

**Habitats Regulations Assessment of  
the Horsham District  
Planning Framework**

Horsham District Council

April 2014

eCountability

Habitats Regulations Assessment of the Horsham District Planning Framework (Preferred Strategy - July 2013) under the Habitats Regulations 2010.

Issue 4 – Final

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## SUMMARY

1. eCountability Ltd was appointed by Horsham District Council in February 2014 to undertake an Appropriate Assessment (AA) of the Horsham District Planning Framework.
2. 'Appropriate Assessment (AA)' is required under the EU Habitats Directive (92/43/EEC), as transposed into the Habitats Regulations 2010, for any proposed plan or project which may have a significant effect on one or more European sites<sup>1</sup> and which is not necessary for the management of those sites. The purpose of AA is to determine whether or not significant effects are likely and to suggest ways in which they could be avoided.
3. This report updates the AA of the Preferred Options stage, undertaken by Treweek Environmental Consultants in 2012. In particular this report reviews the take up of policy recommendations made in that report and the effects of any significant changes in European sites, environmental trends or other plans and projects that may have effects on the European sites in combination with the effects of the Strategy.
4. Screening of the Preferred Options report identified that significant effects could not be ruled out on four European sites, as listed in Table 1. AA was therefore undertaken for potential effects on these sites. Research for this report has confirmed that there have not been any recent designations of European sites within Horsham District or within potential impact distance of it and therefore this AA has studied the same suite of sites.

SACs	SPA	Ramsar Sites
Arun Valley SAC	Arun Valley SPA	Arun Valley Ramsar Site
The Mens SAC		

**Table 1 European sites previously screened in and included in this assessment**

5. AA has assessed the potential effects on site integrity of these sites with reference to the qualifying features (habitats and species) for which they were designated and the site Conservation Objectives.
6. Screening of the Preferred Options report identified four potential impact pathways that could give rise to significant effects on European sites:
  - Increased water demand from new housing causing low river flows and water availability issues in sites.

<sup>1</sup> "European sites" includes Special Areas of Conservation (SACs) designated under the EU Habitats Directive (1992), Special Protection Areas (SPAs) designated under the EU Birds Directive (1979) and Ramsar Sites, designated under the Ramsar Convention.

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- Increased waste water from new housing causing water quality deterioration in wetland sites.
  - Increased housing development causing heightened flood risk in wetland sites, damaging vegetation through prolonged deep flooding in winter, while summer floods threaten invertebrates and make essential site management difficult or impossible.
  - Housing development disrupting foraging routes for bat populations present within sites.
7. The AA finds that the recommendations made in the Preferred Options AA to mitigate potential effects on European sites were for the most part been satisfactorily adopted. The one exception to this is proposed tightening of wording in draft Policy 34. It also concludes that there have been no significant changes in background environmental trends or other reasonably foreseeable plans or projects that could cause potential effects on site integrity of European sites of the Preferred Strategy, alone or in combination with other plans and projects.
8. The Appropriate Assessment concludes that the Strategy will not have an adverse effect on site integrity of any European site and therefore the District Council can proceed with the Planning Framework Preferred Strategy in the context of the Habitats Regulations 2010.

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## 1. Introduction

### 1.1 *Background*

- 1.1.1 eCountability Ltd was appointed by Horsham District Council in February 2014 to undertake an Appropriate Assessment (AA) of the Horsham District Planning Framework.
- 1.1.2 ‘Appropriate Assessment (AA)’ is required under the EU Habitats Directive (92/43/EEC) for any proposed plan or project which is not for the management of European sites and which may have a significant effect upon them. The purpose of AA is to determine whether or not adverse effects on site integrity will occur and to propose ways in which they could be avoided.
- 1.1.3 The Strategy is part of an ongoing plan development process for the Horsham District Planning Framework. Habitats Regulations Assessment has previously been undertaken in a Screening Report in order to inform the Preferred Strategy. (TEC, 2011) and Appropriate Assessment of Preferred Options (TEC, 2012). This AA builds on and updates those reports, in particular the Preferred Strategy AA, with reference to amended draft policies, and changes in background environmental trends and other reasonably foreseeable plans and projects.

