

Planning
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Ref: PG169.SCR.001

2nd April 2026

By email: planning@arun.gov.uk

Dear Sir or Madam

Request for a Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017

Pea Green Ltd is instructed by Bourne Leisure Ltd (“the Applicant”), to request a Screening Opinion from Arun District Council (“the Council”) relating to a proposed extension to the existing Haven Church Farm Holiday Village in Pagham.

Screening is the process by which the need for an Environmental Impact Assessment (EIA) is confirmed by a Local Planning Authority (LPA). This request is submitted in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (“the EIA Regulations”).

Regulation 6(2) requires that a request for a Screening Opinion includes:

- (a) a plan sufficient to identify the land;
- (b) a description of the development, including in particular—
 - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;
 - (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- (c) a description of the aspects of the environment likely to be significantly affected by the development;
- (d) a description of any likely significant effects, to the extent of the information available on those effects, of the proposed development on the environment resulting from—

- (i) the expected residues and emissions and the production of waste, where relevant; and
- (ii) the use of natural resources, in particular soil, land, water and biodiversity; and
- (e) such other information or representations as the person making the request may wish to provide or make including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

The Site

The potential development site is located on the western edge of the Haven Church Farm Holiday Village, on the western edge of the settlement of Bognor Regis. The site is shown edged red on Figure 1 below, with the wider holiday park edged blue.



Figure 1: Potential Development Site Outlined in Red

The site is approximately 3 hectares in area comprising of open space currently laid out as a 9-hole pitch and putt course, on the western side of the existing holiday park. Land around the site is in agricultural use and beyond this to the west is the Broad Rife estuary and wetlands. Access to the site

is provided via a route from the eastern boundary, which extends through the existing Holiday Park (through Ballast Rise and continues along Park Lane) to Church Lane, connecting the site to the surrounding road network.

Planning Policy Context

The Arun Local Plan 2011-2031 was adopted in July 2018. The Council are currently preparing an update to the Local Plan and a programme for the new Local Plan will be prepared in early 2026. The site is identified as being in a 'Gap between Settlements', in this case between Pagham And Selsey. Policy SD SP3 states in relation to this designation that: 'The generally open and undeveloped nature of the following gaps between settlements, as identified on the Policies Maps, will be protected to prevent coalescence and retain their separate identity.' The plan provides additional commentary on the policy, stating: 'The designation of gaps is not intended to rule out all development but to allow for appropriate, small scale development, which is in keeping with the rural nature of the gaps. Development in the gaps must be appropriately sited and designed to minimise the impact on the openness of the gap.'

The Development Plan for the District also comprises the West Sussex Waste Local Plan 2014 and the Joint Minerals Local Plan 2018. The site is not identified as being within an allocated waste site or mineral safeguarding area in these plans.

There is no made Neighbourhood Plan for the Pagham area of the District, in which the site is located.

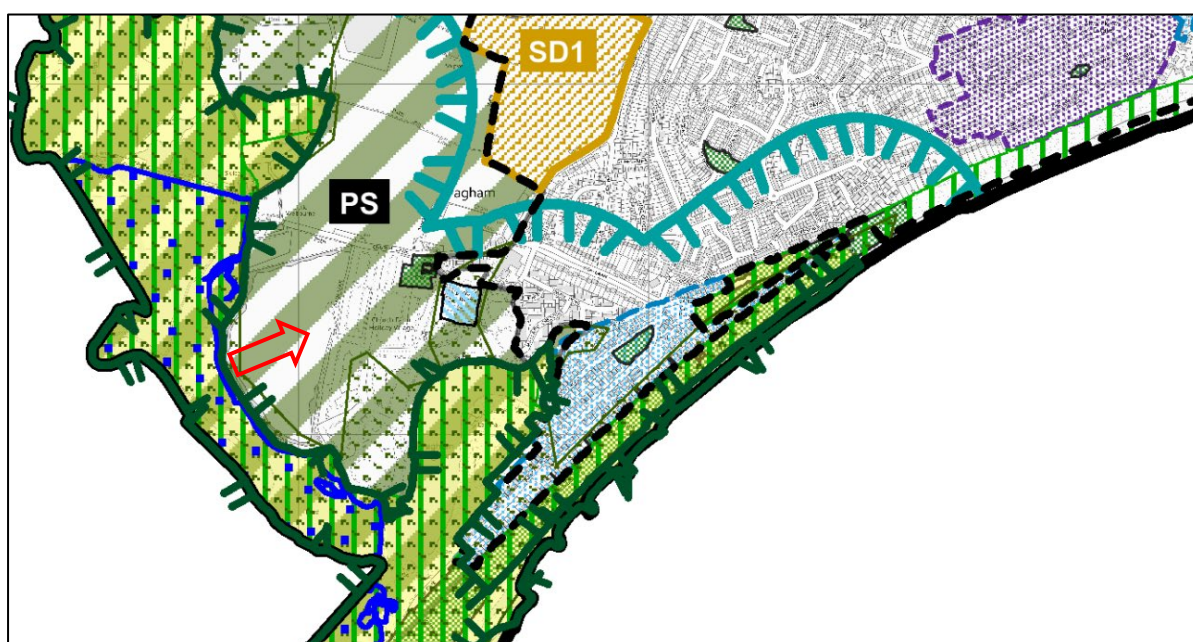


Figure 2: Extract from the Local Plan Allocations Map

The Potential Development

The development involves the installation of 58 no. caravan bases for the siting of static holiday caravans (which fall under the definition of a caravan) with associated decking, car parking, pedestrian footpaths, internal access road, landscaping, biodiversity net gain proposals and infrastructure works.

EIA Screening Thresholds

Whether or not a proposal constitutes EIA development is governed by the schedules within the EIA Regulations. EIA is mandatory for projects appearing in Schedule 1 and is required for projects appearing in Schedule 2 if they are likely to give rise to significant effects on the environment.

