Date: 28 October 2024
Our ref: 490603
Your ref: DC/24?0862

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Crewe Business Park
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Ms A Johnson
Horsham District Council
Parkside
Chart Way
Horsham RH12 1RL

BY EMAIL ONLY
planning@horsham.gov.uk

Dear Ms Johnson

Planning consultation: Erection of 1No. dwelling (in the alternative to permission granted under DC/22/0435 – Prior Notification for the change of use of an agricultural building to residential (Class C3) to form 1no. dwellinghouse).

Location: South House Farm Marringdean Road Billingshurst RH14 9HH

Thank you for your consultation on the above dated 10 October 2024 which was received by Natural England on the same date.

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

European sites
Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest Impact Risk Zones
The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Mrs Sally Ireland
Consultations Team

Annex A –Natural England general advice

Protected Landscapes
Paragraph 182 of the National Planning Policy Framework - GOV.UK (www.gov.uk) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling-up and Regeneration Act 2023 (legislation.gov.uk) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes
Paragraph 180 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) - Landscape Institute for further guidance.

Biodiversity duty
Section 40 of the Natural Environment and Rural Communities Act 2006 (legislation.gov.uk) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the Complying with the biodiversity duty - GOV.UK (www.gov.uk) for further information.

Designated nature conservation sites
Paragraphs 186-188 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see Habitats regulations assessments: protecting a European site - GOV.UK (www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see Appropriate assessment - GOV.UK (www.gov.uk) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones (England) (arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified (Sites of special scientific interest: public body responsibilities - GOV.UK (www.gov.uk).

Protected Species
Natural England has produced Protected species and development: advice for local planning authorities (gov.uk) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Annex A –Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to Wildlife licences: when you need to apply - GOV.UK (www.gov.uk) for more information.

Local sites and priority habitats and species
The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 180, 181 and 185 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local nature recovery strategies - GOV.UK (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and species of principal importance in England - GOV.UK (www.gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitat (Draft) - data.gov.uk (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains
Development should provide net gains for biodiversity in line with the NPPF paragraphs 180(d), 185 and 186. Major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is expected to be extended to smaller scale development in spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

For further information on the timetable for mandatory biodiversity net gain, we refer you to Biodiversity Net Gain moves step closer with timetable set out - GOV.UK (www.gov.uk). Biodiversity net gain - GOV.UK (www.gov.uk) provides more information on biodiversity net gain and includes a link to the draft Biodiversity net gain - GOV.UK (www.gov.uk) Planning Practice Guidance.

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric - GOV.UK (www.gov.uk) for more information. For small development sites, The Small Sites Metric - JP040 (naturalengland.org.uk) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 186 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land

Annex A –Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 74, 108, 124, 180, 181 and 186). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (naturalengland.org.uk) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural environment - GOV.UK (www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees
The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. The Natural England Access to Evidence - Ancient woodlands Map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 180 and 181). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk). Find open data - data.gov.uk on Agricultural Land Classification or use the information available on MAGIC (defra.gov.uk).

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (publishing.service.gov.uk) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim minerals extraction and landfill sites to agriculture - GOV.UK (www.gov.uk), which provides guidance on soil protection for site restoration and aftercare. The Soils Guidance (quarrying.org) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure
For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Annex A –Natural England general advice

The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails
Paragraphs 104 and 180 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. We refer you to Find your perfect trail, and discover the land of myths and legend - National Trails for information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Further information is set out in the Planning Practice Guidance on the Natural environment - GOV.UK (www.gov.uk).

Horsham District Council
Habitats Regulations Assessment Screening Record

Plan/project: **DC/24/0862 | Erection of 1No. dwelling (in the alternative to permission granted under DC/22/0435 - Prior Notification for the change of use of an agricultural building to residential (Class C3) to form 1no. dwellinghouse).| South House Farm Marringdean Road Billingshurst West Sussex RH14 9HH**

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 possible to rule out likely significant effects without mitigation in place.