### 1.2 *This Report*

- 1.2.1 This report summarises the results of the AA process, undertaken for those European sites which could not be screened out in the AA stage undertaken in September 2012, and reviewed for this report. These sites include the Arun Valley SAC, SPA and Ramsar and the Mens SAC.
- 1.2.2 The Horsham District Planning Framework Preferred Strategy sets out the Vision, Objectives and Strategy for the District over the coming 20 years and beyond. Of particular relevance to AA the strategy identifies the Council’s preferred level of housing development, and, to the extent possible under the provisions of the National Planning Policy Framework 2012, the locations where this development could take place. Following consultation on the Preferred Strategy, the next stage of document production will be the Proposed Submission, which will take into account consultation responses.

### 1.3 *The Legislative Context*

- 1.3.1 The Conservation of Habitats and Species Regulations 2010 (as amended 2012) [the Habitats Regulations] require that Habitats Regulation Assessment (HRA) is applied to all statutory land use plans in England and Wales. Horsham District Council, as the plan-making authority, must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives where (a) the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of the site (Paragraph 102 of the Habitats Regulations 2010).

- 1.3.2** The aim of the HRA process is to assess the potential effects arising from a plan against the conservation objectives of any site designated for its nature conservation importance.
- 1.3.3** The Habitats Regulations transpose the requirements of the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [the Habitats Directive] which aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive].
- 1.3.4** In addition, Government guidance also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process as required by the Regulations. The National Planning Policy Framework, 2012, stated that the following should be treated in the same way as European Sites:
- potential Special Protection Areas and possible Special Areas of Conservation;
  - sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.
- 1.3.5** The process of HRA is based on the precautionary principle and evidence should be presented to allow a determination of whether the impacts of a land-use plan, when considered in combination with the effects of other plans and projects against the conservation objectives of a European Site; would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.
- 1.3.6** It is important to recognise that this AA deals exclusively with the requirements of the Habitats Regulations 2010, which in turn is concerned only with sites designated for their importance at the European level. It is not a comprehensive review of the Strategy's interaction with biodiversity and important components such as SSSIs, Local Wildlife Sites, Green Infrastructure and Protected Species and Habitats of Principal Importance.

## 2. Methodology

### 2.1 *HRA Guidance*

- 2.1.1** Guidance on Habitats Regulations Assessment has been published in draft form by the Government (Department for Communities and Local Government (DCLG), 2006) . This draws on advice from a range of experts as well as European Union guidance regarding methodology for Appropriate Assessment of plans (European Commission, 2001) . The approach taken for the HRA of the Plan follows the methods set out in these guidance documents, reflects guidance

produced by Natural England and the RSPB and has additionally been informed by recent good practice examples.

