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Our Ref: B2041/22

27 May 2022

Bourne House, Cores End Road
Bourne End, Bucks, SL8 5AR

Karl Roberts
Development Management
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

By Email

Dear Karl

Environmental Impact Assessment Regulations Screening Opinion

Proposed new Activity Centre building; relocation and reorganisation of the existing fairground and outdoor facilities; alterations to the car parking layout, pedestrian routes and landscaping areas to allow for the replacement of the existing Skyline tensile enclosure on a 'like for like' basis.

Butlin's Bognor Regis, Upper Bognor Road, Bognor Regis, PO21 1JJ

Please treat this Pre-App Screening enquiry as confidential, it should not be publicised, and your consultations should be on a similarly confidential basis.

I enclose herewith the following drawings in respect of the above proposals:

- IPL22_400/08_100 02SLP – Site Location & Proposed General Layout Plan (1:1250)
- IPL22_400/08_101 02SLP – Proposed Site General Arrangement Plan (1:500)
- IPL22_400/08_102 01SLP – Existing & Proposed Skyline South Elevation
- IPL22_400/08_103 01SLP – Existing & Proposed Skyline North Elevation
- IPL22_400/08_104 01SLP – Existing & Proposed Skyline East Elevation
- IPL22_400/08_105 01SLP – Existing & Proposed Skyline West Elevation
- IPL22_400/08_106 01SLP – Existing & Proposed Skyline Roof Plan
- IPL22_400/08_300 04 FE – Proposed Activity Centre Proposed Elevations
- IPL22_400/08_301 06 FE – Proposed Activity Centre Ground Floor Layout
- IPL22_400/08_302 06 FE – Proposed Activity Centre First Floor Layout
- IPL22_400/08_303 06 FE – Proposed Fairground General Arrangement Plan
- IPL22_400/08_304 02 FE – Existing Fairground General Arrangement Plan

Background

The scheme has been informally discussed in an email exchange on 3 May 2022. It also follows:

- An EIA Screening Opinion (ref: PE/00448/20) for *"the demolition of existing Skyline tensile enclosure; replacement facility in single storey building; extension to existing*



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entertainment facility building; alterations to car parking layout, pedestrian routes & Landscaping areas; relocation of fairground rides; installation of illumination to areas exposed by removal of Skyline” in April 2020. The Council concluded that an EIA was not required in April 2021.

- The approval of a Prior Approval application for the demolition of the Skyline tensile enclosure in May 2020 (ref: BR/97/20/DEM).
- The approval of a temporary planning permission for a period of 1 year for an extra temporary entertainment building in March 2021 (ref: BR/292/20/PL).
- Positive pre-application discussions (ref: PAA/65/21) for the development described in EIA Screening Opinion PE/00448/20 in June 2021.
- Approval of a rear extension to the temporary entertainment building (ref: BR/234/21/PL) in November 2021 and an extension of time to its use for an additional 2 years (ref: BR/232/21/PL) in December 2021.

Following the aforementioned planning history, further works and formal submissions on removal of the Skyline enclosure, replacement entertainment building and associated works were put on hold whilst the new Bourne Leisure owners completed a review of the next stage of development options at the resort. It is understood that this has now been completed and the next steps have been agreed.

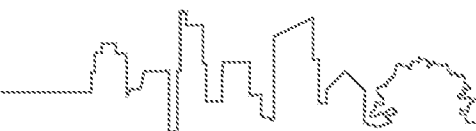
One of the biggest driving forces behind next steps for the resort has been the need to replace the Skyline tensile structure. The existing tensile enclosure is nearing the end of its design life and is the subject of very detailed monitoring which confirms the need for replacement. Butlin's have also been closely monitoring weather conditions at the resort, in particular gusts of wind, wind speed and direction. With deterioration of the fabric predicted wind strength represents a significant concern for the continued future use of the Skyline.

Previously any future steps were predicated on the understanding that it was impractical to directly replace the Skyline, hence the need to review the wider operations at the resort, for example the new entertainment building which would have housed music and other events as part of a general “reshuffle” of facilities. One of the reasons for those plans not going ahead was the practical difficulties around the need to provide sufficient noise attenuation in a new building intended for those purposes.

Following the review, it is now however intended to replace the Skyline with a ‘like for like’ replacement, allowing the retention of what has become an iconic structure for both the resort and the wider town. The design process is now well-advanced with the objective of making the replacement as similar as possible to the existing. It is yet to be determined whether planning permission is required for the replacement Skyline enclosure.

On the basis that the existing covered areas can be retained under a new Skyline there is far less need to “re-invent” the overall operation of the resort, as was the case before. The emphasis can now focus on improving and updating the facilities to help keep the resort competitive and able to meet evolving guest expectations.