Table 1: Screening matrix

Stage 1 HRA screening	
Brief description of the Plan/Project	**Application:** DC/24/0862 Location: South House Farm Marringdean Road Billingshurst West Sussex RH14 9HH Proposal: Erection of 1No. dwelling (in the alternative to permission granted under DC/22/0435 - Prior Notification for the change of use of an agricultural building to residential (Class C3) to form 1no. dwellinghouse).
Brief description of the Habitats sites within scope of this assessment	The Mens SAC and Ebernoe Common SAC (Sussex bat SACs) lie within West Sussex and the Impact Risk Zone identified by Natural England includes Horsham District. The Arun Valley SPA, SAC and Ramsar also lies within West Sussex and is within 20km of the development. The Mens Special Area of Conservation (SAC) is located 6.5km west 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 11.2km to the north west, 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 6.5km to the south 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.*

	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.
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	No rare or unusual species (such as Annex I species) have been recorded onsite. 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 and Singleton and Cocking tunnels SAC. In line with this Protocol, this application is located within the Wider Conservation Area for the Mens SAC and significant impacts or severance to flightlines need to be considered. 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 Preliminary Bat Potential Report (Sylvatica Ecology, June 2021) stated that the barn (Building2 which is the same as building D) had negligible potential to support roosting bats. Barbastelle bats have not been recorded on the development site either roosting or foraging/commuting. All boundary vegetation will be retained and protected as part of the proposals. A sensitive lighting scheme designed in accordance with ILP Guidance Note 08/18 was recommended to be utilised across the site, with all lighting angled down and away from adjacent woodland, hedge and treelines. Lighting will be timed to ensure periods of complete darkness, ensuring the continued ecological functionality of the boundary vegetation. Therefore, there is no potential for habitat fragmentation or loss of functionally linked land for Barbastelle bats as part of the proposal and therefore they have been screened out for further assessment.

Bechstein's bats are a qualifying feature for Ebernoe Common SAC, but were not recorded on site, and are considered most likely to remain within 1.5km of their roosts. As such, Bechstein's are considered likely to be absent, and as such, the potential for LSE is screened out, and they will not be considered further.

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

Hydrological changes
This threat / issue is of no relevance to The Mens SAC and Ebernoe Common SAC. The development is not within the 5km Impact Risk Zone for the Arun Valley sites identified on MAGIC. Also, from MAGIC map it appears that there is no hydrological connectivity between the site and the Arun Valley SPA, SAC and Ramsar. Therefore, there is no potential for Likely Significant Effects due to hydrological changes, so this can be screened out and will not be considered further**.**

Air pollution
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 predominately considered within 200m of a road. As the major roads to and from the site are not within 200m of the Arun Valley SPA, SAC and Ramsar, impacts from air quality can be screened out and will not be considered further.

Public access / disturbance, with regards to light levels.
The HRA Screening Statement for Petworth Neighbourhood Development Plan (South Downs National Park Authority, 2017) notes that most visits to the Mens and Ebernoe Common SACs take place during daylight, with low levels of recreation at night. As such, they conclude that significant adverse effects due to lighting are unlikely. Recreation itself (i.e. during daylight hours) is not listed as threat within the SIPs. Given this, the small scale nature of the proposals, as well as the distance from the designated sites, LSE on the Habitats Sites from this impact pathway can be screened out and will not be considered further

	In combination effects As there is no potential for LSE from direct land take, forestry and woodland management, invasive species, hydrological connections, air pollution or public access / disturbance with regards to light, 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. Impacts on habitat connectivity for commuting and foraging Barbastelle bats, as qualifying feature of both The Mens SAC and Ebernoe Common SAC has already been screened out for further assessment from the development alone and there is no potential for any other impact pathways to result in likely significant effects, in combination with other plans and projects, as these are also screened out.
Test 1 the significance test:	As the development will not affect any of the sensitive features/threats to the aforementioned Habitats sites and the associated Annex II bat species the LPA considers that, without mitigation, the development is not likely to result in a 'likely significant effect' (LSE) to The Mens SAC, Ebernoe Common SAC or Arun Valley SAC, SPA and Ramsar site. Therefore, this assessment does not need to proceed to HRA Stage 2: Appropriate Assessment. **Conclusion:** Having considered the proposal, Horsham District Council concludes that, the project will not have a Likely Significant Effect on the designated features of the Habitats sites listed in this assessment, either alone or in combination with other plan and projects. Having prepared this HRA screening of the implications of the plan or project for the sites in view of those sites' conservation objectives, the authority can agree to the project under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Approving Ecologist: Sue Hooton, Principal Ecological Consultant - Place Services
Date: 9th October 2024

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