

Walsingham Planning
Bourne House
Cores End Road
Bourne End
Bucks
SL8 5AR

Date: 15th June 2022

Please ask for: Mr S Davis

Tel: 01903 737874

Your Ref:

Our Ref: BR/125/22/ESO

Dear Mr Millett,

Environmental Screening Opinion for proposed new Activity Centre; 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.

Butlins Bognor Regis Upper Bognor Road Bognor Regis PO21 1JJ

Screening Opinion

The Group Head of Planning has determined under delegated powers that the above proposal does not require the submission of an Environmental Statement, as any impacts as there are on the environment are not likely to be of a magnitude to be covered by the Regulations. The following environmental issues are considered relevant to this proposal and have been considered in reaching this decision:

The Council considers that the proposal is an "Urban Development Project" as found within section 10(b) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Regarding the Schedule 2 relevant criteria and thresholds, it is noted that the overall site area of approx. 21 hectares exceeds the applicable threshold of 5ha. Whilst the area of the actual works within the overall site is likely to be around 1.5ha (based on measurements taken from roughly plotting the red edged site areas on the councils GIS mapping system), this still exceeds the applicable threshold of 1ha for non-residential development.

According to paragraph: 032 (Reference ID: 4-032-20170728) of the Planning Practice Guidance (PPG), all developments in sensitive areas should be screened regardless of whether they meet the stated thresholds. The PPG states that sensitive areas are:

- Sites of Special Scientific Interest and European Sites.
- National Parks, the Broads, and Areas of Outstanding Natural Beauty; and
- World Heritage Sites and scheduled monuments.

The PPG states "In certain cases, local designations which are not included in the definition of "sensitive areas", but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required".

The Resort is in 2km of the Felpham and Bognor Reef SSSIs and is very close to the Felpham SSSI itself. It is partly within the Pagham Harbour Zone B (although over 4km from the actual Pagham Harbour Special Protection Area boundary).

The proposal is Schedule 2 development however an EIA is not automatically required unless the Local Planning Authority advises that the development is likely to have significant effects on the environment.

It is necessary to consider the proposal against Schedule 3 of the Regulations which outlines the criteria to consider in determining whether development falling within Schedule 2 will require an EIA. These criteria include (1) the characteristics of the development (e.g., its size, design, cumulative impact along with other developments, use of natural resources); (2) the environmental sensitivity of the location; and (3) the characteristics of the potential impact (e.g., its magnitude and duration). Paragraph 018 (reference ID: 4-018-20170728) of the PPG states:

"While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development. However, it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits."

The indicative thresholds state "Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination." The proposal will not be of a significantly greater scale than the existing and the impacts will be the same. There are no known contamination issues. Notwithstanding, this screening response now sets out our analysis of the headings given within Schedule 3.

(1) Location of the Development

The works are entirely in the confines of the well established Butlins Resort. Whilst the site is partly in the 5km buffer of the Pagham Harbour SPA and in fairly close proximity of two nearby

SSSI's, it is not in itself in any environmentally sensitive area and the works are unlikely to directly affect any protected species. The works will not result in additional holiday accommodation on site so will not lead to an increase in people visiting the site or surrounding areas.

The site does lie in current Flood Zones 2 & 3, but this is an existing situation and, the works are not for additional holiday accommodation. The site as a whole is adjacent to the edge of the Upper Bognor Road & Mead Lane Conservation Area but the area of the works is well away from the affected boundary. This is not an environmentally sensitive site, and any environmental impacts are likely to be localised in nature.

(2) Characteristics of the Development

The development would comprise of a new Activity Centre and a replacement roof for the Skyline tensile enclosure. In addition, it will see the fairground and other outdoor facilities relocated to a different part of the site and alterations to car parking, landscaping, and pedestrian routes. Much of the proposals are for replacement works or relatively minor works. The activity centre is a new structure and will be the most significant part of the proposal. This will have two storeys and occupy an approx. footprint of 2,747m². It will accommodate escape rooms, laser tag, sports, and indoor golf, together with associated facilities including a bar and a cafe.

This building is of a similar scale/smaller than other existing facilities & buildings in the resort. It is centrally with other buildings between it and surrounding land uses. There are not considered to be any cumulative impacts as no increase in holiday accommodation at the resort. The site is brownfield land and there will be no new loss of natural resources and no excessive creation of waste. It is likely that noise issues can be adequately controlled by condition. The characteristics of the development are not likely to be significant in the context of the EIA regulations.

(3) Characteristics of the Potential Impacts

The characteristics of the likely impacts are not likely to be particularly significant, or long lasting, will not affect a significant area of the district and are not complex in nature. They are likely to be localised to the Resort and its immediate surroundings. They can be controlled and mitigated by planning conditions.

Conclusion

Having considered the above factors and having had regard to the nature & scale of the proposal, the development does not have the potential to result in significant impacts on the environment. The impacts would be localised small-scale and not significant in scale. They can be localised mitigated in accordance with standard methods including by conditions and planning obligations. As such, the proposal does not constitute EIA development and an Environmental Statement is not required in this instance.

This determination that an environmental statement is not required should not be seen as an indication of the Council's view on the planning merit of the proposal.

Yours sincerely

A handwritten signature in black ink, appearing to be 'NC' followed by a flourish.

Neil Crowther
Group Head of Planning