

**From:** SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>  
**Sent:** 21 January 2026 11:20  
**To:** Planning  
**Subject:** 538777 DC\_25\_1269 NE response  
**Attachments:** ufm2\_Bat\_Impact\_Consultation.pdf; PS bat AA Lnd N Guildford Rd Rudgwick DC251269.pdf

**Categories:** Consultations

Our ref: 538777  
Your ref: DC/25/1269

Dear Sir/Madam

**Planning consultation:** Outline (AMR except access) for up to 90 no. residential dwellings.  
**Location:** Land North of Guildford Road, Bucks Green, Rudgwick, West Sussex

Thank you for your consultation on the above dated 14/01/2026

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Further information on when to consult Natural England on planning proposals is here- [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/planning-and-transport-authorities-get-environmental-advice-on-planning)

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

Impact Risk Zones:

Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.

Standing Advice:

Natural England has published Standing Advice. Links to standing advice are in Annex A

If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.

Further information on LPA duties relating to protected sites and areas is here- [Protected sites and areas: how to review planning applications - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/protected-sites-and-areas-how-to-review-planning-applications)

Further guidance is also set out in Planning Practice Guidance on the natural environment [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment) and on Habitats Regulations Assessment [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/appropriate-assessment)

Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Should the proposal change, please consult us again.

Yours sincerely

James Ward-Gwilliam  
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**[Do you want to give feedback to Natural England?](https://www.gov.uk/natural-england)**  
**[www.gov.uk/natural-england](https://www.gov.uk/natural-england)**



We strongly recommend using the [SSSI Impact Risk Zones \(SSSI IRZs\)](#) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)  
For further information on the Pre-submission Screening Service see [here](#)

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**From:** [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk) <[planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)>  
**Sent:** 14 January 2026 15:19  
**To:** SM-NE-Consultations (NE) <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>  
**Subject:** Planning Application Bat Impact Consultation - DC/25/1269

Please see the attached consultation letter in relation to bats from  
Horsham District Council Re:DC/25/1269

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**Horsham District Council**  
**Habitats Regulations Assessment Appropriate Assessment Record**

**Plan/project:** DC/25/1269 | Outline Planning Application for up to 90 no. residential dwellings (including 40% affordable) all matters to be reserved apart from access. | Land North of Guildford Road Bucks Green Rudgwick West Sussex

The purpose of this screening record is to assess the need for appropriate assessment in relation to the plan/project detailed above.

The Conservation of Habitats and Species Regulations 2017 (as amended) requires that a Habitats Regulations Assessment screening is carried out in relation to any plan or project which is likely to have a significant effect on Habitats (European) sites, either alone or in combination with other plans or projects. European sites are Special Protection Areas and Special Areas of Conservation. Ramsar sites should also be given the same level of protection, as stated within the National Planning Policy Framework.

In line with the Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a development is likely to result in significant effects on a Habitats site. HRA screening concluded that it is not possible to rule out likely significant effects without mitigation in place.

**This report is therefore an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended).**

Where an Appropriate Assessment is carried out a project may only be authorised after having ascertained that it will not adversely affect the integrity of the site(s) concerned.

**Table 1: Screening matrix**

Stage 1 HRA screening	
Brief description of the Plan/Project	<p><b>Application:</b> DC/25/1269</p> <p><b>Planning Application:</b> Outline Planning Application for up to 90 no. residential dwellings (including 40% affordable) all matters to be reserved apart from access.</p> <p><b>Location:</b> Land North of Guildford Road Bucks Green Rudgwick West Sussex</p>

