



Homes  
England

# West of Ifield, Crawley

## Shadow Habitats Regulation Assessment

### Appropriate Assessment

WOI-HPA-DOC-HRA2-01

Version 1 - Planning submission

July 2025





Homes England

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# WEST OF IFIELD

Habitats Regulations Assessment Appropriate  
Assessment





Homes England

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## **WEST OF IFIELD**

Habitats Regulations Assessment Appropriate Assessment

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## EXECUTIVE SUMMARY

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Homes England is proposing to submit a hybrid planning application for the redevelopment of a 'Site' currently comprising an expanse of arable and rural habitats. The 'Proposed Development' would see a residential-led mixed use development comprising up to 3,000 homes, associated amenities including a local centre, employment space, and primary and secondary schools.

Under the requirements of the Conservation of Habitats and Species Regulations 2017 ('The Habitats Regulations') it is necessary to consider whether the Proposed Development may have significant effects upon areas of nature conservation importance (Habitats Sites). 'Stage 1 Screening' for information to inform a Habitats Regulations Assessment (HRA) of the Proposed Development was initially completed by Ramboll in 2023 (and subsequently updated in 2024 and 2025), which identified the potential for Likely Significant Effects on the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site as a result of increased water demand from the residential and non-residential elements.

Homes England commissioned WSP to undertake an update of the Stage 1 Screening assessment (specifically in relation to consideration of in-combination effects of air quality on Ebernoe Common SAC, Mole Gap to Reigate Escarpment SAC and The Mens SAC), and the 'Stage 2 – Appropriate Assessment' for the Proposed Development.

Air quality modelling completed to inform the emerging Horsham District Local Plan 2023-2040 (assumed to be withdrawn), Mole Valley Local Plan 2020-2039 and the emerging Crawley Borough Council Local Plan 2024-2040 confirmed no adverse effects arising from changes to traffic movements through planned development, including the Proposed Development which is an allocation in Horsham District Local Plan 2023-2040 (assumed to be withdrawn). Based on this detailed review of data used to underpin the local plans, it is concluded that there is no potential for in-combination effects due to changes in air quality on Mole Gap to Reigate Escarpment SAC, Ebernoe Common SAC or The Mens SAC.

The information to inform Appropriate Assessment set out in this report was informed by a review of the Water Neutrality Strategy (WNS) produced for the Proposed Development. The WNS sets out four viable mitigation scenarios to achieving water neutrality based on inbuilt mitigation or measures which have been demonstrated through testing to be viable. Such measures include the removal of an existing golf course on site, provision of water efficient fixtures and fittings, rainwater harvesting from residential properties (and commercial units, where required) treated and blended with groundwater abstracted from one or more boreholes, as required. Three of these scenarios include Sussex North Offsetting Water Scheme (SNOWS) credit provision for up to 1600 homes (with the potential for additional credits to be secured, if required), while the fourth mitigation strategy presents a viable route to water neutrality without reliance on SNOWS credit availability. Scenarios are provided because planning applications can only be allocated to available capacity in the SNOWS scheme following full or reserved matters approval. All four of the mitigation scenarios are detailed fully within the WNS and are expected to offset the baseline water demand value of 710,328 litres per day in its entirety. As such, the WNS demonstrates that it is feasible to achieve water neutrality with or without reliance on the SNOWS scheme, and therefore it is concluded that the Proposed Development can proceed without adverse impacts on the integrity of Arun Valley SAC, SPA and Ramsar site alone or in-combination.

# 1 INTRODUCTION

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## PROJECT BACKGROUND

- 1.1.1. WSP has been appointed by Homes England (the “Client” and the “Applicant”) to prepare an Information to Inform Habitats Regulations Assessment (HRA) Appropriate Assessment report in relation to proposed works at West of Ifield, Crawley, West Sussex (referred to as the “Site” and “Proposed Development”).
- 1.1.2. The Proposed Development encompasses the intent of Homes England to submit an outline planning application for the development of the Site to provide a residential-led mixed use development comprising up to 3,000 homes and associated amenities including a local centre, employment space and primary and secondary schools.
- 1.1.3. The Site is centred approximately around National Grid Reference TQ 24161 37398 and falls within the administrative area of Horsham District Council (HDC), for a pedestrian and cycle link to the existing residential area. The location of the Site is shown on Figure 1.
- 1.1.4. A Habitats Regulations Screening Assessment report (information to inform) was produced for the Proposed Development on behalf of the Client by Ramboll in June 2023, and subsequently updated in June 2024 and March 2025 (Ramboll, 2025). The information to inform Appropriate Assessment presented within this report builds on the Screening Assessment report and relevant context and findings are summarised within this report where appropriate.

## PURPOSE OF THIS DOCUMENT

- 1.1.5. Under the requirements of UK law through the Conservation of Habitats and Species Regulations 2017 (‘The Habitats Regulations’) (as originally derived from the European Council Directive 92/43/EEC ‘The Habitats Directive and the Council Directive 79/409/EEC ‘The Wild Birds Directive’), it is necessary to consider whether the Proposed Development may have significant effects upon areas of nature conservation importance designated/classified under the Directives. The Habitats Regulations place a duty upon ‘Competent Authorities’ to consider the potential for effects upon ‘Habitats Sites’ (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) prior to granting consent for projects or plans. As set out further below in Section 1.1.7, under national planning policy this also extends to Ramsar sites, potential SPAs, candidate SACs and sites designated as compensation for existing or candidate Habitats Sites, all of which are collectively referred to in this report as Habitats Sites. Should likely significant effects be identified by the initial screening process, it is necessary to further consider the effects by way of an ‘Appropriate Assessment’. Overall, this process of assessment is known as HRA and further details of the applicable legislative context are summarised within the Legislative Context section below.
- 1.1.6. This document comprises a report to inform the HRA in relation to the Proposed Development to assist the Competent Authority in the planning determination process. The report presented here constitutes information to inform HRA at Stage 1 Screening assessment (specifically in relation to consideration of in-combination effects of air quality on Ebernoe Common SAC and The Mens SAC), and the ‘Stage 2 – Appropriate Assessment’ for the Proposed Development.



## **Stage 1 - Screening**

- 1.1.7. Stage 1 Screening provides information to enable the screening of the Proposed Development, covering the following four elements:
- determining whether the plan is directly connected with, or necessary for, the management of Habitats Sites;
  - describing the project/plan that may have the potential for significant effects upon Habitats Sites;
  - undertaking an initial scoping for potential direct and indirect impacts upon the relevant Habitats Sites; and
  - assessing the likely significance of any potential effects identified as resulting from these impacts, both alone and in-combination with other plans and projects.
- 1.1.8. This document summarises the results of the screening exercise previously completed by Ramboll (2025) and provides updates in relation to in-combination effects for air quality for certain Habitats Sites.

## **Stage 2 – Appropriate Assessment**

- 1.1.9. The second part of this document provides information to enable the Competent Authority to undertake an Appropriate Assessment. This typically includes:
- Detailing the entirety of the habitat types and species for which the relevant Habitats Sites are protected.
  - Identifying and examining the implications of the Proposed Scheme for the designated features present on the Habitats Site, including for the typical species of designated habitats as well as the implications for habitat types and species present outside of the boundaries of the Habitats Sites and functionally linked land; insofar as those implications are liable to affect the conservation objectives of the Habitats Site.
  - Provision of complete, precise and definitive findings and conclusions indicating that there is no reasonable scientific doubt as to the effects of the proposed plan or project.
- 1.1.10. The Appropriate Assessment within this document solely relates to issues of water abstraction on the Arun Valley SAC, SPA and Ramsar site, which was identified as a LSE during the Ramboll HRA (2025).
- 1.1.11. A description of the Proposed Development and the Habitats Sites identified are provided within Sections 2 and 3 respectively. Consideration of potential effects of the Proposed Development upon the Habitats Sites in the absence of mitigation (Screening) and whether these are likely to be significant is provided within Section 4.

# **HABITATS REGULATIONS ASSESSMENT CONTEXT**

## **LEGISLATIVE CONTEXT**

### **Habitats Regulations Assessment**

- 1.1.12. Under the Habitats Regulations, Competent Authorities, in this case HDC along with other regulators relevant to permissions and consents associated with the Proposed Development, must assess projects for their potential to result in likely significant effects (LSE) on Habitats Sites. Where the project may lead to LSE or such effects cannot be ruled out on the basis of objective

information, it must be subject to a HRA to determine whether there will be adverse effects to any European sites<sup>1</sup>. Any Proposed Development that would lead to adverse effects on the integrity of European site(s) cannot be permitted without meeting strict additional tests.

