Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
www.placeservices.co.uk

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Our ref: 24089

Matthew Porter
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only: planning@horsham.gov.uk

Thank you for requesting advice on this outline application from Place Services' ecological advice service. This service provides advice to planning officers to inform Horsham District Council planning decisions with regard to potential ecological impacts from development.

Application: DC/26/1168
Location: Land North of Melton Drive Storrington West Sussex
Proposal: Outline application, with all matters reserved, for the phased development comprising: Phase 1 construction of the access road (to be delivered through a subsequent Reserved Matters Application pursuant to Outline Permission DC/24/2006); and Phase 2 residential development of up to 56 dwellings with associated landscaping, pedestrian and vehicular access

Thank you for re-consulting Place Services on the above outline application.

No ecological objection	☐
No ecological objection subject to attached conditions	☒
Further information required/Temporary holding objection	☐
Recommend refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Please refer to Horsham District Councils advice regarding Water Neutrality requirements following Natural England's Withdrawal Statement (31st October 2025).

Summary

We have reviewed the Ecological Impact Assessment (The Ecology Co-op April 2026) and the ecological addendum (The Ecology Co-op, October 2026) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of proportionate mitigation. Please note that comments on mandatory biodiversity net gain are provided by Horsham District Council in-house. We have now additionally reviewed the Natural England Consultation Response (Ref: 562243, 5th November 2026) and the Ecology Letter Relating to Ancient Woodlands (The Ecology Co-op, 6th November 2026).

Our previous concerns regarding Irreplaceable Habitats (Ancient Woodland) have now been addressed and we have provided further comments on this below. We note the other included comments are unchanged and are included for posterity. We are now satisfied that there is sufficient ecological information available to support determination of this application.

Designated Sites:

The site lies approximately 9.1km southeast of The Mens Special Area of Conservation (SAC) (MAGIC maps) and is therefore within the 12.0km Wider Conservation Area for this SAC, within which significant impacts or severance to flightlines must be considered. This is because the Wider Conservation Area is the full extent of the range of foraging areas required by Barbastelle bats, which are the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 14.9km southeast of Ebernoe Common Special Area of Conservation (SAC) and therefore lies outside the 12.0km Wider Conservation Area for this SAC and lies approximately 3.6km east of Arun Valley SAC, SPA and Ramsar site.

It is our understanding that will be no severance to the flight lines of foraging or commuting bats from the SAC and habitat connectivity within the site will be maintained. We would like to address that there will be a small section of boundary vegetation removal along the western boundary, however, this is not considered significant in terms of impacts to habitat connectivity in relation to these proposed plans.

We recommend that any external lighting is sensitive to wildlife and secured by a condition of any consent to avoid impacts to foraging and commuting bats. This must follow the Guidance Note 8 Bats and artificial lighting (The Institute of Lighting Professionals & Bat Conservation Trust). In summary, it is highlighted that the following measures should be implemented for the lighting design, which could be informed by a professional ecologist:

- Do not provide excessive lighting. Light levels should be as low as possible as required to fulfil the lighting need.
- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- Warm White lights should be used at <2700k. This is necessary as lighting which emits an ultraviolet component or that has a blue spectral content has a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- Where appropriate, external security lighting should be set on motion-sensors and set to as short a possible a timer as the risk assessment will allow.
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.

We therefore believe that, with mitigation, there will be no Adverse Effect on Integrity of the SAC. We advise the LPA to prepare a project level HRA Appropriate Assessment to record its decision and retain on file. We note Natural England have already been consulted and do not require re-consultation.

Irreplaceable Habitat: Ancient Woodland

We previously commented that we had been provided with additional information relating to the site and the *"Formal designation of a woodland strip north of Storrington as 'ancient woodland"* which includes correspondence from Philip Jones and Natural England Ancient Woodland Inventory Programme Manager which took place in 2024. This correspondence pertains to the two bordering woodland strips along the southern and eastern strips, which were both surveyed by a suitably qualified person and found to classify as Ancient Woodland. We noted, that the correspondence from Natural England indicated that the parcels are below 0.25 hectares and thus would not be included in the inventory, as visible on MAGIC, but the woodlands would still be subject to the same protections detailed within the NPPF, regardless of their size if found to be Ancient.