## 2.2 Staged Process

### 2.2.1 The key stages of the HRA process are set out in Figure 1 below.

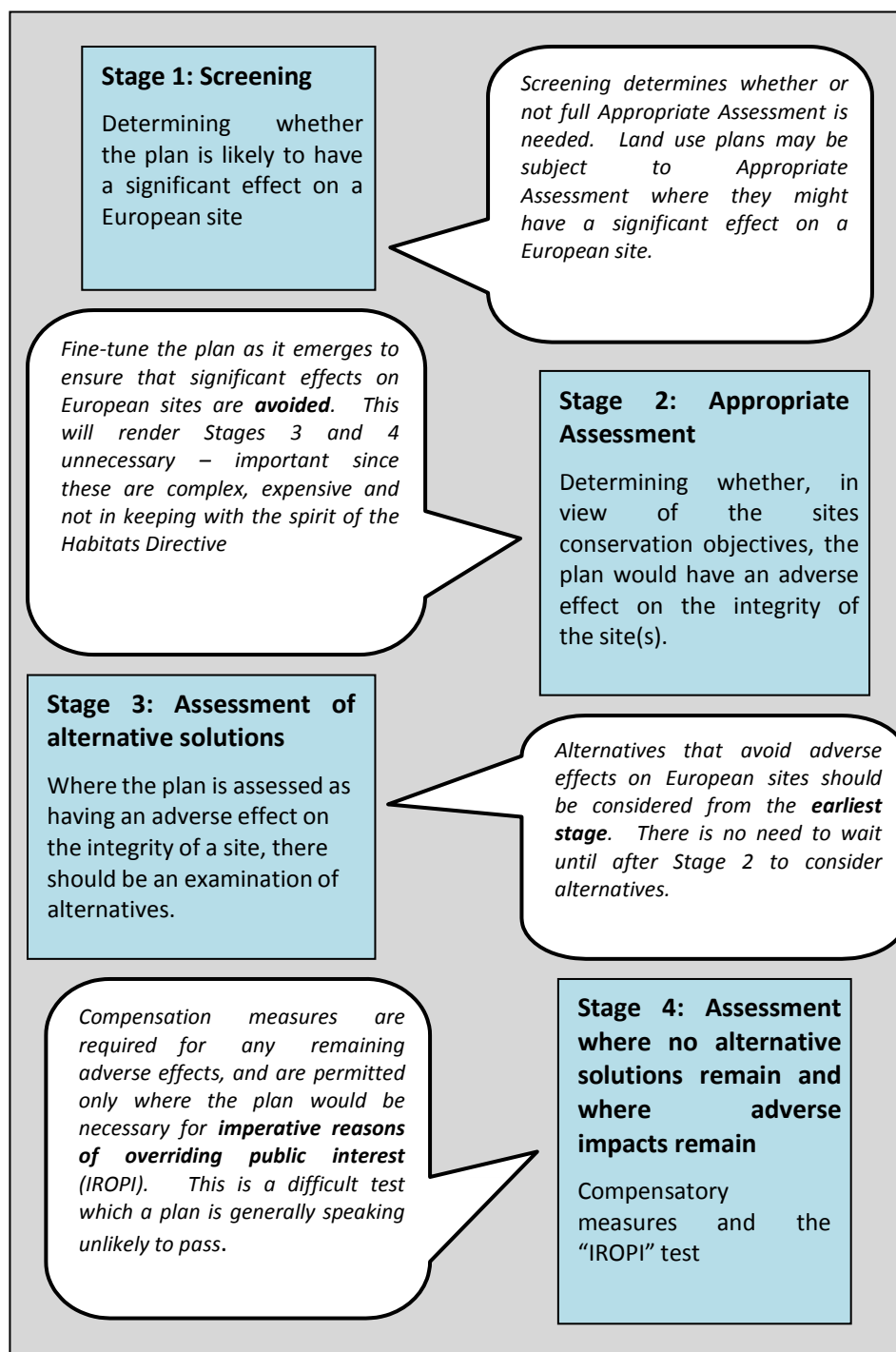


Figure 1 Stages in the Appropriate Assessment Process



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- 2.2.2** Other strategies, plans and developments in the sub region have been considered in relation to the potential pathways of impacts on European sites to decide whether there are any adverse effects that, although they might not result from the Horsham District Planning Framework (HDPF) in isolation, they will do so “in combination”.
- 2.2.3** Part of HRA Guidance is to ensure a proportionate assessment – the level of detail in the assessment should reflect the level of detail in the plan and focuses on information and impacts that are considered to be appropriate at the local level. Taking account of this guidance principle and the staged approach to AA being taken to plan development by the District Council this AA has not found it necessary to undertake at this stage in depth investigations to ascertain the best available scientific position on the subjects in question. In particular it should be noted that AA at the Preferred Options stage concluded no adverse effect on site integrity, and that further changes to the Planning Framework may be necessary following consultation and before the Council moves to adopt the Local Plan.
- 2.2.4** Information gathered enabled conclusions to be drawn as to whether there was a risk that any identified impact will lead to an adverse effect on integrity taking into account mitigation already being built into the plan.
- 2.2.5** The additional policy measures identified in the Preferred Strategy AA as being required to mitigate the impacts were assessed for their take up in the Preferred Strategy.
- 2.2.6** In evaluating significance, eCountability has relied on its professional judgement as well as the evidence from other HRAs and studies undertaken in relation to the European sites considered within this assessment.