1.1.13. Regulation 63 (1) of the Habitats Regulations<sup>2</sup> states that

*‘...a Competent Authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—*

*(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*

*(b) is not directly connected with or necessary to the management of that site,*

*—must make an appropriate assessment of the implications for that site in view of that site’s conservation objectives.’*

1.1.14. The Habitats Regulations also make allowance for projects or plans to be consented if they satisfy ‘imperative reasons of overriding public interest’. Regulation 64<sup>3</sup> relates to such situations.

1.1.15. The Competent Authority must include consideration of ‘in-combination’ effects arising from other projects and plans within their assessment, as well as those potentially acting alone.

1.1.16. In England, the Habitats Regulations that transposed the provisions of the Habitats Directive<sup>4</sup> and the Wild Birds Directive set out the processes to be followed when a proposed plan or project may affect a designated or notified site. On the UK’s exit from the EU, the Habitats Regulations provisions continue to have effect.

1.1.17. As a consequence of the UK’s exit from the EU, SACs and SPAs in the UK no longer form part of the EU’s Natura 2000 ecological network<sup>5</sup>. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 amended the Habitats Regulations so as to create the National Site Network on land and at sea, including both the inshore and offshore marine areas in the UK. The National Site Network includes:

- existing SACs and SPAs; and

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<sup>1</sup> European sites as defined under the Conservation of Habitats and Species Regulations 2017, as amended, refer to those which are classified pursuant to EU Directives and are considered to comprise SACs, SPAs, proposed SACs, potential SPAs, Ramsar sites and areas secured as sites compensating for damage to a European site.

<sup>2</sup> Regulation 63 of the Habitats Regulations. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/regulation/63/made>.

<sup>3</sup> Regulation 64 of the Habitats Regulations. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/regulation/64/made>.

<sup>4</sup> The ‘Habitats Directive’ (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora) protects habitats and species of European Sites. Together with the ‘Birds Directive’ (Council Directive 2009/147/EC on the Conservation of Wild Birds), the Habitats Directive establishes a network of internationally important sites designated for their ecological status. The Habitats Directive was transposed into British law through the Habitats Regulations.

<sup>5</sup> The European sites noted in the text combined to create a Europe-wide ‘Natura 2000’ network of Habitats sites under the EU Habitats Directive.

- new SACs and SPAs designated under the Habitats Regulations.

1.1.18. Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new National Site Network.

1.1.19. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:

- fulfil the commitment made by government to maintain environmental protections; and
- continue to meet the UK's international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR) and Bonn and Ramsar Conventions.

1.1.20. The use of the term Favourable Conservation Status (FCS) is not amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the term still has the meaning given by Article 1 of the Habitats Directive. Defra (2021) does however note that "*an appropriate authority is only responsible for managing and adapting the national site network to secure FCS of a feature proportionately to the importance of the UK within the feature's natural range*". The Habitats Directive provides further interpretation of the meaning of 'favourable conservation status' within Article 1 parts a, e and i as below.

*'(a) conservation means a series of measures required to maintain or restore the natural habitats and the populations of species of wild fauna and flora at a favourable status as defined in (e) and (i);.....*

*(e) conservation status of a natural habitat means the sum of the influences acting on a natural habitat and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species within the territory referred to in Article 2. The conservative status of a natural habitat will be taken as "favourable" when:*

- *its natural range and areas it covers within that range are stable or increasing, and*
- *the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and*
- *the conservation status of its typical species is favourable as defined in (i);*

*(i) conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within the territory referred to in Article 2; The conservation status will be taken as "favourable" when:*

- *- population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and*
- *- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and*
- *- there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis'.*

1.1.21. There are a number of recent Court of Justice of the European Union (CJEU) and UK High Court rulings which are relevant to this HRA and these are summarised in Appendix A.

## POLICY CONTEXT

### National Planning Policy Framework 2024 (NPPF)

- 1.1.22. The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development (including the Proposed Development) can be produced. It must be taken into account in preparing the development plan and is a material consideration in planning decisions.
- 1.1.23. The NPPF states that when considering the conservation and enhancement of the natural environment, with regard to habitats and biodiversity, the Local Planning Authority should:
- a) *'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
  - b) *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'*
- 1.1.24. In addition, the NPPF states the following with regards to designated sites:
- 'The following should be given the same protection as habitats sites:*
- a) *potential Special Protection Areas and possible Special Areas of Conservation;*
  - b) *listed or proposed Ramsar sites; and*
  - c) *sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

*The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats sites (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats sites.'*

### HORSHAM DISTRICT PLANNING FRAMEWORK

- 1.1.25. Local planning policy in HDC is currently directed by the Horsham District Planning Framework (excluding South Downs National Park) Local Plan for Horsham District (Adopted November 2015). The relevant policy relating to biodiversity is Policy 31: Green Infrastructure and Biodiversity. Policy 31 states that:
- 'Particular consideration will be given to the hierarchy of sites and habitats in the district as follows:*
- i) Special Protection Area (SPA) and Special Areas of Conservation (SAC)*
  - ii) Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNRs)*
  - iii) Sites of Nature Conservation Importance (SNCIs), Local Nature Reserves (LNRs) and any areas of ancient woodland, local geodiversity or other irreplaceable habitats not already identified in i) and ii) above.*

*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 (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.*

*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.'*

## **STAGES OF HABITATS REGULATIONS ASSESSMENT**

- 1.1.26. Guidance on managing Natura 2000 sites (now sites within the National Site Network) and the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC<sup>6</sup> (2018) sets out the step-wise approach which should be followed to enable Competent Authorities to discharge their duties under the Habitats Directive and provides further clarity on the interpretation of Articles 6 (3) and 6 (4), as presented below (with additional interpretation in brackets).

*Article 6(3) defines a step-wise procedure for considering plans and projects.*

*a) The first part of this procedure consists of a pre-assessment stage ('screening')\* to determine whether, firstly, the plan or project is directly connected with or necessary to the management of the site, and secondly, whether it is likely to have a significant effect on the site; it is governed by Article 6(3), first sentence. \*(Often commonly referred to in practice as HRA Stage 1 – Screening)*

*b) The second part of the procedure, governed by Article 6(3), second sentence, relates to the appropriate assessment\*\* and the decision of the competent national authorities. (A simplified flow chart of this procedure is presented in Annex II at the end of the guidance document). \*\*(Often commonly referred to in practice as HRA Stage 2 – Appropriate Assessment)*

*A third part of the procedure (governed by Article 6(4)) comes into play if, despite a negative assessment, it is proposed not to reject a plan or project but to give it further consideration. In this case Article 6(4) allows for derogations from Article 6(3) under certain conditions.*

*The applicability of the procedure, and the extent to which it applies, depend on several factors, and in the sequence of steps, each step is influenced by the previous step. The order in which the steps are followed is therefore essential for the correct application of Article 6(3).*

- 1.1.27. As set out in Regulation 3 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 where Natura 2000 sites are referenced in previously issued guidance, this

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<sup>6</sup> Commission Notice C(2018) 7621 final, Brussels, 21.11.2018 *Managing Natura 2000 sites - The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC* Available in all EU languages from:  
[http://ec.europa.eu/environment/nature/natura2000/management/guidance\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm)

should be interpreted as relating to the National Site Network but does not otherwise affect guidance as it applied, before EU exit day.

- 1.1.28. Under the Habitats Regulations in England and Wales the approach taken to the stage referred to as 'derogation' follows the same fundamental steps as established above in EC Guidance, comprising consideration of alternative solutions, IROPI, and compensatory measures.
- 1.1.29. Should consideration of a proposal need to progress beyond a failing of the Stage 2 integrity test, this derogation process requires consideration, notification to the Secretary of State for the relevant UK government department or Welsh Government, and the passing of three legal tests:
- There are no feasible alternative solutions that would be less damaging or avoid damage to the site.
  - The proposal needs to be carried out for imperative reasons of overriding public interest.
  - The necessary compensatory measures can be secured.
- 1.1.30. This report presents information to enable the screening assessment required as part of Stage 1 and 2 of the HRA process.
- 1.1.31. The precautionary principle is applied at all stages of the HRA process. In relation to screening this means that projects or plans where effects are considered likely and those where uncertainty exists as to whether effects are likely to be significant must be subject to the second stage of the HRA process, Appropriate Assessment.