To achieve this, a superficially similar new building is proposed in the same location as the entertainment building scheme previously discussed. However, there is a very important difference, that is, the use of the new building. Rather than hosting concerts and large potentially noisy events, which would require major noise attenuation measures, the new



proposal is for an 'Activity Centre', as shown on the attached plans. This will accommodate escape rooms, laser tag and indoor golf, together with associated facilities, i.e. much quieter activities which will operate with earlier closing times. This makes it much easier to provide levels of noise attenuation in order to meet the expected standards of environmental protection for the community, and of course for the closest potentially affected people staying on the resort itself.

Given the similar size and same location of the new building as the previous scheme, there remains the need to re-locate some of the fairground rides and the opportunity will still be taken to re-organise and update other outdoor attractions. All of these minor works can be achieved within the resort confines.

As before, there is no increase in guest accommodation or traffic generation at the resort. The works are the simple result of the time limited design life of the tensile enclosure and the provision of improved and updated facilities to help keep the resort competitive and meet evolving guest expectations.

It is the current expectation that a planning application for this latest scheme will be submitted within the next couple of months. The first stage of works will be relocating and reorganising the fairground and outdoor facilities which the applicant would wish to commence in October/November 2022. These will be the first steps in the Skyline replacement programme, with works for the new Activity Centre starting in January/March 2023. This must be operational before the Skyline works can commence.

Of direct relevance to this Screening Opinion is the Council's April 2021 decision that the previously submitted and similar proposals did not constitute development requiring EIA and require the preparation of an Environmental Statement. Also of relevance is the Council's response to a Screening Opinion in March 2016 relating to a new swimming pool on the site. This was housed in a larger, taller building closer to the resort boundary and involving works over the culverted river. It was also concluded that these works did not constitute development requiring EIA and preparation of an Environmental Statement. In reaching these conclusions, the Council was of the view that the proposals would not have significant impact on natural resources.

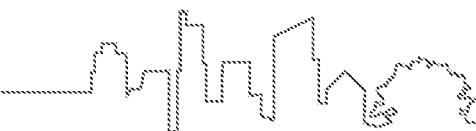
Assessment

Schedule 1 Development

The proposal does not comprise a development listed in Schedule 1 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It is not therefore 'Schedule 1 Development'.

Schedule 2 Development

The resort site has an area of c.21ha. As a result of being above 1ha, the proposal therefore has the potential to be an Infrastructure Project (Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas) as defined within Section 10(b) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.



This was the view in the Council's April 2021 response and the proposal was therefore considered to be 'Schedule 2 Development' requiring screening under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

On the basis that this view remains (and there is no reason why it would not), it is therefore necessary to consider the proposal against Schedule 3 of the Regulations. This schedule outlines the criteria to consider in determining whether development falling within Schedule 2 will require an EIA. The criteria include the characteristics of the development (e.g. its size, use of natural resources, quantities of pollution and waste generated); the environmental sensitivity of the location; and the characteristics of the potential impact (e.g. its magnitude and duration).

Schedule 3

1. Characteristics of the Development:

- a. Size and Design – The proposal is of an appropriate scale and design for the site. The site is located within an urban area and comprises a well-developed resort facility that includes a number of substantial buildings. The new building is located centrally within the resort that has larger buildings around it in the directions of the boundaries.
- b. Cumulative impacts – The cumulative impact of the scheme is low. There will be no increase in guest accommodation at the resort. The proposals will be contained within the existing site and comprise of reorganised, improved and updated facilities to help keep the resort competitive and meet evolving guest expectations.
- c. Natural resources – There will be no material loss of land, soil, water or natural resources, albeit some resources will be consumed in manufacture/erection of the new structure and building. The new building and insertion of facades to the buildings will provide insulation to modern standards.
- d. Waste – The proposals will not create undue level of waste.
- e. Pollution/nuisance – The Activity Centre will help contain light and noise pollution. It will accommodate quieter activities than the previously proposed entertainment venue and will operate with earlier closing times. This makes it much easier to provide levels of noise attenuation in order to meet the expected standards of environmental protection. The relocated fairground rides will be further away from the closest noise sensitive receptors.
- f. Accident risk – The scheme has a low potential for accident risk.
- g. Risk to human health – The scheme has a low potential for risk to human health.

2. Location:

- a. Land use – The proposal is part and parcel of the existing resort land use of the site. There will be no change and no intensification of the use.
- b. Nearby natural resources – The scheme is located centrally within the existing large resort complex, there are no closely adjoining natural resources that would be adversely impacted by the proposal.



- c. Absorption capacity of the natural environment – The proposal is located centrally within the existing large resort complex which is itself set within the urban area of the town and is identified as an economic zone in the adopted Local Plan.