We have now reviewed the Ecology Letter Relating to Ancient Woodlands (The Ecology Co-op, 6th November 2026) which addressed our concerns. We note the document states Natural England did not find the strip to be ancient, this was not the context of their comments, the comments were only advisory and indicated there could be ancient origins, but the habitats are of an area too small to be included on the mappable inventory. The Natural England response did not provide a definitive opinion regarding whether they found the woodland to be ancient or not. We now have access to detailed maps from the National

Tithe Record Collection of which we have used to inform our desktop assessment. Those historic maps do not show any linear features bordering the site, only the linear features, located offsite. As such, with the evidence provided within the Ecology Letter Relating to Ancient Woodlands (The Ecology Co-op, 6th November 2026) and the results of the Place Services desktop assessment, we are satisfied the recommendation within point two of the submitted additional information is appropriate "*To assess both belts as priority habitat deciduous woodland of local value and consider the imbedded mitigation and compensation prescribed through the scheme on this basis.*"

We recommend the mitigation measures are detailed within a Construction Environmental Management Plan (CEMP): Biodiversity and the compensation measures detailed within the Biodiversity Compensation and Enhancement Measures Strategy. These should be secured by a condition of any consent. We would encourage the compensation strategy is informed by updated spring botanical surveys, to assess the woodland flora, as there were queries regarding the validity of botanical list provided within the information which was requesting the woodlands be added to the Ancient Woodland Inventory.

We have no objections on ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership.

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in the Ecological Impact Assessment (The Ecology Co-op April 2026) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly those recorded in the locality.

We also support the proposed reasonable biodiversity measures for protected, Priority and threatened species, as outlined in National Policy N2 1(f) of the National Planning Policy Framework (August 2026). Reasonable biodiversity measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Compensation and Enhancement Measures Strategy to be secured as a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013. We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological Impact Assessment (The Ecology Co-op April 2026) *as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

This will include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason*:* To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

2. CONCURRENT WITH RESERVED MATTERS: TIME LIMIT ON DEVELOPMENT BEFORE FURTHER SURVEYS ARE REQUIRED

"If the development hereby approved does not commence within one year from the date of the planning consent, the approved ecological mitigation measures secured through condition shall be reviewed and, where necessary, amended and updated. This is based on the Advice Note for the Lifespan or Ecological reports and surveys (CIEEM,2019).

The review shall be informed by further ecological surveys commissioned to:

i. establish if there have been any changes in the presence and/or abundance of bats [redacted] likely to be present and

ii. identify any likely new ecological impacts that might arise from any changes.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and

approved in writing by the local planning authority prior to the commencement of development.

Works will then be carried out in accordance with the proposed new approved ecological measures and timetable."

Reason: To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

3. CONCURRENT WITH RESERVED MATTERS: PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY

"A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.

The CEMP (Biodiversity) shall include the following.

a) Risk assessment of potentially damaging construction activities.
b) Identification of "biodiversity protection zones".
c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
d) The location and timing of sensitive works to avoid harm to biodiversity features.
e) The times during construction when specialist ecologists need to be present on site to oversee works.
f) Responsible persons and lines of communication.
g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority"

Reason*:* To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

4. CONCURRENT WITH RESERVED MATTERS: PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY COMPENSATION AND ENHANCEMENT MEASURES STRATEGY

"Prior to any works above slab level, a Biodiversity Compensation and Enhancement Measures Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist, shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Compensation and Enhancement Measures Strategy shall include the following:

a) Purpose and conservation objectives for the proposed measures or features;
b) detailed designs or product descriptions to achieve stated objectives;
c) locations of proposed measures or features by appropriate maps and plans (where relevant);
d) persons responsible for implementing the measures or features; and
e) details of initial aftercare and long-term maintenance (where relevant).