<p>Brief description of the Habitats sites within scope of this assessment</p>	<p>The Mens SAC (Sussex bat SAC) and Ebernoe Common SAC lie within West Sussex and the Impact Risk Zones identified by Natural England includes Horsham District.</p> <p>The Mens Special Area of Conservation (SAC) is located approximately 7.8km southwest of the site and lists Barbastelle bats as a qualifying feature. A long and varied history of management has seen The Mens move from an open, wood pasture system with huge, spreading parkland trees and pollards to a high forest with closely spaced trees with narrow crowns. A lack of management in recent years has added to this silvicultural diversity.</p> <p>Ebernoe Common SAC is located approximately 10.5km southwest of the site and lists Barbastelle and Bechstein's bats as qualifying features. Ebernoe Common is dominated by old wood pasture where Commoners would have turned out their cattle or pigs to graze and browse on young trees and scrub, beech mast and acorns, or on the grassy meadows in glades and clearings. Grazing stopped by the middle of the 20th century and the wood pasture became more and more overgrown. Great effort has been put into opening up glades and rides and restoring grazing to this SAC.</p> <p>Arun Valley SAC, SPA and Ramsar site is approximately 15.92km to the south, and lists rare and diverse plant, invertebrate and bird assemblages as qualifying features. It consists of low-lying grazing marsh, largely on alluvial soils, but with an area of peat derived from a relict raised bog. Variation in soils and water supply lead to a wide range of ecological conditions and hence a rich flora and fauna.</p>
<p>Qualifying Features for SPA/SAC</p>	<p><b>The Mens SAC</b></p> <p><u>Annex I habitats that are a primary reason for selection of the site:</u></p> <p>9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer (Quercion robori-petraeae or Ilici-Fagenion)</p> <p>The Mens is an extensive area of mature Beech <i>Fagus sylvatica</i> woodland rich in lichens, bryophytes, fungi and saproxylic invertebrates, and is one of the largest tracts of Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range. It is developing a near-natural high forest structure, in response to only limited silvicultural intervention over the 20th century, combined with the effects of natural events such as the 1987 great storm.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection:</u></p> <p>1308 Barbastelle <i>Barbastella barbastellus</i></p> <p><b>Ebernoe Common SAC</b></p> <p><u>Annex I habitats that are a primary reason for selection of this site</u></p> <p>9120 Atlantic acidophilous Beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer (Quercion robori-petraeae or Ilici-Fagenion).</p> <p>Ebernoe Common has an extensive block of Beech high forest and former wood-pasture over dense Holly <i>Ilex aquifolium</i>, and has a very rich epiphytic lichen flora, including <i>Agonimia octospora</i> and <i>Catillaria atropurpurea</i>. It represents Atlantic acidophilous Beech forests in the south-eastern part of the habitat's UK range. The Beech woodland is associated with other woodland types, open glades and pools, which contribute to a high overall diversity. The woods are important for a number of bat species, in particular 1323 Bechstein's bat <i>Myotis bechsteinii</i> and 1308 Barbastelle.</p> <p><u>Annex II species that are a primary reason for selection of this site:</u></p>

	<p>1308 Barbastelle <i>Barbastella barbastellus</i></p> <p>A maternity colony of Barbastelles utilises a range of tree roosts in this area of 91A0 old sessile Oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles, which has a dense understorey of holly as well as open glades and open water. Maternity roost sites are usually in dead tree stumps, but the species appears to be present throughout the year, with individuals utilising a range of roost sites in tree holes and under bark.</p> <p>1323 Bechstein's bat <i>Myotis bechsteinii</i></p> <p>A maternity colony of Bechstein's bat is associated with this area of 91A0 Old sessile Oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles. Roosts are mainly in <i>old woodpecker holes in the stems of live mature oak Quercus petraea</i> trees.</p> <p><b>Arun Valley SPA</b> A037 Bewick's swan, <i>Cygnus columbianus bewickii</i> (non-breeding).</p> <p>During the time of site notification, the SPA supported 115 individuals representing at least 1.6% of the wintering population in Great Britain (5 year peak mean 1992/93 - 1996/97).</p> <p>During the non-breeding season, the SPA regularly supports an assemblage of waterfowl with the area regularly supporting 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97) including: Shoveler <i>Anas clypeata</i>, Teal <i>Anas crecca</i>, Wigeon <i>Anas penelope</i>, Bewick's Swan <i>Cygnus columbianus bewickii</i>.</p> <p><b>Arun Valley SAC</b> 4056 Little Whirlpool Ramshorn snail <i>Anisus vorticulus</i></p> <p><i>Anisus vorticulus</i> occurs across a range of sites in southern and eastern England. The Arun valley is one of the three main population centres for this species in the UK. This proposed site includes two of its core sites in the wash lands of the Arun floodplain (Pulborough Brooks and Amberley Wild Brooks SSSIs).</p>
Qualifying Features for Ramsar	<p><b>Arun Valley Ramsar</b> <b>Ramsar criterion 2</b> The site holds seven wetland invertebrate species listed in the British Red Data Book as threatened. One of these, <i>Pseudamnicola confusa</i>, is considered to be endangered. The site also supports four nationally rare and four nationally scarce plant species</p> <p><b>Ramsar criterion 3</b> In addition to the Red Data Book invertebrate and plant species, the ditches intersecting the site have a particularly diverse and rich flora. All five British duckweed (<i>Lemna</i> species), all five water-cress (<i>Rorippa</i> species), and all three British water milfoils (<i>Myriophyllum</i> species), all but one of the seven British water dropworts (<i>Oenanthe</i> species), and two-thirds of the British pondweeds (<i>Potamogeton</i> species) can be found on site.</p> <p><b>Ramsar criterion 5</b> Assemblages of international importance: Species with peak counts in winter: 13774 waterfowl (5 year peak mean 1998/99-2002/2003).</p>
Conservation Status of the relevant Qualifying Features	<p><b>The Mens SAC</b></p> <p>The Barbastelle is one of the UK's rarest mammals. Few maternity roost sites are known in the UK. While the SAC series makes a contribution to securing favourable conservation status for this Annex II species, wider measures are also necessary to support its conservation in the UK.</p> <p>These are outlined in the Species Biodiversity Action Plan (DEFRA website).</p>

