

Recommendation Report for

REF NO: P/38/26/TEL

LOCATION: Land at Haven Church Farm Holiday Village
Church Lane
Bognor Regis
PO21 4NR

PROPOSAL: Prior notification under Schedule 2, Part 16, Class A for the installation of a telecommunications base station comprising of a 15m monopole supporting 3 No antennas, together with 2 No ground based cabinets and ancillary development thereto.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	As above.
TOPOGRAPHY	Predominantly flat.
SITE CHARACTERISTICS	The application falls to be determined under Part 16 of the General Permitted Development Order 2015. The principle of the development is not in dispute. The consideration of the notification concerns only the siting and appearance of this location. The Local Planning Authority has 56 days to provide its comments to the applicant's agent or it is deemed they have no objection. The application site forms part of a large holiday park characterised by a high density of mobile homes together with associated ancillary buildings and infrastructure. The site is located to the south-west of the main building complex, which includes an entertainment facility serving the wider holiday park.
CHARACTER OF LOCALITY	Within the application site boundaries are two designated heritage assets: the Church Farm Club, a former C18 farmhouse, and Becket's Barn, a Grade II Listed Building and also a Scheduled Ancient Monument. The surrounding area is predominantly residential in character, comprising a mix of building types, styles and designs. To the northwest of the site lies the Grade I Listed Building Church of St. Thomas a Becket. The site is also adjacent to a number of important environmental designations. Pagham Harbour Site of Special Scientific Interest (SSSI) wraps around the southern and western boundaries of the site, extending from the south-east to the north-west, and represents a sensitive ecological area

of national importance.

In addition, the Pagham Beach Estate, identified as an Area of Character, lies to the south of the site and extends eastwards along the shoreline, contributing to the distinct coastal character of the locality.

RELEVANT SITE HISTORY

P/42/25/TEL	Installation of a telecommunications base station comprising of a 18m monopole supporting 6 No. antennas on a headframe, together with 3 No. ground based cabinets, 1 No. meter cabinet and ancillary development thereto including compound fencing.	Objection 29-05-25
P/138/23/TEL	Installation of 23.14m high mast supporting communications apparatus, 6 No. antennas and 1 No. equipment housing cabinets at ground level with ancillary works.	Objection 15-01-24

Relevant planning history noted.

REPRESENTATIONS

No representations were received from nearby occupiers.

COMMENTS ON REPRESENTATIONS RECEIVED:

None.

CONSULTATION RESPONSES RECEIVED:

None.

COMMENTS ON CONSULTATION RESPONSES:

None.

POLICY CONTEXT

Outside the Built-Up Area Boundary.
Archaeological Notification Area.
2km Buffer for Site of Special Scientific Interest.
Listed Buildings / Scheduled Monuments.
Pagham Harbour Zone A.
Flood Zone 3.

DEVELOPMENT PLAN POLICIES

Arun Local Plan 2011 - 2031:

TELDM1	TEL DM1 Telecommunications
TELSP1	TEL SP1 Strategic delivery of telecomms infrastructure

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

PDS	Pagham Parish Council's Village Design Statement by PaghamPC
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POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

The above policies outline the criteria against which the application will be assessed. The only aspects that can be considered with regard to this prior approval application are the siting and appearance of the development. This application falls to be determined under the requirements of Part 16 of the Town and Country Planning (General Permitted Development) Order 2015, as amended.

OTHER MATERIAL CONSIDERATIONS

There are other material considerations to be weighed in the balance with the Development Plan.

In all applications, the Council must take into account other material considerations. This includes Government Advice, case law and appeal decisions which have emerged over recent years. By Analysis of these considerations, the following are also relevant:

(i) Health concerns are material planning considerations. Whilst Government advice is that a planning system is not the place for determining health safeguards, Court cases and planning appeals show that public responses on the issue must be weighted in assessing the merits of a site by comparison with alternatives. This must apply to Prior Notification applications as well as applications for planning permission.

(ii) The Planning Inspectorate consider zero health risk (or near zero risk) to be an unreasonable expectation or basis for a decision.

(iii) An ICNIRP Certificate, confirmation compliance with guidelines for the emission of electromagnetic energy, is essential. Sites should be secure by fencing with advisory notes attached.

(iv) Applications must include a thorough examination of alternative sites; this information must be included in the submitted information for public consultation.