The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter."

Reason: To support protected, Priority and threatened species and allow the LPA to discharge its duties under National Policy N2 1(f) of NPPF August 2026 and s40 of the NERC Act 2006 (as amended).

5. CONCURRENT WITH RESERVED MATTERS: PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

"*Prior to occupation, a "lighting design strategy for biodiversity" in accordance with Guidance Note 08/23 (Institute of Lighting Professionals) shall be submitted to and approved in writing by the local planning authority. The strategy shall:*

a) identify those areas/features on site that are particularly sensitive for Bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
b) show how and where external and internal lighting will be installed (through provision of lighting layout plans, isolux contour plans, vertical and horizontal illuminance assessments, internal light spill assessment, luminaire specifications, mounting heights, aiming angles, shielding measures, and lighting control strategies) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

Reason: To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

Please do not hesitate to contact us if you have any queries in relation to this advice.

Hayley Dean MCIEEM MSc BSc (Hons)
Senior Ecological Consultant
Place Services at Essex County Council

Place Services provide ecological advice on behalf of Horsham District Council.

Please note:

This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

We are unable to respond directly to applicants/agents or other interested parties. Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.

Place Services have a policy relating to the use of AI. Unless otherwise stipulated, any AI use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please contact us for information about our AI guidance.

Horsham District Council
Habitats Regulations Assessment Appropriate Assessment

Plan/project: DC/26/1168 | Outline application, with all matters reserved, for the phased development comprising: Phase 1 construction of the access road (to be delivered through a subsequent Reserved Matters Application pursuant to Outline Permission DC/24/2006); and Phase 2 residential development of up to 56 dwellings with associated landscaping, pedestrian and vehicular access| Land North of Melton Drive Storrington West Sussex

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

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

In line with the Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a development is likely to result in significant effects on a Habitats site. HRA screening concluded that it is not possible to rule out likely significant effects without mitigation in place. **This report is therefore an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended).**

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

Table 1: Screening matrix

Stage 1 HRA screening	
Brief description of the Plan/Project	**Application:** DC/26/1168 **Planning Application:** Outline application, with all matters reserved, for the phased development comprising: Phase 1 construction of the access road (to be delivered through a subsequent Reserved Matters Application pursuant to Outline Permission DC/24/2006); and Phase 2 residential development of up to 56 dwellings with associated landscaping, pedestrian and vehicular access **Location:** Land North of Melton Drive Storrington West Sussex
Brief description of the Habitats sites within scope of this assessment	The Mens SAC (Sussex bat SAC) and Ebernoe Common SAC lie within West Sussex and the Impact Risk Zones identified by Natural England includes Horsham District. The Mens Special Area of Conservation (SAC) is located approximately 9.1km to the northwest of the site and lists Barbastelle bats as a qualifying feature. A long and varied history of management has seen The Mens move from an open, wood pasture system with huge, spreading parkland trees and pollards to a high forest with closely spaced trees with narrow crowns. A lack of management in recent years has added to this silvicultural diversity. Ebernoe Common SAC is located approximately 14.9km northwest of the site and lists Barbastelle and Bechstein's bats as qualifying features. Ebernoe Common is dominated by old wood pasture where Commoners would have turned out their cattle or pigs to graze and browse on young trees and scrub, beech mast and acorns, or on the grassy meadows in glades and clearings. Grazing stopped by the middle of the 20th century and the wood pasture became more and more overgrown. Great effort has been put into opening up glades and rides and restoring grazing to this SAC.