## IN-COMBINATION ASSESSMENT

- 1.1.32. It is a requirement of the Habitats Regulations to consider the effects of projects or plans "in combination". Regulation 24, 63 and 105 of the Habitats Regulations require Natural England and other competent authorities to consider the effects of plans or projects alone and in combination with other plans or projects. The 'in-combination' requirement is undertaken in order to make sure that prior to their authorisation the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.
- 1.1.33. The landmark Waddenzee judgment provides a clear interpretation of the legislation. Paragraphs 53 and 54 of the Judgment state:
- "according to the wording of that provision [Article 6(3) of the Habitats Directive] an appropriate assessment of the implications for the site concerned of the plan or project must precede its approval and take into account the cumulative effects which result from the combination of the plan or project with other plans or projects in view of the sites conservation objectives. Such an assessment therefore implies that all the aspects of the plan or project which can, individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field. ...."*
- 1.1.34. Table 1-1 outlines the types of plans and projects that should be considered in an in-combination assessment:

**Table 1-1 – Types of plans and projects considered at "In-combination" assessment**

■ The incomplete or non-implemented parts of plans or projects that have already commenced.
■ Plans or projects given consent or given effect but not yet started.
■ Plans or projects currently subject to an application for consent or proposed to be given effect.
■ Projects that are the subject of an outstanding appeal.
■ Ongoing plans or projects that are the subject of regular review.
■ Any draft plans being prepared by any public body.
■ Any proposed plans or projects published for consultation prior to application.
■ Projects being proposed or being undertaken by a competent authority itself which require no external authorisation.

1.1.35. Based on this complexity and need for consistency in the assumptions relating to mitigation, a precautionary approach should be adopted when considering the HRA conclusions of overlapping plans and projects in-combination.



## 2 PROPOSED SCHEME BACKGROUND AND DESCRIPTION

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### PROPOSED SCHEME OVERVIEW

- 2.1.1. The Proposed Development would comprise the redevelopment of the Site, an existing area of arable and rural habitat, into a residential-led mixed-use development comprising up to 3,000 homes and associated amenities including a local centre, employment space, and primary and secondary schools.
- 2.1.2. In particular, the Proposed Development is described as follows:
- “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.*
- This hybrid planning application is accompanied by an Environmental Statement.*
- 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.”*
- 2.1.3. The Proposed Development is split into four plots: The Hillside and Woodlands; The Neighbourhood Centre; the River Valley; and the Meadows. The Hillside and Woodlands and the Meadows plots will consist solely of residential developments containing 830 and 1,240 homes respectively. The Neighbourhood Centre and River Valley plots will include both residential (620 and 310 homes respectively) and non-residential buildings. Dwellings provided will range from 1-bedroom flats to 4-bedroom houses.

### CONSULTATIONS

- 2.1.4. Initial consultation was conducted between Ramboll and Natural England in April and May 2020 to inform the HRA Screening Assessment Report, as detailed in Ramboll (2023). As part of their consultation response, Natural England raised the following to be scoped into the assessment:
- Consideration of impact pathways relating to groundwater abstraction, water quality and water neutrality.
  - Consideration of air quality impacts throughout the screening process.
  - Consideration of potential impacts of habitat loss and fragmentation for qualifying bat populations associated with SACs within 30km of the Proposed Development.
- 2.1.5. To date, no further consultation relevant to this Appropriate Assessment has occurred.



## **ZONE OF INFLUENCE**

- 2.1.6. The Zone of Influence (Zol) is defined by the potential effects arising from the Proposed Development and the potential pathways for those effects to reach and affect qualifying features of Habitats Sites. The Zol for the Proposed Development allow for a precautionary assessment and have been derived through earlier consultation. It comprises all Habitats Sites within 15km of the Site and SACs within 30km of the Site with bats listed as a qualifying feature, together with other sites highlighted for consideration by Natural England - Arun Valley SAC (25.3 km south-west at the closest point); Arun Valley Ramsar site (25.3 km south-west at the closest point); and Arun Valley SPA (25.3 km south-west at the closest point).
- 2.1.7. This Zol also factors in relevant Impact Risk Zones (IRZ) used to assess planning applications for likely impacts on SACs, SPAs and Ramsar Sites, in addition to Sites of Special Scientific Interest (SSSIs).

### 3 RELEVANT DESIGNATED SITES

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- 3.1.1. As shown on Figure 2, six designated Habitats Sites lie within the potential Zol of the Proposed Development. These designated sites are listed in Table 3-1.

**Table 3-1 – Habitats Sites within the potential Zol of the Proposed Development**

Habitats Site	Approximate distance from the Proposed Development
Mole Gap to Reigate Escarpment SAC	13.5km north
The Mens SAC	22.1km south-west
Ebernoe Common SAC	26.2km south-west
Arun Valley SAC	25.3km south-west
Arun Valley SPA	25.3km south-west
Arun Valley Ramsar site	25.3km south-west

- 3.1.2. The above Zol were agreed in previous consultation between Ramboll and Natural England (Ramboll, 2023) and are considered appropriate for use within this Appropriate Assessment. The reasons for designation of these sites, as well as the conservation objectives, are summarised in Table 3-1 below. Table 3-1 also summarises known vulnerabilities of these sites, collated from the Natura 2000 Standard Data Forms (JNCC, 2016) and Natural England Citations, Conservation Objectives and Site Improvement Plans.
- 3.1.3. Specific conservation objectives for Ramsar sites are not available and are therefore taken to be the objectives used for the underlying SPA or SAC designations where available.

**Table 3-2 – Relevant Habitats Sites and known threats and pressures on these sites**

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
Mole Gap to Reigate Escarpment SAC	892.3	13.5 km north	<p>Mole Gap to Reigate Escarpment SAC supports the following qualifying features:</p> <p><b>Annex I habitats that are a primary reason for selection of the site:</b></p> <ul style="list-style-type: none"> <li>5110 Stable xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes (<i>Berberidion</i> p.p.);</li> <li>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites); and</li> <li>91J0 <i>Taxus baccata</i> woods of the British Isles (priority feature).</li> </ul> <p><b>Annex I habitats that are present as a qualifying feature, but not a primary reason for selection of the site:</b></p> <ul style="list-style-type: none"> <li>4030 European dry heaths; and</li> </ul>	<p>Negative Impacts</p> <ul style="list-style-type: none"> <li>Modification of cultivation practice</li> <li>Biocenotic evolution, succession</li> <li>Air pollution, air-borne pollutants</li> <li>Interspecific floral relations</li> </ul> <p>Positive Impacts</p> <ul style="list-style-type: none"> <li>Modification of cultivation practices</li> <li>Grazing</li> <li>Forest and Plantation management &amp; use<sup>8</sup></li> </ul>	<ul style="list-style-type: none"> <li>Disease (P/T)</li> <li>Inappropriate scrub control (P)</li> <li>Change in land management (T)</li> <li>Public access/disturbance (T)</li> <li>Air Pollution: Risk of atmospheric nitrogen deposition (T)<sup>9</sup></li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>The structure and function (including typical species) of qualifying natural habitats</li> <li>The structure and function of the habitats of qualifying species</li> </ul>

<sup>8</sup> Mole Gap to Reigate Escarpment SAC NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012804.pdf> (Accessed :17/05/2024).

<sup>9</sup> Mole Gap to Reigate Escarpment SAC Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/6256378880458752> (Accessed :17/05/2024)

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
			<ul style="list-style-type: none"> <li>9130 <i>Asperulo-Fagetum</i> beech forests.</li> </ul> <p><b>Annex II species that are present as a qualifying feature, but not a primary reason for selection of the site:</b></p> <ul style="list-style-type: none"> <li>1166 Great crested newt <i>Triturus cristatus</i>; and</li> <li>1323 Bechstein's bat <i>Myotis bechsteinii</i>.<sup>7</sup></li> </ul>			<ul style="list-style-type: none"> <li>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>The populations of qualifying species, and,</li> <li>The distribution of qualifying species within the site.”<sup>10</sup></li> </ul>
The Mens SAC	204.69	22.1 km south-west	<p>The Mens SAC supports the following qualifying features:</p> <p><b>Annex I habitats that are a primary reason for selection of the site:</b></p> <ul style="list-style-type: none"> <li>9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>Illici-Fagenion</i>).</li> </ul>	<p>Negative Impacts</p> <ul style="list-style-type: none"> <li>Forest and plantation management &amp; use</li> <li>Other ecosystem modifications</li> <li>Changes in biotic conditions</li> <li>Modification of cultivation practices<sup>12</sup></li> </ul>	<ul style="list-style-type: none"> <li>Forestry and woodland management (P/T)</li> <li>Habitat connectivity (P &amp; T)</li> <li>Invasive species (T)</li> <li>Change in land management (P/T)</li> <li>Air Pollution: risk of atmospheric nitrogen deposition (T)</li> </ul>	<p>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 Favourable Conservation Status of its Qualifying Features:</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying</li> </ul>

<sup>7</sup> Mole Gap to Reigate Escarpment SAC NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012804.pdf> (Accessed :17/05/2024).