In order to assess whether a Schedule 2 project is likely to give rise to significant effects, it must be screened if (a) it is located within a “sensitive area” (defined as Areas of Special Scientific Interest, Areas of Outstanding Natural Beauty, National Parks, World Heritage Sites, Special Protection Areas and Special Areas of Conservation) or b) if it exceeds the applicable thresholds specified in Schedule 2 of the Regulations (which primarily relate to the scale of the proposed development).

The proposed development does not appear within the list of developments in Schedule 1 and, although there is a SSSI to the north, the Site is not located within a “sensitive area”.

A development such as this might be determined to be a ‘permanent camp sites and caravan site’ under Class 12(e) of Schedule 2 of the EIA Regulations. For this type of development, proposals are considered to be Schedule 2 development if the area of the development exceeds 1 hectare. This use could also be categorised as ‘holiday villages and hotel complexes outside urban areas and associated developments’ (which normally relates to built development rather than caravans) as specified in Class 12(c) of Schedule 2 of the EIA Regulations, for which, proposals are considered to be Schedule 2 development if the area of the development exceeds 0.5 hectares. In either case, the site area exceeds both specified thresholds.

Furthermore, Class 13 of Schedule 2 applies to Changes and Extensions of existing facilities. Class 13(b) applies to extensions of holiday villages and caravan sites, and such extensions may be considered to be Schedule 2 development if:

- i. The development as changed or extended may have significant adverse effects on the environment; or
- ii. in relation to development of a description mentioned in column 1 of this table, the thresholds and criteria in the corresponding part of column 2 of this table applied to the change or extension are met or exceeded.

As stated above, the proposed development site exceeds the thresholds of 1 hectare for caravan parks and 0.5 hectares for holiday village extensions. As such, is being screened for EIA and the remainder of this letter examines the potential for the proposed extended development to generate significant environmental effects.

EIA Screening Analysis

The issues discussed below are considered in the context of the baseline conditions (i.e., as existing), the construction phase (i.e., temporary effects) and the development's operations phase (i.e., permanent effects), as relevant. In considering the likely effects on the environment, the selection criteria in Schedule 3 of the EIA Regulations have been taken into account. The selection criteria fall into three broad categories: the characteristics of the development; the location of the development; and the characteristics of the potential impacts.

Geology and Soils

According to the BGS online Geology Viewer¹ the bedrock geology comprises: 'London Clay Formation - Clay, silt and sand. Sedimentary bedrock formed between 56 and 47.8 million years ago during the Palaeogene period.' Superficial deposits comprise: 'River Terrace Deposits - Sand, silt and clay. Sedimentary superficial deposit formed between 2.588 million years ago and the present during the Quaternary period.'

According to the LandIS Soilscales Viewer² the site is overlain by loamy soils with naturally high groundwater and low fertility. The Agricultural Land Classification map London and South East³ confirms that the soils are categorised as Grade 3 agricultural quality. Given that the land is not in agricultural use and is currently being used as a recreational site in addition to its low fertility as indicated by LandIS data, it is considered to be unlikely that the site includes best and most versatile land. Any soil arising will remain within the site and be used within the landscaping.

There are no Mineral Safeguarding Area (MSA) designations at the site and the site has not been subject to historic development that could have generated any significant contamination risks.

In summary, the site is characterised by managed grasslands that form part of a golf course and there is no evidence of significant historic industrial uses that would lead to a high risk of land or groundwater contamination. The soils are not of high agricultural quality and the site is not classed as a Mineral

¹ [BGS Geology Viewer \(BETA\)+](#)

² [LandIS - Land Information System - Soilscales soil types viewer](#)

³ [ALC Map - Natural England](#)

Safeguarding Area. Therefore, it is concluded that an EIA would not be required to assess and mitigate any impacts associated with ground conditions.

Landscape

The site and the wider holiday park are not covered by any landscape designations. The nearest National Landscape is the Chichester Harbour National Landscape, which is more than 5km to the north-west. The distance between the site and the designated landscape is too great for the development to have any significant effect, given the flat and low lying nature of the landscape.