### 3. Horsham District Planning Framework Preferred Strategy

#### 3.1 *The Vision for Horsham District*

- 3.1.1** The Planning Framework’s vision for the district as set out in Chapter 3 of the Preferred Strategy is shown in Figure 2.

***The vision for the Horsham District Planning Framework will be: “A dynamic District where people care and where individuals from all backgrounds can get involved in their communities and share the benefits of a District that enjoys a high quality of life.***

***By 2031 Horsham District will have become a place where:***

#### **Economy**

**3.3** There is a vibrant economy that recognises both the wider context of the South Downs National Park and the Gatwick Diamond, building upon the established transport connections, and the niche market offer within Horsham District. Supports growth in employment land and communications to provide a diverse, resilient and flexible range of business premises which will provide good quality jobs and the opportunity of living close to where people work. This will incorporate floorspace within a high value business park as well as starter units and move on accommodation to nurture and support growth of smaller businesses and attract inward investment.

#### **Environment**

**3.4** The District recognises and promotes the rich heritage and high quality natural environment and the significant contribution this makes to the overall attractiveness, economic competitiveness and identity of the District, developing the close links with the South Downs National Park. The historical and cultural character of the built environment, green space and landscape is valued, enhanced, and promoted ensuring an attractive place for communities, business and welcoming additional visitors.

#### **Housing**

**3.5** There are many more homes which local people can afford and the District can accommodate the needs of the communities.

#### **Horsham Town**

**3.6** Horsham Town has retained its unique historical and cultural market town character whilst attracting investment and growing positively with mixed use development of high quality that enhances the town’s status as a hub for the District. Horsham Town will be the destination of choice in the northern West Sussex area, with increased accessibility for all, because of the distinctive high quality experience it offers for shopping and leisure time.

#### **Local work and facility connections**

**3.7** The transport infrastructure, especially public transport, is continually improved to offer a high quality, reliable and frequent service and communication facilities developed to support a sustainable, resilient economy with opportunities for living and working communities including opportunities for people to live close to where they work.

**Figure 2 Horsham District Planning Framework - Vision**

- 3.1.2** Detailed draft policies designed to achieve this vision are set out in subsequent chapters.

## **3.2** *Housing Policy*

- 3.2.1** The AA Screening Report in 2012 identified Housing policy as the area for which Likely Significant Effects on European sites could not be ruled out.

- 3.2.2** A review of the Preferred Strategy has confirmed that there are no other policies for which Appropriate Assessment investigation is required.

- 3.2.3** The remainder of this AA will therefore focus on potential impacts arising from Housing policy.

- 3.2.4** The draft housing policy set out in the Preferred Strategy is shown in Figure 3.

