

Horsham District Council Habitats Regulations Assessment (HRA) Screening Matrix

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

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. Habitats 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.

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: HRA Screening matrix for water neutrality

Stage 1 HRA screening	
Brief description of the development project	Application reference: DC/26/0242
	Application address: Tanners Farm Lordings Road Adversane West Sussex
	Application description: Renovation and conversion of redundant barns for residential use
	Type of application: Householder
	Planning officer: Daniel Holmes
Details of the development project	Proximity to Arun Valley SAC / SPA / Ramsar: Is the application site: A) Within the Sussex North Water Supply Zone (WSZ) YES B) Within the 5km Zone of Influence for functionally linked habitats for Arun Valley SPA / Ramsar site No. The site is located approximately 6.1km north of the Arun Valley SAC, SPA and Ramsar site and is therefore outside the 5km Zone of Influence for functionally linked habitats. C) Is the Arun Valley SAC / SPA / Ramsar potentially impacted by the development: Yes. The site lies within the Sussex North Water Supply Zone and approximately 6.1km from the Arun Valley SAC, SPA and Ramsar site. Water neutrality considerations associated with the Arun Valley designated sites are considered separately by Horsham District Council following Natural England's Withdrawal Statement dated 31 October 2025. D) If YES to question (A) is the planning application directly connected with or necessary to the management of the a SAC/SPA/Ramsar site? No. The proposal relates to the renovation and conversion of redundant barns for residential use and is not directly connected with, or necessary to, the management of any European designated site.

Brief description of the Habitats sites within scope of this assessment	The Habitats sites within scope of this assessment are The Mens SAC, Ebernoe Common SAC, and the Arun Valley SAC/SPA/Ramsar. The Mens SAC is located approximately 3.6km west of the site and is designated principally for its extensive mature beech woodland habitat and for supporting Barbastelle bats as a qualifying feature. Ebernoe Common SAC is located approximately 8.4km west of the site and is designated for its Atlantic acidophilous beech woodland together with populations of Barbastelle and Bechstein's bats. The Arun Valley SAC, SPA and Ramsar site is located approximately 6.1km south of the site. The designated site comprises low-lying grazing marsh and wetland habitats of high ecological value supporting important assemblages of wintering birds, wetland plants and invertebrates, including the Little Whirlpool Ramshorn snail and Bewick's swan. Whilst the Arun Valley SAC, SPA and Ramsar site falls within the wider scope of consideration due to the site's location within the Sussex North Water Supply Zone, the primary ecological pathways assessed within this screening relate to The Mens SAC and Ebernoe Common SAC
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; • Changes in land management, with reference to foraging and commuting routes for Barbastelle bats; • 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 and monitoring at this stage. Arun Valley SAC, SPA and Ramsar • Inappropriate water levels; • Water pollution; • Inappropriate ditch management; • Disturbance. Again, the mechanism for addressing all of these issues within the SIP is investigation, research and monitoring at this stage. The Arun Valley SAC, SPA and Ramsar site has historically been subject to water neutrality considerations associated with water abstraction within the Sussex North Water Supply Zone. However, Natural England issued a Withdrawal Statement on 31 October 2025 in relation to its previous Position Statement and interim advice. Accordingly, water neutrality considerations are addressed separately by Horsham District Council under the Council's current approach and are not relied upon as part of this bat SAC screening assessment
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HRA Screening 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 Arun Valley SAC, SPA and Ramsar site	The nature of the development would not affect any use of the site by Barbastelle or Bechstein bats and there would be no impact on any key foraging or commuting routes. The development would not result in any land take from designated sites and there is no pathway for woodland management to be affected by the proposal. No external lighting is proposed. The proposed development relates to the renovation and conversion of redundant barns for residential use. The site lies approximately 6.1km north of the Arun Valley SAC, SPA and Ramsar site. The nature of the development would not affect any use of the site by Barbastelle or Bechstein's bats and there would be no impact on any key foraging or commuting routes. The submitted ecological information confirms that all existing trees and hedgerows will be retained and there would therefore be no severance or fragmentation of habitat connectivity for bats. The development would not result in any direct land take from any designated Habitats site and there is no pathway for forestry or woodland management within the designated sites to be affected by the proposal. No significant impacts are identified in relation to habitat connectivity, invasive species, air pollution, or disturbance from lighting. Whilst external lighting may be required, this would be controlled through a Wildlife Sensitive Lighting Design Scheme secured by condition to avoid impacts on foraging and commuting bats. No impact pathways have been identified in relation to The Mens SAC or Ebernoe Common SAC arising from habitat loss, fragmentation, commuting routes, lighting, air pollution or land take. Water neutrality considerations associated with
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	the Arun Valley SAC, SPA and Ramsar site are considered separately by the Local Planning Authority.
Test 1 the significance test: – Can a judgement be made as to whether there could be any potential significant impacts of the development on the integrity of the Arun Valley SPA/SAC/Ramsar.	The Local Planning Authority therefore anticipates that it is possible to conclude no likely significant effect (LSE) on The Mens SAC or Ebernoe Common SAC, either alone or in combination with other plans and projects. The submitted ecological information confirms that the proposal would retain existing habitat connectivity and would not impact identified Barbastelle bat flightlines, commuting routes or functionally linked habitat. The proposal would not result in direct land take from designated Habitats sites and no likely significant effects have been identified in relation to habitat fragmentation, woodland management, air pollution or lighting disturbance. Having considered the proposal, Horsham District Council concludes that the project will not have a Likely Significant Effect on the designated features of The Mens SAC or Ebernoe Common SAC, either alone or in combination with other plans and projects. 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). Water neutrality considerations associated with the Arun Valley SAC/SPA/Ramsar are considered separately in accordance with the Council's approach following Natural England's Withdrawal Statement dated 31 October 2025.

Approving Planner: Daniel Holmes

Date: 27.05.2026