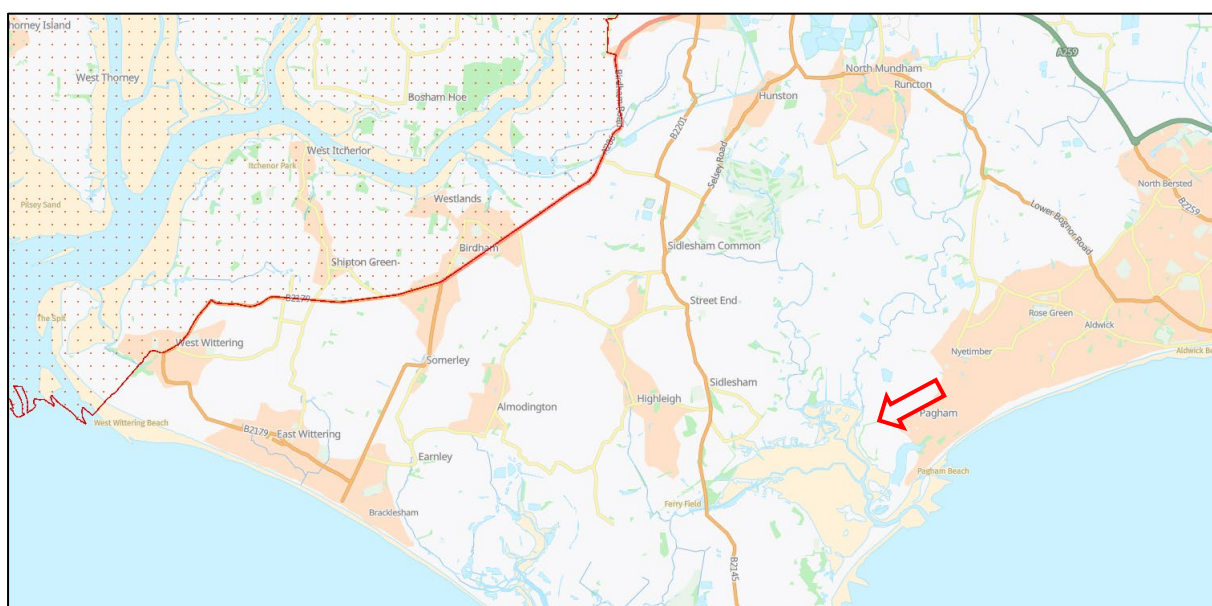


Figure 3: The Chichester Harbour National Landscape⁴

A preliminary landscape and visual appraisal has been undertaken by RPS. This involved the identification of the public rights of way at the site and the Zone of Theoretical Visibility (ZTV). These are identified on Figure 4 below. The PRoW network includes well used footpaths around the site, including #110 and #111 that pass through the wider holiday park, and the King Charles III England Coast Path, which is a key visual receptor and is shown dashed green on the plan below.

⁴ <https://magic.defra.gov.uk/MagicMap.html>

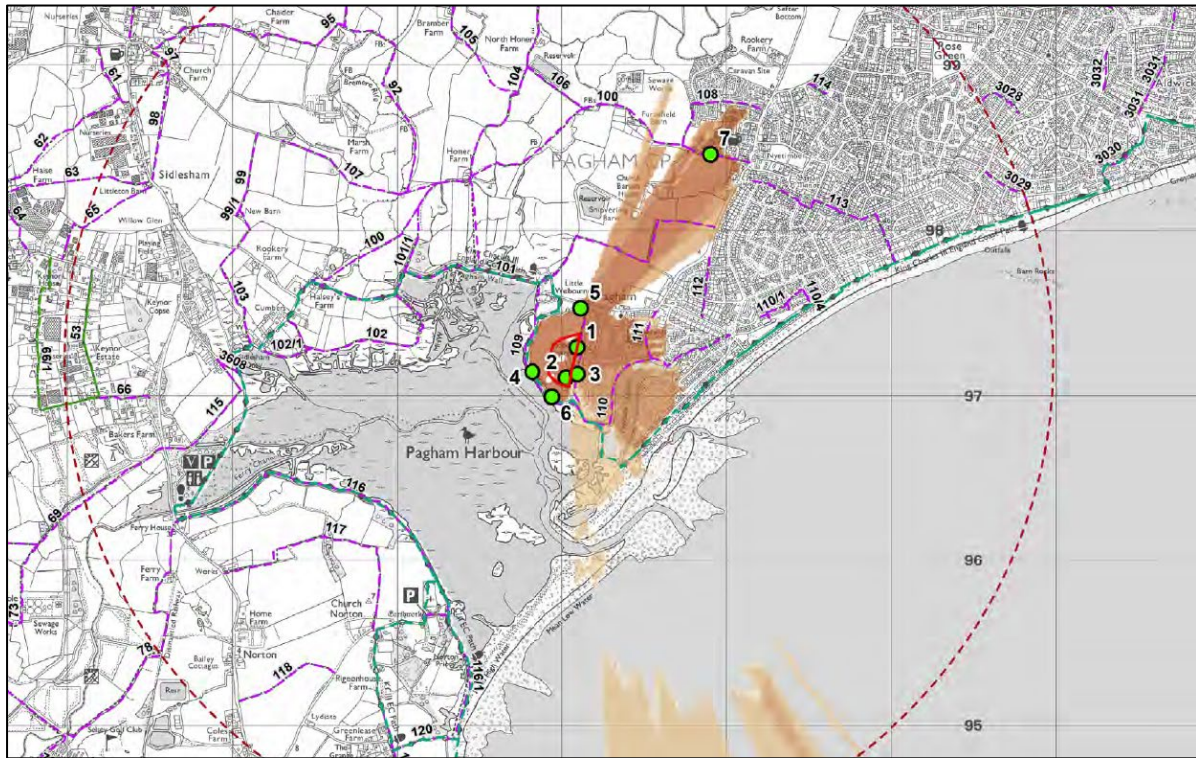


Figure 4: Public Rights of Way, Zone of Theoretical Visibility and Candidate Viewpoint Plan⁵

The findings of the preliminary LVIA confirm that the site is visually separated from the existing caravan site and the wider landscape by a band of thick native scrub and as a result of the markedly flat and low lying topography. In the northern part of the application site is an area of tall scrub and a small service compound. The site is bound to the east by the existing developed area of the Holiday Park, which is afforded some separation by two narrow strips of scrub and tree planting and a Public-right-of-way (PROW) footpath. This is confirmed by the ZTV plan at Figure 4, which shows possible views being restricted in all directions, except for a narrow corridor to the north-east, to all but the immediate surrounding land, much of which is part of the existing holiday park.

In terms of landscape impact, the development would require the development of an area of open land, which would result in a change in the immediate landscape character. However, there are no important landscape features within the development area, only an existing man-made golf course with little vegetation of interest, which would not be considered to be a sensitive landscape. The use would be in keeping with the land immediately to the east and the siting of caravans would be supplemented by the planting of trees and shrubs around the periphery of the site, increasing the overall landscape value. In accordance with guidance received from the council's Landscape Officer, planting will include native

⁵ RPS (2025) Landscape and Visual Impact Assessment (LVIA) - Preliminary Report

species including flower, berry and fruit-bearing species to enhance the habitat for birds, bats and invertebrates.

Taking the above into account, the siting of caravans would be expected to have an insignificant effect on the landscape and on views from the surrounding area and an EIA would not be warranted on the basis of potential landscape and visual effects.

