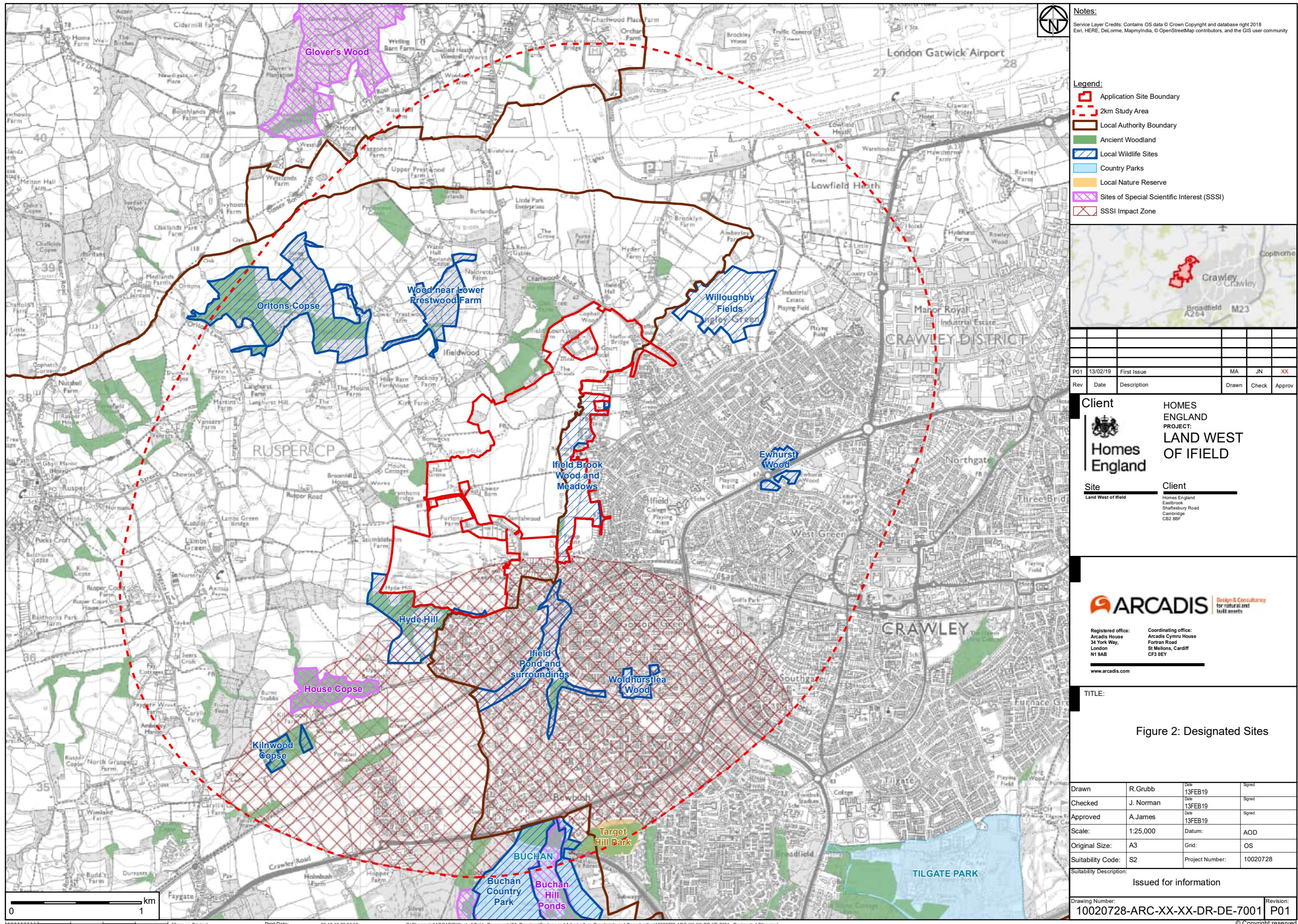


Figure 2: Statutory and Non-Statutory Designated Sites Location Plan



APPENDIX A: Legislation and Policy

Table 2: Summary of applicable legislation and policy

Ecological constraint	Rationale
European Designated sites (Special Areas of Conservation, Special Protection Areas and Ramsar Sites)	<p>Under the Conservation of Habitats and Species Regulations 2017 (Ref 15), an assessment is required where a plan or project may give rise to significant effects upon 'European Sites' including SACs, SPAs, and Ramsar sites. The process of assessing the implications of development on European Sites is known as Habitats Regulations Assessment (HRA).</p> <p>The initial stage of the HRA is Screening. This process initially identifies the likely impacts upon a European Site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts may be significant.</p> <p>Natural England must be consulted in relation to the outcome of Screening. Unless the likelihood of a significant effect can be ruled out on the basis of objective information, then an Appropriate Assessment must be undertaken (this is the next stage of the HRA).</p>
Nationally Designated Sites (Sites of Special Scientific Interest)	<p>It is a legal requirement to apply for 'assent' from Natural England for any works which could potentially damage the flora, fauna or features for which a SSSI is designated (under the Wildlife and Countryside Act (1981) (as amended)) (Ref 16).</p>
Invasive Plants (Rhododendron, Giant Hogweed, Japanese Knotweed, certain species of Cotoneaster, Variegated Yellow Archangel, Canadian Waterweed, Japanese Rose, Monbretia, New Zealand Pigmyweed, Virginia Creeper, Water-fern etc.)	<p>It is an offence under Section 14 of Wildlife and Countryside Act 1981 (as amended) (Ref 16) to cause plants listed in Schedule 9 of this act to grow in the wild.</p> <p>Material contaminated with these species is classified as controlled waste under the Environmental Protection Act 1990 and should therefore be disposed of in an appropriately licensed landfill site.</p>
European protected species (great crested newts, natterjack toad, sand lizard, smooth snake, bats, dormice, otters)	<p>It is an offence under the Conservation of Habitats and Species Regulations 2017 (Ref 15) to deliberately kill or injure a European protected species, to destroy breeding/ resting sites, or to deliberately disturb these species and affect their ability to survive, rear young, breed or hibernate.</p>
Nationally protected species- those listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (Allis shade, twaite shad, great crested newt, natterjack toad, bats, dormice, otter)	<p>It is an offence under the Wildlife and Countryside Act 1981 (as amended) (Ref 16) to intentionally or recklessly disturb a species listed on Schedule 5 whilst it is in a place of shelter, or to obstruct access to a place of shelter.</p>
Reptiles	<p>It is an offence under the Wildlife and Countryside Act 1981 (as amended) (Ref 16) to kill or injure common species of reptiles.</p>

Ecological constraint	Rationale
Nationally protected bird species- those listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) (barn owl, peregrine falcon, red kite, kingfisher, firecrest etc.)	All nesting birds are protected whilst nesting as identified below. However, for those listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) (Ref 16) it is also an offence to intentionally or recklessly disturb these birds at, on or near an active nest.
Nesting birds	It is an offence under the Wildlife and Countryside Act 1981 (as amended) (Ref 16) to damage or destroy a bird's nest whilst it is in use, and to kill or injure a bird or destroy an egg.
Badgers	It is an offence under the Protection of Badgers Act (1992) (Ref 17) to damage or destroy a badger sett; obstruct any entrance of a badger sett; and disturb a badger whilst it is occupying a badger sett.
Crawley Borough Council (2015). Crawley Borough Local Plan 2015-2030: Policy ENV2: Biodiversity	<p>All development proposals will be expected to incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development.</p> <p>To ensure a net gain in biodiversity, the following areas will be conserved and enhanced where possible and the council will support their designation and management:</p> <p><u>Nationally designated sites:</u></p> <ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSI) <p>SSSI will receive the highest level of protection for habitat conservation value in line with national legislation, policy and guidance.</p> <p><u>National Planning Policy Framework Sites</u></p> <ul style="list-style-type: none"> • Ancient Woodland, and aged or veteran trees <p>Planning permission will not be granted for development that results in the loss or deterioration of ancient woodland and aged or veteran trees unless the need for, and benefits of, the development in that location clearly outweigh the loss. A buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice.</p> <p><u>Locally designated sites, and habitats and species outside designated sites:</u></p> <ul style="list-style-type: none"> • Local Nature Reserves • Sites of Nature Conservation Importance • Nature Improvement Areas • Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act 2006 or Biodiversity Action Plans • Biodiversity Opportunity Areas • Where Protected Species are present

Ecological constraint	Rationale
Horsham District Council (2015) Horsham District Planning Framework: Policy 31 - Green Infrastructure and Biodiversity	<ul style="list-style-type: none"> • Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and Rural Communities Act 2006 (Ref 9). <p>1. Development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained.</p> <p>2. Development proposals will be required to contribute to the enhancement of existing biodiversity, and should create and manage new habitats where appropriate. The Council will support new development which retains and /or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks.</p> <p>3. Where felling of protected trees is necessary, replacement planting with a suitable species will be required.</p> <p>4. a) Particular consideration will be given to the hierarchy of sites and habitats in the district as follows:</p> <ul style="list-style-type: none"> i) Special Protection Area (SPA) and Special Areas of Conservation (SAC) ii) Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) iii) Sites of Nature Conservation Importance (SNIs), Local Nature Reserves (LNRs) and any areas of Ancient woodland, local geodiversity or other irreplaceable habitats not already identified in i & ii above. <p>4. b) Where development is anticipated to have a direct or indirect adverse impact on sites or features for biodiversity, development will be refused unless it can be demonstrated that:</p> <ul style="list-style-type: none"> i) The reason for the development clearly outweighs the need to protect the value of the site; and, ii) That appropriate mitigation and compensation measures are provided. <p>5. Any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to a HRA to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the HRA of this plan (Ref 10).</p>

APPENDIX B: Local Record Centre Data

Table 3: Record Centre Data

Scientific Name	Common Name	Status
Plants		
<i>Osmunda regalis</i>	Royal Fern	Sussex Rare
<i>Agrostemma githago</i>	Corncockle	Sussex Rare
<i>Anthemis cotula</i>	Stinking Chamomile	RedList GB post 2001 VU, RedList ENG post 2001 VU
<i>Briza media</i>	Quaking-grass	RedList ENG post 2001 NT
<i>Buxus sempervirens</i>	Box	RedList GB post 2001 DD, RedList ENG post 2001 DD, Nat Rare, Sussex Rare
<i>Calluna vulgaris</i>	Heather	RedList ENG post 2001 NT
<i>Carex echinata</i>	Star Sedge	RedList ENG post 2001 NT
<i>Carex vesicaria</i>	Bladder-sedge	RedList ENG post 2001 VU
<i>Cruciata laevis</i>	Crosswort	RedList ENG post 2001 NT
<i>Erica tetralix</i>	Cross-leaved Heath	RedList ENG post 2001 NT
<i>Erysimum cheiranthoides</i>	Treacle-mustard	RedList ENG post 2001 NT
<i>Euphorbia platyphyllus</i>	Broad-leaved Spurge	Sussex Rare
<i>Euphrasia nemorosa</i>	Eyebright	RedList ENG post 2001 NT
<i>Filago vulgaris</i>	Common Cudweed	RedList GB post 2001 NT, RedList ENG post 2001 NT
<i>Fragaria vesca</i>	Wild Strawberry	RedList ENG post 2001 NT
<i>Hyacinthoides non-scripta</i>	Bluebell	WCA Sch8
<i>Knautia arvensis</i>	Field Scabious	RedList ENG post 2001 NT
<i>Lathyrus linifolius</i>	Bitter-vetch	RedList ENG post 2001 NT
<i>Lepidium campestre</i>	Field Pepperwort	RedList ENG post 2001 NT
<i>Meconopsis cambrica</i>	Welsh Poppy	Nat Scarce, Sussex Rare
<i>Melampyrum pratense</i>	Common Cow-wheat	RedList ENG post 2001 NT
<i>Mentha arvensis</i>	Corn Mint	RedList ENG post 2001 NT
<i>Oxalis acetosella</i>	Wood-sorrel	RedList ENG post 2001 NT
<i>Potentilla erecta</i>	Tormentil	RedList ENG post 2001 NT
<i>Ranunculus flammula</i>	Lesser Spearwort	RedList ENG post 2001 VU

Scientific Name	Common Name	Status
<i>Sanicula europaea</i>	Sanicle	RedList ENG post 2001 NT
<i>Silene flos-cuculi</i>	Ragged-Robin	RedList ENG post 2001 NT
<i>Stachys arvensis</i>	Field Woundwort	RedList GB post 2001 NT, RedList ENG post 2001 NT
<i>Stachys germanica</i>	Downy Woundwort	WCA Sch8, RedList GB post 2001 VU, RedList ENG post 2001 EN, Nat Rare
<i>Succisa pratensis</i>	Devil's-bit Scabious	RedList ENG post 2001 NT
<i>Tilia platyphyllos</i>	Large-leaved Lime	Nat Scarce, Sussex Rare
<i>Veronica officinalis</i>	Heath Speedwell	RedList ENG post 2001 NT
<i>Orthotrichum cupulatum</i>	Hooded Bristle-moss	Sussex Rare
<i>Allium triquetrum</i>	Three-cornered Garlic	WCA Sch 9 INNS
<i>Centranthus ruber</i>	Red valerian	Sussex INNS
<i>Cotoneaster</i>	A Flowering Plant	WCA Sch 9 INNS
<i>Cotoneaster franchetii</i>	Franchet's Cotoneaster	WCA Sch 9 INNS
<i>Cotoneaster frigidus x salicifolius = C. x watereri</i>	Waterer's Cotoneaster	WCA Sch 9 INNS
<i>Cotoneaster horizontalis</i>	Wall Cotoneaster	WCA Sch 9 INNS
<i>Cotoneaster simonsii</i>	Himalayan contoneaster	WCA Sch 9 INNS
<i>Crassula helmsii</i>	New Zealand Pigmyweed	WCA Sch 9 INNS
<i>Crocosmia pottsii x aurea = C. x crocosmiiflora</i>	Montbretia	WCA Sch 9 INNS
<i>Elodea nuttallii</i>	Nuttall's Waterweed	WCA Sch 9 INNS
<i>Fallopia japonica</i>	Japanese Knotweed	WCA Sch 9 INNS
<i>Heracleum mantegazzianum</i>	Giant Hogweed	WCA Sch 9 INNS
<i>Hyacinthoides non-scripta x hispanica = H. x massartiana</i>	Hybrid bluebell	Sussex INNS
<i>Impatiens glandulifera</i>	Indian Balsam	WCA Sch 9 INNS
<i>Lamiastrum galeobdolon subsp. <i>argentatum</i></i>	Yellow Archangel	WCA Sch 9 INNS
<i>Lemna minuta</i>	Least Duckweed	Sussex INNS
<i>Lysichiton americanus</i>	American Skunk-cabbage	Sussex INNS
<i>Petasites fragrans</i>	Winter Heliotrope	Sussex INNS