	<p><i>It is likely that its low population density and slow population growth make it particularly vulnerable to:</i></p> <ul style="list-style-type: none"> <li>• <i>further loss and fragmentation of ancient deciduous woodland habitat;</i></li> <li>• <i>loss, destruction and disturbance of roosts in buildings, trees and underground sites;</i></li> <li>• <i>a reduction in numbers of insect prey due to habitat simplification acting through factors such as fertiliser use and intensive grazing.</i></li> </ul> <p><b>Ebernoe Common SAC</b></p> <p>Barbastelle as outlined for The Mens SAC.</p> <p>Bechstein's Bat Species Biodiversity Action Plan (DEFRA website):  <i>The rarity of this species means that it is poorly understood, but according to the national species action plan, its low population density, exacting habitat requirements and low rates of reproduction make it particularly vulnerable to factors such as:</i></p> <ul style="list-style-type: none"> <li>• <i>Further loss and fragmentation of open ancient deciduous woodland habitat.</i></li> <li>• <i>Loss, destruction and disturbance of roosts or potential roosts (particularly in old trees)</i></li> </ul> <p><b>Arun Valley SAC, SPA and Ramsar</b></p> <p>In line with the national trend, the number of Bewick's swans wintering in the Arun Valley has declined since the time of designation and is now typically fewer than 50 birds. This may reflect an overall decline in the population of the species and/or be due to the effects of a milder climate in which more are able to winter in continental Europe (The Birds of Sussex, 2014). The waterfowl assemblage numbers fluctuate depending upon conditions in the valley but over the past five years have averaged 40,311, an increase from the five year mean of 27,241 at the time of designation.</p> <p>The Arun Valley is one of the remaining strongholds for the Little Whirlpool Ramshorn Snail.</p>
<p>Conservation Objectives (Only Relevant for SPA/SAC)</p>	<p><b>The Mens SAC</b></p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>• The structure and function (including typical species) of qualifying natural habitats</li> <li>• The structure and function of the habitats of qualifying species</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>• The populations of qualifying species, and,</li> <li>• The distribution of qualifying species within the site.</li> </ul> <p><b>Ebernoe Common SAC</b></p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>• The structure and function (including typical species) of qualifying natural habitats</li> <li>• The structure and function of the habitats of qualifying species</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>• The populations of qualifying species, and,</li> <li>• The distribution of qualifying species within the site.</li> </ul> <p><b>Arun Valley SAC &amp; SPA</b></p> <p>Ensure that the integrity of the site is maintained or restored as appropriate,</p>