<sup>10</sup> Mole Gap to Reigate Escarpment SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/4911739200077824?category=6528471664689152> (Accessed :17/05/2024).

<sup>12</sup> The Mens Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/6144692196474880> (Accessed :17/05/2024).

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
			<b>Annex II species that are present as a qualifying feature, but not a primary reason for selection of the site:</b> <ul style="list-style-type: none"> <li>1308 Barbastelle <i>Barbastella barbastellus</i>.<sup>11</sup></li> </ul>		<ul style="list-style-type: none"> <li>Public Access/Disturbance (P/T)<sup>13</sup></li> </ul>	<p>natural habitats and habitats of qualifying species</p> <ul style="list-style-type: none"> <li>The structure and function (including typical species) of qualifying natural habitats</li> <li>The structure and function of the habitats of qualifying species</li> <li>The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>The populations of qualifying species, and,</li> <li>The distribution of qualifying species within the site.”<sup>14</sup></li> </ul>

<sup>11</sup>The Mens SAC NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012716.pdf> (Accessed :17/05/2024).

<sup>13</sup> The Mens Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/6144692196474880> (Accessed :17/05/2024).

<sup>14</sup> The Mens SAC Conservation Objectives. Available at : <https://publications.naturalengland.org.uk/file/4643646439948288> (Accessed :17/05/2024).

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
Ebernoe Common SAC	234.93	26.2 km south-west	<p>Ebernoe Common SAC supports the following qualifying features:</p> <p><b>Annex I habitats that are a primary reason for selection of the site:</b></p> <ul style="list-style-type: none"> <li>9120 Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion).</li> </ul> <p><b>Annex II species that are a primary reason for selection of this site:</b></p> <ul style="list-style-type: none"> <li>1308 Barbastelle; and</li> <li>1323 Bechstein's bat.<sup>15</sup></li> </ul>	<p>Negative Impacts</p> <ul style="list-style-type: none"> <li>Human induced changes in hydraulic conditions</li> <li>Other ecosystem modifications</li> <li>Changes in biotic conditions</li> <li>Modification of cultivation practices</li> <li>Forest and plantation management &amp; use</li> </ul> <p>Positive Impacts</p> <ul style="list-style-type: none"> <li>Forest and plantation management &amp; use<sup>16</sup></li> </ul>	<ul style="list-style-type: none"> <li>Forestry and Woodland Management (P/T)</li> <li>Offsite Habitat Availability/ Management (P)</li> <li>Habitat Fragmentation (T)</li> <li>Change in Land Management (P/T)</li> <li>Hydrological Changes (T)</li> <li>Public Access/Disturbance (T)</li> <li>Air Pollution : Risk of Atmospheric Nitrogen Deposition (P/T)<sup>17</sup></li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features through:</p> <ul style="list-style-type: none"> <li>The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>The structure and function (including typical species) of qualifying natural habitats</li> <li>The structure and function of the habitats of qualifying species</li> <li>The supporting processes on which</li> </ul>

<sup>15</sup> The Ebernoe Common SAC NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012715.pdf> (Accessed :17/05/2024).

<sup>16</sup> The Ebernoe Common SAC NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012715.pdf> (Accessed :17/05/2024).

<sup>17</sup> The Ebernoe Common SAC Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5365367427825664> (Accessed :17/05/2024).

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
						<p>qualifying natural habitats and the habitats of qualifying species rely</p> <ul style="list-style-type: none"> <li>■ The populations of qualifying species, and,</li> <li>■ The distribution of qualifying species within the site<sup>18</sup></li> </ul>
Arun Valley SAC	487.48	25.3 km south-west	<p>Arun Valley SAC supports the following qualifying features:</p> <p><b>Annex II species that are a primary reason for selection of this site:</b></p> <ul style="list-style-type: none"> <li>■ 4056 Ramshorn snail <i>Anisus vorticulus</i><sup>19</sup></li> </ul>	<p>Negative Impacts</p> <ul style="list-style-type: none"> <li>■ Human induced changes in hydraulic conditions</li> </ul> <p>Positive Impacts</p> <ul style="list-style-type: none"> <li>■ Modification of cultivation practices</li> <li>■ Forest and Plantation management &amp; use<sup>20</sup></li> </ul>	<ul style="list-style-type: none"> <li>■ Inappropriate water levels (T)</li> <li>■ Water pollution (T)</li> <li>■ Inappropriate ditch management (T)<sup>21</sup></li> </ul>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of the habitats of qualifying species</li> </ul>

<sup>18</sup> The Ebernoe Common SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/file/5942973099671552> (Accessed :17/05/2024).

<sup>19</sup> Arun Valley SAC NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030366.pdf> (Accessed :17/05/2024).

<sup>20</sup> Arun Valley SAC NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030366.pdf> (Accessed :17/05/2024).

<sup>21</sup> Arun Valley SAC Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5185212862431232> (Accessed :17/05/2024).

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
						<ul style="list-style-type: none"> <li>■ The structure and function of the habitats of qualifying species</li> <li>■ The supporting processes on which the habitats of qualifying species rely</li> <li>■ The populations of qualifying species, and,</li> <li>■ The distribution of qualifying species within the site.<sup>22</sup></li> </ul>
Arun Valley Ramsar site	529	25.3 km south-west	<p>The site is designated under Ramsar criteria 2, 3 and 5.</p> <p><b>Ramsar Criterion 2</b></p> <ul style="list-style-type: none"> <li>■ "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</li> </ul>	<ul style="list-style-type: none"> <li>■ Disturbance to vegetation. Community through cutting/clearing (inside)</li> <li>■ Drainage reclamation for agriculture (both)</li> <li>■ Pollution- fertilizers (both)</li> <li>■ Pollution- pesticides/agricultural runoff (both)</li> <li>■ Canalisation (both)<sup>24</sup></li> </ul>	NA	<p>The site vulnerability and management statement within the Ramsar site information sheet is summarised below:</p> <ul style="list-style-type: none"> <li>■ Sympathetic management of wet grassland and grazing marsh habitats is essential for achieving favourable condition</li> <li>■ Summer grazing, ditch management and control</li> </ul>

<sup>22</sup> Arun Valley SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/file/6136148019904512> (Accessed :17/05/2024).

<sup>24</sup> Arun Valley Ramsar Information Sheet. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1011RIS.pdf> (Accessed :17/05/2024).



Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
			<p>rare and four nationally scarce plant species.”</p> <p><b>Ramsar Criterion 3</b></p> <ul style="list-style-type: none"> <li>■ "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 Lemna 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.”</li> </ul> <p><b>Ramsar Criterion 5</b></p> <ul style="list-style-type: none"> <li>■ "Internationally important waterfowl assemblage (greater than 20,000 birds).”<sup>23</sup></li> </ul>			<p>of fertiliser usage within the valley are essential management measures</p> <ul style="list-style-type: none"> <li>■ 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</li> <li>■ Agricultural changes must be carefully managed<sup>25</sup></li> </ul>

<sup>23</sup> Arun Valley Ramsar Information Sheet. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1011RIS.pdf> (Accessed :17/05/2024).

<sup>25</sup> Arun Valley Ramsar Information Sheet. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1011RIS.pdf> (Accessed :17/05/2024).