(v) Government best practice advice to applicants expects pre-application consultation with organisations

such as schools. The Council can look for evidence that this has happened.

CONSIDERATION OF ALTERNATIVE SITES

The applications report received with this application explains that alternative sites have been considered. These include the following:

Discounted Option 1- Rooftop (E: 488567, N: 97472): Roof structure cannot support telecoms equipment or required coverage.

Discounted Option 2- Rooftop (E: 488587, N: 97496): Rooftop too low to achieve required coverage.

Discounted Option 3- Greenfield (E: 488653, N: 97532): Insufficient space and nearby overhead power lines constrain development.

Discounted Option 4- Rooftop (E: 488607, N: 97515): Low-pitched roof unsuitable for telecoms equipment or structural loading.

Discounted Option 5- Greenfield (E: 488620, N: 97447): Proximity to leisure facilities; overly exposed and unsuitable.

Discounted Option 6- Greenfield (E: 488503, N: 97441): Loss of essential car parking impacting site operations.

Discounted Option 7- Greenfield (E: 488435, N: 97431): Located within Scheduled Ancient Monument and near listed church.

Discounted Option 8- Greenfield (E: 488476, N: 97314): Within Scheduled Ancient Monument; development inappropriate.

Discounted Option 9- Greenfield (E: 488096, N: 97313): Too exposed and adjacent to PRow

Discounted Option 10- Greenfield (E: 488030, N: 97033): Overly exposed; alternative sites preferable.

Discounted Option 11- Greenfield (E: 488263, N: 96804): Too exposed and within/near designated ecological site.

Discounted Option 12- Greenfield (E: 488261, N: 97313): Exposed and surrounded by caravans; unsuitable.

Discounted Option 13- Greenfield (E: 488381, N: 97284): Close to gas storage facilities; safety constraints.

Discounted Option 14- Greenfield (E: 488213, N: 97246): Insufficient space for installation.

Discounted Option 15- Greenfield (E: 488165, N: 97132): Insufficient space for installation.

Discounted Option 16- Greenfield (E: 488507, N: 97299): Exposed with limited screening; better alternatives exist.

Discounted Option 17- Greenfield (E: 488274, N: 97411): Proximity to Listed Building; heritage constraints.

Discounted Option 18- Greenfield (E: 488148, N: 97432): Insufficient space for installation.

CONCLUSIONS

The proposal falls to be determined under Part 16 of the General Permitted Development Order 2015. The principle of the development is not in dispute. The consideration of the notification concerns only the siting and appearance of the equipment in this location.

The proposal seeks to install telecommunications base station comprising of a 15m monopole supporting 3 No. antennas mounted on a headframe. The development also includes two ground based equipment cabinets, together with ancillary works including the installation of ten safety bollards. The monopole would be installed on a T9 root foundation, with associated equipment set on a concrete plinth. The mast would be finished in grey colour and the housing cabinets would be finished in Fir Green (RAL 6009), both elements made out of steel.

The site is located on a grass verge adjacent to a pedestrian footpath, positioned opposite a public bin

store and adjacent to a track leading to an existing gas storage area serving the Church Farm Holiday Village. The nearest residential receptors comprise six static caravans situated in close proximity to the proposed installation.

It is noted that the ancillary cabinets constitute permitted development and would not, in isolation, require prior approval. Their scale and siting would be acceptable within the context of the site.

The main policy considerations in respect of this proposal are Arun Local Plan policy TEL DM1, and the National Planning Policy Framework (NPPF).

The relevant parts of policy TEL DM1 to be considered in relation to this application are:

- a) There are no satisfactory alternative sites for telecommunications available;
- b) Alternatives have been investigated, including the possibility of mast sharing and mounting the antennae required on existing buildings or other structures,
- c) Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate;
- d) The proposal will not have an unacceptable impact upon the landscape,
- e) The proposal will not have an adverse effect on the amenity of local residents;
- f) Proposals include full details of all new landscaping, screening and of any trees or vegetation to be retained on the site. In addition, details of a satisfactory scheme to return the site to its former or improved condition once operations have ceased are also required;
- g) Proposals include full details of the design and external appearance of the development including siting, colour and materials.

