

Pea Green Environmental Planning  
16 Clarendon Drive  
Macclesfield  
SK10 2QQ

Date: 17th April 2026

Please ask for: Mr S Davis

Tel: 01903 737874

Your Ref: PG169.SCR.001

Our Ref: P/43/26/ESO

Dear Mr Peacock,

---

Environmental Screening Opinion relating to a proposed extension to the existing Haven Church Farm Holiday Village.

Church Lane Pagham Bognor Regis PO21 4NR

---

## 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 extension of a Schedule 2 development therefore is covered by 13(b) "Changes and Extensions" of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) - with the change concerning either an authorised development under 12(c) "Holiday villages and hotel complexes outside urban areas" or under 12(e) "Permanent camp sites and caravan sites".

Paragraph: 017 (Reference ID: 4-017-20170728) of the National Planning Practice Guidance (NPPG) states that "If a proposed project is listed in the first column in Schedule 2 of the 2017 Regulations and exceeds the relevant thresholds or criteria set out in the second column, the proposal needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required."

Schedule 2 states that the applicable criteria and thresholds are either that the development as extended may have significant adverse effects on the environment; or that the area of the development exceeds 0.5 hectares (holiday villages) or 1 hectare (permanent caravan sites).

The proposed holiday park extension will have impacts on the environment and is greater than 1 hectares, so it is necessary to screen the proposed development.

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

This site is within only about 100m of the Pagham Harbour SPA/SSSI and is also within around 1.2km of the Bognor Reef SSSI. In the case of the former, the site is also classed as within the Pagham Harbour Access Management Zone A (0-400m). The proximity to the SPA will separately necessitate the production of a Habitats Regulation Assessment, agreement with Natural England and the payment of a contribution towards the agreed Pagham Harbour mitigation scheme.

The proposal is clearly Schedule 2 development and has the potential to harm environmentally sensitive locations. An EIA is not automatically required unless the Local Planning Authority considers that the proposed development is likely to have significant effects on this 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) states:

"Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment. 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 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 linked from paragraph: 057 (Reference ID: 4-057-2070720) state in respect of holiday accommodation proposals, that the criteria is whether more than 300 bed spaces or more than 200 caravan pitches will be created. Neither is applicable in this case. The key issues to consider are then visual impacts, impacts on ecosystems and traffic generation. This Screening Response now continues in response to the headings given within Schedule 3.

#### (1) Location of the Development

The site is open space laid out as a 9-hole pitch and putt course, on the western side of the existing holiday park. The land around the site is in agricultural use and beyond this to the south and west is Pagham Harbour including the Pagham Rife and Broad Rife; and areas of estuary/wetland.

The site minus the golf course features is predominantly flat. There is an established hedgerow on the eastern boundary (bordering 22 caravans approved in 2016) but no trees are affected. The existing caravan park lies to the immediate east but otherwise the site borders with open land (or open wetland/estuary). The proposed site would be eligible for statutory Biodiversity Net Gain.

The site is in Flood Zone 1 with Flood Zones 2 and 3 just outside of the site to the south. As per the EAs climate change (2070 to 2125) mapping, the whole of the site area will be in FZ3a by 2125 - and the caravan pitches will all be in this area. Some small areas of the site are at risk from surface water flooding and ground water levels are likely to be high, potentially leading to flooding.

There are several Listed Buildings on Church Lane to the North and including some within the wider Church Farm Holiday Park. There is potential for these to be affected although it is relevant that heritage was not stated to be a concern in the approval of P/84/16/PL for 22 pitches on the eastern side of the new site. There is a Public Right of Way (PAG/110/2) which runs outside but adjacent to the southern and western edges of the site.

This is an environmentally sensitive location. However, it is likely that any environmental impacts that may arise will be localised in nature and capable of resolution through mitigation measures.

#### (2) Characteristics of the Development

This development would comprise of a 58 (static) caravan extension to the holiday village. There would be associated decking, car parking, pedestrian footpaths, an internal access road, landscaping, biodiversity net gain proposals, and other infrastructure works. Visually, the development would be similar (albeit with a greater extent) to the 22-caravan extension on the eastern side as approved in 2016. The caravans will meet the statutory definition of a caravan and will all be single storey to a maximum height of 3.05m (measured internally from the floor at the lowest level to the ceiling at the highest level) and will be on a raised base (typically 0.6m above the ground).