### **Draft Policy 13**

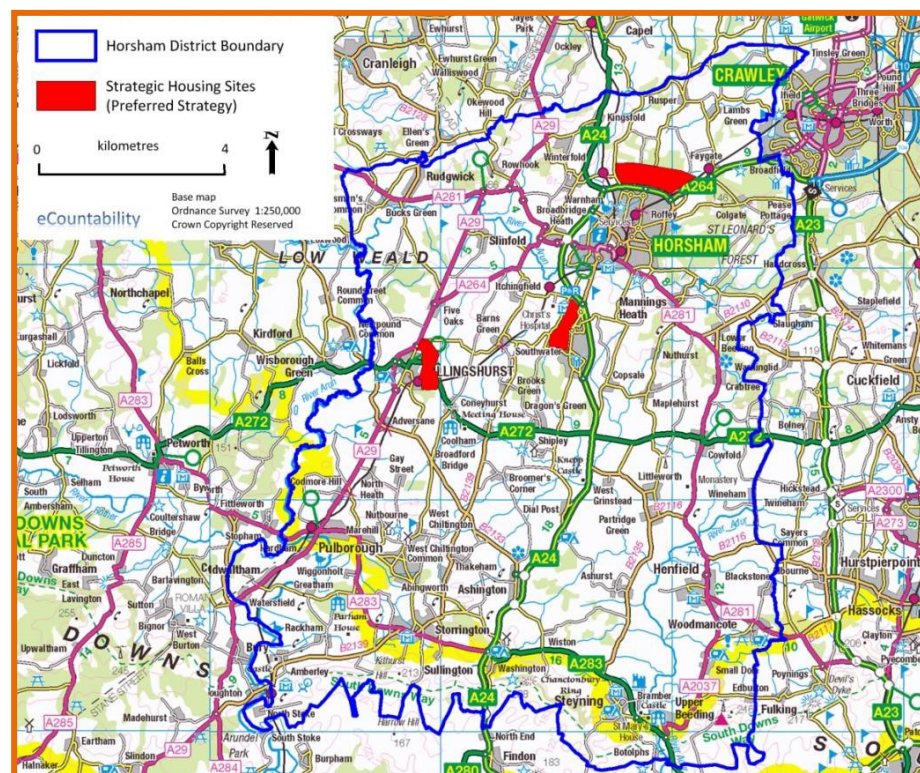
Provision is made for the development of at least 11,500 homes and associated infrastructure in the District within the period 2011-2031, at an average of 575 homes per annum. This includes:

- a. Completions 2011 – 2014: xxxx;\*\*
- b. c.6,900 homes already completed, permitted or agreed for release\*;
- c. c.600 current applications likely to be granted prior to adoption of the HDPF\*\*
- d. c.500 homes East of Billingshurst;
- e. c.500 homes West of Southwater;
- f. 2,500 homes on land North of Horsham - proposed strategic allocation;
- g. At least 500 homes provided throughout the District allocated through Neighbourhood Planning.

To ensure that the strategic requirements for the District are met, the delivery through Neighbourhood Planning will be closely monitored and additional land in the most sustainable locations will be allocated if necessary through an update to the Small Site Allocations Development Plan Document to ensure a consistent and adequate housing land supply is maintained. \* Including strategic sites West of Crawley and West of Horsham, identified in the 2007 Core Strategy \*\* To be updated for examination, will be revised jointly with figure quoted in point b & c.

**Figure 3 Draft Policy 13 Housing**

- 3.2.5** This policy has been updated in the Proposed Submission is to include provision for 13,000 homes in the plan period, equivalent to an annual rate of 650 homes. Further consideration of these additional numbers has not been found to alter the issues for consideration as part of this Assessment.
- 3.2.6** The study has considered the development locations North of Horsham, and West of Southwater. This study was commissioned prior to the application for 475 dwellings (DC/13/0735) was granted permission, and the land East of Billingshurst was also considered as part of this assessment. The location of the three sites is shown in Figure 4.



**Figure 4 Location of Strategic Development Sites for Housing**

### 3.3 Neighbourhood Planning

- 3.3.1** The allocation of some homes through Neighbourhood Planning cannot by its nature be assessed spatially as any community in the district could come forward with a proposal.
- 3.3.2** Some reference to the potential location of housing approved through Neighbourhood Plans is made in paragraph 4.6 of the HDPF Preferred Submission which relates to the Development Hierarchy Draft Policy 3. Our interpretation of this is that the Development Hierarchy would not act as a constraint on Neighbourhood Planning.

- 3.3.3** In some ways Neighbourhood Planning can be viewed as the inverse of plan-led decision making and as such is extremely difficult to assess in Appropriate Assessment of district level Local Plans. The policy at District Level is not sufficiently spatially explicit to allow robust assessment under the Habitats Regulations, 2010.
- 3.3.4** This raises the question of the need for Neighbourhood Plans to undertake an HRA.
- 3.3.5** The South Downs National Park Authority has the following text on its website in advising on Neighbourhood Planning:

**Does every Neighbourhood Plan need an HRA?**

Not every neighbourhood plan will need a Habitats Regulations Assessment. Much will depend on the area to be covered and whether its policies and proposals will impact on any Natura 2000 site. In many cases, the Neighbourhood Plan may be determining sites for housing allocations that have been approved in an existing Local Plan that will itself have been subject to an HRA. Where this is the case, a separate HRA for the Neighbourhood Plan is unlikely to be necessary.