Scientific Name	Common Name	Status
<i>Prunus laurocerasus</i>	Cherry Laurel	Sussex INNS
<i>Quercus ilex</i>	Evergreen Oak	Sussex INNS
<i>Rhododendron ponticum</i>	A Flowering Plant	WCA Sch 9 INNS
<i>Robinia pseudoacacia</i>	False-acacia	WCA Sch 9 INNS
<i>Rosa rugosa</i>	Japanese Rose	WCA Sch 9 INNS
<i>Campylopus introflexus</i>	Heath Star Moss	Sussex INNS
Fungi		
<i>Mitrula paludosa</i>	Bog Beacon	Sussex Rare
Invertebrates		
<i>Agabus</i>	A Beetle	Sussex Rare
<i>Agabus (Gauromydas) bipustulatus</i>	A Beetle	Sussex Rare
<i>Donacia crassipes</i>	Water-Lily Reed Beetle	Nat Scarce, Notable B, Sussex Rare
<i>Helochares lividus</i>	A Beetle	Sussex Rare
<i>Peltodytes caesus</i>	A Beetle	Nat Scarce
<i>Rhantus (Rhantus) frontalis</i>	A Beetle	Nat Scarce, Notable B, Sussex Rare
<i>Staphylinus dimidiaticornis</i>	A Beetle	Sussex Rare
<i>Apatura iris</i>	Purple Emperor	WCA Sch5 s9.5a, RedList GB post 2001 NT, Sussex Rare
<i>Coenonympha pamphilus</i>	Small Heath	NERC S41, UK BAP Priority, RedList GB post 2001 NT
<i>Coenonympha pamphilus pamphilus</i>	Small Heath	NERC S41, UK BAP Priority, RedList GB post 2001 NT
<i>Cupido minimus</i>	Small Blue	WCA Sch5 s9.5a, NERC S41, UK BAP Priority, RedList GB post 2001 NT
<i>Erynnis tages</i>	Dingy Skipper	NERC S41, UK BAP Priority, RedList GB post 2001 VU
<i>Limenitis camilla</i>	White Admiral	NERC S41, UK BAP Priority, RedList GB post 2001 VU
<i>Polyommatus coridon</i>	Chalk Hill Blue	WCA Sch5 s9.5a RedList GB post 2001 NT
<i>Pyrgus malvae</i>	Grizzled Skipper	NERC S41, UK BAP Priority, RedList GB post 2001 VU
<i>Thecla betulae</i>	Brown Hairstreak	WCA Sch5 s9.5a, NERC S41, UK BAP Priority, RedList GB post 2001 VU, Sussex Rare

Scientific Name	Common Name	Status
<i>Cordulia aenea</i>	Downy Emerald	Sussex Rare
<i>Somatochlora metallica</i>	Brilliant Emerald	RedList GB post 2001 VU, Sussex Rare
<i>Conocephalus fuscus</i>	Long-winged Cone-head	Sussex Rare
<i>Metrioptera roeselii</i>	Roesel's Bush-cricket	Sussex Rare
<i>Acronicta rumicis</i>	Knot Grass	NERC S41, UK BAP Priority
<i>Allophyes oxyacanthalae</i>	Green-brindled Crescent	NERC S41, UK BAP Priority
<i>Diarsia rubi</i>	Small Square-spot	NERC S41, UK BAP Priority
<i>Eilema sororcula</i>	Orange Footman	Sussex Rare
<i>Hoplodrina blanda</i>	Rustic	NERC S41, UK BAP Priority
<i>Lycia hirtaria</i>	Brindled Beauty	NERC S41, UK BAP Priority
<i>Malacosoma neustria</i>	Lackey	NERC S41, UK BAP Priority
<i>Spilosoma lutea</i>	Buff Ermine	NERC S41, UK BAP Priority
<i>Tyria jacobaeae</i>	Cinnabar	NERC S41, UK BAP Priority
<i>Aquarius paludum</i>	A True Bug	Nat Scarce, Notable B, Sussex Rare
<i>Harmonia axyridis</i>	Harlequin Ladybird	Sussex INNS
<i>Harmonia axyridis form spectabilis</i>	A Beetle	Sussex INNS
<i>Harmonia axyridis form succinea</i>	A Beetle	Sussex INNS
<i>Pacifastacus leniusculus</i>	Signal crayfish	WCA Sch 9 INNS
Amphibians		
<i>Bufo bufo</i>	Common Toad	WCA Sch5 s9.5a, NERC S41, UK BAP Priority
<i>Lissotriton helveticus</i>	Palmar Newt	WCA Sch5 s9.5a
<i>Lissotriton vulgaris</i>	Smooth Newt	WCA Sch5 s9.5a
<i>Rana temporaria</i>	Common Frog	WCA Sch5 s9.5a
<i>Triturus cristatus</i>	Great Crested Newt	Hab Dir A2 NP, Hab Dir A4, Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority
Reptiles		
<i>Anguis fragilis</i>	Slow-worm	WCA Sch5 s9.1/s9.1 kill/s9.5a, NERC S41, UK BAP Priority
<i>Natrix Helvetica</i>	Grass Snake	WCA Sch5 s9.1/s9.1 kill/s9.5a, NERC S41, UK BAP Priority

Scientific Name	Common Name	Status
<i>Vipera berus</i>	Adder	WCA Sch5 s9.1/s9.1 kill/s9.5a, NERC S41, UK BAP Priority
Birds		
<i>Cygnus olor</i>	Mute Swan	Bird Amber, Notable Bird
<i>Anas platyrhynchos</i>	Mallard	Bird Amber, Notable Bird
<i>Aythya fuligula</i>	Tufted Duck	Notable Bird
<i>Tachybaptus ruficollis</i>	Little Grebe	Notable Bird
<i>Milvus milvus</i>	Red Kite	Birds Dir A1 WCA Sch1 Pt1 RedList Global post 2001 NT, Notable Bird
<i>Pandion haliaetus</i>	Osprey	Birds Dir A1 WCA Sch1 Pt1 Bird Amber, Notable Bird
<i>Falco tinnunculus</i>	Kestrel	Bird Amber, Notable Bird
<i>Falco subbuteo</i>	Hobby	WCA Sch1 Pt1 Notable Bird
<i>Charadrius dubius</i>	Little Ringed Plover	WCA Sch1 Pt1 Notable Bird
<i>Vanellus vanellus</i>	Lapwing	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Actitis hypoleucos</i>	Common Sandpiper	Bird Amber, Notable Bird
<i>Gallinago gallinago</i>	Snipe	Bird Amber, Notable Bird
<i>Larus fuscus</i>	Lesser Black-backed Gull	Bird Amber, Notable Bird
<i>Larus argentatus</i>	Herring Gull	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Columba oenas</i>	Stock Dove	Bird Amber, Notable Bird
<i>Cuculus canorus</i>	Cuckoo	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Tyto alba</i>	Barn Owl	WCA Sch1 Pt1 Notable Bird
<i>Strix aluco</i>	Tawny Owl	Bird Amber, Notable Bird
<i>Caprimulgus europaeus</i>	Nightjar	Birds Dir A1 NERC S41, UK BAP Priority, Bird Amber, Notable Bird
<i>Apus apus</i>	Swift	Bird Amber, Notable Bird
<i>Alcedo atthis</i>	Kingfisher	Birds Dir A1 WCA Sch1 Pt1 Bird Amber, Notable Bird
<i>Picus viridis</i>	Green Woodpecker	Notable Bird
<i>Dendrocopos minor</i>	Lesser Spotted Woodpecker	NERC S41, UK BAP Priority, Bird Red, Notable Bird

Scientific Name	Common Name	Status
<i>Phylloscopus sibilatrix</i>	Wood Warbler	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Phylloscopus trochilus</i>	Willow Warbler	Bird Amber, Notable Bird
<i>Alauda arvensis</i>	Skylark	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Hirundo rustica</i>	Swallow	Notable Bird
<i>Delichon urbicum</i>	House Martin	Bird Amber, Notable Bird
<i>Anthus pratensis</i>	Meadow Pipit	Bird Amber, Notable Bird
<i>Motacilla cinerea</i>	Grey Wagtail	Bird Red, Notable Bird
<i>Prunella modularis</i>	Dunnock	NERC S41, UK BAP Priority, Bird Amber, Notable Bird
<i>Luscinia megarhynchos</i>	Nightingale	Bird Red, Notable Bird
<i>Phoenicurus ochruros</i>	Black Redstart	WCA Sch1 Pt1 Bird Red, Notable Bird
<i>Phoenicurus phoenicurus</i>	Redstart	Bird Amber, Notable Bird
<i>Oenanthe oenanthe</i>	Wheatear	Notable Bird
<i>Turdus philomelos</i>	Song Thrush	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Turdus viscivorus</i>	Mistle Thrush	Bird Red, Notable Bird
<i>Muscicapa striata</i>	Spotted Flycatcher	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Sylvia communis</i>	Whitethroat	Notable Bird
<i>Sylvia undata</i>	Dartford Warbler	Birds Dir A1 WCA Sch1 Pt1 RedList Global post 2001 NT, Bird Amber, Notable Bird
<i>Regulus ignicapilla</i>	Firecrest	WCA Sch1 Pt1 Notable Bird
<i>Poecile palustris</i>	Marsh Tit	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Sturnus vulgaris</i>	Starling	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Passer domesticus</i>	House Sparrow	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Acanthis cabaret</i>	Lesser Redpoll	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Linaria cannabina</i>	Linnet	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Loxia curvirostra</i>	Common Crossbill	WCA Sch1 Pt1 Notable Bird

Scientific Name	Common Name	Status
<i>Pyrrhula pyrrhula</i>	Bullfinch	NERC S41, UK BAP Priority, Bird Amber, Notable Bird
<i>Coccothraustes coccothraustes</i>	Hawfinch	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Emberiza citrinella</i>	Yellowhammer	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Emberiza schoeniclus</i>	Reed Bunting	NERC S41, UK BAP Priority, Bird Amber, Notable Bird
<i>Emberiza calandra</i>	Corn Bunting	NERC S41, UK BAP Priority, Bird Red, Notable Bird
<i>Aix galericulata</i>	Mandarin Duck	WCA Sch 9 INNS
<i>Alopochen aegyptiacus</i>	Egyptian Goose	WCA Sch 9 INNS
<i>Branta canadensis</i>	Canada Goose	WCA Sch 9 INNS
<i>Psittacula krameri</i>	Ring-necked Parakeet	WCA Sch 9 INNS
Mammals		
	Bat species	Hab Dir A2 NP, Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority, RedList Global post 2001 NT
<i>Eptesicus serotinus</i>	Serotine	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a
<i>Myotis sp.</i>	Myotis bat	Hab Dir A2 NP, Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority, RedList Global post 2001 NT
<i>Myotis bechsteinii</i>	Bechstein's bat	Hab Dir A2 NP, Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority, RedList Global post 2001 NT
<i>Myotis brandti</i>	Brandt's bat	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a
<i>Myotis daubentonii</i>	Daubenton's bat	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a
<i>Myotis mystacinus</i>	Whiskered bat	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a
	Whiskered/ Brandt's bat	Hab Dir A4 Hab Reg Sch2, WCA Sch5 Sec9.4b, WCA Sch5 Sec9.4c, WCA Sch5 Sec9.5a
<i>Myotis nattereri</i>	Natterer's bat	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a

Scientific Name	Common Name	Status
<i>Nyctalus leisleri</i>	Lesser noctule	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a
<i>Nyctalus noctula</i>	Noctule	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority
<i>Pipistrellus sp.</i>	Pipistrelle sp.	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority
<i>Pipistrellus nathusii</i>	Nathusius's pipistrelle	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a
<i>Pipistrellus pipistrellus</i>	Common pipistrelle	Hab Dir A4 Hab Reg Sch2, NERC S41, WCA Sch5 Sec9.4b, WCA Sch5 Sec9.4c, WCA Sch5 Sec9.5a, UK BAP Priority
<i>Pipistrellus pygmaeus</i>	Soprano pipistrelle	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority
<i>Plecotus sp.</i>	Long eared sp.	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority
<i>Plecotus auritus</i>	Brown long-eared bat	Hab Dir A4 Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority
<i>Erinaceus europaeus</i>	West European Hedgehog	NERC S41, UK BAP Priority
<i>Micromys minutus</i>	Harvest mouse	NERC S41, UK BAP Priority
<i>Muscardinus avellanarius</i>	Hazel dormouse	Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority
<i>Sciurus vulgaris</i>	Eurasian red squirrel	WCA Sch5 s9.1/s9.1 kill/s9.1 take/s9.4a/s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority
<i>Neovison vison</i>	American Mink	WCA Sch 9 INNS
<i>Sciurus carolinensis</i>	Eastern grey squirrel	WCA Sch 9 INNS

APPENDIX C: Phase 1 Target Notes

Table 4: Phase 1 Target Notes

Phase 1 Target Notes	
Number	Description
Target Note 1	Bank good for reptiles.
Target Note 2	Rubble pile, suitable hibernacula.
Target Note 3	Corrugated sheets and wooden panels, suitable reptiles hibernacula.
Target Note 4	Woodpecker hole on pine tree on west side approx. 2.5m – high bat roost potential.
Target Note 5	Mammal path into woodland.
Target Note 6	Good for invertebrates and all reptile species.
Target Note 7	Mammal path leading into woodland.
Target Note 8	Mature oak – bat roost potential.
Target Note 9	Mature oaks - bat roost potential.
Target Note 10	Large mature oak with bat roost potential.
Target Note 11	Log pile- suitable reptile hibernacula.
Target Note 12	Log pile- suitable reptile hibernacula.
Target Note 13	Log pile- suitable reptile hibernacula.
Target Note 14	Log pile- suitable reptile hibernacula.
Target Note 15	Log pile- suitable reptile hibernacula.
Target Note 16	Log pile- suitable reptile hibernacula.
Target Note 17	Badger sett: One entrance with fresh spoil, bedding and hair at entrance, one entrance borderline big enough for badgers, five rabbit burrow entrances, one collapsed entrance.
Target Note 18	Rabbit warren.
Target Note 19	Tree with bat roost potential.
Target Note 20	Tree with bat roost potential.
Target Note 21	Tree with bat roost potential.
Target Note 22	Tree with bat roost potential.
Target Note 23	Wood pile – suitable hibernacula.
Target Note 24	Rhododendron.