Ecology

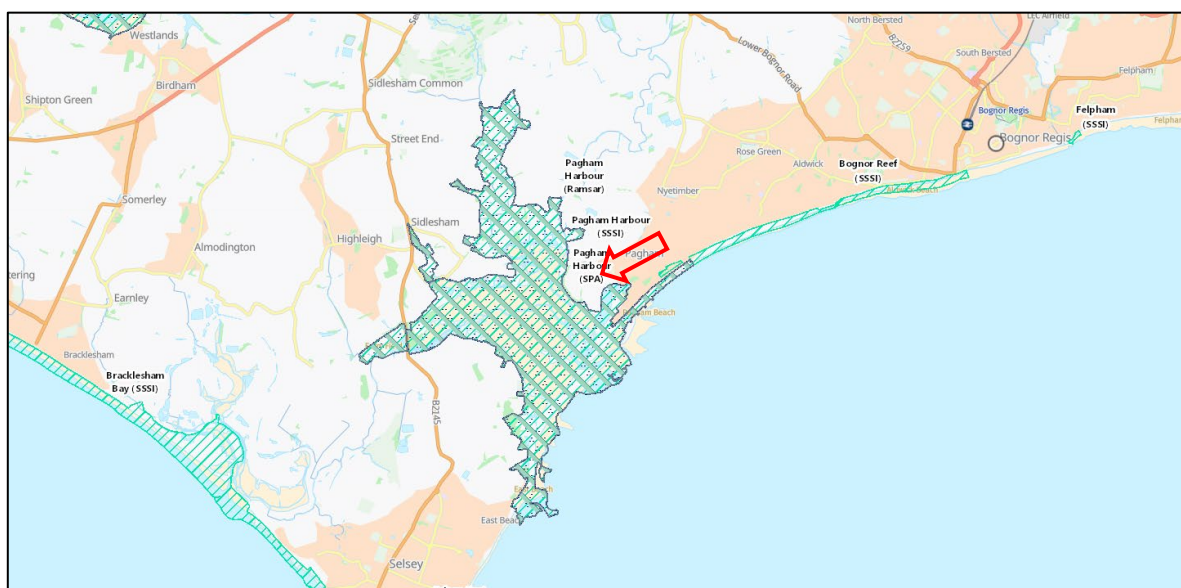


Figure 5: Pagham Harbour SSSI, SPA and Ramsar Site⁶

The site is not covered by any designation on the basis of ecological value. However, Pagham Harbour is situated to the west and south of the potential development site, as shown on Figure 5. The Harbour is designated as a SSSI, SPA, Ramsar Site and Local Nature Reserve. The harbour comprises an extensive central area of saltmarsh and tidal mudflats with surrounding habitats including shingle, open water, reed swamp and wet permanent grassland. The citation for the designations confirms that the mud-flats are rich in invertebrates and algae and provide important feeding areas for the many bird species that use the site. The local RSPB have managed the site as a local nature reserve (LNR) since 2013, amplifying the productivity and variety of species present. The Pagham Harbour Local Nature Reserve (LNR) covers broadly the same areas as the SSSI, as shown on Figure 7.

The SSSI Units are shown on Figure 6 below. Where shown in green, the site is in favourable condition but areas in red are in unfavourable – declining condition. Whilst the majority of the SSSI is in favourable

⁶ [Magic Map Application \(defra.gov.uk\)](https://magic.defra.gov.uk/)

condition, the units covering the lagoon adjacent to the existing holiday park and the shingle adjacent to the lagoon are shown as being in unfavourable condition, which is based on a survey undertaken in 2023. This status is noted as being caused by the escape of garden plants into the shingle habitat from adjacent residential properties, and the lack of presence of Starlet Sea Anemone in the lagoon, which is known to require 'regular inputs of seawater, reduced freshwater input and reduced disturbance and low intensity catchments to reduce nutrient inputs and pollutants.' Evidence of elevated nutrient/phosphate levels in the form of algal growth was noted in the survey. The citation⁷ notes that recreational disturbance is only a potential pressure, rather than an active one. The active pressures were identified as the presence of deer and terrestrial invasive non-native species as well as unknown sources of water pollution.

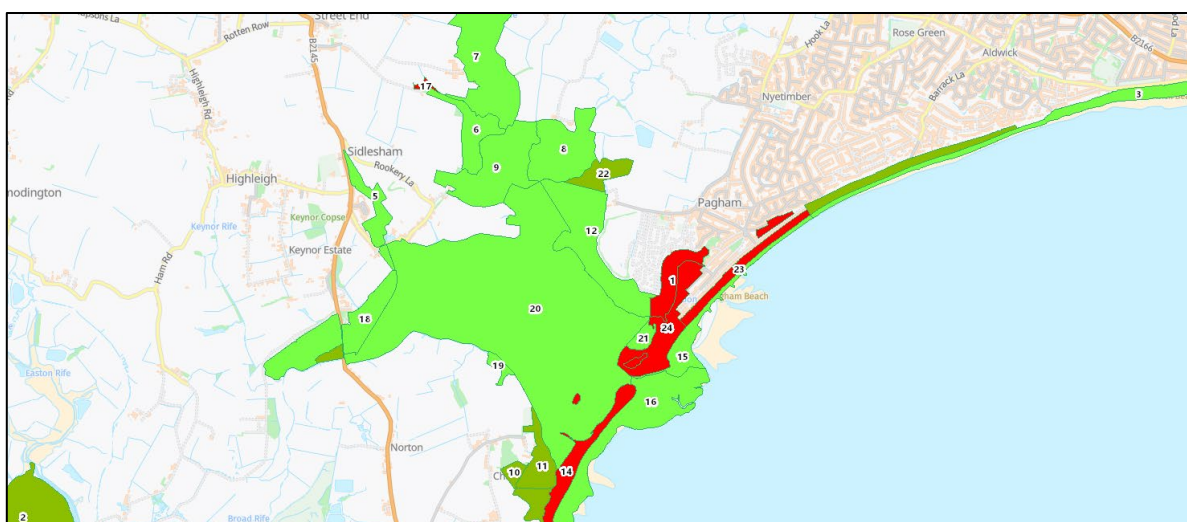


Figure 6: SSSI Units

On the basis that the designated sites are predominantly in favourable condition and, where they are in unfavourable condition, that this is not as a result of recreational pressure, the potential extension of the existing holiday park by a modest number of caravans is not likely to result in significant effects upon the designated sites.

