14.16. Policy RAS6 stated the following:
- "Subject to Policy AF1, the provision of new tourism facilities, including holiday lets, in rural areas will be encouraged. Where suitable access arrangements exist, the provision of new and the expansion of existing camping and caravan sites will be supported. Any development should be of a scale and type appropriate to the location and should increase the range, or improve the quality of accommodation, attraction or experiences for tourists and visitors to the District."*

- 14.17. This draft policy, which demonstrates the Council's aims and objectives for caravan park development in the District under their new development plan, clearly supports the proposals to provide 71 static holiday caravans in lieu of 94 touring pitches currently sited at Bay View. The proposal will enable a higher standard of holiday accommodation to be provided at the park, and, given that the proposal concerns an established holiday caravan park which will remain as a holiday caravan use, the conversion of touring to static pitches is appropriate development for its location. The scale and type of the development is also "appropriate" as the proposals do not actually seek to extend beyond the established boundaries of Bay View Holiday Park and provides an overall reduction in the number of holiday caravans using the site. Furthermore, the principle of the development has been deemed acceptable in policy terms through the grant of previous permissions for the conversion of touring to static pitches on the northern element of the park.
- 14.18. On a similar basis, Policy BED1 (Design) required proposals to comply with a number of criteria in order to conserve and enhance the natural and built environment. Given that the site will remain for holiday accommodation purposes, it is considered that there will be no significant change in impact on amenity for occupiers/users of nearby land, nor will the scale and appearance of the park result in any adverse impact on landscape character, local distinctiveness or important natural features. The LVA produced to support this application (Ref: N0562 dated 21 March 2019) confirms this and states at paragraph 8.2:
- "Although caravan parks are sited as landscape detractors, this is an established touring caravan site and therefore the proposal offers the opportunity to improve the landscape character of the immediate area by providing new landscaping and improving the existing, positioning the units in more ordered layout and reducing the movement of the larger vehicles through the lanes. Although the change of use will bring a permanent feature in the landscape the improvements will, on balance, have an overall beneficial impact."*
- 14.19. In this respect, the proposed development complied fully with the requirements relating to Design and Landscape Character, a full analysis for which is provided within the Landscape and Visual Appraisal (Ref: N0562 dated 21.03.2019).
- 14.20. With regards to the location of the site within Flood Zone 3, this matter has been addressed within section 9 of this report. The Flood Risk Assessment (FRA) which has been undertaken to support the proposed development positively concludes that *"the proposed development would be operated with minimal risk of flooding and would not increase flood risk elsewhere. The development should therefore not be precluded on the grounds of flood risk and drainage"*.

Eastbourne Borough Council

- 14.21. We are advised that the Development Plan currently used to determine planning applications within Eastbourne borough comprises the 'saved' policies of the Eastbourne Borough Plan (2001-2011) and the Core Strategy (2006-2027). Policies D3 (Tourism and Culture), D9 (Natural Environment), and D10a (Design) of the Core Strategy have been identified as relevant to this planning application.
- 14.22. At the time of writing, the joint Eastbourne and Lewes Council are undertaking a public consultation with regard to the "Issues and Options" Paper for their Local Plan review. The consultation period ends on 10th January 2020. The draft policies within the Issues and Options paper do not carry any weight at this stage and are not being referred to for development control purposes.

- 14.23. Similar to the policy position of Wealden District Council above, policy D3 within the Eastbourne Borough Plan supports *“the appropriate upgrading of existing hotels and holiday accommodation to provide improved facilities for visitors”*. As already highlighted, the proposed development will result in a higher standard of accommodation at the park and in doing so does not seek to extend the established boundaries of the park. Additionally, it will enable the park to offer high quality holiday accommodation for 11 months of the year, contributing to an all-year-round tourist economy for Eastbourne and benefiting the local economy.
- 14.24. An element of the application site lies within Flood Zone 3 adjacent to the coast. In accordance with policy D9 (Natural Environment), a Flood Risk Assessment has been undertaken which conforms with national policy, the positive conclusions of which are addressed fully within section 9 of this report.
- 14.25. Finally, the redevelopment of the site to provide static holiday caravan accommodation will enable the operator to implement a number of landscaping and layout improvements on the site which offers the opportunity to improve landscape character and the site’s setting within the landscape. The LVA provided to support this application includes a landscape strategy which will involve substantial new planting within the site and its boundaries. In this respect, the proposal will fulfil the requirements in policy D10a for development to contribute positively to the appearance of the area and preserve local character.
- 14.26. The proposed development therefore complies fully with both national and local planning policy guidance and there is no conflict in this respect.

15. Conclusion

- 15.1. The subject planning application is simplistic and seeks consent to exchange the 94 touring caravans sited at Bay View Holiday Park with 71 static holiday caravans. In addition to the 20 static holiday caravans already approved this will result in a total of 91 static holiday caravans across the Bay View site, and the park as a whole will be redesigned to accommodate this number.
- 15.2. The development itself will be confined to the existing defined limits of Bay View Holiday Park and no extension to the site boundary is proposed in which to accommodate the static holiday caravans; such being confined to the those areas of the park which accommodate the touring caravans. The 20 static holiday caravans to the north and the 50 touring caravans on the southern section of the park have the benefit of year round use and are not restricted to any holiday season period.
- 15.3. The proposed exchange of touring caravans to static caravans will therefore provide a defined (11 month) holiday season for the park and will result higher quality holiday accommodation being provided on site to help to sustain and improve Bay View Holiday Park as a tourism business, tourism destination and local employer.
- 15.4. The planning application itself is supported by a number of key reports and assessments including a Landscape and Visual Appraisal (LVA), a Preliminary Ecological Appraisal (PEA) and also a Flood Risk Assessment (FRA). The findings and conclusions of these individual reports are positive in having regard to the level of development that will take place and indeed provide opportunities for enhancement and improvement of the site in having regard to the setting of Bay View Holiday Park in the wider environment.

Planning, Design and Access Statement

Bay View Holiday Park, Old Martello Road, Pevensey Bay, Pevensey, BN24 6DX



- 15.5. In policy terms the planning application is supported at both a national and local planning level, with the development complying with the up-to-date policy positions of both districts.
- 15.6. In view of the above, we trust that you will find this planning application to be in order and that a favourable determination can be made.

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March 2020

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