	Arun Valley SAC, SPA and Ramsar is approximately 3.6km to the west, and lists rare and diverse plant, invertebrate and bird assemblages as qualifying features. It consists of low-lying grazing marsh, largely on alluvial soils, but with an area of peat derived from a relict raised bog. Variation in soils and water supply lead to a wide range of ecological conditions and hence a rich flora and fauna.
Qualifying Features for SPA/SAC	**The Mens SAC** Annex I habitats that are a primary reason for selection of the site: *9120 Atlantic acidophilous beech forests with Ilex and sometimes also Taxus i*n the shrub layer (Quercion robori-petraeae or Ilici-Fagenion) The Mens is an extensive area of mature Beech Fagus sylvatica woodland rich in lichens, bryophytes, fungi and saproxylic invertebrates, and is one of the largest tracts of Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range. It is developing a near-natural high forest structure, in response to only limited silvicultural intervention over the 20th century, combined with the effects of natural events such as the 1987 great storm. Annex II species present as a qualifying feature, but not a primary reason for site selection: 1308 Barbastelle *Barbastella barbastellus* **Ebernoe Common SAC** Annex I habitats that are a primary reason for selection of this site 9120 Atlantic acidophilous Beech forests with Ilex and sometimes also Taxus in the shrub layer (Quercion robori-petraeae or Ilici-Fagenion). Ebernoe Common has an extensive block of Beech high forest and former wood-pasture over dense Holly *Ilex aquifolium*, and has a very rich epiphytic lichen flora, including *Agonimia octospora* and *Catillaria atropurpurea.* It represents Atlantic acidophilous Beech forests in the south-eastern part of the habitat's UK range. The Beech woodland is associated with other woodland types, open glades and pools, which contribute to a high overall diversity. The woods are important for a number of bat species, in particular 1323 Bechstein's bat *Myotis bechsteinii* and 1308 Barbastelle. Annex II species that are a primary reason for selection of this site: 1308 Barbastelle *Barbastella barbastellus* A maternity colony of Barbastelles utilises a range of tree roosts in this area of 91A0 old sessile Oak woods with Ilex and *Blechnum* in the British Isles, which has a dense understorey of holly as well as open glades and open water. Maternity roost sites are usually in dead tree stumps, but the species appears to be present throughout the year, with individuals utilising a range of roost sites in tree holes and under bark. 1323 Bechstein`s bat *Myotis bechsteinii* A maternity colony of Bechstein's bat is associated with this area of 91A0 Old sessile Oak woods with *Ilex* and *Blechnum* in the British Isles. Roosts are mainly i*n old woodpecker holes in the stems of live mature oak* Quercus petraea trees. **Arun Valley SPA** A037 Bewick's swan, *Cygnus columbianus bewickii* (non-breeding). During the time of site notification, the SPA supported 115 individuals representing at least 1.6% of the wintering population in Great Britain (5 year peak mean 1992/93 - 1996/97).