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
Arun Valley SPA	530.42	25.3 km south-west	<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"> <li>■ Bewick's swan <i>Cygnus columbianus bewickii</i> (1.6% of the Great Britain population)</li> </ul> <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"> <li>■ Wigeon <i>Anas penelope</i></li> <li>■ Teal <i>Anas crecca</i></li> <li>■ Pintail <i>Anas acuta</i></li> <li>■ Shoveler <i>Anas clypeata</i></li> <li>■ Ruff <i>Philomachus pugnax</i> (Annex 1 species)</li> </ul>	<p>Negative Impacts</p> <ul style="list-style-type: none"> <li>■ Human induced changes in hydraulic conditions (both)</li> <li>■ Pollution to groundwater (point sources and diffuse sources) (both)</li> </ul> <p>Positive Impacts</p> <ul style="list-style-type: none"> <li>■ Modification of cultivation practices (inside)</li> <li>■ Interpretative centres (inside)</li> <li>■ Forest and Plantation management &amp; use (inside)</li> <li>■ Improved access to site (inside) <sup>27</sup></li> </ul>	<ul style="list-style-type: none"> <li>■ Inappropriate water levels (T)</li> <li>■ Water pollution (T)</li> <li>■ Inappropriate ditch management (T)<sup>28</sup></li> </ul>	<p>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:</p> <ul style="list-style-type: none"> <li>■ The extent and distribution of the habitats of the qualifying features</li> <li>■ The structure and function of the habitats of the qualifying features</li> <li>■ The supporting processes on which the habitats of the qualifying features rely</li> <li>■ The population of each of the qualifying features, and,</li> </ul>

<sup>27</sup> Arun Valley SPA NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9020281.pdf> (Accessed :17/05/2024).

<sup>28</sup> Arun Valley SPA Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5185212862431232> (Accessed :17/05/2024).

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
			<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"> <li>■ Golden plover <i>Pluvialis apricaria</i></li> <li>■ Kingfisher <i>Alcedo atthis</i> <sup>26</sup></li> </ul>			<ul style="list-style-type: none"> <li>■ The distribution of the qualifying features within the site <sup>29</sup></li> </ul>

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<sup>26</sup> Arun Valley SPA NATURA 2000 - Standard Data Form. Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9020281.pdf> (Accessed :17/05/2024).

<sup>29</sup> Arun Valley SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/4567444756627456?category=6528471664689152> (Accessed :17/05/2024).

## 4 STAGE 1: SCREENING OF POTENTIAL EFFECTS

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### 4.1 SUMMARY OF PREVIOUS STAGE 1 SCREENING ASSESSMENT

- 4.1.1. A summary of the Stage 1 Screening Assessment (information to inform) completed by Ramboll (Ramboll, 2025) is provided below for context.
- 4.1.2. The Stage 1 Screening Assessment considered the potential for the Proposed Development to result in Likely Significant Effects (LSE) to Mole Gap to Reigate Escarpment SAC, Ebernoe Common SAC and the The Mens SAC, arising from air pollution, and habitat fragmentation for barbastelle and Bechstein's bat. The assessment concluded that the Proposed Development would not result in LSE through habitat fragmentation (either alone or in combination) for the qualifying species of bats on both The Mens SAC and Ebernoe Common SAC, owing to the location of the Site, which sits outside of recognised buffers and conservation areas (containing functionally linked land) for the species identified within the South Downs Local Plan.
- 4.1.3. The Screening Assessment also concluded that the Proposed Development alone would not result in LSE from air pollution to Mole Gap to Reigate Escarpment SAC, The Mens SAC and Ebernoe Common SAC, as roads within 200m of these designated sites would not be subject to an increase of 1000 vehicles per day as a result of the Proposed Development. The screening assessment did not consider the potential for in-combination effects of air quality. This element is therefore subject to re-screening as part of this Appropriate Assessment as set out below in Section 4.2.
- 4.1.4. The potential for LSE relating to water quality and water quantity was considered for the Arun Valley SAC, SPA and Ramsar site. The Screening Assessment identified that the provision of new homes and infrastructure could place additional strain on the groundwater abstraction at Hardham, with subsequent impacts to the Arun Valley Habitats sites and LSE were therefore screened in for these receptors, in the absence of a detailed water neutrality strategy. Appropriate Assessment of the impacts of water quality and quantity is therefore required and is provided in Section 5 of this report.

### 4.2 UPDATED SCREENING ASSESSMENT FOR MOLE GAP TO REIGATE ESCARPMENT SAC, THE MENS SAC AND EBERNOE COMMON SAC

- 4.2.1. This section updates the Screening Assessment previously completed (Ramboll, 2025), specifically considering the potential for in-combination effects relating to air quality impacts to Mole Gap to Reigate Escarpment SAC, The Mens SAC and Ebernoe Common SAC.

#### **In-combination Effects**

- 4.2.2. Under the Habitats Regulations, it is also necessary to consider the in-combination effects of development proposals on Habitats Sites. These refer to effects which may or may not interact with each other, but which could affect the same receptor or interest feature (i.e. a habitat or species for which a Habitats Site is designated).
- 4.2.3. At present, there is no widely accepted methodology for the assessment of in-combination effects, although there are a number of guidance documents available. The assessment is qualitative in nature and is based on the available information. Where information is not available, assumptions will be made based on professional judgement and clearly stated alongside any uncertainty as part

of the assessment. A review of the relevant local plans and their supporting information has been undertaken to inform this assessment of in-combination effects.

- 4.2.4. The Horsham District Local Plan 2023 – 2040 (Regulation 19) (the ‘Draft Local Plan’) allocated the Site under Strategic Policy HA2: Land West of Ifield. A HRA has been completed by AECOM to assess the policies of the Draft Local Plan, including Strategic Policy HA2, for LSE on the Habitats Sites described within this assessment (Horsham District Council, 2023). Although it is understood that the Draft Local Plan is now considered to be withdrawn, this document is detailed here as it is considered that the evidence base informing the HRA process at a plan level is in-combination in nature. LSE of atmospheric pollution on Ebernoe Common at a Draft Local Plan level were screened out but screened in for Appropriate Assessment for The Mens SAC owing to increased likely increased traffic flows along the A272.
- 4.2.5. The subsequent Appropriate Assessment concluded no adverse effects on The Mens SAC as a result of atmospheric pollution, either alone under the Draft Local Plan or in-combination. This conclusion was based on several factors, including the finding that traffic is a minor source of ammonia and nitrogen deposition at The Mens SAC, and the presumption that nitrogen deposition from traffic will continue to decrease as a result of a continued shift to electric vehicles during the 2030s.
- 4.2.6. Mole Gap to Reigate Escarpment SAC was screened in for LSE as part of the HRA work underpinning both the Mole Valley Local Plan 2020-2039 (adopted October 2024) and the emerging Crawley Borough Council Local Plan 2024 – 2040, because of the sensitivity of the site to air pollution and nitrogen deposition.
- 4.2.7. The subsequent Appropriate Assessment within the Crawley Borough Council Local Plan HRA (Lepus Consulting, 2023) concluded no adverse impacts on the site integrity of the Mole Gap to Reigate Escarpment SAC from the emerging local plan. This conclusion was based on the results of air quality modelling that found an overall reduction in nitrogen deposition between the baseline and 2035 modelled scenario, with the exception of a number of locations along the A217 where small in-combination increases attributable to the local plan were expected. Given the small contribution of the local plan to in-combination nitrogen deposition levels at the A217 and taking into consideration the policy provisions to address this contribution, no in-combination effects were concluded.
- 4.2.8. The Appropriate Assessment within the Mole Valley Local Plan HRA (AECOM, 2021) concluded no adverse effects on site integrity from ammonia concentrations as the critical levels were not forecast to be exceeded at any point on transects along affected road networks. Adverse effects were also ruled out both alone and in combination for impacts to heathland components of the Habitats Site. This conclusion was based on air quality modelling, which indicated that additional nitrogen deposition loads would not be sufficient to such an extent that a change in management regime (which generally has a much greater impact on vegetation cover and species richness) would be required. With regards to the sensitive calcareous grassland habitats, it is noted within the HRA that projected traffic increases could impact these habitats alongside the roadside areas of the A24 “*with the rest of the SAC entirely unaffected*”, but that the sustainable transport policy (Policy INF1) is expected to provide a mechanism for delivering protection from atmospheric pollution.
- 4.2.9. As a result of the above, LSE effects of air quality impacts on The Mens SAC, Ebernoe Common SAC and Mole Gap to Reigate Escarpment SAC are not considered likely either alone or in-combination and are not considered further as part of this assessment.

## 5 STAGE 2: APPROPRIATE ASSESSMENT

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- 5.1.1. Based on the screening exercise completed by Ramboll (2025) and updated within Section 4 of this report, it has been identified that potential LSE cannot be ruled out on the Arun Valley SPA, SAC and Ramsar site Habitats sites, either alone or in-combination, due to the impacts of residential development resulting in increased water demand from the Proposed Development.