Phase 1 Target Notes

Number	Description
Target Note 25	Pond 6 - large pond approx. 1330m ² , good water quality with limited aquatic vegetation, surrounded by barbed wire, scattered Broadleaved trees scattered and grazed pasture, minor fish presence.
Target Note 26	Barn complex - not surveyed due to access restrictions.
Target Note 27	Concrete bridge over Ifield Brook.
Target Note 28	Tree with bat potential - woodpecker holes.
Target Note 29	Tree with bat roost potential.
Target Note 30	Multiple mature oaks with bat roost potential.
Target Note 31	Dead tree with bat potential.
Target Note 32	Mature Ash with bat potential.
Target Note 33	Dead tree with bat roost potential.
Target Note 34	Tree with bat roost potential- large cavity in main stem.
Target Note 35	Two mature Ash trees with bat roost potential.
Target Note 36	Pond 1 – small pond 8m x 15m, approx. area of 120m ² , appears to be permanent with wooded bank to one side and surrounded by amenity grassland. Diverse aquatic vegetation with good water quality.
Target Note 37	Mature Ivy-covered oak with bat roost potential.
Target Note 38	Mature oak trees with bat roost potential.
Target Note 39	Alder with woodpecker holes.
Target Note 40	Mature Ash with multiple bat features for bat roost potential.
Target Note 41	Brash pile.
Target Note 42	Multiple mature oaks along woodland with potential bat roost features.
Target Note 43	Slow-worm.
Target Note 44	Dead wood pile and brash pile. Suitable reptile hibernacula.
Target Note 45	Dead wood pile and brash pile. Suitable reptile hibernacula.
Target Note 46	Culvert on eastern side of Ifield Brook comprised of a concrete pipe with red brick head wall. Approx 1m in diameter. Horizontal grille on entrance and enough room between the horizontal bars for bats to fly through. However, could not see daylight at other end of culvert.
Target Note 47	Sandy/clay bank with holes and bird dropping - likely nesting site.
Target Note 48	Badger sett, hair found, 4 well used entrances (1 very well worn path with badger hair found), 2 partially used entrances, 4 collapsed entrances.

Phase 1 Target Notes

Number	Description
Target Note 49	Mature oak with bat roost potential.
Target Note 50	Mature tree, possible Beech, with bat roost potential.
Target Note 51	Three mature oak trees, one standing dead tree, with bat roost potential.
Target Note 52	Mature oak with bat roost potential.
Target Note 53	Grass snake sighting.
Target Note 54	Concrete bridge carrying PROW over top. Easily accessible for bats for night time perching/roosting and passage. along the ditch. Heavily shaded so not considered suitable for roosting by large numbers of bats and no crevices present for daytime roosting.
Target Note 55	Brash and log pile, suitable hibernacula.
Target Note 56	Standing dead oak tree next to mature oaks with bat roost potential.
Target Note 57	Rhododendron.
Target Note 58	Derelict buildings – not surveyed due to access restrictions.
Target Note 59	Ifield Golf Course buildings- a number of buildings comprised a mixture of brick, breezeblock and metal buildings all with features suitable to support roosting bats.
Target Note 60	Ifield Art Centre buildings - a number of buildings comprised of a mixture of brick and wood. All of the buildings had a number of features suitable to support roosting bats.
Target Note 61	Pond 4 – large pond approx. 1580m ² , moderate water quality with diverse aquatic vegetation, major fish presence, wooded banks surrounded by amenity grassland.
Target Note 62	Pond 3b – small pond approx. 15m by 8m, good water quality with diverse range of aquatic vegetation, surrounded by mature willows and amenity grassland, fish present.
Target Note 63	Pond 3 – small pond approx. 10m x 20m, good water quality with diverse range of aquatic vegetation, surrounded by four semi-mature trees and amenity grassland, fish present. New Zealand Pigmyweed recorded in this pond.
Target Note 64	Pond 2 – small shallow pond approx. 10m x 10m, moderate water quality with limited aquatic vegetation, surrounded by amenity grassland. New Zealand Pigmyweed recorded in this pond.
Target Note 65	Pond 5 – medium pond approx. 550m ² , limited aquatic vegetation, poor water quality, wooded banks surrounded by amenity grassland.
Target Note 66	Ditch 2 – small ditch <50m ² , dry sections with wooded banks surrounded by grassland, amphibians observed.
Target Note 67	Ditch 4 – large ditch >330m ² , wooded banks surrounded by rough grassland.
Target Note 68	Ditch 6 – shallow ditch approx. 180m in length, 1m wide, surrounded by scrub banks with grazing pasture to one side, no aquatic vegetation.
Target Note 69	Potential badger sett under mature oak tree, badger hairs found and scratching signs.

Phase 1 Target Notes

Number	Description
Target Note 70	Mature oak with bat roost potential.
Target Note 71	Oak with bat roost potential.
Target Note 72	Oak with bat roost potential.
Target Note 73	Large mature oak with split limb - potential for bats.
Target Note 74	Large mature oak with knotholes – potential for bats.
Target Note 75	Small concrete bridge, crossing Ifield Brook, within woodland area
Target Note 76	Small concrete crossing over brook.
Target Note 77	Wooden bridge crossing the River Mole.
Target Note 78	Small ornamental pond containing fish
Target Note 79	Group of buildings which house maintenance equipment
Target Note 80	Mature oak -bat potential
Target Note 81	Mature pollarded Ash with pigeon nest, bird box and knot holes
Target Note 82	Area of dense scrub
Target Note 83	Pollarded Ash with bat roost potential – knot holes and broken limb.
Target Note 84	Two Ash trees with bat roost potential – one with multiple woodpecker holes and a bird box and one with fewer features and a bird box
Target Note 85	Mature Field Maple with bat roost potential – ivy covered stem and a bird box.
Target Note 86	Mature oak with bat roost potential – large tear out, broken limbs and ivy clad stem.
Target Note 87	Concrete bridge, crossing Ifield Brook
Target Note 88	Pond, approx 30m long and 30m , contains island at centre with willow and ash, pond contains, yellow flag iris, bulrushes, water mint, water lilies.
Target Note 89	Building with bat potential slip tiles seen from the SINC and dense vegetation covering the roof
Target Note 90	Buildings with bat potential outside of redline boundary
Target Note 91	Freshwater mussel found on eastern bank of Ifield Brook. Species unknown.
Target Note 92	Badger sett on eastern bank of Ifield Brook. Nine entrances, one very well used with badger hair present and well defined pathway between entrances.
Target Note 93	Horticultural yard with a number of barn structures present
Target Note 94	Area of stored waste and aggregate / earth
Target Note 95	Area of piled earth adjacent to a plantation broadleaf woodland

Phase 1 Target Notes

Number	Description
Target Note 96	Barn
Target Note 97	Semi-improved grassland, no evidence of management
Target Note 98	Hedgerow in the west of the site
Target Note 99	Improved grassland in the west of the site
Target Note 100	Broadleaf woodland plantation in the south of the site
Target Note 101	Derelict building adjacent to unused swimming pool in the west of the site
Target Note 102	Large oak tree, possibly veteran
Target Note 103	Duck pond in the west of the site
Target Note 104	Horse paddocks in the east of the site
Target Note 105	Area with derelict caravans and sheds

APPENDIX D: Photographs

Table 5: *Photographs of the Site*



Photo 1: Semi-natural broadleaved woodland



Photo 2: Ifield Golf Course plantation woodland



Photo 3: Scrub



Photo 4: Ifield Brook and Meadows LWS scattered trees



Photo 5: Ifield Golf Course scattered trees



Photo 6: Ifield Golf Course scattered trees



Photo 7: Ifield Brook and Meadows LWS neutral semi-improved grassland



Photo 8: Cut neutral semi-improved grassland



Photo 9: Cut species poor semi-improved grassland



Photo 10: Arable field margins species poor semi-improved grassland



Photo 11: Ifield Golf Course species poor semi-improved grasslands



Photo 12: Ruderal vegetation



Photo 13: Pond – TN 36



Photo 14: Pond - TN 64



Photo 15: Pond - TN 63



Photo 16: Pond TN - 62



Photo 17: Pond - TN 61



Photo 18: Pond - TN 65



Photo 19: Pond - TN 25



Photo 20: Dry ditch



Photo 21: Ditch - TN 66



Photo 22: Ditch - TN 67



Photo 23: Ditch - TN 68



Photo 24: River Mole



Photo 25: Ifield Brook

Photo 26: Arable field



Photo 27: Ifield Golf Course amenity grassland



Photo 28: Ephemeral vegetation



Photo 29: Ifield Golf Course hedgerow



Photo 30: Ifield Golf Course buildings



Photo 31: Ifield Golf Course buildings



Photo 32: Ifield Golf Course buildings



Photo 33: Ifield Art Centre buildings



Photo 34: Rhododendron at Ifield Golf Course



Photo 35: New Zealand Pigmyweed



Photo 36: Rubble pile



Photo 37: Badger sett



Photo 38: Potential badger sett



Photo 39: Horticultural yard (TN 78)



Photo 40: Area of stored waste and aggregate / earth (TN 79)



Photo 41: Area of piled earth adjacent to a plantation broadleaf woodland (TN 80)



Photo 42: Barn (TN81)



Photo 43: Semi-improved grassland (TN82)



Photo 44: Hedgerow in the west of the site (TN83)



Photo 45: Improved grassland in the west of the site (TN84)



Photo 46: Broadleaf woodland plantation in the south of the site (TN85)



Photo 47: Derelict building adjacent to unused swimming pool in the west of the site (TN86)

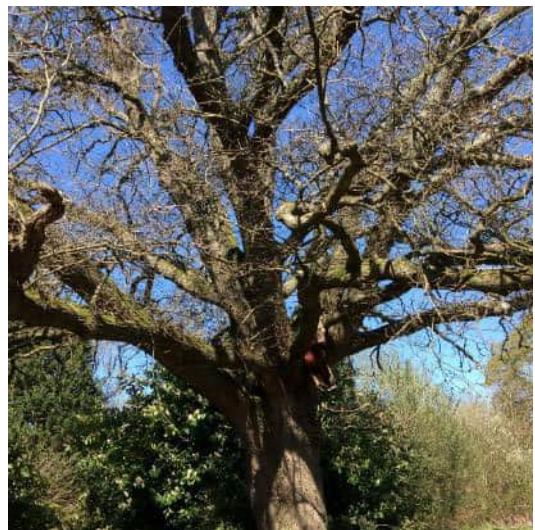


Photo 48: Large oak tree (TN87)



Photo 49: Duck pond in the west of the site (TN88)



Photo 50: Horse paddocks in the east of the site (TN89)

APPENDIX E: Key Surveyor Pen Portraits

Table 6: Key Surveyor Pen Portraits

Surveyor	CV details
Brandon Murray MCIEEM (Principal Ecological Consultant) BSc(hons)	Brandon has been a professional ecologist for over nine years and has undertaken multiple Phase 1 habitat surveys and Hedgerow Assessments. Brandon has planned and led surveys for many species including badgers, bats, GCN (Great Crested Newts) water voles and reptiles and is very confident in assessing habitats for their protected species suitability.
Porscha Thompson ACIEEM (Graduate Ecologist) MSc BSc (Hons)	Porscha has experience in assessing sites for potential ecological impacts and is able to provide appropriate recommendations and mitigation in order to reduce potential impacts. Porscha has experience in undertaking a range of protected species surveys including bats, great crested newts (GCN), dormice, reptiles and badger surveys, phase 1 habitat surveys and ecological clerk of works and has a keen interest in botany. She also has strong report writing, desk study and coordination skills. She currently holds a Class 1 Natural England GCN licence, is an accredited agent of a Natural Resources Wales GCN licence and bat licence.
Siân Carr MCIEEM (Senior Ecologist) PhD BSc (Hons)	Siân has over 10 years' experience as an ecological consultant working on both public and private sector projects of various scales. These roles have provided her with a wide range of technical experience, and a thorough understanding of environmental legislation and excellent organisational skills. She has expertise in a range of species surveys, including badgers and produced numerous technical reports, including habitat assessments, species specific reports including mitigation strategies and method statements
Julie Player ACIEEM (Ecologist) BSc (Hons)	Julie has 6 years' experience as an ecological consultant working on both public and private sector projects. Julie has significant experience of undertaking surveys for protected species. These roles have provided her with a wide range of technical experience, has significant experience in undertaking surveys for protected species, a thorough understanding of environmental legislation, Ecological and Environmental Clerk of Works and excellent organisation skills. Julie is experienced in producing technical reports, including habitat assessments, species specific reports including mitigation strategies, method statements and species licenses.

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APPENDIX 8.3: SUSSEX BIODIVERSITY RECORDS CENTRE – ECOLOGICAL DATA SEARCH – SUMMARY REPORT

Ecological Data Search SxBRC/25/069 - Summary Report

An ecological data search was carried out for land west of Ifield on behalf of Angela Ferguson (Ramboll UK Ltd) on 03/06/2025.

The following datasets were consulted for this report:

	Requested	Radius/buffer size
Designated sites, habitats & ownership maps	Yes	2km
Protected, designated and invasive species	Yes	2km
Bats at different search size		5km

Summary of results

Sites and habitats

Statutory sites	2 SSSIs / 1 AONB / 2 LNRs / 1 Country Park
Non-statutory sites	10 LWS
Section 41 habitats	3 habitats
Ancient and/or ghyll woodland	Present

Protected and designated species

International designations	52 species	2,119 records
National designations	138 species	9,962 records
Other designations	328 species	20,284 records
Total	351 species	21,325 records
Invasive non-native	48 species	1,956 records

The report is compiled using data held by Sussex Biodiversity Record Centre (SxBRC) at the time of the request. SxBRC does not hold comprehensive species data for all areas. Even where data are held, a lack of records for a species in a defined geographical area does not necessarily mean that the species does not occur there – the area may simply not have been surveyed.

**This summary page may be published.
The full report and maps may not be published or otherwise shared.**

The data search report is valid until 03/06/2026 for the site named above.

APPENDIX 8.4: SURREY BIODIVERSITY INFORMATION CENTRE – SUMMARY OF RESULTS

Summary of Results

A background ecological data search was carried out for Land West of Ifield on behalf of Angela Ferguson (Ramboll UK Ltd) on 02/06/2025.