The caravan park extension will occupy almost the whole of the existing extent of the golf course. Landscape buffers are proposed on the western and southern edges of the layout which are at least 10m deep (and in places much deeper). The layout/scheme includes a

specific Brent Geese mitigation area as well as other scrub areas for wildlife.

Given that this is an extension to a holiday village comprising approximately 903 caravans with supporting facilities and ancillary development; and will occupy an existing golf course, 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 in general are unlikely to be particularly significant, or long lasting, affect a significant area of the district or be complex in nature.

As noted elsewhere, the site is within only 100m of the Pagham Harbour SPA/SSSI/Ramsar site. Whilst there is a boundary between the land in the ownership of the holiday park and the Harbour, it is possible to get very close to the Harbour edge from the site and there is potential for disturbance and other impacts. The loss of the golf course itself may reduce the availability of functionally linked habitat for birds visiting the Harbour. It is likely that the impacts will be localised in nature and will be capable of resolution through appropriate mitigation measures including conditions and/or legal agreements. Just because a development requires assessment under the Habitat Regulations does not then mean that an EIA is required.

Subject to full assessment through the planning application (including Habitats Regulation Assessment), it is not likely the development will result in any significant harm to ecological interests and it should be possible to mitigate any impacts through planning conditions/a legal agreement, and the approval of an appropriate layout including significant buffer planting. If the issues prove unsurmountable then the Local Planning Authority would be able to refuse the development, but such a decision does not automatically mean that an EIA should have been required.

The entirety of the site is not at current risk of flooding from surface water, rivers or sea and the development represents a potential opportunity to improve the existing surface water drainage system through infiltration and so reduce discharge rates to any local watercourses.

The development of the site will not directly affect any heritage assets whilst those in the wider area will likely be protected as a result of the distance to them and intervening development or potential landscape improvements.

The site is not considered to be agricultural land and regardless of the soil grade, the site is not of sufficient size for any loss to be significant. There have been no historic uses which will have resulted in any contamination of the land. 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 development site. When built and occupied, the caravan site extension will not generate any significant noise and so there will be no harmful impacts.

Although there will be an increase in vehicular traffic using the access to the Park from Church Lane (which then becomes Pagham Road a short distance to the east), this impact will not be significant in the context of the EIA Regulations. As a holiday park, trips to and from the site are likely to be staggered throughout the day rather than be within the rush hour peaks. Many people will stay on the site or walk to local attractions.

The landscape impacts will not be significant in the context of the EIA regulations. The surrounding landscape is flat and new landscaping and/or woodland planting to the edges of the layout are likely to be sufficient to ensure that there is no significant or long-lasting impact on the wider landscape.

Finally, although the construction phase of the site will result in some impacts (such as noise and dust), these effects will be temporary and, provided suitable mitigation measures are put in place, not significant.

### Cumulative Effects

Paragraph 024 (Reference ID: 4-024-20140306) of the NPPG states with regard to cumulative effects that "There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development".

As noted elsewhere the site was extended following the approval of a 2016 permission for 22 caravans on the western side. However, this has now been in place for 8 or 9 years and cannot be considered as new or significant.

There have been a number of major residential approvals on land to the North (1 or 2 fields away). These consist of the strategic allocation (Pagham South) for up to 465 dwellings, a 70-bed care home, a new Local Centre, and a Primary School; and the Summer Lane development by Drew Smith comprising of 90 dwellings. The latter included a significant area of open space (2.57ha) to the south of Summer Lane. These permissions have either been commenced or completed. These developments will not be seen in the same light as they are accessed from different locations, some distance apart and not readily visible from each other. Whilst they do both have impacts on functionally linked habitat to the Pagham Harbour SPA, this does not mean that the development in combination with others is significant. It is material that the Government's Screening Direction for the majority of the Pagham South allocation stated that there was no requirement for an EIA.

### Conclusion

Having considered the above factors and having regard to the nature & scale of the proposal, it is not considered that the proposed development has the potential to result in significant impacts on the environment. The impacts would be relatively small-scale and localised and will be mitigated in accordance with standard methods including by conditions and a s106 legal agreement. As such, it is considered that the proposal does not constitute EIA development and therefore 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



Neil Crowther  
Group Head of Planning