	<p>and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of the qualifying features</li> <li>• The structure and function of the habitats of the qualifying features</li> <li>• The supporting processes on which the habitats of the qualifying features rely</li> <li>• The population of each of the qualifying features, and,</li> <li>• The distribution of the qualifying features within the site.</li> </ul>
Key vulnerabilities / factors affecting site integrity	<p>Issues listed in the relevant Site Improvement Plan (SIP) are:</p> <p><b>The Mens SAC</b></p> <ul style="list-style-type: none"> <li>• Forestry and woodland management;</li> <li>• Habitat connectivity for barbastelle bats;</li> <li>• Invasive species;</li> <li>• Changes in land management, with reference to foraging and commuting routes;</li> <li>• Air pollution, risk of atmospheric nitrogen deposition;</li> <li>• Public access / disturbance, with regards to light levels.</li> </ul> <p>The mechanism for addressing these issues within the SIP is investigation, research and monitoring; with the exception of appropriate management, and removal of, rhododendron, within The Mens SAC.</p> <p><b>Ebernoe Common SAC</b></p> <ul style="list-style-type: none"> <li>• Forestry and woodland management;</li> <li>• Off-site habitat availability / management;</li> <li>• Habitat fragmentation;</li> <li>• Change in land management, with reference to foraging and commuting routes for Barbastelles;</li> <li>• Hydrological changes;</li> <li>• Air pollution, risk of atmospheric nitrogen deposition;</li> <li>• Public access / disturbance, with regards to light levels.</li> </ul> <p>Again, the mechanism for addressing all of these issues within the SIP is investigation, research, monitoring at this stage.</p> <p><b>Arun Valley SAC and SPA</b></p> <ul style="list-style-type: none"> <li>• Inappropriate water levels</li> <li>• Water pollution</li> <li>• Inappropriate ditch management</li> <li>• Disturbance</li> </ul> <p>Again, the mechanism for addressing all of these issues within the SIP is investigation, research, monitoring at this stage.</p> <p>Natural England's substantive advice (September 2021) is that the Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of;</p> <ul style="list-style-type: none"> <li>• Arun Valley Special Area Conservation (SAC)</li> <li>• Arun Valley Special Protection Area (SPA)</li> <li>• Arun Valley Ramsar Site</li> </ul>
<b>Assessment Criteria</b>	
The individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Habitats site	<p>No desktop records for Barbastelle were returned within two kilometres of the site. However, transect surveys of the site recorded a total of 7 barbastelle calls during the survey period (Report to Inform Habitats Regulations Assessment – Screening Assessment (Ecology Partnership, November 2025))</p> <p>Greenaway (2008) has radio tracked Barbastelle bats from both SACs and has identified Barbastelle bat flight lines and foraging kernels. In addition to the SACs</p>



containing their roosting sites, the bats also require access to habitats outside the boundary of the SACs. This habitat is integral to supporting bats associated with the SACs and is often referred to as functionally-linked habitat. Such functionally-linked habitat includes the following:

- Flightlines – these are key commuting routes from roosts to foraging (or feeding) areas used by the bats. The Barbastelle flightlines around Ebernoe Common and The Mens have been investigated through survey and are shown in the Sussex bat SAC landscape tool for planning.
- Foraging areas – these are the areas of land where bats feed. Barbastelle bats can forage 10-15 kilometres from the roosting sites, and they prefer wet meadows and riparian habitats. Bechstein's tend to forage in and around the woodland where they roost with limited outward travel.

The Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol provides advice for developers and local Councils when assessing applications which fall within an identified 12 km Impact Zone for The Men's SAC, Ebernoe Common SAC. In line with this Protocol, this application is located within the wider Conservation Area of The Mens SAC, and significant impacts or severance to flightlines need to be considered. This development does not occur along one of the identified flightlines.

From the submitted documents, it appears several trees will be removed along the central hedge line to allow road access. The Report to Inform Habitats Regulations Assessment – Screening Assessment (Ecology Partnership, November 2025) states the following *"The central tree line is to be largely retained; however a couple of trees are to be removed to allow the road to pass between the two fields. This is not considered to be ecologically significant, with low level use of this feature by barbastelles, and the enhancement and retention of eastern and western networks and enhancement and creation of new habitats along the northern and southern edges of the site. As such, it is considered the ecological functionality of the landscape is being retained."* Therefore, based on the provided information there will be no significant severance to flight lines, with the implementation of enhancements to the existing hedgerows.