The following datasets were consulted for this report:

	Requested	Radius/buffer size
Statutory Designated sites	Yes	2km
Non-Statutory Designated sites	Yes	2km
Protected, notable, priority and invasive species	Yes	2km
Bats at different search size	Yes	5km

Summary of results:

Sites

Statutory Designated Sites	None present
Non-statutory Designated Sites	None present
Ancient Woodland	5 AWIs

Protected and designated species

Protected species records (1km or less)	27 species	44 records
Protected species records (Tetrad/10km)	2 species	3 records
Notable species records (1km or less)	30 species	67 records
Notable species records (Tetrad/10km)	1 species	2 records
Priority species records (1km or less)	15 species	40 records
Priority species records (Tetrad/10km)	4 species	6 records
Invasive non-natives species (1km or less)	5 species	11 records
Invasive non-natives species (Tetrad/10km)	0 species	0 records
Bat records (1km or less)	9 species	70 records
Bat records (Tetrad/10km)	5 species	8 records

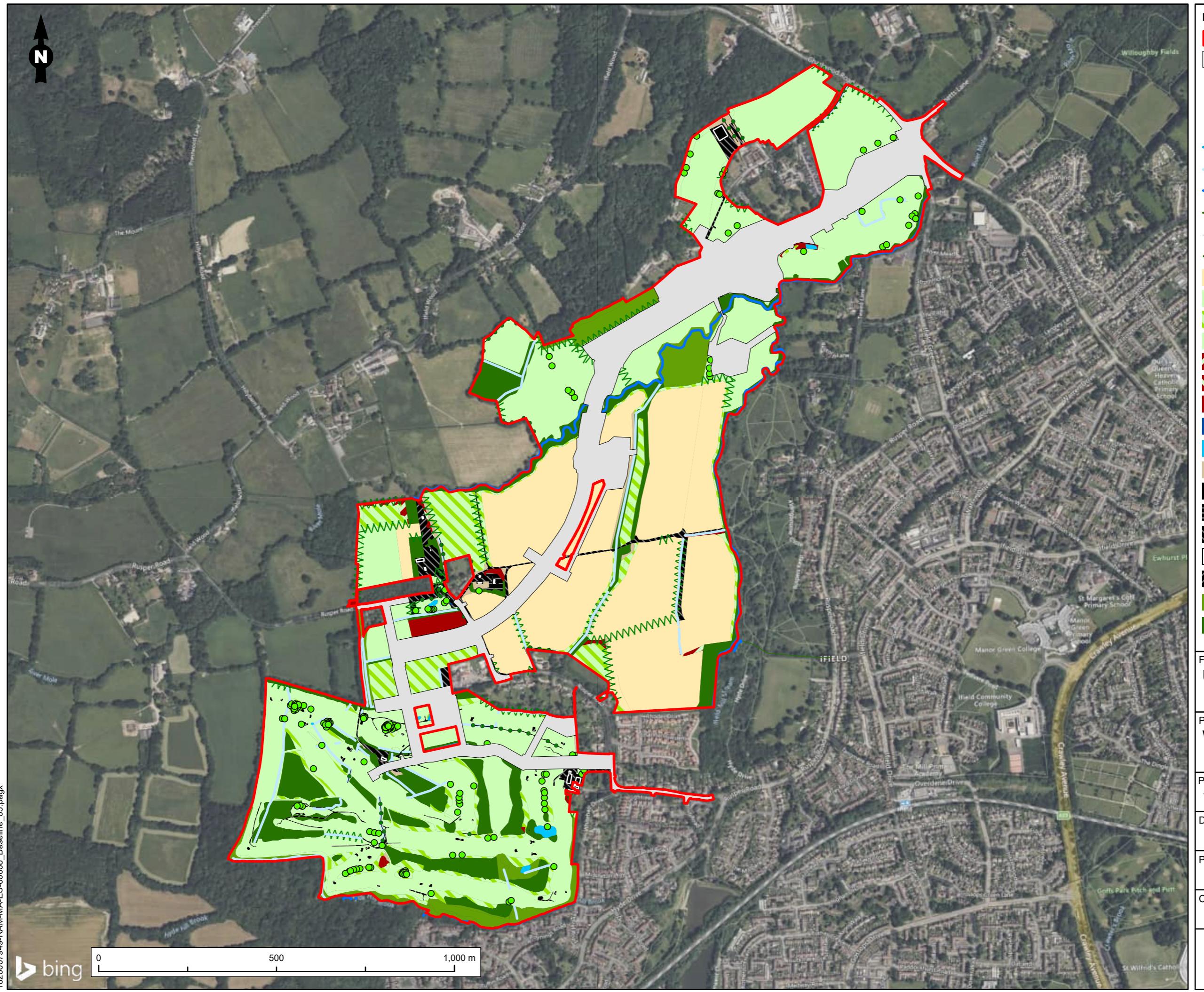
The report is compiled using data held by Surrey Biodiversity Information Centre (SBIC) at the time of the request. SBIC does not hold comprehensive species data for all areas. Even where data are held, a lack of records for a species in a defined geographical area does not necessarily mean that the species does not occur there – the area may simply not have been surveyed.

This summary report may be published.

The full report and maps may not be published or otherwise shared.

The background ecological data search report is valid until 02/06/2026 for the site named above.

APPENDIX 8.5: UKHAB BASELINE MAP – IFIELD



APPENDIX 8.6: HABITATS REGULATIONS SCREENING ASSESSMENT – WEST OF IFIeld



West of Ifield, Crawley Stage 1 Habitats Regulations Assessment

WOI-HPA-DOC-HRA1-01
Version 1 - Planning submission

June 2025



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Turner and Townsend Project Management Ltd

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WEST OF FIELD SCREENING HABITATS REGULATIONS ASSESSMENT

WEST OF IFIELD
SCREENING HABITATS REGULATIONS
ASSESSMENT

Project name **West of Ifield**
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Revision	Date	Prepared by	Checked by	Approved by	Description
1	12/05/23				First draft
2	13/06/24				Second Draft following design freeze
3	27/03/25				Third issue following project update
4	06/06/25				Fourth issue following minor project update
5	30/06/25				Fifth issue following Client comments

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APPENDICES

Appendix 1

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Natural England Correspondence

EXECUTIVE SUMMARY

Ramboll UK Limited have been appointed by Turner and Townsend Project Management Ltd on behalf of Homes England to prepare a screening Habitats Regulations Assessment report for the site at land west of Ifield (the 'Site'), in relation to the proposed mixed-use development (the 'Proposed Development').

This report has been prepared to provide information to Horsham District Council (HDC) (as the Local Planning Authority) on the potential implications of the Proposed Development on designated National Site Network sites. The implications of the Proposed Development on designated sites have been considered due to their proximity to the Site, the potential existence of effect pathways between them, and through consultation with Natural England. The effects of the Proposed Development have been discussed using available information and professional judgement.

Significant adverse effects on the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), The Mens SAC and Ebernoe Common SAC and their qualifying features as a result of the Proposed Development are not considered likely either alone or in combination with other schemes, due to their distance from the Site. Therefore, additional assessment or mitigation for these designated sites is not required, and there is no requirement for an Appropriate Assessment for these three designated sites.

Likely significant effects at Arun Valley SAC, Special Protection Area (SPA) and Ramsar site cannot be ruled out at the Screening assessment stage, and these designated should be carried forward to the Appropriate Assessment stage.

A report to inform an Appropriate Assessment considering the likely significant effects on Arun Valley SAC, SPA and Ramsar site has been prepared by WSP (ref: WOI-HPA-DOC-HRA2-01). This has been presented in a separate report, and accompanies the hybrid planning application.

1 INTRODUCTION

1.1 Background

1.1.1 Ramboll UK Limited (Ramboll) have been appointed by Turner and Townsend Project Management Ltd (the "Client") on behalf of Homes England (the "Applicant") to prepare a screening Habitats Regulations Assessment (HRA) report for the site at West of Ifield (the "Site" as illustrated in Figure 1, **Appendix 1**), in relation to the proposed mixed-use development (the "Proposed Development").

1.2 Site and Location

1.2.1 The Site consists of approximately 171 hectares (ha) of land centred approximately at National Grid Reference TQ 23679 36673. The Site falls primarily within the administrative area of Horsham District Council (HDC).

1.2.2 The Site is predominantly occupied by a mixture of arable and pastoral fields and includes the Ifield Golf Course and Country Club in the south. The River Mole is present across the northern part of the Site and flows from south-west to north-east.

1.2.3 Current access to the Site is via Charlwood Road in the north and Rusper Road to the south.

1.2.4 An area to the east of the Site is occupied by Ifield Brook Wood and Meadows, which adjoins a wooded area and extends into an area of ancient woodland. Ifield Brook Wood and Meadows is designated as a Local Wildlife Site (LWS) and a Site of Nature Conservation Importance (SNCI).

1.2.5 The Site topography is generally low-lying, with ridges to the south and west. The first of these ridges passes through the southern part of the Site in an approximate east-west alignment and this rises up from 76m above ordnance datum (AOD) in the south-west to approximately 85m AOD at Hyde Hill. The second ridge is located approximately 1km to the north-west at Russ Hill. It is orientated in an approximate south-west to north-east alignment which rises up from 68m AOD m on Site and extends up to 100m AOD at Russ Hill. The low-lying land between these two ridges lies at approximately 60-70m AOD and is dissected by the narrow watercourses of Ifield Brook and the River Mole.

1.3 Proposed Development

1.3.1 The Applicant intends to submit a hybrid planning application (part outline and part full planning application) for a phased, mixed-use development comprising:

A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside

An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition.

1.3.2 This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way. This assessment forms part of the hybrid planning application.

1.3.3 Further details on the Proposed Development, the Description of Development and the proposed land uses are set out within the Development Specification and Parameter Plan Framework (WOI-HPA-DOC-DSPPF-01) and the Design and Access Statement (WOI-HPA-DOC-DAS-01).

1.3.4 The Proposed Development would be accessed via Charlwood Road in the north, Rusper Road in the south and a proposed new road off Rusper Road to the east of the Site.

1.3.5 Parameter Plan 1 (WOI-HPA-PLAN-PP01-01) in Figure 1.1 below represents the Landscape and Public Realm plan for the hybrid planning application.

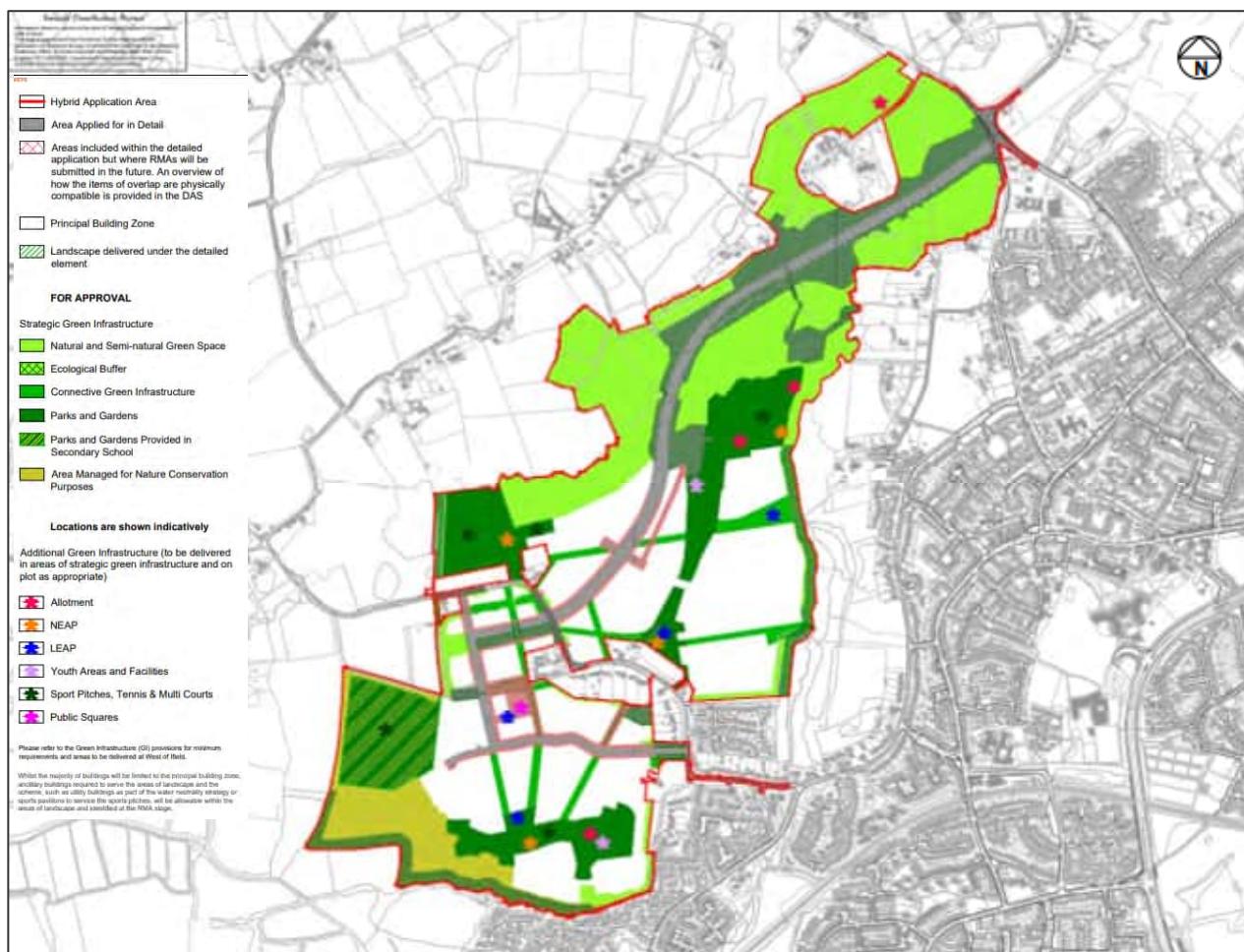


Figure 1.1: Landscape and Public Realm (WOI-HPA-PLAN-PP01-01)

1.4 Aim of the Report

1.4.1 A number of designated National Site Network sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) and Ramsar sites are located within the Zone of Influence (ZoI) of the Proposed Development, as outlined in Section 1.4.2 below. This report has been prepared to provide information to HDC (as the Local Planning Authority (LPA)) on the potential implications of the Proposed Development on the following National Site Network and Ramsar sites:

- Mole Gap to Reigate Escarpment SAC;
- The Mens SAC;
- Ebernoe Common SAC;
- Arun Valley SAC;
- Arun Valley Ramsar site; and
- Arun Valley SPA.

1.4.2 The implications of the Proposed Development on these designated sites have been considered due to their proximity to the Site, the potential existence of effect pathways between them, and through consultation with Natural England. As agreed through consultation with Natural England, all National Site Network and Ramsar sites within 15 km of the Proposed Development have been considered (see Figure 2, Appendix 1) as well as all SACs within 30 km of the Proposed Development with bats given as a qualifying feature for designation (see Figure 3, Appendix 1).

1.4.3 This report also considers the following:

- The ecological interest of the sites listed above;
- The likely nature and scale of potential effects on these sites from the Proposed Development; and
- Consideration of the need for an Appropriate Assessment.

1.4.4 Where it is considered that an Appropriate Assessment is not likely to be required, the reasons and evidence to support that conclusion are presented.

1.5 Legislation

1.5.1 National Site Network sites include SACs and SPAs, which were designated or notified in accordance with domestic legislation (The Conservation of Habitats and Species Regulations 2017(the Habitats Regulations))¹ that transposed the provisions of European Council Directive 92/43/EEC² on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive) and Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive)³ respectively. Such sites are also known as European sites.

