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Date: 08 July 2026 Our ref: 19103

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By email only: Planning Department, planning@horsham.gov.uk

Thank you for requesting advice on this 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/25/0986
Location: Land Opposite Codmore Field House, Plot 3 Hill Farm Lane Codmore Hill West Sussex RH20 1BJ
Proposal: Erection of 1no. detached self-build / custom-build dwelling.

Thank you for re-consulting Place Services on the above 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 Bat 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 Ground Level Tree Assessment (Arbtech, November 2025), Reptile presence/ absence surveys (Arbtech, June 2025), Preliminary Ecological Appraisal (Arbtech, November 2024) and Arboricultural Survey (Arbtech, December 2024), relating to the likely impacts of development on designated sites, protected and Priority species & habitats and

identification of appropriate mitigation measures. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We note from the Preliminary Ecological Appraisal (Arbtech, November 2024) that a Preliminary Roost Assessment was undertaken of a small, densely Ivy clad building present on site. The document states internal access was not feasible due to the density of the Ivy growth, but this was not considered a significant constraint to the appropriate assessment, and the building was assessed as having negligible bat roost potential. We have reviewed the images of the building and whilst Ivy can provide niches suitable for use by roosting bats, we are in agreement with the assessment provided within the Preliminary Ecological Appraisal (Arbtech, November 2024). However, as internal access could not be achieved, should the LPA be minded to grant permission, we recommend the need for a Non-licenced Precautionary Method Statement for bats, to ensure the Ivy is first searched by a suitably qualified ecologist and hand stripped. We recommend this is secured by a condition of any consent.

We note that the Ground Level Tree Assessment (Arbtech, November 2025) now confirms that none of the trees to be removed (Trees T02 and T03 (both Leyland Cypress), T5 (Hawthorn), T9, T10 (both Goat Willow) and T24 (Norway Spruce) (identified as Goat Willow in error), have Potential Roost Features (PRFs) for bats. As none of the trees on the southern boundary have PRFs for bats, we now consider the removal of the trees will create no likely impact on The Mens Special Area of Conservation.

The site lies approximately 3.5km southeast of The Mens Special Area of Conservation (SAC) and is therefore within the 6.5km Key Conservation Area (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). One of the qualifying features for the SACs is Barbastelle bats, although this species has not been recorded within 2km of the site (MAGIC maps). In the Key Conservation Area all impacts must be considered as habitats within this zone are considered critical for sustaining the populations of bats within the SACs (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site also lies approximately 8.9km southeast of Ebernoe Common SAC (MAGIC maps) and therefore lies within the Wider Conservation Area for this SAC.

There are approximately 121 records for bats within 2km of the site, including Soprano Pipistrelle, Brown Long-eared bat, Whiskered bat, Daubenton's bat and Common Pipistrelle bat (Sussex Biodiversity Record Centre – accessed under licence). Three of the records are also for Barbastelle bat, with the nearest being 600 metres west. No EPSLs are present within a 2km radius of the site (MAGIC maps).

We understand from the submitted documents that the site comprises one building, large areas of grassland, woodland and scattered trees which connect to the wider landscape and

there is also a network of waterways. Six trees are due to be removed. However, seven trees will be planted, comprising Hawthorn, Hazel, Field Maple and Himalayan Birch, together with two areas of native scrub and a new native hedge (Planting Plan Drawing number hla 611 03 Revision A (Harper Landscape Architecture LLP, March 2025)).

Therefore, there will be no overall severance to the flight lines of foraging or commuting bats from the SAC and habitat connectivity within the site will be maintained.

It is recommended in the Ground Level Tree Assessment (Arbtech, November 2025) that a sensitive lighting scheme is implemented for this application to mitigate against the increase in light measures following Bat Conservation Trust advice and The Institution of Lighting Professionals.

As there is a potential for habitat fragmentation from light spill of potentially functionally linked land for Barbastelle bats, this has been screened in and will need to be considered at Stage 2 Appropriate Assessment of the LPA's project level Habitats Regulations Assessment (HRA).

As Barbastelle bat may use the onsite habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ground Level Tree Assessment (Arbtech, November 2025)) to avoid impacts from lighting disturbance. This should be secured by a condition of any consent and implemented in full. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely to be present within the local area. This should summarise the following measures recommended by Guidance Note:08/23 (Institute of Lighting Professionals) will be implemented:

- 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 consult Natural England on the conclusion.

The Preliminary Ecological Appraisal (Arbtech, November 2024) recommended reptile presence/ likely absence surveys, which have now been completed and reported within the Reptile presence/ absence surveys (Arbtech, June 2025). The survey was conducted following appropriate methodology and identified no reptiles during the surveys. We are satisfied impacts upon reptiles have been sufficiently considered. We are in agreement with comments within the Landscape design text and recommend suitable enhancements for reptiles are provided, such as log piles.

We support the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) in the Preliminary Ecological Appraisal (Arbtech, November 2024). This should be secured by a condition of any consent and implemented in full.

We are now satisfied that there is sufficient ecological information available to support determination of this application. 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.

We have considered the likely impacts on European Protected Species and applied the Favourable Conservation Status licensing test to demonstrate that the LPA, as a competent authority, has had regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) as this must not be left until the licence application stage when reaching planning decisions.