The above notwithstanding, the applicant has undertaken a Habitat Regulations Assessment to consider the effect upon the internationally designated sites in the surrounding area. The HRA concluded that there is unlikely to be any significant effect on the integrity of the protected sites, once a contribution is made to the Strategic Scheme of Access Management and Mitigation (SAMM) for Pagham Harbour SPA, which will offset potential effects associated with increased recreation in

⁷ [Designated Site Views - Natural England](#)

accordance with adopted local policies. The HRA would be submitted with any forthcoming planning application.

The applicant is committed to the ongoing improvement of its environmental setting through the provision of information to visitors on the importance and sensitivity of the local habitats and how to avoid causing any unnecessary disturbance. This would be achieved through the provision of educational visitor information, dog waste bins and regular site maintenance.

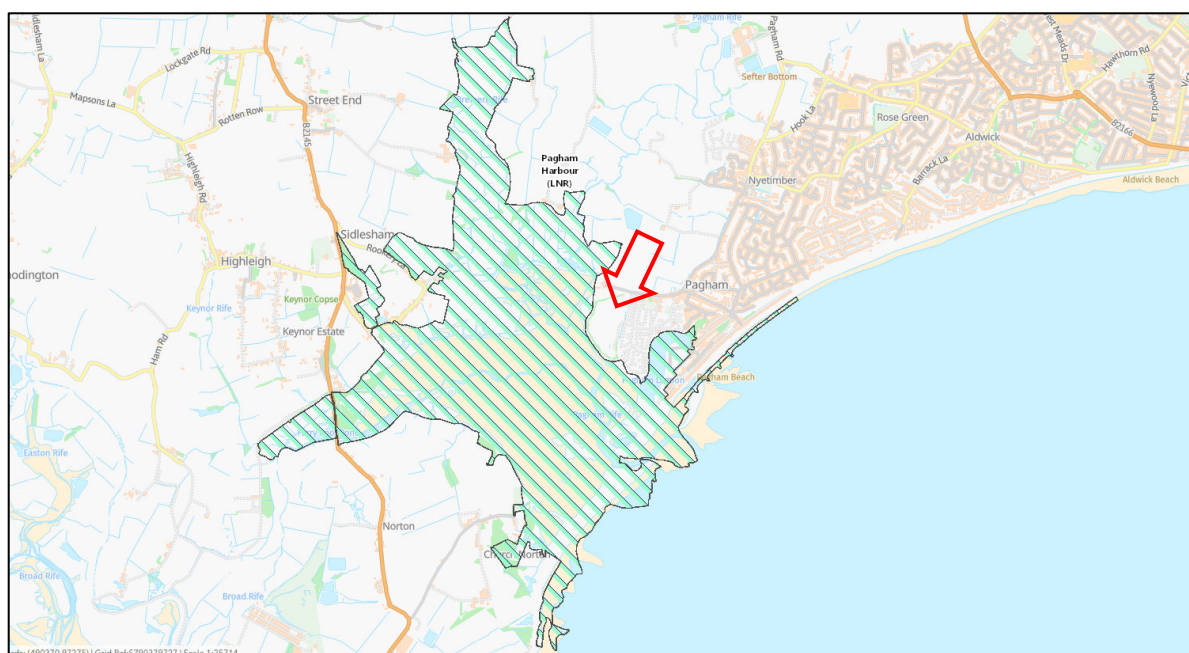


Figure 7: Pagham Harbour Local Nature Reserve⁸

A site survey has been undertaken by Tetra Tech. The onsite habitats comprise managed grassland associated with pitch and putt use. Protected species surveys identified the following:

- Reptile surveys identified a good population of common lizard and a low population of slow worm.
- Nine species of bat were recorded foraging/commuting onsite.
- Breeding and wintering bird surveys identified a population of local level geographical Importance.
- No evidence of badgers or dormice was recorded onsite.

In terms of proposed enhancements, bat friendly lighting will be installed in accordance with best practice guidance and a natural buffer (hedge) will be created along the western boundary to reduce

⁸ [Magic Map Application \(defra.gov.uk\)](https://magicmap.defra.gov.uk/)

potential disturbance to the overwintering bird populations. Planting will include native species including flower, berry and fruit-bearing species to enhance the habitat for birds, bats and invertebrates. In combination, these measures will ensure that a Biodiversity Net Gain of at least 10% will be achieved onsite.

Given the lack of ecological designation, the current conditions at the site and the low impact nature proposed development, it is not likely that mitigation and enhancement measures would be of sufficient complexity as to warrant an EIA and these could be implemented through the normal design process.

Pollution control measures would be employed during construction to ensure that runoff would be subject to sediment filtration before entering local watercourses. Once operational, surface waters from hard surfaced areas such as parking and roadways would be passed through appropriate interceptors to remove any contaminants before being discharged from the site via the drainage system for the existing holiday village.

Given that the measures described above are commonplace in nature and straightforward to condition and implement, there would not be a need for an EIA to further assess ecology.

Archaeology and Heritage

There are no heritage assets located within the site itself but Figure 8 illustrates that there is a Scheduled Monument, known as Beckett's Barn and adjoining earthworks, located around 350m to the east, within the existing holiday park boundary. There are also a collection of listed buildings to the north and north-east, most notably the Grade I Listed Church of St. Thomas à Becket, around 300m to the north-east.