1.5.2 The habitat types and species for which these sites are designated are those considered to be most in need of conservation at an international level. Ramsar sites are designated under the Convention on Wetlands of International Importance (Ramsar Convention 1971). Although Ramsar sites do not form part of the National Site Network, many overlap with SAC and SPA boundaries, and Ramsar sites are in effect protected in the same way as SACs and SPAs under the Habitats Regulations as a result of policy⁴.

1.5.3 The regulations impart a duty on local planning authorities (competent authorities) to carefully consider whether any proposals may have a significant effect on a National Site Network or Ramsar site, either alone or in combination with other plans or projects. In most circumstances, permission may only be given for a plan or project to proceed if it has been ascertained that it will not have an adverse effect on the integrity of any such designated sites.

1.6 Natural England Consultation

1.6.1 Prior to the writing of this Habitats Regulations Screening report, a technical note (document reference: Technical Note 1620007949_HRA-01 dated 27 April 2020) was issued to Natural England from Ramboll outlining the proposed methodology of the Habitats Regulations Assessment for the Proposed Development. A response was received from Natural England on 21 May 2020, the details of which are outlined in this section and the correspondence is included as Appendix 2.

1.6.2 Natural England highlighted in their response that emerging evidence suggests developments within Horsham District are leading to deleterious effects on the Arun Valley SAC, SPA and Ramsar site due to the Hardham groundwater abstraction which potentially feeds these areas. As such, future developments will need to ensure these impact pathways are included in the HRA screening process. Natural England explained that in order to meet the requirements of the Habitats Regulations, the Proposed Development will need to provide evidence of water usage. Water quality was also raised as a concern by Natural England in their response, which suggested that any development coming forward that uses wastewater treatment works within the catchment of the River Arun must provide robust mitigation, including strategic solutions such as water neutrality.

1.6.3 Further to this, in their response Natural England agreed with Ramboll's assessment that air quality impacts should be considered through the HRA screening process.

1.6.4 Additionally, with regard to SACs designated for bats within 30 km of the Proposed Development, Natural England noted in their response that potential impacts of habitat loss and fragmentation should be considered in the HRA screening process.

1.6.5 A water neutrality statement (produced by WSP in support of the Proposed Development, ref: WOI-HPA-DCO-WNS-01) forms part of the hybrid planning application submission. Whilst it has been considered in preparing this Screening Report, the measures proposed in it have not been taken into

¹

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiCw7jzpZuOAxVuVUEAHd_SLOwOFnoECBEOAQ&url=https%3A%2F%2Fwww.legislation.gov.uk%2Fuksi%2F2017%2F1012%2Fcontents&usq=AOvVaw3uxLJDpzGf5x2pQ1KhB0QG&opi=89978449

² JNCC, 1992, Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora. Available from:

<http://jncc.defra.gov.uk/page-1463>

³ European Commission, 2009. Council Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version)

⁴ National Planning Policy Framework (Ministry of Housing, Communities and Local Government) 2021, Paragraph 181 available at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf [March 2023]

account and instead form part of the next stage of HRA, the Appropriate Assessment, as discussed in subsequent sections.

1.7 Limitations

- 1.7.1 Ramboll has been commissioned to identify potential effects on National Site Network and Ramsar sites as a result of the Proposed Development. This report does not address any other potential environmental impacts that may result from the Proposed Development. These are addressed in the Environmental Statement and associated documents.
- 1.7.2 Ramboll does not accept any liability for the accuracy or otherwise of any information derived from secondary sources; however, reasonable endeavours have been made to verify information obtained in this way.
- 1.7.3 This report is based on the assessment of the Site, the boundaries of which are as shown in Figure 1, Appendix 1. If the Proposed Development is subsequently amended to extend to land additional to that shown on the drawing, or the proposals alter, the recommendations may need to be revised.
- 1.7.4 Ramboll undertook screening up to a certain point in 2024 and then WSP were appointed by the Applicant to prepare a report to inform an Appropriate Assessment (ref: WOI-HPA-DOC-HRA2-01). As such Ramboll's screening exercise ceased at that point. To ensure that the latest screening information was incorporated WSP undertook a further screening assessment which is detailed in the further HRA report (ref: WOI-HPA-DOC-HRA2-01).

2 ASSESSMENT METHODOLOGY

The procedure for assessment of projects that are not directly connected with, or necessary to, the management of the designation for conservation of a National Site Network site is an ordered process following a number of key stages, as set out within the Habitats Regulations at regulations 63 and 64 and in Defra guidance relating to Habitats Regulations assessments⁵.

2.1 Stage 1 – Screening

- 2.1.1 Under the first stage, it is necessary for the competent authority to examine if the proposals will result in any 'likely significant effect' on the internationally important features of the designated site, either alone or in combination with other plans or projects. Defra guidance recommends that key indicators should be used to determine the significance of effects.
- 2.1.2 If it can be objectively concluded that it is not likely that there would be significant effects on the National Site Network site, no further assessment is necessary, the outcome should be documented and agreed, and permission should not be refused under the assessment.
- 2.1.3 If a risk of any 'likely significant effects' is identified or where it is not possible to exclude the possibility of such a risk on the basis of objective information, the assessment procedure should follow on to Stage 2.
- 2.1.4 Contrary to previous case law, following the Court of Justice of the European Union (CJEU) ruling (People over Wind, Peter Sweetman v Coillte Teoranta, Case C323/17, dated 12 April 2018)⁶, measures intended to avoid or reduce the harmful effects of a plan or project on a National Site Network site should not be taken into account at this screening stage, and instead these must be considered as part of an Appropriate Assessment (Stage 2). Measures proposed as integral to or embedded in a project, whether in design or in the construction process, that are not included within the project for the purpose of avoiding or reducing impacts to features of a designated site can be considered.

2.2 Stage 2 – Appropriate Assessment

- 2.2.1 Should it be determined that (in the absence of mitigation/avoidance measures) a plan or project will result in 'likely significant effects' on a National Site Network site (or that such effects cannot be ruled out), the competent authority should proceed to the next stage, where further assessment is required.
- 2.2.2 Under the second stage, it is necessary for the competent authority to determine whether the proposals, either alone or in combination with other projects or plans, will result in any adverse effects on the integrity of the protected site as defined by the conservation objectives and status of the site. The precautionary principle should be applied, and the focus should be on objectively demonstrating, with supporting evidence, that there will be no adverse effects on the integrity of the National Site Network site. Where this is not the case, and where there is reasonable scientific doubt about the absence of significant adverse effects, adverse effects must be assumed. Mitigation for any effects on integrity can be applied at the Appropriate Assessment stage.
- 2.2.3 If it is considered by the competent authority that the proposal will not adversely affect the integrity of the site, permission can be granted. If this cannot be ascertained, or there is uncertainty, the assessment procedure should follow on to Stage 3.

2.3 Stage 3 Onwards

- 2.3.1 Under Stages 3 and 4, it is necessary for the competent authority to assess if there are alternative solutions and whether there are imperative reasons of overriding public interest. If these tests are passed, authorisation may be granted subject to compensation measures being secured.

⁵ Defra, 2021, Habitat regulations assessments: protecting a European site. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

⁶ 'People Over Wind and Peter Sweetman v Coillte Teoranta' (2018), Irish High Court, case no. C-323/17. EUR-Lex. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62017CJ0323> (Accessed: March 2025).

3 NATIONAL SITE NETWORK AND RAMSAR SITES SCREENING ASSESSMENT

3.1.1 National Site Network sites within 15 km of the Site and SACs within 30 km of the Site with bats listed as a qualifying feature, together with other sites highlighted for consideration by Natural England in correspondence dated 21 May 2020 (Appendix 2), are outlined in Table 3.1. These designated sites are assessed further within this HRA Screening Assessment.

Table 3.1: Impact Pathway Screening for National Site Network and Ramsar Sites

National Site Network and Ramsar sites that could be affected by the Proposed Development	<ul style="list-style-type: none"> i. Mole Gap to Reigate Escarpment SAC (approximately 13.5 km north at the closest point); ii. The Mens SAC (approximately 22.1 km south-west at the closest point); iii. Ebernoe Common SAC (approximately 26.2 km south-west at the closest point); iv. Arun Valley SAC (25.3 km south-west at the closest point); v. Arun Valley Ramsar site (25.3 km south-west at the closest point); and vi. Arun Valley SPA (25.3 km south-west at the closest point).
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3.1.2 The following tables outline the baseline information for each designation taken forward for assessment. The listed threats are those outlined in the SAC, SPA or Ramsar site citation or their underlying Special Site of Scientific Interest (SSSI) citations as available. Threats listed as **bold** are those considered relevant to the nature of the Proposed Development. Threats beyond these listed threats are also considered as appropriate, for example habitat loss and fragmentation is not a listed threat for the Mens SAC but is considered in this screening assessment. The screening assessment of potential significant effects, according to the relevant threats to ecological features, associated with the Proposed Development are presented.

3.1.3 This report presents the HRA carried out up to the point of Ramboll's screening exercise. A Habitats Regulations Assessment Appropriate Assessment report has been prepared to address the HRA Stage 2 assessment (ref: WOI-HPA-DOC-HRA2-01). That report accompanies the hybrid planning application and presents further screening information.

3.2 Mole Gap to Reigate Escarpment SAC

Table 3-2: Baseline Information for Mole Gap to Reigate Escarpment SAC

Baseline Information	Detail
Relationship between designated site and the Proposed Development	<p>Mole Gap to Reigate Escarpment SAC is located approximately 13.5 km north of the Proposed Development at the closest point.</p>
Designated site interest features ⁷	<p>Mole Gap to Reigate Escarpment SAC supports the following qualifying features:</p> <p>Annex I habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. 5110 Stable xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes (Berberidion p.p.); ii. 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites); and iii. 91J0 <i>Taxus baccata</i> woods of the British Isles (priority feature). <p>Annex I habitats that are present as a qualifying feature, but not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. 4030 European dry heaths; and ii. 9130 <i>Asperulo-Fagetum</i> beech forests. <p>Annex II species that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> i. Not applicable <p>Annex II species that are present as a qualifying feature, but not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. 1166 Great crested newt <i>Triturus cristatus</i>; and ii. 1323 Bechstein's bat <i>Myotis bechsteinii</i>.
Conservation objectives of the designated site	<p><i>"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:</i></p> <ul style="list-style-type: none"> i. <i>The extent and distribution of qualifying natural habitats and habitats of qualifying species</i> ii. <i>The structure and function (including typical species) of qualifying natural habitats</i> iii. <i>The structure and function of the habitats of qualifying species</i> iv. <i>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</i> v. <i>The populations of qualifying species, and,</i> vi. <i>The distribution of qualifying species within the site."</i>⁸

⁷ Joint Nature Conservation Committee (2015) *Mole Gap to Reigate Escarpment*. Available at <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012804.pdf>

⁸ Natural England (2018) *Mole Gap to Reigate Escarpment SAC Conservation Objectives*. Available at: <https://publications.naturalengland.org.uk/publication/4911739200077824?category=6528471664689152>

Baseline Information	Detail						
	<p>In addition to the broad targets quoted above, further detail on the conservation objectives and actions for each interest feature is given in the Mole Gap to Reigate Escarpment SAC Conservation Objectives Supplementary Advice document⁹. With regards to Barbastelle and Bechstein's bat, which are considered a qualifying feature of the site (but not primary for designation), this document lists the following targets:</p> <ul style="list-style-type: none"> i. <i>Maintain the abundance of the breeding population at a level which is above the baseline population-size known or estimated at or soon after the time of SAC designation, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.</i> ii. <i>Maintain the distribution and continuity of the feature and its supporting habitat, including where applicable its component vegetation types and associated transitional vegetation types, across the site.</i> iii. <i>Maintain the total extent of the habitat(s) which support the feature at the baseline level of 25 hectares.</i> iv. <i>Maintain the presence, structure and quality of any linear landscape features which function as habitually used routes along which bats navigate to foraging and swarming areas. Routes should remain unlit, functioning as dark corridors.</i> v. <i>Maintain the structural integrity and weatherproofing of the known hibernation sites, with no significant shading of the main roost area by trees/vegetation or man-made structures</i> vi. <i>Maintain appropriate light levels, humidity, temperature and ventilation in the known hibernation roost sites</i> vii. <i>Maintain the number of access points to the roost at an optimal size and in an unlit and unobstructed state, with surrounding vegetation providing sheltered flyways without obstructing access</i> viii. <i>Maintain the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal: bacterial ratio, within typical values for the supporting habitat</i> ix. <i>Maintain the feature's ability, and that of its supporting habitat, to adapt or evolve to wider environmental change, either within or external to the site</i> x. <i>Maintain or, where necessary, restore concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.co.uk)</i> xi. <i>Maintain the management measures (either within and/or outside the site boundary as appropriate) which are necessary to maintain the structure, functions and supporting processes associated with the feature and/or its supporting habitats.</i> xii. <i>Control and minimise human access to roost sites"</i> 						
Listed Threats	<p>The following are considered as threats to the integrity of the Mole Gap to Reigate Escarpment SAC, listed in order of scale (high, medium, low) and with reference to the origin location of threat (inside, outside or both, where applicable).</p> <table> <thead> <tr> <th>High</th> <th>Medium</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> i. Modification of cultivation practices (inside) ii. Biocenotic evolution, succession (inside) iii. Air pollution, air-borne pollutants (both) iv. Interspecific floral relations (inside) </td> <td> <ul style="list-style-type: none"> i. n/a </td> </tr> <tr> <td></td> <td> <ul style="list-style-type: none"> Low i. n/a </td> </tr> </tbody> </table>	High	Medium	<ul style="list-style-type: none"> i. Modification of cultivation practices (inside) ii. Biocenotic evolution, succession (inside) iii. Air pollution, air-borne pollutants (both) iv. Interspecific floral relations (inside) 	<ul style="list-style-type: none"> i. n/a 		<ul style="list-style-type: none"> Low i. n/a
High	Medium						
<ul style="list-style-type: none"> i. Modification of cultivation practices (inside) ii. Biocenotic evolution, succession (inside) iii. Air pollution, air-borne pollutants (both) iv. Interspecific floral relations (inside) 	<ul style="list-style-type: none"> i. n/a 						
	<ul style="list-style-type: none"> Low i. n/a 						

⁹ Natural England (2019) Mole Gap to Reigate Escarpment SAC Conservation Objectives Supplementary Advice. Available at:

<https://publications.naturalengland.org.uk/publication/4911739200077824?category=6528471664689152>

Table 3-3: Screening of Likely Significant Effects for Mole Gap to Reigate Escarpment SAC