(Source – South Downs National Park Authority website, March 2014)

**Figure 5 Neighbourhood Planning and HRA (South Downs National Park website)**

- 3.3.6** This seems to be a fair assessment and likely to be consistent with the Regulations and European law. The National Park website goes on to invite Neighbourhood planners to seek a screening opinion from the authority as part of the separate Strategic Environmental Assessment process.
- 3.3.7** On the assumption that Horsham District Council adopts a similar position on this issue and for the avoidance of doubt, this AA has assessed only the three major proposed development sites, therefore any issue of the requirement or otherwise for a Neighbourhood Plan in Horsham District to undertake HRA will need to be assessed on its own merits.
- 3.3.8** While any location of Neighbourhood Plan in the District could in theory require a HRA it should be noted that the parishes of Pulborough, West Chiltington, Thakeham, Storrington and Sullington, listed in Draft Policy 3, are located in close proximity to the Arun Valley SAC/SPA/Ramsar site and/or water courses which flow into the site and these are likely to require especially close examination if any significant proposal was to arise through the Neighbourhood Plan or Small Sites Allocation process.

## 4. Other Plans and Projects

### 4.1 Plans

**4.1.1** It is a requirement of the Habitats Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question. Both existing and proposed “reasonably foreseeable” plans and projects are relevant to the in combination assessment, and the following were examined in this AA.

- Mid Sussex District Plan - Submission – (May 2013)
- Mole Valley District Council Core Strategy (adopted 2009) & Schedule of Saved Policies (December 2012)
- Chichester Local Plan 2014-2029- Key Policies, Pre-Submission, (2013)
- Chichester District Council - Statement on Water Quality and Strategic Growth for Chichester District - Background Paper (2012).
- Chichester District Council - Position Statement on Wastewater and Delivering Development in the Local Plan.
- Adur Local Plan - Draft (2012)
- South Downs National Park Local Plan Options Consultation (February 2014)
- Crawley Borough Local Plan - Consultation Draft (January 14)
- Waverley Pre-Submission Core Strategy (2012)
- Arun District Local Plan - Publication Version (2014)
- Arun and Western Streams Catchment Flood Management Plan Summary Report (2009)
- Environment Agency Arun and Western Streams Catchment Abstraction Management Strategy (2003)
- Arun Valley Water Level Management Plans
- Southern Water - Revised Draft Water Resources Management Plan 2015-2040
- West Sussex Transport Plan 2011-2026

### 4.2 Projects

**4.2.1** In addition there are a number of housing developments of significant size that have been recently approved or are in the development control process currently:

- West of Horsham (East of A24) - DC/09/2138 (1044 dwellings)
- Land South of Broadbridge Heath - DC/08/2101 (963 dwellings)
- Land West of Bewbush – DC/10/1612 (2500 dwellings)
- Billingshurst Application DC/13/0735 (Up to 475 homes)
- Ad hoc applications around Pulborough include DC/09/0488, DC/11/0952, DC/10/075. (Up to 203 homes in total)

**4.2.2** Additionally a private sector company, Mayfield Market Towns Ltd, is promoting a proposal for a new market town of up to 10,000 homes on the borders of Mid Sussex and Horsham districts between the settlements of Sayers Common and