Based on the threats listed in the SIPs, the following potential impact pathways are considered with reference to the development proposals regarding the need for further assessment:

**Direct land take** - The proposed development will not result in any direct land take from any designated sites. Direct land take does not therefore have the potential to result in likely significant effects (LSE), and can be screened out and will not be considered further.

**Forestry and woodland management** - This threat / issue is of relevance to the habitats within the designated sites themselves. There is no pathway for woodland management at these locations to be affected by the proposals. There is no potential for forestry and woodland management to be impacted by the proposals, so they have been screened out and will not be considered further.

**Habitat connectivity and availability for foraging and commuting Barbastelle bats** – Barbastelle bats are qualifying features for both SACs, and threats and issues relating to this species in the wider area have been identified in the relevant SIPs as:

- Off-site habitat availability / management;
- Habitat fragmentation / Habitat connectivity for barbastelle bats;
- Changes in land management, with reference to foraging and commuting routes.

Barbastelle bat was recorded onsite on seven occasions in 2024 (Report to Inform Habitats Regulations Assessment – Screening Assessment (Ecology Partnership, November 2025)) and there is potential for changes in vegetation structure with habitat loss of glades to alter the availability of foraging and commuting routes for Barbastelle around the site, and to impact commuting routes across the wider area. The removal or fragmentation of commuting routes for this species e.g. treelines,

may result in increased energy expenditure and consequently reduced survival. This would be in conflict with the conservation objectives for both SACs which include 'maintaining or restoring the population of qualifying species'.

Further assessment is therefore screened in regarding habitat connectivity for commuting and foraging Barbastelle bats, as there is potential for LSE on this qualifying feature of both The Mens SAC and Ebernoe Common SAC as a result of the proposed development.

Bechstein's bats are a qualifying feature for Ebernoe Common SAC. The site lies inside the Ebernoe Common Impact Risk Zone, but the species is considered most likely to remain within 1.5km of their roosts. As such, Bechstein's bats from Ebernoe Common SAC are considered likely to be absent, and as such, the potential for LSE is screened out, and they will not be considered further.

#### **Invasive species**

This threat concerns invasive rhododendron within The Mens SAC, and, as such there is no pathway for impacts due to the proposals. There is no potential for invasive species in The Mens to be impacted by the proposals, so they have been screened out and will not be considered further.

#### **Hydrological changes**

This threat / issue is of no relevance to The Mens SAC and Ebernoe Common SAC.

The nearest area which would be affected by hydrological changes is the Arun Valley SAC/ SPA/ Ramsar site.

Therefore, there is a predicted Likely Significant Effects due to hydrological changes in combination with other plans and projects, so these have been screened in. **This is considered under a separate HRA Appropriate Assessment for water neutrality.**

#### **Air pollution**

The proposal will result in an increase in local residents and use of the SACs and Arun Valley SPA, and Ramsar are currently above their critical load for nitrogen deposition as noted in the HRA Screening Statement for Petworth Neighbourhood Development Plan (South Downs National Park Authority, 2017). Natural England Advice to Local Authorities when Considering Air Quality Impacts at HRA poses that air pollution impacts are predominantly considered within 200m of a road. As the development is >200m from any Habitats site, the potential for LSE on the Habitats sites due to air pollution can be screened out and will not be considered further.

#### **Public access / disturbance, with regards to light levels.**

The HRA Screening Statement for Petworth Neighbourhood Development Plan (South Downs National Park Authority, 2017) notes that most visits to the Mens and Ebernoe Common SACs take place during daylight, with low levels of recreation at night. As such, they conclude that significant adverse effects due to lighting are unlikely. Recreation itself (i.e. during daylight hours) is not listed as threat within the SIPs.

Whilst there is potential for disturbance to local flightlines from increased light levels, light spill is not anticipated to extend into the wider landscape.

Therefore there is no potential for disturbance effects to the habitat or Barbastelle within the designated site. This impact pathway therefore needs to be screened out.

#### **In combination effects**

There is no potential for LSE from direct land take, forestry and woodland management, invasive species, hydrological connections, or air pollution there is no potential for the development proposals to contribute to any likely significant effects along these pathways, in combination with other plans and projects.