The applicant provided sufficient details in the submitted documents to address the above considerations. For context, this application seeks an amended proposal to that submitted under P/42/25/TEL. The amendments include a reduction in the height of the monopole from 18m to 15m (a reduction of 3m) and a reduction in the number of antennas from 6 to 3. The siting of the proposal has also been amended such that it would now be located on a grass verge to the east of the bin store where the proposal was sited under refused application reference P/42/25/TEL.

The main issues arising from this prior approval notification are whether the mast and cabinets due to their scale and siting would be a visually obtrusive feature which would be so detrimental to the character and appearance of the area and whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined in the development plan and NPPF.

The applicant has provided a list of alternative sites, however the assessment is primarily driven by operational and technical constraints, rather than a balanced consideration of environmental and visual impacts. Several sites were discounted due to their impact on heritage assets or exposure, yet the chosen site still results in significant harm to landscape character and heritage settings. The reasoning for dismissing alternatives is, in many cases, limited or generic, and does not clearly demonstrate that the proposed location represents the least harmful option. As such, the applicant has not adequately demonstrated compliance with Arun Local Plan policy TEL DM1 (a) and (b).

The application proposes a 15m monopole within a low lying and open landscape, characterised by predominantly flat topography, limited vertical structures and built form largely consisting of low rise caravans approximately 3m high. There are currently no telecommunications on the site, with the closest masts being situated approximately 500m north east of the site. Whilst it is acknowledged there are existing vertical elements such as lamp posts and CCTV poles, these structures are significantly smaller in scale and visual prominence. The proposed mast would be substantially taller and bulkier than surrounding features and appear as a visually dominant and isolated vertical structure. It would be highly

visible across the wider landscape, including views from Church Farm Holiday Village, surrounding residential areas and Pagham Harbour and its surrounding.

Church Farm and the surrounding land, comprising Pagham Harbour, is characterized by a predominantly flat topography, with a low number of trees or buildings spanning a height greater than 15m. The spire of St Thomas A Becket Church currently marks the highest structure within the wider context. Given there will be no other structures, trees or screening of a comparable height within close proximity of the mast, it would be significantly visible from within the Holiday Village, surrounding residential areas, and Pagham Harbour. This would result in significant harm to the visual appearance and character of the area, and would be incongruous with the existing landscape.

Pagham Beach Estate to the south of the site is designated as an Area of Character. There are little to no landmarks or screening between Church Farm and this estate, and the mast would be highly visible from this context. As such, it would appear unduly obtrusive within the surrounding landscape, and would have a detrimental impact on the visual appearance and character of this Area of Character.

Given the flat and open character of the area, the absence of comparable vertical features, and the limited screening opportunities, the mast would result in unacceptable harm to the character and visual appearance of the landscape, contrary to Arun Local Plan policy TEL DM1(d).

The site lies in close proximity to Pagham Harbour, a designated SSSI (A Site of Special Scientific Interest), Ramsar site, Special Protection Area. Whilst the proposal would not directly affect these ecological assets, the introduction of a prominent vertical urban structure within their wider setting would erode the undeveloped and open coastal character that contributes to their significance.

The development would therefore result in urbanising visual encroachment into a sensitive coastal landscape, contrary to Arun Local Plan policy TEL DM1(d).

The applicant asserts that the proposal represents the most sensitive design available and that camouflage is not feasible for operational reasons. However no meaningful evidence has been provided to demonstrate that alternative design solutions (e.g. alternative mast types, integration into existing structures) have been fully explored. The proposal relies on a standard monopole design, which would remain visually prominent. Furthermore, the submitted Supplementary Information contains inconsistencies, for example, reference is made (page 9) to a 32m monopole designed to clear mature trees along the M60, which does not align with the current proposal. This raises further concern that alternative design options have not been comprehensively explored. In addition, the proposal doesn't include any landscaping or screening scheme or other measures to reduce longer term visual impact. Accordingly, the development would not adequately minimise harm through design, contrary to Arun Local Plan policy TEL DM1(c).

The proposal lies within the setting of several listed buildings. The mast would be located approximately 200m south of St Thomas a Becket Church (Grade I Listed), 150m southwest of Becket's Barn (Grade II Listed and Scheduled Ancient Monument), and 260m southwest of Church Farm Club (Grade II Listed). The mast would be clearly visible within views associated with these assets and would introduce a prominent modern vertical structure into their historic setting.