### **Effects resulting from water quality and water quantity**

- 5.1.2. The Site falls within the Sussex North Water Resource Zone (WRZ). Natural England published a position statement in 2021 advising local authorities that any new development to be granted planning permission within the Sussex North WRZ should be water neutral. In practical terms, this requires that *‘for every new development, the total water use in the region after the development must be equal to or less than the total water-use in region before the new development.’*
- 5.1.3. This Appropriate Assessment is informed by a detailed Water Neutrality Strategy (WNS), designed to ensure that Natural England’s requirements with regards to the Sussex North WRZ are met by the Proposed Development (WSP, 2025). As set out in the WNS, the baseline water demand for the Proposed Development requiring offset has been calculated as 710,328 litres per day based on the residential units achieving a per capita consumption of 85 litres per person per day, and non-residential (commercial and education) units achieving a score of three credits within the water (Wat01 Water Consumption) issue category for the BREEAM New Construction Standard, through the use of water efficient fixtures and fittings.
- 5.1.4. The WNS presents four mitigation option scenarios in Table 7-1, 7-2, 7-3 and 7-4 of the WNS, all of which feature mitigation measures designed into the Proposed Development and which, if adopted, would ensure the baseline water demand would be offset and therefore water neutrality can be achieved. Three of these scenarios include the purchase of credits from the Sussex North Offsetting Water Scheme (SNOWS) to make up any shortfall in water demand offset. As outline planning permission is currently sought for the Proposed Development, at this stage it is not possible to confirm the availability of SNOWS credits which the Proposed Development could purchase for offset because *“applications will only be allocated to available capacity in SNOWS following Full or Reserved Matters approval”* (as set out in the SNOWS Applicant User Guide<sup>30</sup>). Therefore, the WNS confirms a fourth mitigation scenario which does not include SNOWS credit purchase, with all mitigation for offset instead provided through onsite measures, demonstrating that water neutrality is achievable with or without reliance on the SNOWS scheme. A summary of these mitigation scenarios from the WNS are presented in Table 5-1 below. Homes England has committed to delivering the measures set out in the WNS.

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<sup>30</sup> Horsham District Council (March 2025) SNOWS Applicant User Guide. Available at:  
[https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0017/144620/SNOWS-Applicant-User-Guide-Mar-2025.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0017/144620/SNOWS-Applicant-User-Guide-Mar-2025.pdf)

**Table 5-1 – Summary of WNS Scenarios for Proposed Development (WSP, 2025)**

WNS Mitigation Scenario	Details
Scenario A1 (see Table 7-1 of WNS)	<p>Water neutrality to offset the baseline water demand would be achieved through the implementation of all of the following mitigation measures:</p> <ul style="list-style-type: none"> <li>■ <b>Closure of the Ifield Golf and Country Club</b> (located within the Site boundary). Based on average water demand from actual meter reading data, ceasing activities at this Site would result in a reduction of baseline water demand of 10,420 litres per day.</li> <li>■ <b>Rainwater harvesting of residential properties.</b> The rainwater yield has been calculated as per the methodology provided in British Standard BS EN 16941-1:2024. As a precautionary approach, only rainwater harvested from residential properties is considered. The rainwater yield (pre-treatment) as a source for potable water supply was calculated at 405,344 litres per day. Rainwater would be blended with groundwater prior to treatment.</li> <li>■ <b>Blending of harvested rainwater with ground water.</b> Exploration phase drilling has been completed to inform the estimated yield of boreholes on site (with full results presented in Appendix F of the WNS). Based on testing, during the exploration phase of drilling at the Proposed Development site, a conservative approach to estimate a yield for one production borehole at the site was undertaken. During limited testing undertaken on the Upper Tunbridge Wells Sand Member aquifer on exploration boreholes, the aquifer was found to be capable of supplying 0.9 l/s (77.8 m<sup>3</sup>/day) for a drawdown of approximately 20m within the boreholes tested. These values for yield are in line with literature estimated yields for the Upper Tunbridge Wells Sand Member aquifer. Using a conservative approach (as a worst-case scenario) to extrapolating yield, by increasing drawdown and increasing diameter of a future production borehole, a yield of 125,000 litres per day for one production borehole is predicted. This borehole would be installed by Phase 2 occupation at location IE3 in the WNS. It should be noted that following production borehole(s) installation, a programme of testing should be undertaken to determine the likely long term sustainable yield from the borehole(s). This will be a conditional requirement relating to any abstraction licensing for production borehole development and operation. A water quality assessment identified that, with the current available technology for the production of potable water in the UK, a minimum ratio between groundwater and rainwater inflows of 1:1 is required alongside the requirement for fluoride treatment. As a worst-case scenario, a recovery rate for the treatment plant of 75% is used.</li> <li>■ <b>Purchase of SNOWS credits for any residual offset.</b> Under the now withdrawn emerging Horsham Local Plan, the Site was allocated and able to secure sufficient credits for up to 1600 homes which is equivalent to 304,640 litres per day offset.</li> </ul>



WNS Mitigation Scenario	Details
	<p>In line with SNOWS current user guidance, Homes England is unable to apply for these credits until the outline planning application has been submitted. However, the West of Ifield Development, at the point of submission, will be in accordance with the SNOWS access definition, being in accordance with a 'post submission local plan' that has 'informed the preparation of Southern Water's Water Resource Management Plan 2024 calculations of water demand'. The SNOWS project manager has confirmed that the Proposed Development 'meets the SNOWS access criteria' and 'would be eligible to request <i>additional</i> SNOWS capacity.' The SNOWS scheme is live as of March 2025 and it is the intention that, at a minimum, the number of SNOWS credits required to offset at least 1600 homes will be secured following the submission of the outline planning application. It is considered highly likely that SNOWS credits will be secured as the Proposed Development meets the SNOWS access criteria and would also address four out of the five SNOWS credit prioritisation criteria:</p> <ul style="list-style-type: none"> <li> <b>Criterion 2:</b> Whether the application is a local authority 'corporate priority', which includes schemes in council plans or those approved by the council's political leadership. These will be given greater weighting. <ul style="list-style-type: none"> <li>The Proposed Development is a strategic, priority site that was allocated under the now withdrawn emerging Horsham Local Plan.</li> </ul> </li> <li> <b>Criterion 3:</b> The extent to which water efficiency measures have been included in the application to maximise on-site water savings and minimise offsetting requirements. Applications that minimise their on-site water use will be given greater weighting. <ul style="list-style-type: none"> <li>The Proposed Development is highly water efficient. It complies with the minimum residential water consumption threshold of 85 litres per person per day and incorporates rainwater harvesting and reuse that would reduce domestic consumption to 56.3 litres per person per day. The inclusion of high-performance BREEAM designs, rainwater harvesting and greywater reuse for the non-household and commercial properties would deliver significant water efficiency reductions.</li> </ul> </li> <li> <b>Criterion 4:</b> (residential applications only): Whether the application is policy compliant in the delivery of affordable housing units. Applications delivering 100% affordable schemes made by registered or approved affordable housing providers will be given greater weighting. <ul style="list-style-type: none"> <li>The Proposed Development is policy compliant for the delivery of affordable housing units.</li> </ul> </li> <li> <b>Criterion 5:</b> (non-residential applications only): Whether the application provides community services or other infrastructure supporting development*. These applications will be given a greater weighting. <ul style="list-style-type: none"> <li>The Proposed Development provides considerable community services and other supporting</li> </ul> </li> </ul>



WNS Mitigation Scenario	Details
	infrastructure, including primary and secondary schools, leisure, office and commercial components.
Scenario A2 (see Table 7-2 of WNS)	<p>Water neutrality to offset the baseline water demand would be achieved through the implementation of all of the following mitigation measures:</p> <ul style="list-style-type: none"> <li>■ <b>Closure of the Ifield Golf and Country Club</b>, as per Scenario A1.</li> <li>■ <b>Rainwater harvesting of residential properties</b>, as per Scenario A1.</li> <li>■ <b>Blending of harvested rainwater with ground water</b>. As per Scenario A1, but with the inclusion of <b>an additional borehole</b> to be installed at location IE2 by Phase 3 occupation. Based on the testing results and the predicted yield of 125,000 litres per day per borehole based on conservative estimates, this would provide 250,000 litres per day.</li> <li>■ <b>Purchase of SNOWS credits for any residual offset</b>, as per Scenario A1.</li> </ul>
Scenario B (see Table 7-3 of WNS)	<p>Water neutrality to offset the baseline water demand would be achieved through the implementation of all of the following mitigation measures:</p> <ul style="list-style-type: none"> <li>■ <b>Closure of the Ifield Golf and Country Club</b>, as per Scenario A1.</li> <li>■ <b>Rainwater harvesting of residential properties</b> as per Scenario A1, but expanded to also include <b>rainwater harvesting of commercial properties</b> (466,604 litres per day).</li> <li>■ <b>Blending of harvested rainwater with ground water</b>. As per Scenario A1, but with the inclusion of four additional borehole. Two boreholes to be installed at location IE2 and IE3 by Phase 2 occupation. Two more boreholes to be installed by Phase 3 occupation. The location of the remaining two boreholes would be determined following further testing at reserved matters stage but are likely to be located at sites shown on Figure 6-2 in the WNS. Based on the testing results and the predicted yield of 125,000 litres per day per borehole based on conservative estimates, four boreholes would provide 500,000 litres per day. However, to comply with the 1:1 dilution ratio requirements, this would be limited to 466,604 litres per day.</li> </ul>
Scenario C (see Table 7-4 of WNS)	<p>Water neutrality to offset the baseline water demand would be achieved through the implementation of all of the following mitigation measures:</p> <ul style="list-style-type: none"> <li>■ <b>Closure of the Ifield Golf and Country Club</b>, as per Scenario A1.</li> </ul>