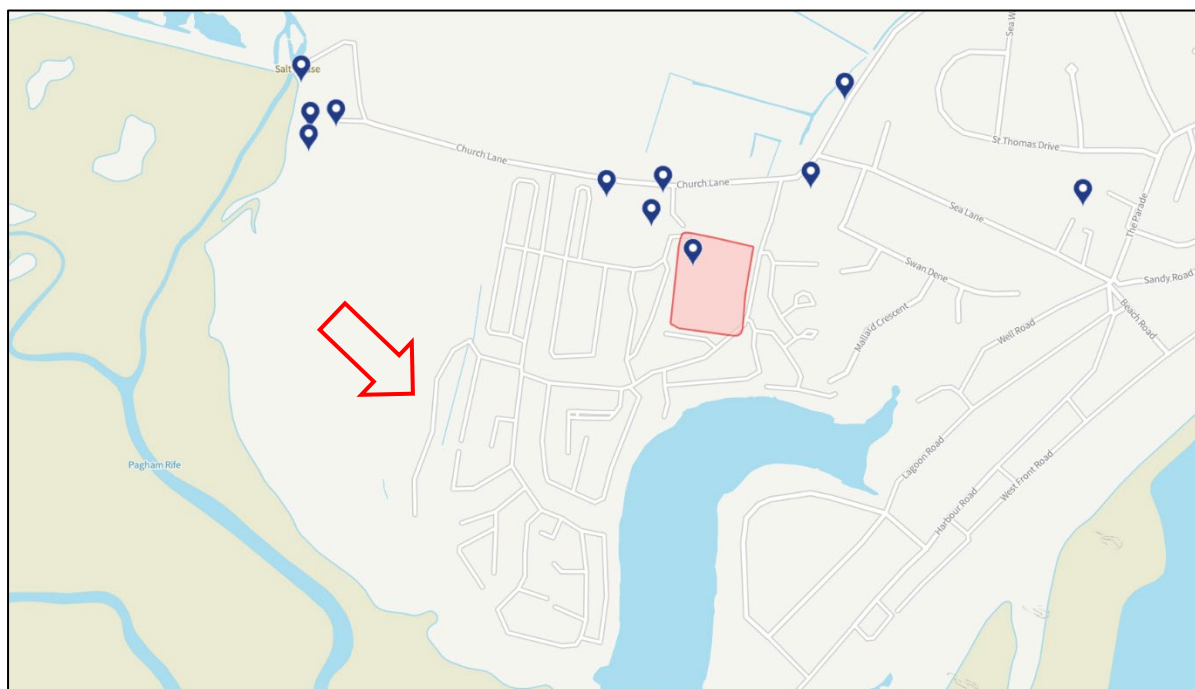


Figure 8: Local Heritage Assets⁹

An assessment of the potential effects upon heritage assets and buried archaeology has been undertaken by AH Heritage Planning. This assessment concluded that the proposed development will result in minor changes to the settings of a number of nearby heritage assets, including the Former Vicarage, Millstone Cottage, the Church of St. Thomas à Becket, and Beckett's Barn Scheduled Monument, which have been assessed in detail in terms of both their significance (and the significance of their settings), and the potential for the proposed development to adversely impact upon them.

These changes are considered not to adversely affect the significance of these heritage assets due to a range of factors such as distance from Site, existing screening, and the already significantly altered nature of their immediate surroundings.

Regarding the potential for buried archaeology, the AH Heritage assessment has identified that the site lies within an Archaeological Notification Area and holds a moderate potential for buried remains, particularly prehistoric. LiDAR evidence, whilst largely showing the existing golf course features, included a north-south aligned linear feature of unknown date or function. It does not correspond to any known historic boundaries as seen in historic maps and is considered to potentially be related to historic sea defences or land reclamation. The proposed development at the Site has the potential to impact on

⁹ [Historic England](#)

any surviving below-ground remains, should they remain extant, and further consultation with the county archaeological service will be undertaken to determine the necessary next steps for investigation.

The proposed development at the Site will not significantly alter the nature of the historic landscape character (HLC). Whilst it is recorded as Informal Fieldsapes, the Site has been subject to recent landscaping to form the extant golf course. In consideration of the fundamental nature of the HLC as it exists today, it should be more accurately defined as leisure related. In this context it will remain unaffected.

Overall, the proposed development was found to represent a minor and acceptable change within the existing context of the Leisure Park, with no identified adverse impacts on heritage assets or the historic landscape.