	During the non-breeding season, the SPA regularly supports an assemblage of waterfowl with the area regularly supporting 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97) including: Shoveler *Anas clypeata*, Teal *Anas crecca*, Wigeon *Anas penelope,* Bewick's Swan *Cygnus columbianus bewickii.* **Arun Valley SAC** 4056 Little Whirlpool Ramshorn snail *Anisus vorticulus* *Anisus vorticulus* occurs across a range of sites in southern and eastern England. The Arun valley is one of the three main population centres for this species in the UK. This proposed site includes two of its core sites in the wash lands of the Arun floodplain (Pulborough Brooks and Amberley Wild Brooks SSSIs.
Qualifying Features for Ramsar	**Arun Valley Ramsar** **Ramsar criterion 2** The site holds seven wetland invertebrate species listed in the British Red Data Book as threatened. One of these, *Pseudamnicola confusa*, is considered to be endangered. The site also supports four nationally rare and four nationally scarce plant species **Ramsar criterion 3** In addition to the Red Data Book invertebrate and plant species, the ditches intersecting the site have a particularly diverse and rich flora. All five British duckweed (*Lemna* species), all five water-cress (*Rorippa* species), and all three British water milfoils (*Myriophyllum* species), all but one of the seven British water dropworts (*Oenanthe* species), and two-thirds of the British pondweeds (*Potamogeton* species) can be found on site. **Ramsar criterion 5** Assemblages of international importance: Species with peak counts in winter: 13774 waterfowl (5 year peak mean 1998/99-2002/2003).
Conservation Status of the relevant Qualifying Features	**The Mens SAC** The Barbastelle is one of the UK's rarest mammals. Few maternity roost sites are known in the UK. While the SAC series makes a contribution to securing favourable conservation status for this Annex II species, wider measures are also necessary to support its conservation in the UK. These are outlined in the Species Biodiversity Action Plan (DEFRA website). *It is likely that its low population density and slow population growth make it particularly vulnerable to:* *• further loss and fragmentation of ancient deciduous woodland habitat;* *• loss, destruction and disturbance of roosts in buildings, trees and underground sites;* *• a reduction in numbers of insect prey due to habitat simplification acting through factors such as fertiliser use and intensive grazing.* **Ebernoe Common SAC** Barbastelle as outlined for The Mens SAC. Bechstein's Bat Species Biodiversity Action Plan (DEFRA website): *The rarity of this species means that it is poorly understood, but according to the national species action plan, its low population density, exacting habitat requirements and low rates of reproduction make it particularly vulnerable to factors such as:* *• Further loss and fragmentation of open ancient deciduous woodland habitat.* *• Loss, destruction and disturbance of roosts or potential roosts (particularly in old trees)* **Arun Valley SAC, SPA and Ramsar** In line with the national trend, the number of Bewick's swans wintering in the Arun Valley has declined since the time of designation and is now typically

	fewer than 50 birds. This may reflect an overall decline in the population of the species and/or be due to the effects of a milder climate in which more are able to winter in continental Europe (The Birds of Sussex, 2014). The waterfowl assemblage numbers fluctuate depending upon conditions in the valley but over the past five years have averaged 40,311, an increase from the five year mean of 27,241 at the time of designation. The Arun Valley is one of the remaining strongholds for the Little Whirlpool Ramshorn Snail.
Conservation Objectives (Only Relevant for SPA/SAC)	**The Mens SAC** 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; • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site. **Ebernoe Common SAC** 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; • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site. **Arun Valley SAC & SPA** 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; • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.
Key vulnerabilities / factors affecting site integrity	Issues listed in the relevant Site Improvement Plan (SIP) are: **The Mens SAC** • Forestry and woodland management; • Habitat connectivity for barbastelle bats; • Invasive species; • Changes in land management, with reference to foraging and commuting routes; • Air pollution, risk of atmospheric nitrogen deposition; • Public access / disturbance, with regards to light levels. The mechanism for addressing these issues within the SIP is investigation, research and monitoring; with the exception of appropriate management, and removal of, rhododendron, within The Mens SAC.

	Ebernoe Common SAC • Forestry and woodland management; • Off-site habitat availability / management; • Habitat fragmentation; • Change in land management, with reference to foraging and commuting routes for Barbastelles; • Hydrological changes; • Air pollution, risk of atmospheric nitrogen deposition; • Public access / disturbance, with regards to light levels. Again, the mechanism for addressing all of these issues within the SIP is investigation, research, monitoring at this stage. **Arun Valley SAC and SPA** • Inappropriate water levels • Water pollution • Inappropriate ditch management • Disturbance Again, the mechanism for addressing all of these issues within the SIP is investigation, research, monitoring at this stage. Natural England's substantive advice (September 2021) is that the Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of; • Arun Valley Special Area Conservation (SAC) • Arun Valley Special Protection Area (SPA) • Arun Valley Ramsar Site
Assessment Criteria	
The individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the Habitats site	There is one record for Barbastelle bat within 2km of the site and no European Protected Species Mitigation Licences have been granted for this species within 2km of the site (Sussex Biodiversity Record Centre – accessed under licence) and (MAGIC maps). The Ecological Impact Assessment (The Ecology Co-op April 2026) recorded 25 Barbastelle registrations from static detector surveys, which constituted <1% of all bat calls recorded. It is highlighted that static records are only an indicator of site use, in terms of commuting and foraging, they are not sources which can define whether there is a roost present on site. Greenaway (2008) has radio tracked Barbastelle bats from both SACs and has identified Barbastelle bat flight lines and foraging kernels. In addition to the SACs containing their roosting sites, the bats also require access to habitats outside the boundary of the SACs. This habitat is integral to supporting bats associated with the SACs and is often referred to as functionally- linked habitat. Such functionally linked habitat includes the following: • Flightlines – these are key commuting routes from roosts to foraging (or feeding) areas used by the bats. The Barbastelle flightlines around Ebernoe Common and The Mens have been investigated through survey and are shown in the Sussex bat SAC landscape tool for planning. • Foraging areas – these are the areas of land where bats feed. Barbastelle bats can forage 10-15 kilometres from the roosting sites, and they prefer wet meadows and riparian habitats. Bechstein's tend to forage in and around the woodland where they roost with limited outward travel. The Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol provides advice for developers and local Councils when assessing applications which fall within an identified 12 km Impact Zone for The Men's SAC, Ebernoe Common SAC. In line with this Protocol, this application is located within the wider Conservation Area of The Men's SAC, and significant impacts or severance to flightlines need to be