WNS Mitigation Scenario	Details
	<ul style="list-style-type: none"> <li>■ <b>Rainwater harvesting of residential, commercial and residential properties with less extensive treatment</b> (411,710 litres per day).</li> <li>■ <b>Purchase of SNOWS credits for any residual offset</b>, as per Scenario A1</li> </ul>

5.1.5. Further details including full calculations for the above scenarios are set out in the WNS. Calculation methods in the WNS adopt a conservative, precautionary approach to ensure that the outcomes are realistic and achievable. Taken together, the adopted measures in any of the four mitigation scenario options will provide sufficient redundancy to ensure delivery of sufficient water to meet the baseline residential and non-residential water demand of 710,328 litres per day. As such, the water demand from the Proposed Development will be offset and adverse effects on the integrity of the Arun Valley SPA, SAC and Ramsar site can be ruled out.

5.1.6. It is recognised that, at present, a confirmed approach for mitigation (Scenario A1, A2 and C) cannot be determined due to the nature of the SNOWS scheme as set out in the User Guide, as the availability of SNOWS credits upon which mitigation Scenarios A1, A2 and C rely cannot be confirmed at outline planning stage. However, the WNS demonstrates that a fourth mitigation scenario (Scenario B), which is not reliant on the allocation of SNOWS credits, is achievable should it be required. Given the strategic importance of the scheme, the eligibility for SNOWS credits to offset 1,600 homes, the eligibility to apply for additional SNOWS credits, and compliance with four of the five SNOWS credit prioritisation criteria, it is highly likely that SNOWS credits will be allocated to the scheme following submission of the outline planning application. Additionally, the multiple water neutrality scenarios establish that it would be possible to offset the water demand for the Proposed Development even in the unlikely event that SNOWS credits are not available.

## 6 CONCLUSIONS

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- 6.1.1. This report has summarised the results of the screening for possible LSE of the Proposed Development upon Habitats sites (SPA, SAC, Ramsar sites) undertaken by Ramboll (2025), updating this with specific regard for possible in-combination effects of air quality on Ebernoe Common SAC and The Mens SAC, in accordance with published guidance.
- 6.1.2. Stage 1 – Screening completed by Ramboll (2025) identified that the Arun Valley SAC, SPA and Ramsar site Habitats sites could be subject to LSE as a result of residential water abstraction in the Sussex North WRZ.
- 6.1.3. Accordingly, the WNS for the scheme was reviewed to inform Stage 2 - Appropriate Assessment. To account for the fact that the provision of SNOWS credits cannot be allocated until after outline planning submission, the WNS sets out four mitigation scenarios. Each mitigation scenario incorporates a combination of measures which are accounted for within the Proposed Development design and have been demonstrated as achievable, including removal of the existing golf course within the Site, installation of water efficient fittings, treated rainwater harvesting (of just residential properties or residential and commercial, as required) blended with abstracted groundwater from one or more boreholes as required. Three of the mitigation scenarios allow for the assumed allocation of SNOWS credits for up to 1600 homes, while the fourth mitigation strategy presents a viable route to achieving water neutrality in the unlikely absence of SNOWS credit allocation. When enacted as a package, either of these four mitigation scenario measures will ensure that the additional water demand from the Proposed Development will be reduced to zero and, as such, no adverse effects on the integrity of the Arun Valley SAC, SPA and Ramsar site resulting from water abstraction are anticipated.

## 7 REFERENCES

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### General References

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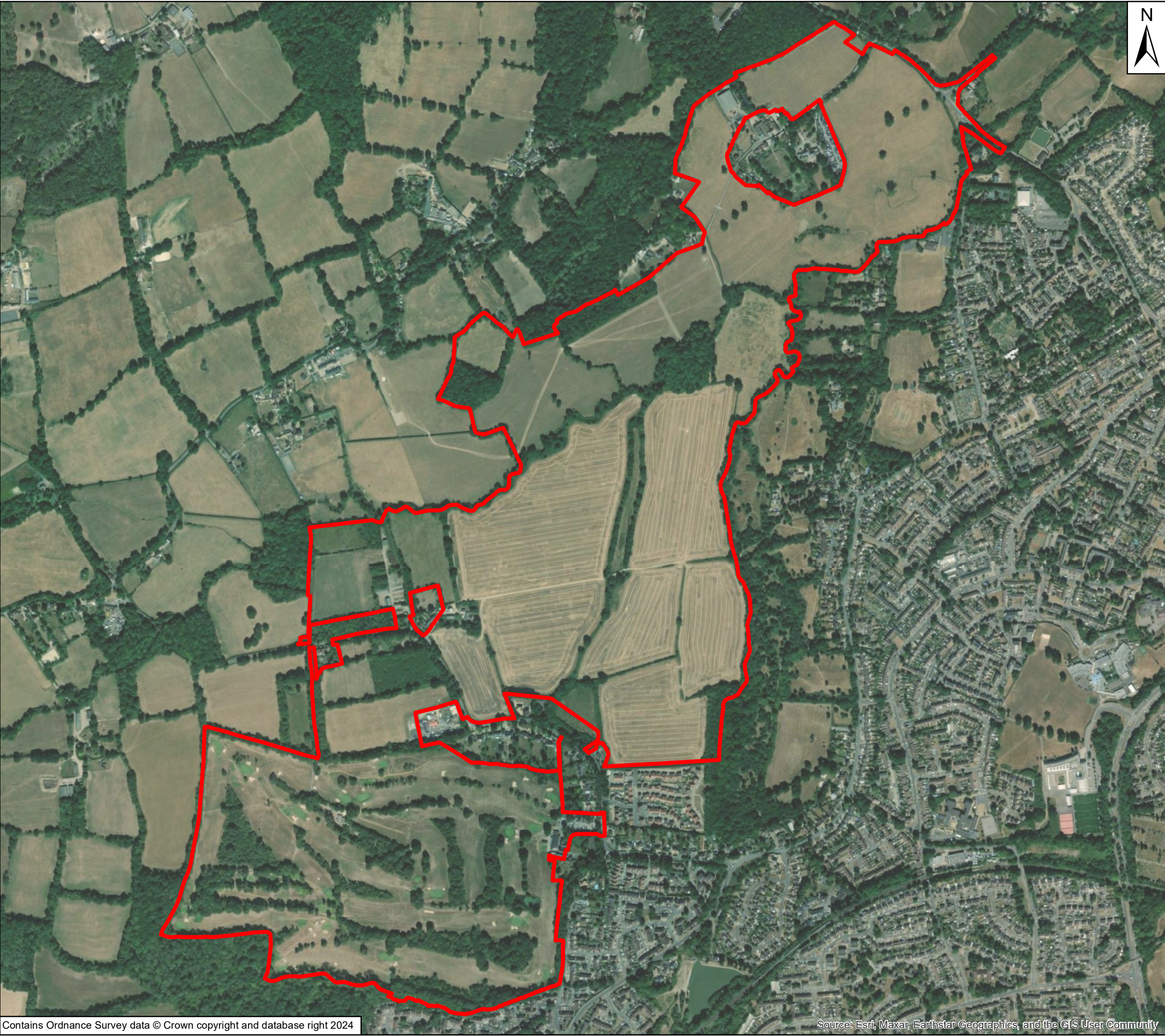
## 8 FIGURES

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Figure 1 – Site Location Plan

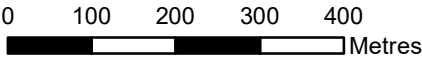
Figure 2 – Internationally Designated Sites within the ZOI