Flood Risk and Drainage

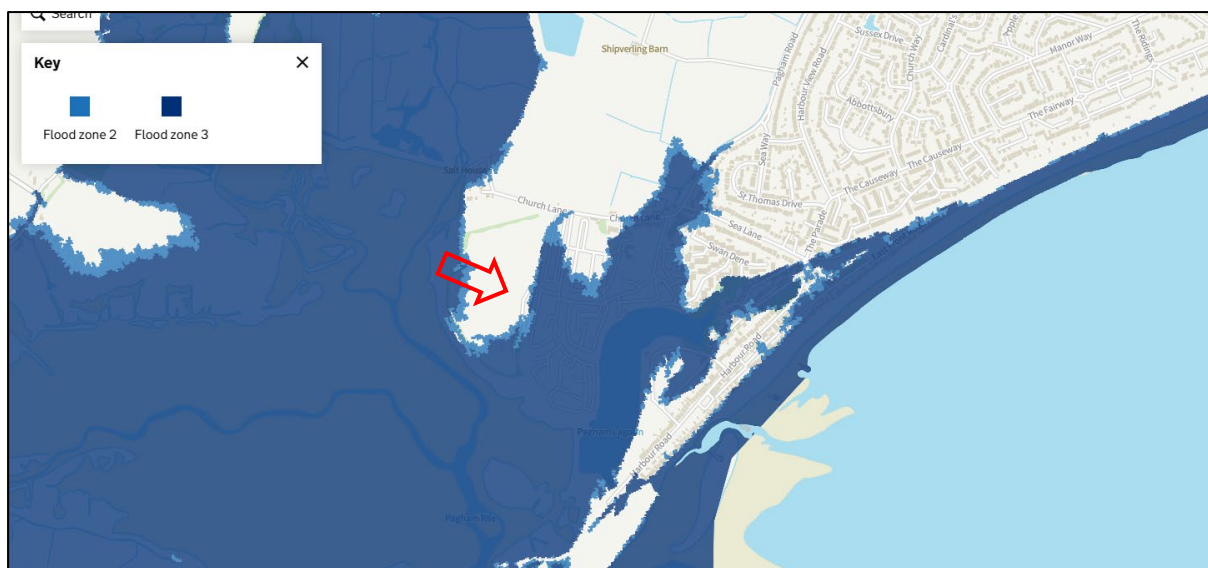


Figure 9: Flood Risk Map¹⁰

Figure 9 shows that the portion of the site in which the caravans would be sited lies entirely within Flood Zone 1, with the lowest risk of flooding, according to the Environment Agency flood maps. The layout has been designed to fall outside of the flood risk areas shown in blue on the plan above but it is acknowledged that the access route, which is formed by an existing roadway through the holiday park, passes through an area that is at risk of flooding.

¹⁰ [DEFRA - Flood map for planning](#)

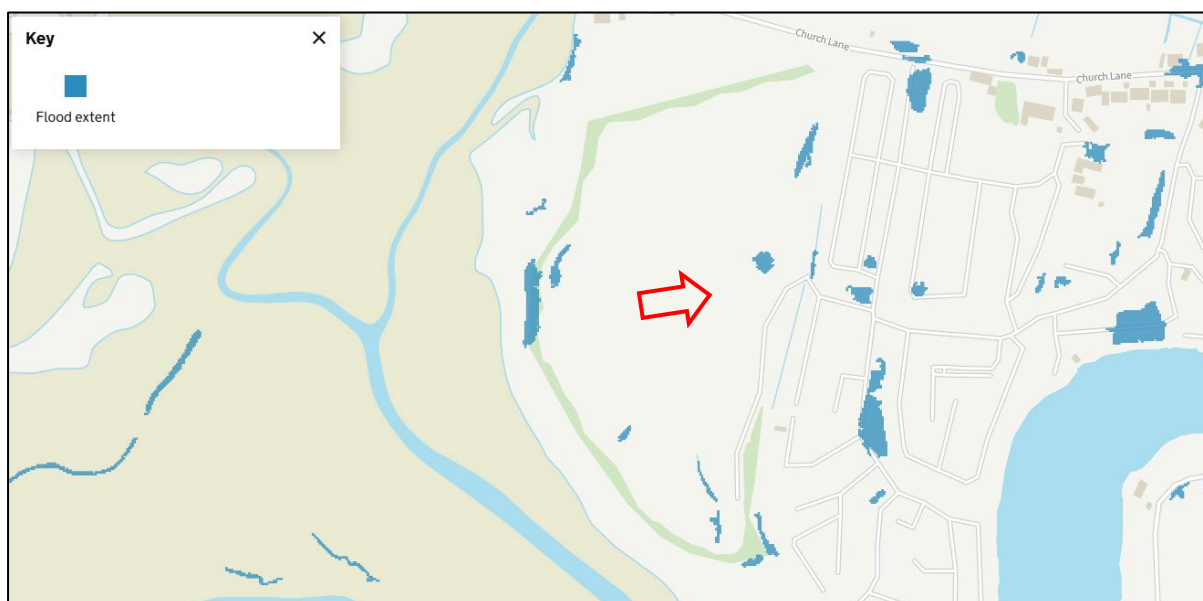


Figure 11: Surface Water Flood Risk¹²

Traffic and Transport

The site would be accessed via the main site access off Church Lane and through the existing holiday park. No additional vehicular access to the public highway would be required.

Current visitor traffic is primarily concentrated into the Friday and Monday changeover days and does not cause any significant effect on the network during the standard daytime peak periods. The addition of 58 caravans would not have any significant effect on these established traffic patterns or on the capacity of any local junctions.

The proposed development would not generate significant volumes of traffic during the construction stage given that the on-site works would involve only the construction of concrete bases, internal roads and utility connections. The number of deliveries and workforce movements would therefore not be significant and the duration of these works would be limited.

The caravans themselves would be constructed off-site and delivered in completed form by HGV, which is a highly efficient means of construction that generates very few traffic movements at the development site.

¹² [DEFRA - Flood map for planning](#)



Given the limited amount of construction traffic associated with this type of development and the limited scale of the increase in visitor numbers, an EIA would not be required to evaluate the impacts of the project.

Noise

The site is not affected by any significant sources of man-made noise that could render the site unsuitable for holiday park development.

The nearest noise sensitive neighbours to the site are the residential properties to the north on Church Lane, albeit that they are over 200m from the proposed development site.

Any noise associated with construction of the bases, internal roads or utilities will be very short term in duration and on a very small scale. The type of construction required is not particularly noisy, given that it primarily involves localised excavations and the pouring of concrete. The delivery of caravans is also a quiet process given that the units are delivered by road and wheeled into position.

Once completed and occupied, the caravans would generate no more noise than a typical residential property and would not require an EIA to evaluate the acoustic impacts.

Overall, the proposed development would not generate any potentially significant noise effects that would justify the need for an EIA.

Air Quality and Dust

There are no Air Quality Management Areas in the District of Arun, meaning that there are no local exceedances of air pollution thresholds that have warranted the production of an Air Quality Management Plan. The baseline conditions for air quality are therefore very good.

During the construction period, there would be some short terms potential for dust to be generated as a result of minor and very localised excavations and the construction of the bases. However, these operations are very limited in scale and dust is highly unlikely to significantly affect any neighbouring properties given that the nearest property is 200m to the north-west from the most northerly point of the site. This notwithstanding, best practice dust suppression such as damping down, sheeting of stockpiles and skips and wheel washing would be employed to ensure that dust does not affect nearby residents or the designated ecological site to the west.