	<p>However, impacts from disturbance with regards to increased levels of lighting and loss of connectivity on foraging and commuting Barbastelle bats, as qualifying feature of both The Mens SAC and Ebernoe Common SAC have already been screened in for further assessment from the development alone. In combination effects will be considered at stage 2 Appropriate Assessment.</p>
Test 1 the significant test:	<p>As the development may result in new lighting of commuting and foraging habitat within the Impact Risk Zone of the SACs, mitigation will be required in terms of new planting and a sensitive lighting scheme. The LPA therefore anticipates that, without mitigation, it is not possible to conclude no 'likely significant effect' (LSE) to The Men's SAC in terms of <b>disturbance impacts from lighting and loss of habitat connectivity</b> when considered from the development alone.</p> <p>The effects due to changes to lighting, in-combination with other plans and projects, are also possible pathways for LSE so these will be assessed further in Stage 2: Appropriate Assessment.</p> <p>Therefore, in accordance with the Sussex Bat SAC planning and landscape scale enhancement protocol, this assessment needs to proceed to HRA Stage 2: Appropriate Assessment. This will consider, with mitigation, the impacts of disturbance from lighting on Barbastelle bats from the above designated site, either alone or in combination with other plans and projects.</p> <p>After mitigation has been embedded into the project design, Test 2 – the integrity test then needs to be applied.</p>
<h3>Stage 2 Appropriate Assessment</h3>	
<p>The above Stage 1 HRA screening has determined that LSE are possible at The Mens SAC as a result of impacts on habitat connectivity and availability for foraging and commuting Barbastelle bats.</p> <p>These pathways have been screened in, and the potential for adverse effects on site integrity, either alone, or in-combination will be assessed.</p> <p>Therefore, this section of the report to inform HRA Stage 2 only discusses the potential for impacts from new lighting as a result of the proposed development.</p>	
Potential for Adverse Effects On the Integrity (AEOI) of a Habitats site from the development alone.	<p>Barbastelle may commute and forage along the treelines onsite and therefore the site could be important for Barbastelle bats within the bat sustenance zone of a bat SAC designated for this Appendix II species.</p> <p>Based on published data<sup>1</sup> Natural England recommends that the Zone of Influence of 12km (as detailed on Defra's MAGIC map 2022) is used for the wider conservation area for the Sussex Bat SACs and all impacts are assessed.</p> <p>This development is within the 12km "wider conservation area" for The Mens SAC and lying within a 'bat sustenance zone' for Barbastelle bats, a designated feature of the SACs as identified in the Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol.</p>
Potential for Adverse Effects On the Integrity (AEOI) of a Habitats site from the development in combination with other plans and projects.	<p>Based on the scale of the proposed development, and the conclusions of the HDC Local Plan HRA, any further search using data from surrounding LPA planning portals for other projects was not considered necessary.</p> <p>Horsham District Planning Framework (HDPF, 2015), Section 9.34 within Policy 31 states: In the case of the Men's, development must not impact on bat flight paths in the district. As recommended in the Council's Habitat Regulations Assessment of this plan, a 'bat sustenance zone' has been identified and is shown on the Policies Map (see Appendix B). Within this area, it may be necessary for compensatory</p>

measures such as hedgerow enhancement to be undertaken prior to any development.

The HRA for the Chichester Local Plan Review (ACOM, 2018), considers disturbance of bat flight lines from both The Men's and Ebernoe Common SACs. With regards to The Men's, they conclude that *"Along with implementation of the Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol' (2017), the Chichester Local Plan policies provide a protective framework for the SAC and the Local Plan Review will not result in an adverse effect in integrity on this SAC"*.

The HRA Appropriate Assessment for development in the locality which could act in combination relates to Land at Wiltshire Farm, Pickhurst Lane, Codmore Hill, Pulborough (DC/19/0591) for redevelopment of Wiltshire Farm, Pulborough (Place Services, August 2019). The site comprises a number of outbuildings and grassland fields. The proposals entail the demolition of barn on site and construction of a replacement residential accommodation, concluded with mitigation secured, no adverse effect on site integrity of The Mens SAC or Ebernoe Common either alone or in combination with other plans and projects and Natural England agreed with this decision.

Other developments within the wider conservation zone for The Mens SAC include the HRA Appropriate Assessment (Place Services, May 2020) for Land at Lyons Farm Lyons Road Slinfold (DC/19/1723) for an outline application for the erection of a continuing care retirement community, concluded with mitigation secured, no adverse effect on site integrity of The Mens SAC either alone or in combination with other plans and projects and Natural England agreed with this decision. This was refused consent and a decision of appeal APP/Z3825/W/20/3265874 is still awaited as the Hearing is in progress.