Key Issues and Relevant Threats	Justification
Air pollution	Air pollution effects on habitats at Mole Gap to Reigate Escarpment SAC as a result of increased traffic from the Proposed Development are not considered likely to occur, due to the distance between the designated site and the Site. Roads within 200 m of the SAC would not be subject to an increase of 1000 vehicles per day as a result of the Proposed Development, which is the accepted distance and number of vehicles triggering further assessment ^{10,11} .
Fragmentation or loss of supporting habitat for Bechstein's bat	<p>Radio-tracking surveys of Bechstein's bats have shown that they prefer to forage within a short distance from their roosts, typically up to around 1.5 km maximum¹². As the Proposed Development is located approximately 13.5 km away from Mole Gap to Reigate Escarpment SAC at the closest point, it is considered highly unlikely the proposed changes to the Site would have a significant effect on the Bechstein's bat populations associated with the SAC or on their supporting habitat.</p> <p>Bechstein's bats have been recorded foraging on parts of the Site during extensive survey work and radio tracking has found a single male day roosting on Site and a night roost at the golf course area of the Site. No Bechstein's bat maternity roosts have been identified and the radio tracking data has not provided any results showing any link with Mole Gap to Reigate Escarpment SAC. Appropriate mitigation for the foraging and roosting Bechstein's bat populations using the Site are described in the Environmental Statement and associated documents. Whilst the nature of Proposed Development may cause changes to the nature of the Site for bats, the distance from the Mole Gap to Reigate Escarpment SAC and the lack of any evidence connecting the Bechstein's bat population on Site to the SAC makes these changes unlikely to affect habitat connectivity for Bechstein's bat associated with Mole Gap to Reigate Escarpment SAC.</p>

Table 3-4: Conclusions for Mole Gap to Reigate Escarpment SAC

Conclusion – is the Potential Scale or Magnitude of any Effect Likely to be Significant?	
Alone	No
In combination with other plans or projects	Other proposed schemes would be expected to have either no significant effects or no effect on the integrity of the Mole Gap to Reigate Escarpment SAC as a result of controls through their own consents and under the Habitat Regulations. It is assumed that, if required, appropriate mitigation measures would be devised for such schemes. It is considered that any significant effect on the Mole Gap to Reigate Escarpment SAC is unlikely as a result of the Proposed Development, therefore overall, it is unlikely that any significant effects would occur on the SAC in combination with other projects. No further assessment is required. This approach is in accordance with established case law ⁽¹³⁾ , in which the High Court concluded that there is no basis to carry out an assessment of in combination effects of a project when there are no likely significant effects of that project to take into account.
In the absence of mitigation, are the proposals likely to have a significant effect on the National Site Network or Ramsar site?	
No – an Appropriate Assessment is not required.	

¹⁰ Design Manual for Roads and Bridges, Volume 11, Section 3 Part 1 (HA207/07) and subsequent Interim Advice Notes.¹¹ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations.¹² Pimley, E.R., Palmer, E., Sutton, G. and Downs, N.C. (2018) 'Ranging patterns and habitat preferences of Bechstein's bat (*Myotis bechsteinii*) in Worcestershire', *Mammal News*. Available at: https://www.researchgate.net/publication/333783654_Ranging_patterns_and_habitat_preferences_of_Bechstein%27s_bats_Myotis_bechsteinii_in_Worcestershire¹³ R (Foster and Langton) v Forest of Dean DC and Homes and Communities Agency [2015] EWHC 2648 (Admin) Cranston J. September 2015

3.3 The Mens SAC

Table 3-5: Baseline Information for The Mens SAC

Baseline Information	Detail
Relationship between designated site and the Proposed Development	<p>The Mens SAC is located approximately 21.9 km south-west of the Proposed Development at the closest point.</p>
Designated site interest features ¹⁴	<p>The Mens SAC supports the following qualifying features:</p> <p>Annex I habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. 9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (Quercion roburi-petraeae or Ilici-Fagenion). <p>Annex I habitats that are present as a qualifying feature, but not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. Not applicable. <p>Annex II species that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> i. Not applicable. <p>Annex II species that are present as a qualifying feature, but not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. 1308 Barbastelle <i>Barbastella barbastellus</i>.
Conservation objectives of the designated site	<p><i>"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:</i></p> <ul style="list-style-type: none"> i. <i>The extent and distribution of qualifying natural habitats and habitats of qualifying species</i> ii. <i>The structure and function (including typical species) of qualifying natural habitats</i> iii. <i>The structure and function of the habitats of qualifying species</i> iv. <i>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</i> v. <i>The populations of qualifying species, and,</i> vi. <i>The distribution of qualifying species within the site."</i>¹⁵ <p>In addition to the broad targets quoted above, further detail on the conservation objectives and actions for each interest feature is given in the Mens SAC Conservation Objectives Supplementary Advice document¹⁶. With regards to barbastelle, which are considered a qualifying feature of the site (but not primary for designation), this document lists the following targets:</p> <ul style="list-style-type: none"> i. <i>"Maintain a sustainable population, whilst accepting no deterioration from current levels which is above 80 breeding females, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.</i>

¹⁴ Joint Nature Conservation Committee (2015) *The Mens*. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012716.pdf>

¹⁵ Natural England (2018) *The Mens SAC Conservation Objectives*. Available at: <https://publications.naturalengland.org.uk/publication/5642356338458624?category=6528471664689152>

¹⁶ Natural England (2019) *The Mens SAC Conservation Objectives Supplementary Advice*. Available at: <https://publications.naturalengland.org.uk/publication/5642356338458624?category=6528471664689152>

Baseline Information	Detail
	<p>ii. <i>Restore the distribution and continuity of the feature and its supporting habitat, including where applicable its component vegetation types and associated transitional vegetation types, across the site</i></p> <p>iii. <i>Restore the total extent of the habitats which support the feature at 203.28 hectares</i></p> <p>iv. <i>Restore the presence, structure and quality of any linear landscape features which function as flightlines. Flightlines should remain unlit, functioning as dark corridors</i></p> <p>v. <i>Maintain the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal: bacterial ratio, within typical values for the supporting habitat</i></p> <p>vi. <i>Restore any core areas of feeding habitat outside of the SAC boundary that are critical to Barbastelles during their breeding period</i></p> <p>vii. <i>Restore the extent and structural diversity of supporting woodland habitat used for feeding and foraging</i></p> <p>viii. <i>Restore the feature's ability, and that of its supporting habitat, to adapt or evolve to wider environmental change, either within or external to the site</i></p> <p>ix. <i>Restore concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.ac.uk).</i></p> <p>x. <i>Restore the management measures (either within and/or outside the site boundary as appropriate) which are necessary to restore the structure, functions and supporting processes associated with the feature and/or its supporting habitats.</i></p> <p>xi. <i>Control and minimise human access to roost sites</i></p> <p>xii. <i>Where the feature or its supporting habitat is dependent on surface water and/or groundwater, maintain water quality and quantity to a standard which provides the necessary conditions to support the feature."</i></p> <p>Additionally, the South Downs Local Plan¹⁷ states that development proposals on sites which may support or be within close proximity with suitable commuting or foraging habitat for Barbastelle or Bechstein's bat within certain ranges (6.5 km = key conservation area, 12 km = wider conservation area) of the Local Plan Policies Map¹⁸ should have due regard to the possibility that bats will be using the site. The Proposed Development does not fall within the area highlighted in the Local Plan Policies Map for habitat regulations assessment and also falls outside of the key conservation area and wider conservation area for The Mens SAC.</p> <p>The Draft Sussex Bat SAC Planning and Landscape Scale Enhancement Protocol¹⁹ provides further detail on the above protections. The protocol reiterates that bats require functionally linked habitats outside of their immediate roosting area, particularly barbastelles which often forage 10-15 kilometres (and up to a maximum of 20 km²²) from their roosting sites.</p>
Listed Threats	<p>The following are considered as threats to the integrity of The Mens SAC, listed in order of scale (high, medium, low) and with reference to the origin location of threat (inside, outside or both, where applicable).</p> <p>High</p>

¹⁷ South Downs National Park Authority (2019) *South Downs Local Plan*. Available at: https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf

¹⁸ South Downs National Park Authority (2019) *Local Plan Policies Map*. Available at: <https://sdnpa.maps.arcgis.com/apps/webappviewer/index.html?id=41bc8fd8adc34c2e8abd2c4fed013f68>

¹⁹ South Downs National Park Authority and Natural England (2019) *Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol*. Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-15-Draft-Sussex-Bat-SAC-Protocol.pdf>

Baseline Information	Detail
	<ul style="list-style-type: none"> i. Forest and plantation management & use (inside) ii. Other ecosystem modifications (both) iii. Changes in biotic conditions (both) iv. Modification of cultivation practices (inside)
Medium	<ul style="list-style-type: none"> i. n/a
Low	<ul style="list-style-type: none"> i. n/a

Table 3-6: Screening of Likely Significant Effects for The Mens SAC

Key Issues and Relevant Threats	Justification
Air pollution	Air pollution effects on habitats at The Mens SAC as a result of increased traffic from the Proposed Development are not considered likely to occur, due to the distance between the designated site and the Site. Roads within 200 m of the SAC would not be subject to an increase of 1000 vehicles per day as a result of the Proposed Development ²⁰ .
Fragmentation or loss of supporting habitat for barbastelle	The Proposed Development falls entirely outside of the identified Habitat Regulations Assessment buffers identified in the Local Plan Policies Map for the South Downs Local Plan ²¹ , which considers effects on The Mens SAC. Barbastelles have a foraging range of up to 20 km from their roosts ²² ; the Proposed Development falls more than 21 km from The Mens SAC at its closest point. The Proposed Development also falls entirely outside of the 6.5 km 'key conservation area' and 12 km 'wider conservation area' buffers outlined in the South Downs Local Plan. Low numbers of barbastelle have been recorded on parts of the Site during extensive survey work, though no roosts were identified. Appropriate mitigation for the foraging Barbastelle populations using the Site are described in the Environmental Statement and associated documents. Radio tracking has not been undertaken for Barbastelles, though it is considered likely that these are different populations to those at The Mens SAC due to the distance between the Site and the SAC, though barbastelles do forage a considerable distance from their hibernation roosts. Whilst the Proposed Development may cause changes to the nature of the Site for bats, the low number of Barbastelles recorded on Site makes these changes highly unlikely to have a significant effect on the Barbastelle population associated with the Mens SAC.

²⁰ The threshold of 1000 vehicles per day is the lowest level above which traffic models can represent change in traffic conditions to a reasonable level of confidence, and designated sites within 200 m of the affected road network (ARN) are those taken forward for air quality assessments, in accordance with LA 105 Revision 0 of Design Manual for Roads and Bridges (DMRB) (2019)

<https://www.standardsforhighways.co.uk/tes/attachments/10191621-07df-44a3-892e-c1d5c7a28d90?inline=true>. This is also referenced in Natural England's (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations.

²¹ South Downs National Park Authority (unknown date) *Overview Map of all Local Plan Policies*. Available at: <https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/policies-map/overview-map-local-plan-policies/>

²² Zeale, M.R.K., Davidson-Watts, I. and Jones, G. (2012) 'Home range use and habitat selection by barbastelle bats (*Barbastella barbastellus*): implications for conservation', *Journal of Mammalogy*, 93(4), pp. 1110-1118. Available at: <https://academic.oup.com/jmammal/article/93/4/1110/959700>

Table 3-7: Conclusions for The Mens SAC

Conclusion – is the Potential Scale or Magnitude of any Effect Likely to be Significant?	
Alone	No
In combination with other plans or projects	Other proposed schemes would be expected to have either no significant effects or no effect on the integrity of The Mens SAC as a result of controls through their own consents and under the Habitat Regulations. It is assumed that, if required, appropriate mitigation measures would be devised for such schemes. It is considered that any significant effect on The Mens SAC is unlikely as a result of the Proposed Development, therefore overall, it is unlikely that any significant effects would occur on the SAC in combination with other projects. No further assessment is required.
In the absence of mitigation, are the proposals likely to have a significant effect on the National Site Network or Ramsar site?	
No – an Appropriate Assessment is not required.	

3.4 The Ebernoe Common SAC

Table 3-8: Baseline Information for Ebernoe Common SAC

Baseline Information	Detail
Relationship between designated site and the Proposed Development	The Ebernoe Common SAC is located approximately 26.1 km south-west of the Proposed Development at the closest point.
Designated site interest features ²³	<p>Ebernoe Common SAC supports the following qualifying features:</p> <p>Annex I habitats that are a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. 9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (Quercion roburi-petraeae or Ilici-Fagenion). <p>Annex I habitats that are present as a qualifying feature, but not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. Not applicable. <p>Annex II species that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> i. 1308 Barbastelle; and ii. 1323 Bechstein's bat. <p>Annex II species that are present as a qualifying feature, but not a primary reason for selection of the site:</p> <ul style="list-style-type: none"> i. Not applicable.
Conservation objectives of the designated site	<p><i>"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;</i></p> <ul style="list-style-type: none"> i. <i>The extent and distribution of qualifying natural habitats and habitats of qualifying species</i>

²³ Joint Nature Conservation Committee (2015) *Ebernoe Common*. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012715.pdf> <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012716.pdf>

Baseline Information	Detail
	<ul style="list-style-type: none"> ii. <i>The structure and function (including typical species) of qualifying natural habitats</i> iii. <i>The structure and function of the habitats of qualifying species</i> iv. <i>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</i> v. <i>The populations of qualifying species, and,</i> vi. <i>The distribution of qualifying species within the site.</i>²⁴ <p>In addition to the broad targets quoted above, further detail on the conservation objectives and actions for each interest feature is given in the Ebernoe Common SAC Conservation Objectives Supplementary Advice document²⁵. With regards to barbastelle and Bechstein's bat, both of which are considered as qualifying features of the site, this document lists the following targets:</p> <ul style="list-style-type: none"> i. <i>"Restore the abundance of the hibernating population, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.</i> ii. <i>Restore the abundance of the breeding population to a level which is above 100 adult females (for barbastelle) and above 152 adult females (for Bechstein's bat), whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.</i> iii. <i>Maintain the distribution and continuity of the feature and its supporting habitat, including where applicable its component vegetation types and associated transitional vegetation types, across the site</i> iv. <i>Maintain the total extent of the habitats which support the feature (at 234.05 ha)</i> v. <i>Restore the presence, structure and quality of any linear landscape features which function as flightlines. Flightlines should remain unlit, functioning as dark corridors.</i> vi. <i>Restore any core areas of feeding habitat outside of the SAC boundary that are critical to Barbastelles or Bechstein's Bat during their hibernation and breeding period</i> vii. <i>Maintain the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal: bacterial ratio, within typical values for the supporting habitat</i> viii. <i>Maintain the extent and structural diversity of supporting woodland habitat used for feeding and foraging</i> ix. <i>Restore the feature's ability, and that of its supporting habitat, to adapt or evolve to wider environmental change, either within or external to the site (for barbastelles)</i> x. <i>Maintain or, where necessary, restore concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values given for this feature of the site on the Air Pollution Information System (www.apis.ac.uk).</i> xi. <i>Restore and maintain the management measures (either within and/or outside the site boundary as appropriate) which are necessary to Restore and maintain the structure, functions and supporting processes associated with the feature and/or its supporting habitats.</i> xii. <i>Control and minimise human access to roost sites</i> xiii. <i>Where the feature or its supporting habitat is dependent on surface water and/or groundwater maintain water quality and quantity to a standard which provides the necessary conditions to support the feature."</i>