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 Ground Level Tree Assessment (Arbtech, November 2025), Reptile presence/ absence surveys (Arbtech, June 2025), Preliminary Ecological Appraisal (Arbtech, November 2024) 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, including bats.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Ground Level Tree Assessment (Arbtech, November 2025), Reptile presence/ absence surveys (Arbtech, June

2025) and Preliminary Ecological Appraisal (Arbtech, November 2024) to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). Reasonable biodiversity enhancement measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement 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 Ground Level Tree Assessment (Arbtech, November 2025), Reptile presence/ absence surveys (Arbtech, June 2025) and the Preliminary Ecological Appraisal (Arbtech, November 2024) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the Precautionary Method Statement for mobile protected and Priority species in the Preliminary Ecological Appraisal (Arbtech, November 2024), which avoids impacts on protected species.

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. PRIOR TO COMMENCEMENT: PRECAUTIONARY METHOD STATEMENT FOR BATS

"*A Precautionary Method Statement for bats shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to bats in relation to stripping*

the Ivy from the small building proposed to be removed during the construction phase.

The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter."

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).

3. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY

"Prior to any works above slab level, a Biodiversity Enhancement 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 Enhancement Strategy shall include the following:

a) Purpose and conservation objectives for the proposed enhancement measures;
b) detailed designs or product descriptions to achieve stated objectives;
c) locations of proposed enhancement measures by appropriate maps and plans (where relevant);
d) persons responsible for implementing the enhancement measures; 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 enhance protected, Priority and threatened species and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

4. 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 lighting will be installed (through provision of appropriate lighting plans and technical specifications) 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.

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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.

Horsham District Council
Habitats Regulations Assessment Appropriate Assessment Record

Plan/project: DC/25/0986 | Erection of 1no. detached self-build / custom-build dwelling. | Land Opposite Codmore Field House, Plot 3 Hill Farm Lane Codmore Hill West Sussex RH20 1BJ

The purpose of this 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/25/0986 **Planning Application:** Erection of 1no. detached self-build / custom-build dwelling. **Location:** Land Opposite Codmore Field House, Plot 3 Hill Farm Lane Codmore Hill West Sussex RH20 1BJ
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 3.5km 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 8.9km 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 site is approximately 2.1km to the south, 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. <u>Annex II species that are a primary reason for selection of this site:</u> 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. However, for applications where increased demand for water resources is the only pathway for impacts, Natural England's substantive advice (Position Statement Interim Approach, September 2021) is that such applications - without mitigation - will result in a likely significant effect on the Arun Valley SAC/SPA/Ramsar site in combination with other developments in the Sussex North WSZ. As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley sites, developments within this zone must not add to this impact. Therefore, such applications, even where mitigation is proposed, must progress to Appropriate Assessment (AA).

	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 are three records for Barbastelle bats within 2km of the site, with the nearest approximately 600 metres to the west 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. 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 Mens SAC, and significant impacts or severance to flightlines need to be considered. This development does not occur along one of the identified flightlines. From the submitted documents, it appears that the site comprises one building, large areas of grassland, woodland and scattered trees which connect to the wider landscape and there is a network of waterways. Six trees are due to be removed. However, seven trees will be planted, including Hawthorn, Hazel, Field Maple and Himalayan Birch, together with two areas of native scrub and a new native hedge. Therefore, with mitigation, there will be no overall loss of hedgerow or woodland. 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 – 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.

Barbastelle bat was recorded onsite on 48 occasions in 2025 ((Bat Activity Survey Report (The Ecology Partnership, November 2025)) and there is potential for changes in vegetation structure with habitat loss of glades to alter the availability of foraging and commuting routes for Barbastelle around the site, and to impact commuting routes across the wider area. The removal or fragmentation of commuting routes for this species e.g. treelines, may result in increased energy expenditure and consequently reduced survival. 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 both The Mens SAC and Ebernoe Common SAC as a result of the proposed development.

Bechstein's bats are a qualifying feature for Ebernoe Common SAC. The site lies inside the Ebernoe Common Impact Risk Zone, but 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 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 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. **This is considered under a separate HRA Appropriate Assessment for water neutrality.**

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 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. 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 Mens 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:	As the development will result in new lighting of commuting and foraging habitat within the Impact Risk Zone of the SACs, mitigation will be required in terms of new planting and a sensitive lighting scheme. 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 Mens 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 have been recorded commuting along the treelines and hedgerows onsite and therefore the site is considered 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 Mens 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.
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 Mens 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 Mens 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 Mens 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 is still awaited as the Hearing is in progress. 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 Mens 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 Mens 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) (Ground Level Tree Assessment (GLTA) (Arbtech, November 2025) and Preliminary Ecological Appraisal (Arbtech, November 2024)). • The planting of seven trees comprising Hawthorn, Hazel, Field Maple and Himalayan Birch (Planting Plan Drawing number hla 611 03 Revision A (Harper Landscape Architecture LLP, March 2025)). • The planting of two areas of native scrub (Planting Plan Drawing number hla 611 03 Revision A (Harper Landscape Architecture LLP, March 2025)). • The planting of a new native species hedge comprising Field Maple, Dogwood, Hazel, Hawthorn, Holly, Honeysuckle, Blackthorn and Guelder Rose (Planting Plan Drawing number hla 611 03 Revision A (Harper Landscape Architecture LLP, March 2025)). The avoidance and mitigation measures are considered appropriate to avoid adverse effects on the integrity of the interest features (Barbastelles) of The Men's SACs 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: 8th July 2026

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