The setting of a heritage asset relates to how it is experienced, which in this context includes the surrounding roads, caravans and other built form within the area. The mast would be experienced as a piece of modern technology within this setting and would intrude upon the surrounding landscape that contributes to the assets' architectural and historic significance. The Council's Conservation Officer has been verbally consulted and advised that, notwithstanding the reduction in height and design amendments, the proposal would result in less than substantial harm to the significance of these

designated heritage assets in accordance with the NPPF.

Para. 215 of the NPPF (2024) requires that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. The proposal would be a significantly bulky, tall and incongruous structure visible within the context of designated heritage assets. Whilst the proposal would have public benefit, by way of improving communications infrastructure, it would harm the historic character of the area. In conjunction with its impact to the visual appearance of the surrounding landscape, it is considered that this harm would outweigh the public benefits identified.

Whilst it is acknowledged that the proposal has been amended to reduce the height of the mast to 15m, representing a reduction of 3m from the previously submitted scheme, this change would not be sufficient to overcome the harm previously identified. Although the reduction is noted as an improvement, the mast would remain substantially taller than any surrounding structures. Within an area characterised by low lying topography and a high degree of historic sensitivity, the structure would continue to appear highly visible and visually prominent. As such, it would remain an unacceptably intrusive feature within both the surrounding landscape and the wider heritage context.

Whilst the mast would be located in close proximity to a number of static caravans, these units are not in permanent residential occupation and are used on a temporary basis by visitors to the holiday village. As such, the impact to residential amenity does not warrant reason for objection, as the mast is situated a sufficient distance from any permanent local residents. Views from the residential properties would not be adversely affected, the mast would be set away as far as is practical whilst ensuring that network coverage is maintained.

The social and economic benefits of providing reliable and high quality mobile broadband connections, including 5G, to support growth in productivity, efficiency and labour force participation across the whole economy is fully supported by the NPPF. These benefits are material considerations, and it is acknowledged that there is a necessity to improve network coverage within this location. However, these benefits and need for coverage does not significantly outweigh the impact of the proposal on designated heritage assets, Area of Character and the surrounding landscape, by way of unacceptable harm to the visual appearance and character of the area.

Whilst the principle of telecommunications development is supported, the proposed installation, by reason of its siting, scale, and insufficient design mitigation, would appear as an unduly prominent and incongruous feature affecting the setting of designated heritage assets.

Therefore, it is recommended an objection be raised to the siting and appearance of the proposal, as the proposal would be contrary to Arun Local Plan policy TEL DM1 (a), (b), (c) and (d).

HEALTH AND SAFETY

Radiation safety issues and any relevant standards for exposure are a matter for the Health and Safety Executive advised by the National Radiological Protection Board (NRPB). Code system operators must comply with standards for radiation safety under the Health and Safety at Work Act 1974 and associated regulations; and they must demonstrate that exposure of employees and the public comply with NRPB exposure guidelines.

Notwithstanding the above, the scientific evidence of possible adverse health effects from electromagnetic fields has been reviewed by an Independent Expert Group on Mobile Phones (IEGMP) which reported in 2000 (the Stewart Report). The report concluded that the balance of evidence indicated that there was no general risk to the health of people living or being near telecommunications

installations on the basis that exposures are expected to be small fractions of the guidelines. The relevant guidelines are set by the International Commission on Non-Ionising Radiation Protection (ICNIRP) for public exposure.

Current planning guidance at para.123 of the NPPF explains that local planning authorities must determine applications on planning grounds only. They should not, among other things, determine health safeguards if the proposal meets ICNIRP guidelines for public exposure. NPPF para.122 requires proposals to be supported by evidence in the form of a self-certified statement that, when operational, the communications development will meet the guidelines. The applicants have complied with this requirement so there is no basis for the matter to be considered further for the purposes of this application.

RECOMMENDATION

OBJECTION

- 1 By reason of its siting and appearance within this location, the proposed telecommunications equipment would appear unduly obtrusive and would be detrimental to the character and visual appearance of the area, contrary to Arun Local Plan TEL DM1.

The development shown on the following plans (submitted on 27 March 2026) is hereby objected to:

- Supplementary Information v2
- Site Location Plans, Photo 100 rev B
- Proposed Site Plan 200 Rev D
- Proposed Elevation A 301 Rev D