As stated above, the number of vehicular movements associated with the construction period and the completed development will be very limited and focused on the off-peak periods on Mondays and

Fridays. As such, the extended holiday park is not expected to have any significant impact on local air quality such that an EIA would be required to assess and mitigate the effects.

Accidents and Disasters

Given its scale and nature, the type of development proposed would not result in an increased risk of major accidents or disasters that would necessitate an EIA.

Wastes

Given the scale of the proposed development, the quantity of waste generated during the construction period would be very limited. Soil arisings will be used in landscaping elsewhere within the site and any other construction wastes will be securely stored on-site prior to being transferred to a processing facility for recycling and recovery. In terms of the caravans, these will be constructed off-site and transported to site fully assembled. This construction method is very efficient at minimising waste generation.

Once operational, the holiday park would generate non-hazardous household-type wastes, that would be collected by a commercial operator as is currently the case for the wider holiday park. The increase in waste production would be insignificant for an extension of this size and would not necessitate an EIA to assess the potential effects.

Population and Human Health

The development is located adjacent to an established holiday park, which provides opportunities for people to enjoy leisure activities in a seaside setting. The type of development proposed attracts short-term visitors who do not increase the local population or exert any persistent additional demands upon local social, health or community services. Holiday parks do, however, generate local employment opportunities for local residents, which improves opportunities for local people to find work and improve their quality of life. Given the lack of adverse social impacts and the positive contribution to the local economy, it is not necessary to undertake an EIA to assess and mitigate the impacts of the project.

Climate Change

The EIA Regulations emphasise the need to consider the impact of new development on climate change over the course of a development's lifetime as well as considering the potential impacts that climate change may have on the development itself.

The proposed development is for holiday lodge accommodation. The construction works and the quantities of materials are modest in scale and their production and use at the site would not have a significant effect on climate change. Once operational, the energy used by each caravan would be

comparable to a small residential property, which would not represent a potentially significant effect upon climate change. It could also be argued that the provision of additional high quality accommodation in the UK offers an alternative to flying abroad for holidays, which would represent a positive climate outcome.

Cumulative Effects

The EIA Regulations require that, in Screening a development proposal that falls under Schedule 2, consideration is also given to the likely cumulative effects of the proposal when combined with other major development in the local area. This includes likely effects that may occur both during construction and operation. Schedule 3,1(b) notes that screening must consider the effects of a proposal in “cumulation with other existing and/or approved development”.

The extension of the site has been considered throughout this letter and comment has already been provided on the cumulative effects associated with landscape and highways, where no significant cumulative effects are anticipated.

In terms of other development projects that could generate a significant combined effect with the proposed development, two existing permissions for major residential development have been identified in the local area.

- **Planning Ref: P/140/16/OUT** – Outline planning application for a mixed-use development comprising up to 400 dwellings; a care home of up to 70 beds; a Local Centre providing up to 2,000 sqm of A1/A2/A3/D1 and sui generis floorspace; provision of land for a primary school; provision of land for a scout hut; safeguarding of land to facilitate connections to the Pagham Harbour Cycle Route; and other community uses including public open space and allotments, with all other matters reserved.
- **Planning Ref: P/30/19/OUT** – Land north of Hook Lane, Pagham. Outline planning application with some matters reserved for the construction of up to 300 dwellings; a care home of up to 80 beds; up to 4,000 sqm of floorspace including a primary school; formation of new access onto Hook Lane and Pagham Road; provision of new pedestrian and cycle links; open space; strategic landscaping; habitat creation; drainage features; and associated groundworks and infrastructure.

The latter of these permission is currently under construction but the status of the former is unknown. These projects are large scale developments and are connected to the site by Pagham Road. Therefore, there is the potential for cumulative construction, traffic, visual and ecological effects when the developments are considered in combination. However, it should be noted that the scale and nature of these development sites exert very different types of effect than a holiday park development.

Construction effects from the proposed development, such as noise and dust, would be minimal and very short term in duration, given the type of construction work proposed. This therefore has very limited potential for interaction with the development to the north, the programme for delivery of which is unclear. Construction vehicular movements for the proposed development would also be very limited with caravans being delivered immediately prior to installation onsite and limited to only a small number per day for a period of around one month. The construction period for the residential development would take place over several years, within which there would be an insignificant overlap with the proposed development.

Operational traffic patterns for holiday use are focused on changeover days and do not generally align with peak traffic periods for residential development, which tend to be focused on commuting hours. Therefore the potential for cumulative traffic effects, and associated noise and emissions, is limited.

Although the proposed development and the development consented under permission P/140/16/OUT would be visible from some local footpaths, the extension to the holiday is very modest in scale and in keeping with the existing holiday park, which would form a backdrop to the development. The consented development would have an impact on the landscape and views because of its size and the change in land use, rather than in conjunction with the proposed development.

In terms of the potential ecological effects, each development would need to align with local policies on the provision of contributions towards the Strategic Scheme of Access Management and Mitigation (SAMM) to address impacts associated with increased recreational pressures, ensuring that the cumulative effects are effectively managed or offset.

On this basis, the potential for cumulative effects is limited or is already being offset by established mitigation schemes and EIA would not be required to specify additional mitigation.

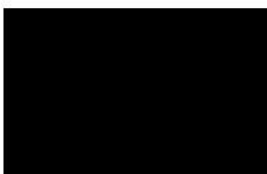
Summary

Having regard to the prevailing environmental conditions, the limited scale of the proposed development and context of the existing holiday park development, it is concluded that the proposed development is not likely to result in such significant or complex effects on the environment as to warrant an EIA.



I trust that the enclosed information is sufficient to assist the Council in adopting a screening opinion in this instance; however, please do not hesitate to contact me should you wish to discuss matters in further detail.

Yours faithfully



Christopher Peacock BSc MA MIEMA

Director