considered. This development does not occur along one of the identified flightlines.

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

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

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

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

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

The proposals retain the bordering vegetation, retaining a buffer and recommending a wildlife sensitive lighting scheme. Without securing the lighting plan details and ensuring they are implemented as submitted this could result in an alteration to the availability of foraging and commuting routes for Barbastelle around the site, and to impact commuting routes across the wider area. This would be in conflict with the conservation objectives for both SACs which include 'maintaining or restoring the population of qualifying species'.

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

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

Invasive species

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

Hydrological changes

This threat / issue is of no relevance to The Men's SAC and Ebernoe Common SAC.

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

Therefore, there is a predicted Likely Significant Effects due to hydrological changes in combination with other plans and projects, so these have been screened in.

	Air pollution The proposal will result in an increase in local residents and use of the SACs and Arun Valley SPA, and Ramsar are currently above their critical load for nitrogen deposition as noted in the HRA Screening Statement for Petworth Neighbourhood Development Plan (South Downs National Park Authority, 2017). Natural England Advice to Local Authorities when Considering Air Quality Impacts at HRA poses that air pollution impacts are predominantly considered within 200m of a road. As the development is >200m from any Habitats site, the potential for LSE on the Habitats sites due to air pollution can be screened out and will not be considered further. **Public access / disturbance, with regards to light levels.** The HRA Screening Statement for Petworth Neighbourhood Development Plan (South Downs National Park Authority, 2017) notes that most visits to The Men's and Ebernoe Common SACs take place during daylight, with low levels of recreation at night. As such, they conclude that significant adverse effects due to lighting are unlikely. Recreation itself (i.e. during daylight hours) is not listed as threat within the SIPs. Whilst there is potential for disturbance to local flightlines from increased light levels, light spill is not anticipated to extend into the wider landscape. Therefore, there is no potential for disturbance effects to the habitat or Barbastelle within the designated site. This impact pathway therefore needs to be screened out. **In combination effects** There is no potential for LSE from direct land take, forestry and woodland management, invasive species, hydrological connections, or air pollution there is no potential for the development proposals to contribute to any likely significant effects along these pathways, in combination with other plans and projects. However, impacts from disturbance with regards to increased levels of lighting and loss of connectivity on foraging and commuting Barbastelle bats, as qualifying feature of both The Men's SAC and Ebernoe Common SAC have already been screened in for further assessment from the development alone. In combination effects will be considered at stage 2 Appropriate Assessment.
Test 1 the significant test:	The development will result in new external lighting, which without mitigation could result in the illumination of the commuting and foraging habitat within the Impact Risk Zone of the SACs. The LPA therefore anticipates that, without mitigation, it is not possible to conclude no 'likely significant effect' (LSE) to The Men's SAC in terms of **disturbance impacts from lighting and loss of habitat connectivity** when considered from the development alone. The effects due to changes to lighting, in-combination with other plans and projects, are also possible pathways for LSE so these will be assessed further in Stage 2: Appropriate Assessment. Therefore, in accordance with the Sussex Bat SAC planning and landscape scale enhancement protocol, this assessment needs to proceed to HRA Stage 2: Appropriate Assessment. This will consider, with mitigation, the impacts of disturbance from lighting on Barbastelle bats from the above designated site, either alone or in combination with other plans and projects. After mitigation has been embedded into the project design, Test 2 – the integrity test then needs to be applied.
Stage 2 Appropriate Assessment	