Key

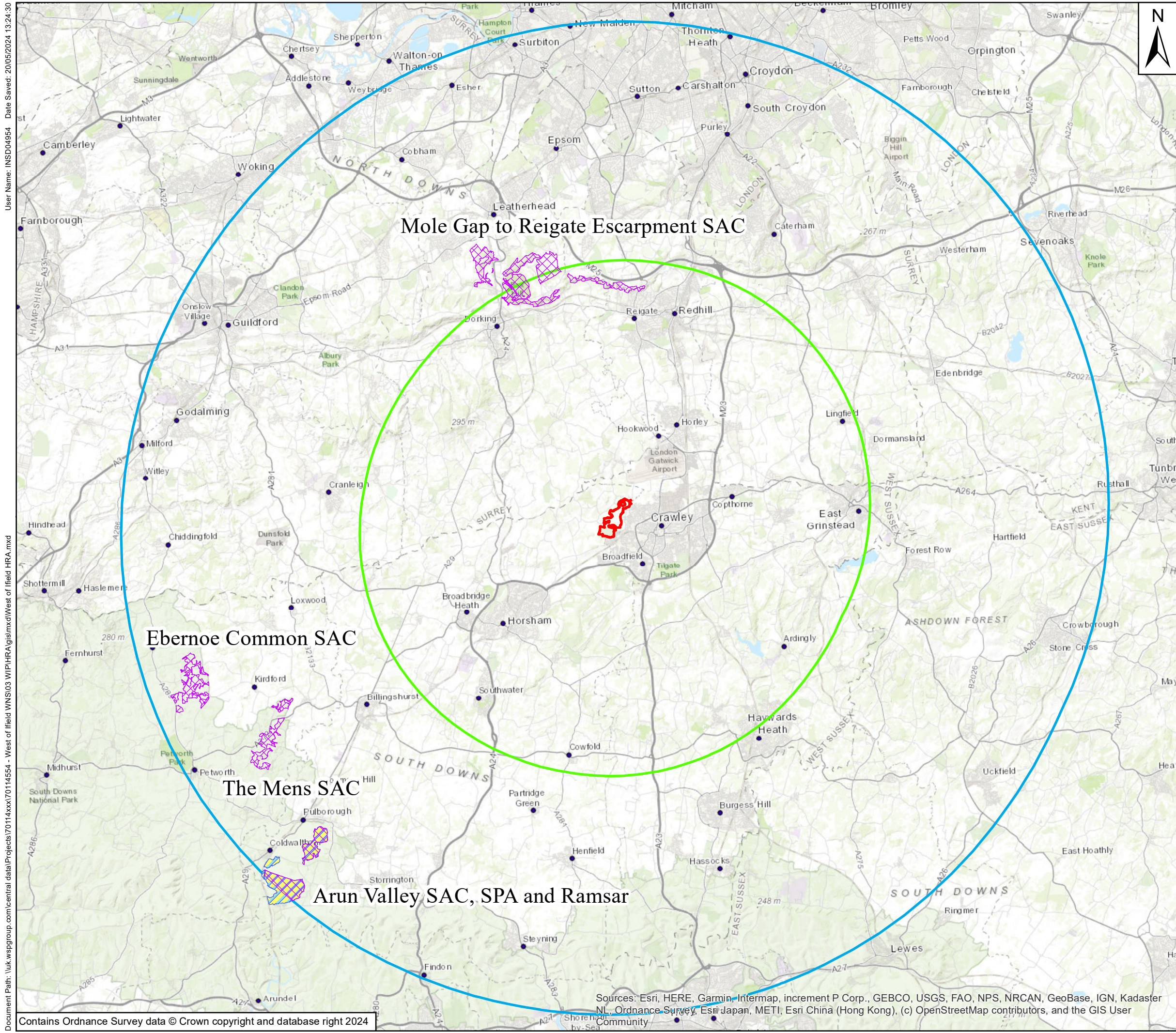
 Site Boundary









Client:	Homes England
Project:	WEST OF IFIELD
Title:	Site Location

Drawing No:	Figure 1	Drawn:	SD
Date:	24/05/2024	Checked:	CH
Scale:	9,000 @ A3	Approved:	OP





## Key

-  Site Boundary
-  15km Buffer
-  30km Buffer
-  Special Areas of Conservation (SAC)
-  Ramsar Sites
-  Special Protection Areas (SPA)

0 2,000 4,000 6,000 8,000  
Metres



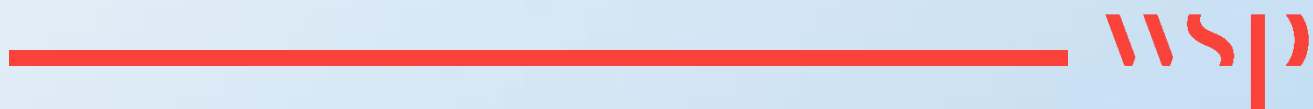
Client:	Homes England		
Project:	WEST OF IFIELD		
Title:	Internationally Designated Sites within the ZOI		
Drawing No:	Figure 2	Drawn:	SD
Date:	24/05/2024	Checked:	CH
Scale:	230,000 @ A3	Approved:	OP

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



# Appendix A

**CJEU RULINGS**





## The Council for Justice of the European Union rulings

A number of CJEU rulings are relevant to the HRA screening exercise and are noted below.

### The Wealden Judgement

The Wealden Judgement<sup>31</sup>, handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.

Prior to this Judgement, air quality impacts on Habitats Sites were only considered alongside roads where the traffic growth associated with the individual Plan or Proposed Scheme being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07<sup>32</sup>), namely: increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).

The Wealden Judgement means that every single plan or project which, alone, is predicted to give rise to any increase in traffic or other air emission (however small) must be subjected to an in-combination assessment with other plans or projects (which would include those plans or projects with a similar tiny impact). However, the judgement did not rule out the application of thresholds in principal and this approach is normally taken as the basis of the assessment.

The judgement has led to a more detailed analysis of three key questions to discern which plans and project are those where a detailed “in combination” assessment is required in relation to changes in air quality<sup>33</sup>:

1. Is your plan or project putting emissions into the air?;
2. If so, are those emissions at a level where they could actually be measured / perceived?; and,
3. If so, is there a realistic (rather than hypothetical) risk that those emissions, alone, will have an adverse effect on the ecology of a SAC / SPA?

A fuller justification will be required when applying the threshold approach.

### People over Wind (The Sweetman Case)

The Court of Justice of the European Union's (CJEU's) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17) (hereafter referred to as the 'Sweetman Case')<sup>34</sup>, states that:

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<sup>31</sup> Judgment in Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.

<sup>32</sup> DMRB Design Manual for Roads and Bridges (DMRB) Volume 11, Section 3, Part 1. Available at: <http://dmrb.net/ha/standards/dmr/vol11/section3/ha20707.pdf> (Accessed 02/12/18).

<sup>33</sup> <https://www.freeths.co.uk/2017/04/25/environmental-bulletin-spring-2017/>

<sup>34</sup> Sweetman v. An Bord Pleanála, Case C-258/11, CJEU judgment 11 April 2013.

*‘Article 6(3) ..... must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.’*

In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the Habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.

This is an emerging issue for local authorities and means that, because of the potential for ‘in-combination effects and the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats Sites. Therefore, it is becoming increasingly commonplace for local authorities to conduct an Appropriate Assessment of all project, plans and planning applications (i.e. these are often no longer screened out, by way of an HRA Screening as has been the practise to date).

### **CJEU Ruling in the Netherlands nitrogen and agriculture cases c-293/17 and c-294/17**

The final Court Judgement in relation to these two cases was handed down on the 7<sup>th</sup> November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality (as the air quality calculations draw upon N deposition rates from APIS<sup>35</sup> and guidance within the DMRB which assumes a 2% reduction in N deposition year on year).

Of particular relevance to the assessment of air quality effects on Habitats Sites, the Court of Justice of the European Union ruled that:

“An ‘appropriate assessment’ may only take into account the existence of Article 6(1) ‘conservation measures’, or Article 6(2) ‘preventive measures’, or specific measures adopted for a conservation programme, or ‘autonomous’ measures not in the programme, if the expected benefits of those measures **are certain** at the time of the assessment.

The Ruling makes clear that certainty and a thorough and in-depth examination of the scientific soundness is required that there is no reasonable scientific doubt as to the absence of adverse effects of each plan or project on the integrity of the site concerned.

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<sup>35</sup> Air Pollution Information System (APIS). Available at: <http://www.apis.ac.uk/> [Accessed 02/12/18]



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