²⁴ Natural England (2018) Ebernoe Common SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/625562916539596?category=6528471664689152>

²⁵ Natural England (2019) Ebernoe Common SAC Conservation Objectives Supplementary Advice. Available at: <https://publications.naturalengland.org.uk/publication/625562916539596?category=6528471664689152>

Baseline Information	Detail
	<p>As also outlined in the Conservation Objectives section for The Mens SAC, the South Downs Local Plan states that development proposals on sites which may support or be within close proximity with suitable commuting or foraging habitat for Barbastelle or Bechstein's bat within certain ranges (6.5 km = key conservation area, 12 km = wider conservation area) of the Local Plan Policies Map should have due regard to the possibility that bats will be using the site. The Proposed Development does not fall within the area highlighted in the Local Plan Policies Map for habitat regulations assessment and also falls outside of the key conservation area and wider conservation area for the Ebernoe Common SAC.</p> <p>As also outlined in the Conservation Objectives section for The Mens SAC, the Draft Sussex Bat SAC Planning and Landscape Scale Enhancement Protocol provides further detail on the above protections. The protocol reiterates that bats require functionally linked habitats outside of their immediate roosting area, particularly barbastelles which often forage 10-15 kilometres (and up to a maximum of 20 km²²) from their roosting sites. Bechstein's tend to forage in and amongst the woodland where they are roosting.</p>
Listed Threats	<p>The following are considered as threats to the integrity of Ebernoe Common SAC, listed in order of scale (high, medium, low) and with reference to the origin location of threat (inside, outside or both, where applicable).</p> <p>High</p> <ul style="list-style-type: none"> i. Human induced changes in hydraulic conditions (both) ii. Other ecosystem modifications (both) iii. Changes in biotic conditions (both) iv. Modification of cultivation practices (inside) v. Forest and plantation management & use (inside) <p>Medium</p> <ul style="list-style-type: none"> i. n/a <p>Low</p> <ul style="list-style-type: none"> i. n/a

Table 3-9: Screening of Likely Significant Effects for Ebernoe Common SAC

Key Issues and Relevant Threats	Justification
Air pollution	Air pollution effects on habitats at Ebernoe Common SAC as a result of increased traffic from the Proposed Development are not considered likely to occur, due to the distance between the designated site and the Site. Roads within 200 m of the SAC would not be subject to an increase of 1000 vehicles per day as a result of the Proposed Development ²⁶ .
Fragmentation or loss of supporting habitat for barbastelle or Bechstein's bat	<p>Impacts on Ebernoe Common SAC for bats are similar to those highlighted for The Mens SAC. The Proposed Development falls entirely outside of the identified Habitat Regulations Assessment buffers identified in the Local Plan Policies Map for the South Downs Local Plan, which considers effects on Ebernoe Common SAC. Barbastelles have a foraging range of up to 20 km from their roosts; the Proposed Development falls more than 26 km from The Ebernoe Common SAC at its closest point. Bechstein's bats prefer to forage within habitats closer to their roosts. The Proposed Development also falls entirely outside of the 6.5 km 'key conservation area' and 12 km 'wider conservation area' buffers outlined in the South Downs Local Plan.</p> <p>Barbastelles and Bechstein's have been recorded foraging in low numbers on parts of the Site during extensive survey work, and a single day and single night (but not maternity) roost have been identified for Bechstein's bats. Appropriate mitigation for the foraging barbastelle and foraging and roosting Bechstein's bat populations using the Site are described in the Environmental Statement and associated documents, though it is considered likely that these are different populations to those at Ebernoe Common SAC, due to the distance between the Site and the SAC. Whilst the nature of Proposed Development may cause changes to the nature of the Site for bats, the distance from the Ebernoe Common SAC makes these changes unlikely to affect habitat connectivity for barbastelle or Bechstein's bat associated with Ebernoe Common SAC.</p>

Table 3-10: Conclusions for Ebernoe Common SAC

Conclusion – is the Potential Scale or Magnitude of any Effect Likely to be Significant?	
Alone	No
In combination with other plans or projects	Other proposed schemes would be expected to have either no significant effects or no effect on the integrity of Ebernoe Common SAC as a result of controls through their own consents and under the Habitat Regulations. It is assumed that, if required, appropriate mitigation measures would be devised for such schemes. It is considered that any significant effect on Ebernoe Common SAC is unlikely as a result of the Proposed Development, therefore overall, it is unlikely that any significant effects will occur on the SAC in combination with other projects. No further assessment is required.
In the absence of mitigation, are the proposals likely to have a significant effect on the National Site Network or Ramsar site?	
No – an Appropriate Assessment is not required.	

²⁶ The threshold of 1000 vehicles per day is the lowest level above which traffic models can represent change in traffic conditions to a reasonable level of confidence, and designated sites within 200 m of the affected road network (ARN) are those taken forward for air quality assessments, in accordance with LA 105 Revision 0 of Design manual for Roads and Bridges (DMRB) (2019)

<https://www.standardsforhighways.co.uk/tses/attachments/10191621-07df-44a3-892e-c1d5c7a28d90?inline=true>

3.5 Arun Valley SAC, SPA and Ramsar Site

3.5.1 Baseline information is provided separately for the Arun Valley SAC, SPA and Ramsar sites, however the impacts on these sites are assessed together in Tables 3-14 and 3-15 as the potential threats from the Proposed Development are the same for each site.

Table 3-11: Baseline Information for Arun Valley SAC

Baseline Information	Detail
Relationship between designated site and the Proposed Development	<p>The Arun Valley SAC is located approximately 25.3 km south-west of the Proposed Development at the closest point.</p>
Designated site interest features ²⁷	<p>Arun Valley SAC supports the following qualifying features:</p> <p>Annex I habitats that are a primary reason for selection of the site:</p> <ol style="list-style-type: none"> Not applicable. <p>Annex I habitats that are present as a qualifying feature, but not a primary reason for selection of the site:</p> <ol style="list-style-type: none"> Not applicable. <p>Annex II species that are a primary reason for selection of this site:</p> <ol style="list-style-type: none"> 4056 Ramshorn snail <i>Anisus vorticulus</i> <p>Annex II species that are present as a qualifying feature, but not a primary reason for selection of the site:</p> <ol style="list-style-type: none"> Not applicable.
Conservation objectives of the designated site	<p><i>"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:</i></p> <ol style="list-style-type: none"> <i>The extent and distribution of the habitats of qualifying species</i> <i>The structure and function of the habitats of qualifying species</i> <i>The supporting processes on which the habitats of qualifying species rely</i> <i>The populations of qualifying species, and,</i> <i>The distribution of qualifying species within the site."</i>²⁸ <p>In addition to the broad targets quoted above, further detail on the conservation objectives and actions for the interest feature is given in the Arun Valley SAC Conservation Objectives Supplementary Advice document²⁹.</p>

²⁷ Joint Nature Conservation Committee (2016) Arun Valley. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030366.pdf> <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012715.pdf> <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012716.pdf>

²⁸ Natural England (2018) Arun Valley SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/4924283725807616?category=6528471664689152>

²⁹ Natural England (2019) Arun Valley SAC Conservation Objectives Supplementary Advice. Available at: <https://publications.naturalengland.org.uk/publication/4924283725807616?category=6528471664689152>

Baseline Information	Detail
	<p>This document lists the following targets:</p> <ul style="list-style-type: none"> i. <i>"Maintain the abundance of the population at a level within the known core population areas at Pulborough Brooks.</i> ii. <i>Restore the population within Amberley Wild Brooks.</i> iii. <i>Maintain the distribution and continuity of the feature and its supporting habitat, including where applicable its component vegetation types and associated transitional vegetation types, across the site</i> iv. <i>Maintain the total extent of the habitats which support the feature</i> v. <i>Maintain a physical structure dominated by unshaded, gently-shelving ditch margins with low levels of accumulated in-channel silt</i> vi. <i>Maintain a well-vegetated channel, with native vegetation in at least 10% of ditches with a ratio of 50:50 emergent to floating/submerged</i> vii. <i>Maintain open, lightly grazed ditch channel margins</i> viii. <i>Maintain the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal: bacterial ratio, within typical values for the supporting habitat</i> ix. <i>Ensure invasive non-native species which pose a threat to the feature are either absent or being contained at a level which does not significantly affect the feature</i> x. <i>Restore the feature's ability, and that of its supporting habitat, to adapt or evolve to wider environmental change, either within or external to the site</i> xi. <i>Maintain the management measures (either within and/or outside the site boundary as appropriate) which are necessary to Maintain the structure, functions and supporting processes associated with the feature and/or its supporting habitats</i> xii. <i>Restore a total phosphorus level <0.1 mg L-1</i> xiii. <i>Maintain water quantity to a standard which provides the necessary conditions to support the feature</i> xiv. <i>Maintain salinity at a level which would not significantly affect <i>Anisus</i> populations."</i>
Listed Threats	<p>The following are considered as threats to the integrity of Arun Valley SAC, listed in order of scale (high, medium, low) and with reference to the origin location of threat (inside, outside or both, where applicable).</p> <p>High</p> <ul style="list-style-type: none"> i. Human induced changes in hydraulic conditions (both) <p>Medium</p> <ul style="list-style-type: none"> i. n/a <p>Low</p> <ul style="list-style-type: none"> i. n/a

Table 3-12: Baseline Information for Arun Valley SPA

Baseline Information	Detail
Relationship between designated site and the proposed Development	<p>The Arun Valley SPA is located approximately 25.3 km south-west of the Proposed Development at the closest point.</p>
Designated site interest features ³⁰	<p>Arun Valley SPA has been designated for supporting the following qualifying features:</p> <p>Internationally important populations of the following Annex 1 bird species:</p> <ul style="list-style-type: none"> i. Bewick's swan <i>cygnus columbianus bewickii</i> (1.6% of the Great Britain population) <p>The site is also regularly used by over 20,000 waterfowl (27,241 peak mean from 1992 to 1997).</p> <p>The site also supports nationally important populations of several bird species, which are not considered to be qualifying features:</p> <ul style="list-style-type: none"> i. Wigeon <i>Anas penelope</i> ii. Teal <i>Anas crecca</i> iii. Pintail <i>Anas acuta</i> iv. Shoveler <i>Anas clypeata</i> v. Ruff <i>Philomachus pugnax</i> (Annex 1 species) <p>The following Annex 1 species also appear on the SPA, though their populations are not considered nationally important and they are not considered to be qualifying features:</p> <ul style="list-style-type: none"> i. Golden plover <i>Pluvialis apricaria</i> ii. Kingfisher <i>Alcedo atthis</i>
Conservation objectives of the designated site	<p><i>"Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</i></p> <ul style="list-style-type: none"> i. <i>The extent and distribution of the habitats of the qualifying features</i> ii. <i>The structure and function of the habitats of the qualifying features</i> iii. <i>The supporting processes on which the habitats of the qualifying features rely</i> iv. <i>The population of each of the qualifying features, and,</i> v. <i>The distribution of the qualifying features within the site."</i>³¹ <p>In addition to the broad targets quoted above, further detail on the conservation objectives and actions for each interest feature is given in the Arun Valley SPA Conservation Objectives Supplementary Advice document³².</p> <p>This document lists the following targets:</p>

³⁰Natural England (2016) Arun Valley SPA Citation. Available at: <https://publications.naturalengland.org.uk/publication/4567444756627456>

³¹ Natural England (2016) Arun Valley SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/4567444756627456?category=6528471664689152>

³² Natural England (2019) Arun Valley SPA Conservation Objectives Supplementary Advice. Available at: <https://publications.naturalengland.org.uk/publication/4567444756627456?category=6528471664689152>

Baseline Information	Detail
	<p>i. "Restore the size of the non-breeding population at a level which is at or above 115 individuals (calculated at a 5 year peak mean at time of notification), whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent of 33 (5 year peak mean from 2012/13-2016/17).</p> <p>ii. Maintain cover/abundance of preferred food plants (e.g. <i>Potamogeton</i>, <i>Ceratophyllum</i>, <i>Zannichellia</i>, <i>Myriophyllum</i>, <i>Chara spp.</i>).</p> <p>iii. Maintain the extent and distribution of suitable habitat (either within or outside the site boundary) which supports the feature for all necessary stages of the non-breeding/wintering period (moulting, roosting, loafing, feeding)</p> <p>iv. Maintain the safe passage of birds moving between roosting and feeding areas</p> <p>v. Maintain the availability of cereal grains, rape, potatoes and sugar beet, where these sources are locally important to feeding flocks</p> <p>vi. Maintain cover/abundance of preferred food plants (e.g. <i>Lolium perenne</i>, <i>Glyceria fluitans</i>, <i>Phleum pratense</i>, <i>Rorippa amphibia</i>, <i>Alopecurus geniculatus</i>).</p> <p>vii. Maintain the hydrology of a waterbody used as a feeding site such that water levels continue to fluctuate by 5-15% each month.</p> <p>viii. Maintain the availability of standing water of <1 m deep, over at least 50% of the total standing water area.</p> <p>ix. Where the supporting habitats of the SPA feature are dependent on surface water ensure water quality and quantity is restored to a standard which provides the necessary conditions to support the feature</p> <p>x. Total phosphorus <0.1 mg L⁻¹</p> <p>xi. Maintain and where necessary restore management or other measures (whether within and/or outside the site boundary as appropriate) necessary to maintain and restore the structure, function and/or the supporting processes associated with the feature and its supporting habitats.</p> <p>xii. Maintain hydrological processes to ensure water availability in feeding sites, with visible areas of standing shallow water</p> <p>xiii. Maintain the number of large waterbodies of optimal size (typically >10 ha).</p> <p>xiv. Restrict the frequency, duration and/or intensity of disturbance within close proximity of affecting roosting, foraging, feeding, moulting and/or loafing birds so that the feature is not significantly disturbed</p> <p>xv. Maintain open and unobstructed terrain within and around roosting and feeding areas, with no overall decrease in field sizes</p> <p>xvi. Maintain The extent and distribution of predominantly short (<10 cm) grassland swards in areas used for feeding</p> <p>xvii. Restore the overall abundance of the non-breeding assemblage to a level which is above 27,241 individual waterfowl (based on a 5 year peak mean around time of notification - 1992/93 to 1996/97), whilst avoiding deterioration from its current level as indicated by the latest 5 year peak mean count or equivalent.</p> <p>xviii. Maintain the species diversity of the bird assemblage.</p> <p>xix. Maintain the extent and distribution of habitats which support the assemblage feature during all necessary stages (moulting, roosting, loafing, and feeding) of the non-breeding period of the full open water and land within SSSI/SPA areas of 530.42ha.</p> <p>xx. Where the supporting habitats of the SPA feature are dependent on surface water ensure water quality and quantity is maintained to a standard which provides the necessary conditions to support the feature</p> <p>xxi. Maintain and where necessary restore management or other measures (whether within and/or outside the site boundary as appropriate) necessary to maintain or the structure, function and/or the supporting processes associated with the feature and its supporting habitats.</p>