The above Stage 1 HRA screening has determined that LSE are possible at The Men's SAC as a result of impacts on habitat connectivity and availability for foraging and commuting Barbastelle bats.

These pathways have been screened in, and the potential for adverse effects on site integrity, either alone, or in-combination will be assessed.

Therefore, this section of the report to inform HRA Stage 2 only discusses the potential for impacts from new lighting as a result of the proposed development.

Potential for Adverse Effects On the Integrity (AEOI) of a Habitats site from the development alone.	Barbastelle may commute and forage along the treelines onsite and therefore the site could be important for Barbastelle bats within the bat sustenance zone of a bat SAC designated for this Appendix II species. Based on published data[1] Natural England recommends that the Zone of Influence of 12km (as detailed on Defra's MAGIC map 2022) is used for the wider conservation area for the Sussex Bat SACs and all impacts are assessed. This development is within the 12km "wider conservation area" for The Men's SAC and lying within a 'bat sustenance zone' for Barbastelle bats, a designated feature of the SACs as identified in the Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol. From the submitted documents, including the Biodiversity Impact Calculation (The Ecology Co-op, April 2026), it appears that there will be a loss of open areas of other neutral grassland to make space for the residential dwellings, it is out understanding from reviewing the Illustrative Masterplan that the central band of individual trees will be retained where possible, with additional tree planting proposed. Along the western boundary there is a band of Bramble scrub, which there will be a break in to enable the approved site access. The break is not considered significant and will not sever foraging or commuting corridors.
Potential for Adverse Effects On the Integrity (AEOI) of a Habitats site from the development in combination with other plans and projects.	Based on the scale of the proposed development, and the conclusions of the HDC Local Plan HRA, any further search using data from surrounding LPA planning portals for other projects was not considered necessary. Horsham District Planning Framework (HDPF, 2015), Section 9.34 within Policy 31 states: In the case of The Men's, development must not impact on bat flight paths in the district. As recommended in the Council's Habitat Regulations Assessment of this plan, a 'bat sustenance zone' has been identified and is shown on the Policies Map (see Appendix B). Within this area, it may be necessary for compensatory measures such as hedgerow enhancement to be undertaken prior to any development. The HRA for the Chichester Local Plan Review (ACOM, 2018), considers disturbance of bat flight lines from both The Men's and Ebernoe Common SACs. With regards to The Men's, they conclude that *"Along with implementation of the Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol' (2017), the Chichester Local Plan policies provide a protective framework for the SAC and the Local Plan Review will not result in an adverse effect in integrity on this SAC".* The HRA Appropriate Assessment for development in the locality which could act in combination relates to Land at Wiltshire Farm, Pickhurst Lane, Codmore Hill, Pulborough (DC/19/0591) for redevelopment of Wiltshire Farm, Pulborough (Place Services, August 2019). The site comprises a number of outbuildings and grassland fields. The proposals entail the demolition of barn on site and construction of a replacement residential accommodation, concluded with mitigation secured, no adverse effect on site integrity of The Men's SAC or Ebernoe Common either alone or in combination with other plans and projects and Natural England agreed with this decision.