The HRA Appropriate Assessment (Place Services, June 2020) for Land at Wellcross Farm Broadbridge Heath (DC/19/1897) which was allowed at appeal (APP/Z3825/W/20/3262938) also for an outline application for the erection of a continuing care retirement community, concluded with mitigation secured, no adverse effect on site integrity of The Mens SAC or Ebernoe Common either alone or in combination with other plans and projects and Natural England agreed with this decision.

The HRA Appropriate Assessment (Place Services, Feb 2021) for Land at Duckmoor East of Billingshurst (DC/20/2607) for an Outline Application for the development of 83 residential units, landscaping, access, parking and associated infrastructure on land at Duckmoor, East Billingshurst concluded that with mitigation secured the project will avoid an Adverse Effect on the Integrity of the Habitats sites listed in this assessment, either alone or in combination with other plan and projects. The application was refused consent but allowed at appeal (APP/Z3825/W/21/3283823). Natural England has confirmed that it has no objection to the development, providing all relevant mitigation is secured in any planning permission which the Inspector has included in the decision notice.

Additional HRA Appropriate Assessment for development in the locality which have been deemed to have, with mitigation secured, no adverse effect on site integrity of The Mens SAC or Ebernoe Common either alone or in combination with other plans and projects include:

DC/22/0141 (Cattlestone Farm, Pulborough), SDNP/20/05831/FUL (Pulborough Garden Centre), DC/21/2530 (Land South of East Street Billingshurst), DC/20/2567 (Billhook Farm West, Billingshurst), DC/19/02952 (Land at Platts Roundabout, Billingshurst) and DC/22/0141 (Cattlestone Farm, West Chiltington).

Other developments nearby over the past 6 years have comprised of smaller developments such as extensions and building conversions. No in -combination effects are therefore considered likely to result from the on-site proposals and

	<p>these small-scale developments. Any development proposals in the wider area around Broadbridge Heath will need to be assessed within the Horsham Local Plan HRA Appropriate Assessment or bespoke assessments at application stage.</p> <p>Given the above, and once the mitigation and compensation measures have been incorporated and secured, there is no potential for significant impacts from the proposals, it is considered that there is no potential for the development proposals to contribute to any adverse effects on integrity, in combination with other plans and projects.</p>
Proposed mitigation for the project to secure the mitigation as a condition of any consent	<p><b>Summary of mitigation package</b></p> <p>The implementation of an ecologically sensitive lighting scheme which specifies that lighting should comply with Bat Conservation Trust and the Institution of Lighting Professionals, including the measures recommended by GN:08/23 (ILP) (Ecological Impact Assessment (Ecology Works, March 2025).</p> <p>The implementation of a Landscape Ecological Management Plan which details the retention and enhancement to the eastern and western hedgerows.</p> <p>The implementation of a Construction Environmental Management Plan (CEMP): Biodiversity, which details the precautionary mitigation measures of trees classified as PRF-M and PRF-I.</p> <p>The avoidance and mitigation measures are considered appropriate to avoid adverse effects on the integrity of the interest features (Barbastelles) of The Men's SACs likely to occur within the site. The measures will be secured by a condition of any consent.</p>
Test 2 – the integrity test	<p><b>Conclusion:</b></p> <p>Having considered the proposed avoidance and mitigation measures above, Horsham District Council concludes that, the project will avoid an Adverse Effect on the Integrity of the Habitats sites listed in this assessment, either alone or in combination with other plan and projects.</p> <p>Having made this appropriate assessment of the implications of the project for the sites in view of those sites' conservation objectives and having consulted Natural England and fully considered any representation received where necessary, the authority may now agree to the project under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).</p> <p>As the mitigation has been considered after HRA screening, this HRA Appropriate Assessment is in line with the People over Wind CJEU Court ruling.</p>

**Approving Ecologist:** Hayley Dean

**Date:** 14<sup>th</sup> January 2026

**DISCLAIMER:** This information has been produced by Place Services's Ecology Team on behalf of Horsham District Council, at their request.