Baseline Information	Detail
	<p>xxii. <i>Restrict the frequency, duration and/or intensity of disturbance affecting moulting, loafing, feeding and/or roosting birds so that the assemblage feature is not significantly disturbed</i></p> <p>xxiii. <i>Maintain structure, function and availability of the following habitats which support the main component species of the assemblage feature for all stages (moulting, roosting, loafing, feeding) of the non-breeding period.</i></p> <p>The South Downs Local Plan states that development proposals within 5 km of the Arun Valley SPA on greenfield sites need to undertake an appraisal as to whether the land holds suitability for Bewick's swan. If found suitable, surveys would be undertaken to determine the site's importance for this species and appropriate alternative habitat may be required before development can proceed. The Proposed Development does not fall within 5 km of the Arun Valley SPA and so no appraisal or surveys are appropriate.</p>
Listed Threats	<p>The following are considered as threats to the integrity of Arun Valley SPA, listed in order of scale (high, medium, low) and with reference to the origin location of threat (inside, outside or both, where applicable).</p> <p>High</p> <p>i. Human induced changes in hydraulic conditions (both)</p> <p>Medium</p> <p>i. n/a</p> <p>Low</p> <p>i. n/a</p>

Table 3-13: Baseline Information for Arun Valley Ramsar Site

Baseline Information	Detail
Relationship between Designated Site and Site	<p>The Arun Valley Ramsar site is located approximately 25.3 km south-west of the Proposed Development at the closest point.</p>
Designated site interest features ³³	<p>The site is designated under Ramsar criteria 2, 3 and 5.</p> <p>Ramsar Criterion 2 – <i>"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."</i></p> <p>Ramsar Criterion 3 – <i>"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 <i>Lemna</i> species, all five <i>Rorippa</i> species, and all three British 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."</i></p> <p>Ramsar Criterion 5 – <i>"Internationally important waterfowl assemblage (greater than 20,000 birds)."</i></p>

³³ Ramsar Sites Information Service (1999) Arun Valley Ramsar Information Sheet. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1011RIS.pdf>

Baseline Information	Detail
Site vulnerability and management statement summary	<p>The site vulnerability and management statement within the Ramsar site information sheet is summarised below:</p> <ul style="list-style-type: none"> i. Sympathetic management of wet grassland and grazing marsh habitats is essential for achieving favourable condition ii. Summer grazing, ditch management and control of fertiliser usage within the valley are essential management measures iii. The hydrology of the area is also vital, and changes to the hydrology (including water abstraction from the Greensand aquifer) has led to the drying out of the site iv. Agricultural changes must be carefully managed

Table 3-14: Screening of Likely Significant Effects for Arun Valley SAC, SPA and Ramsar Site

Key Issues and Relevant Threats	Justification
Water quantity and quality	<p>Natural England raised concerns in their 21 May 2020 correspondence (see Appendix 2) regarding water usage resulting from the creation of new homes as part of the Proposed Development, and the additional strain this could place on the groundwater abstraction at Hardham and as such the Arun Valley SAC, SPA and Ramsar site. This is also outlined in a Natural England position statement on water abstractions within the Sussex North Water Supply Zone³⁴. A Water Neutrality Statement (WNS, ref: WOI-HPA-DCO-WNS-01) has been prepared by WSP in support of the Proposed Development and in response to the concerns of Natural England. In order to inform the WNS, WSP produced a Groundwater Initial Feasibility and Hydrogeological Risk Assessment for the Proposed Development, which is included as Appendix B in the May 2024 West of Ifield EIA Scoping Opinion Request Report.</p> <p>As the WNS and Groundwater Initial Feasibility and Hydrogeological Risk Assessment documents are concerned with measures to reduce or avoid adverse effects identified by the Natural England position statement on water abstraction they cannot be considered at the HRA Screening stage and so information on them is contained in the HRA Appropriate Assessment report submitted with the hybrid planning application (ref: WOI-HPA-DOC-HRA2-01). The Stage 2 assessment undertaken by WSP has been updated with the knowledge of data which has been collected from further drilling, installation and testing of production boreholes, the outcome of which is presented in the WSP report to inform Appropriate Assessment (ref: WOI-HPA-DOC-HRA2-01).</p>

Table 3-15: Conclusions for Arun Valley SAC, SPA and Ramsar Site

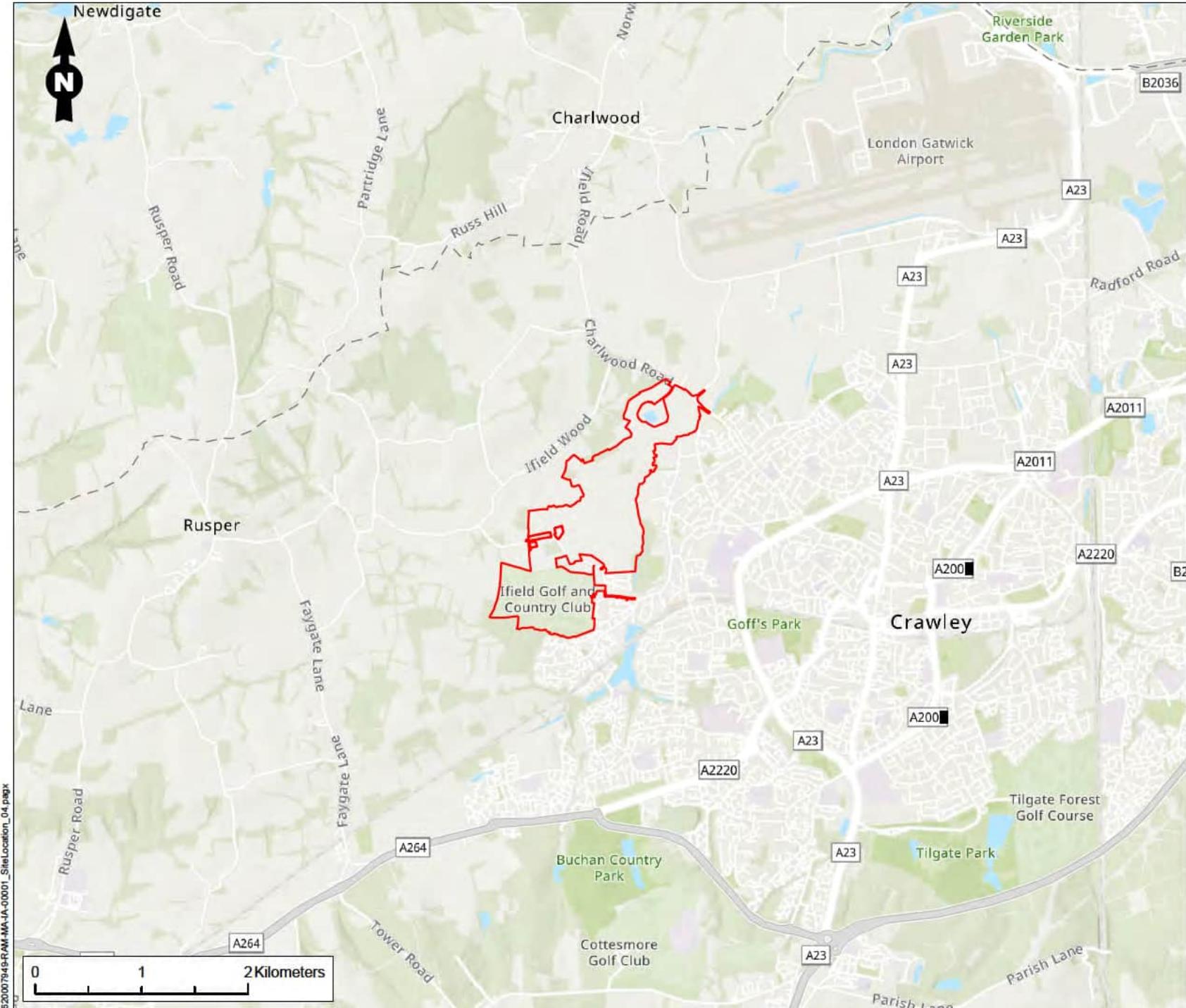
Conclusion – is the Potential Scale or Magnitude of any Effect Likely to be Significant?	
Alone	A likely significant effect on the Arun Valley SAC, SPA and Ramsar sites cannot be ruled out due to risks surrounding water neutrality during the completed development stage of the Proposed Development.
In combination with other projects	All developments within the Sussex North Water Supply Zone are subject to the Natural England groundwater abstraction restrictions, therefore, provided that other developments in the area follow sufficient water neutrality strategies, no in-combination effects are anticipated.
In the absence of mitigation, are the proposals likely to have a significant effect on the National Site Network or Ramsar site?	
Yes – an Appropriate Assessment is required.	

³⁴ Natural England (2021) *Natural England's Position Statement for Applications within the Sussex North Water Supply Zone*. Available at: https://www.southdowns.gov.uk/wp-content/uploads/2021/10/NE_Position_statement_Water_Neutrality_Sept.21-Final.pdf

4 CONCLUSIONS

- 4.1.1 This report has been prepared to provide information to the competent authority regarding the potential for the Proposed Development to have likely significant effects on designated sites, in accordance with the HRA process required under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
- 4.1.2 The effects of the Proposed Development have been discussed using available information and professional judgement.
- 4.1.3 Significant adverse effects on the Mole Gap to Reigate Escarpment SAC, The Mens SAC and Ebernoe Common SAC and their qualifying features as a result of the Proposed Development are not considered likely either alone or in combination with other schemes, due to their distance from the Site. Therefore, additional assessment or mitigation for these designated sites is not required, and there is no requirement for an Appropriate Assessment for these three designated sites.
- 4.1.4 Likely significant effects at Arun Valley SAC, SPA and Ramsar site cannot be ruled out at the Screening assessment stage and should be carried forward to the Appropriate Assessment stage.
- 4.1.5 A report to inform an Appropriate Assessment considering the likely significant effects on Arun Valley SAC, SPA and Ramsar site has been prepared by WSP (ref: WOI-HPA-DCO-HRA2-01). This has been presented in a separate report, and accompanies the hybrid planning application.

APPENDIX 1
FIGURES



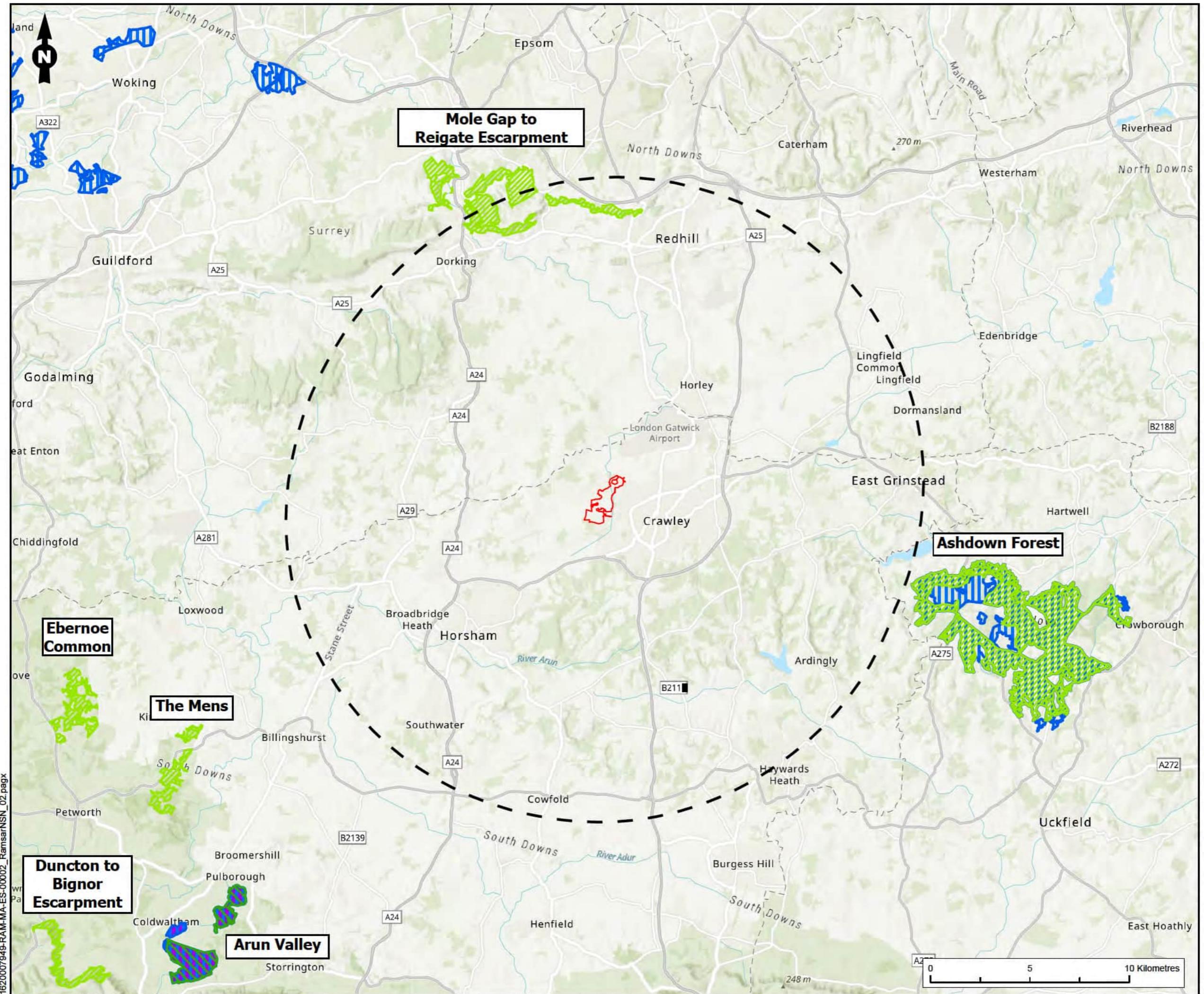


Figure Title National Site Network and Ramsar Sites				
Project Name West of Ifield				
Project No. 1620007949-003				
Date May 2025	Figure No. 2	Revision 2.0		
Prepared By MB	Scale 1:180,000 @A3			
Client Homes England				
RAMBOLL				