3. Characteristics of the Potential Impacts:

- a. Magnitude and spatial extent of the impact
- b. Nature of the impact
- c. Transboundary nature of the impact
- d. The intensity and complexity of the impact
- e. Probability of the impact
- f. Expected Onset, Duration, Frequency and Reversibility of the Impact
- g. the cumulation of the impact with the impact of other existing and/or approved development;
- h. Possibility of Effectively Reducing the Impact

Criteria a. – h. can be adequately assessed and controlled via the planning process in terms of accompanying assessments and reports, planning conditions and obligations.

As required by The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Regulation 6(c), consideration is also given to “aspects of the environment likely to be significantly affected by the development”.

Ecology:

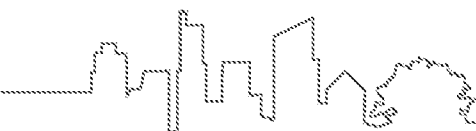
The part of the site directly impacted by the proposal is of low ecological value as it is currently occupied by car parking and fairground rides. Nonetheless, the planning application package is intended to include an ecological assessment to demonstrate that there will be biodiversity net gains as a result of the scheme. A Preliminary Assessment has already concluded that there are no bats present in the buildings directly affected and no protected species affected by the proposals.

Traffic and Transport:

The proposal is traffic and parking neutral as the proposed works are the simple result of the time limited design life of the tensile enclosure and the provision of improved and updated facilities to help keep the resort competitive and meet evolving guest expectations.

Flood Risk and Drainage:

The site is shown as defended but within flood zone 3 on the flood map for planning website. The new facility is part of a much wider resort activity which includes 24-hour staffing thereby enabling prompt action in the event of any flood risk event. The planning application package will include a Flood Risk Assessment and drainage details.



Trees/Arboriculture:

No trees of any significance will be lost as a result of the proposal.

Landscape and Visual Impact:

The site is located within an urban area and comprises a well-developed resort facility that includes a number of substantial buildings. The new building is located centrally within the resort that has larger buildings around it in the directions of the boundaries.

Noise, Air Quality, and Amenity:

The new Activity Centre which will have effective noise and light attenuation properties. It is located centrally within the site well distanced from the nearest residential properties. It will accommodate quieter activities than the previously proposed entertainment venue which will operate with earlier closing times. This makes it much easier to provide levels of noise attenuation in order to meet the expected standards of environmental protection. The relocated fairground rides will be further away from the closest noise sensitive receptors.

Building Environmental/Energy Performance:

The proposed Activity Centre building will allow for effective energy efficiency measures.

Heritage Impact:

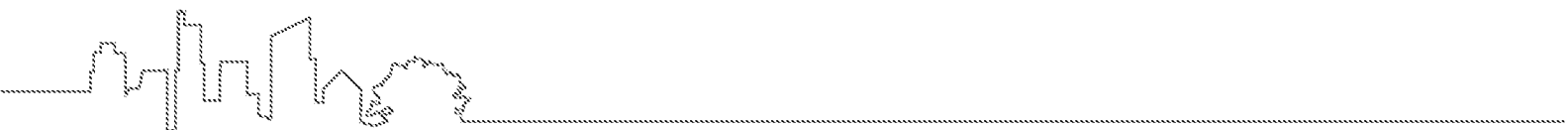
There are no immediately adjoining or affected heritage assets that would be materially impacted by the proposal. Previous archaeological investigation of the site has identified some potential interest, but the below ground intervention as a result of the proposed building type will minimise potential impact. The planning application package will include an archaeological assessment.

Construction Impacts:

Any construction impacts will be temporary and fully reversible and so are not relevant to the considerations of the need for an EIA. It is also worthy of note that the Skyline tensile enclosure to be replaced is a lightweight innovative structure that will have lesser demolition impact than would be the case with a conventionally built structure. The construction of the new Activity Centre and replacement of the tensile enclosure would take place within an operational holiday resort complex which will have guests present for most of the works period; as such the applicants will be at very considerable pains to ensure that all works are executed with a minimum of disturbance and disruption. Any such impacts can be appropriately mitigated through construction management. The planning application package will include a Construction Management Plan.

In conclusion, the proposal will not have “significant effect on the environment”.

The Council is requested to provide a Screening Opinion and advise whether the proposals constitute development requiring EIA and preparation of an Environmental Statement.

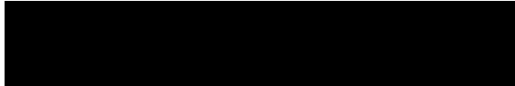


Please contact me if you have any queries arising from this request.

Yours faithfully



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