	Other developments within the wider conservation zone for The Men's SAC include the HRA Appropriate Assessment (Place Services, May 2020) for Land at Lyons Farm Lyons Road Slinfold (DC/19/1723) for an outline application for the erection of a continuing care retirement community, concluded with mitigation secured, no adverse effect on site integrity of The Men's SAC either alone or in combination with other plans and projects and Natural England agreed with this decision. This was refused consent and a decision of appeal APP/Z3825/W/20/3265874 has been withdrawn. The HRA Appropriate Assessment (Place Services, June 2020) for Land at Wellcross Farm Broadbridge Heath (DC/19/1897) which was allowed at appeal (APP/Z3825/W/20/3262938) also for an outline application for the erection of a continuing care retirement community, concluded with mitigation secured, no adverse effect on site integrity of The Men's SAC or Ebernoe Common either alone or in combination with other plans and projects and Natural England agreed with this decision. The HRA Appropriate Assessment (Place Services, Feb 2021) for Land at Duckmoor East of Billingshurst (DC/20/2607) for an Outline Application for the development of 83 residential units, landscaping, access, parking and associated infrastructure on land at Duckmoor, East Billingshurst concluded that with mitigation secured the project will avoid an Adverse Effect on the Integrity of the Habitats sites listed in this assessment, either alone or in combination with other plan and projects. The application was refused consent but allowed at appeal (APP/Z3825/W/21/3283823). Natural England has confirmed that it has no objection to the development, providing all relevant mitigation is secured in any planning permission which the Inspector has included in the decision notice. Additional HRA Appropriate Assessment for development in the locality which have been deemed to have, with mitigation secured, no adverse effect on site integrity of The Men's SAC or Ebernoe Common either alone or in combination with other plans and projects include: DC/22/0141 (Cattlestone Farm, Pulborough), SDNP/20/05831/FUL (Pulborough Garden Centre), DC/21/2530 (Land South of East Street Billingshurst), DC/20/2567 (Billhook Farm West, Billinghurst), DC/19/02952 (Land at Platts Roundabout, Billinghurst) and DC/22/0141 (Cattlestone Farm, West Chiltington). Other developments nearby over the past 6 years have comprised of smaller developments such as extensions and building conversions. No in - combination effects are therefore considered likely to result from the on-site proposals and these small-scale developments. Any development proposals in the wider area around Broadbridge Heath will need to be assessed within the Horsham Local Plan HRA Appropriate Assessment or bespoke assessments at application stage. Given the above, and once the mitigation and compensation measures have been incorporated and secured, there is no potential for significant impacts from the proposals, it is considered that there is no potential for the development proposals to contribute to any adverse effects on integrity, in combination with other plans and projects.
Proposed mitigation for the project to secure the mitigation as a condition of any consent	**Summary of mitigation package** The implementation of an ecologically sensitive lighting scheme which specifies that lighting should comply with Bat Conservation Trust and the Institution of Lighting Professionals, including the measures recommended by GN:08/23 (ILP) (Ecological Impact Assessment (The Ecology Co-op April 2026). Retention of all hedgerows and boundary habitat on site (Ecological Impact Assessment (The Ecology Co-op April 2026)), except for where access is required along the western boundary. Soft landscaping, including tree planting will be undertaken.

	The avoidance and mitigation measures are considered appropriate to avoid adverse effects on the integrity of the interest features (Barbastelles) of The Men's SAC likely to occur within the site. The measures will be secured by a condition of any consent
Test 2 – the integrity test	**Conclusion:** Having considered the proposed avoidance and mitigation measures above, Horsham District Council concludes that, the project will avoid an Adverse Effect on the Integrity of the Habitats sites listed in this assessment, either alone or in combination with other plan and projects. Having made this appropriate assessment of the implications of the project for the sites in view of those sites' conservation objectives and having consulted Natural England and fully considered any representation received where necessary, the authority may now agree to the project under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). As the mitigation has been considered after HRA screening, this HRA Appropriate Assessment is in line with the People over Wind CJEU Court ruling.

Approving Ecologist: Hayley Dean
Date: 18th November 2026

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