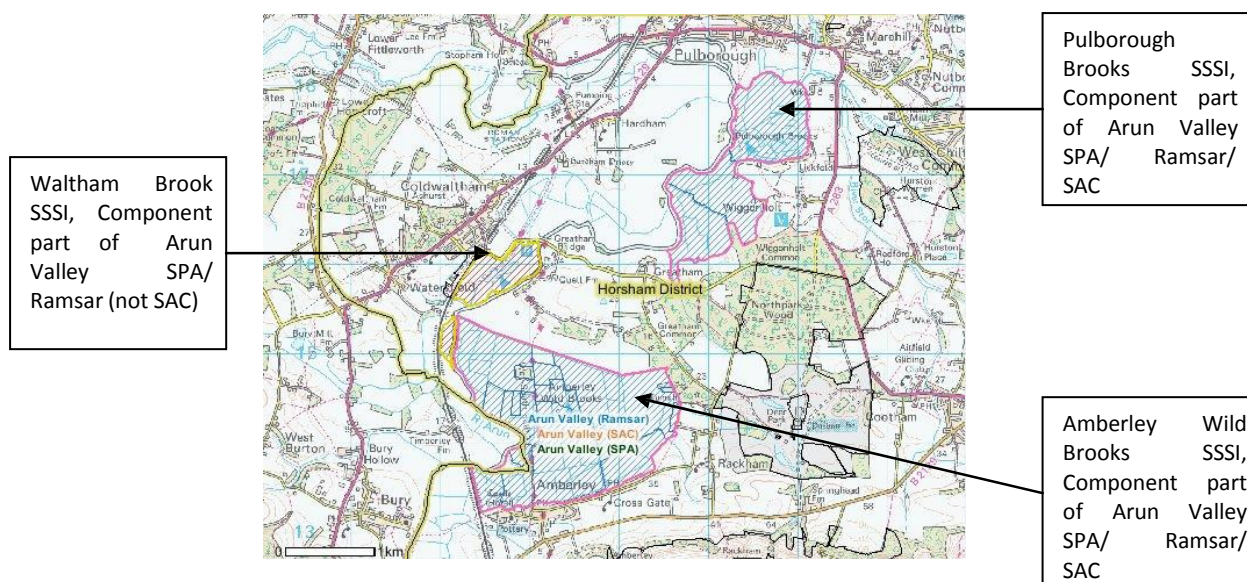


Henfield. Neither the Horsham Preferred Strategy or the Mid Sussex Submission District Plan include this major proposal and no timescale for potential development is currently available. Accordingly this potential development is not considered to be “reasonably foreseeable” currently in the context of this AA and its potential in combination impacts have not been assessed.

## 5. The European Sites

### 5.1 Arun Valley SAC, SPA, Ramsar

**5.1.1** The Arun Valley SPA/Ramsar consists of three component Sites of Special Scientific Interest (SSSI), Pulborough Brooks SSSIs, Amberley Wild Brooks SSSIs and Waltham Brook SSSI (see Figure 6). The Arun Valley SAC comprises Pulborough Brooks and Amberley Wild Brooks SSSI. The sites lie wholly within Horsham District near the south-west boundary between Pulborough and Amberley.



**Figure 6 spatial arrangement of the SSSI components making up the Arun Valley SPA, Ramsar and SAC (source: nature on the map <http://www.natureonthemap.naturalengland.org.uk/>)**

- 5.1.2** Together these sites comprise an area of wet meadows on the floodplain of the River Arun. The neutral wet grassland, which is subject to winter and occasional summer flooding, is dissected by a network of ditches, several of which support rich aquatic flora and invertebrate fauna. The area is of outstanding ornithological importance notably for wintering wildfowl and breeding waders.
- 5.1.3** The SPA qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:
- Bewick's Swan (*Cygnus columbianus bewickii*), 115 individuals representing at least 1.6% of the wintering population in Great Britain (5 year peak mean for 1992/93 to 1996/7)
- 5.1.4** Additionally the SPA qualifies under Annex 4.2 as over winter the area regularly supports 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97).
- 5.1.5** The site qualifies as a Ramsar through criteria 2, 3, 5 and 6:
- Criterion 2 - supports vulnerable, endangered, or critically endangered species or threatened ecological communities
  - Criterion 3 - supports populations of plant and/or animal species important for maintaining the biological diversity of a particular biogeographic region
  - Criterion 5 - regularly supports 20,000 or more waterbirds
  - Criterion 6 - regularly supports 1% of the individuals in a population of one species or subspecies of waterbird.
- 5.1.6** The SAC is designated for the Ramshorn snail, *Anisus vorticulus*. The Arun valley is one of the three main population centres for this species in the UK. The SAC includes two of its core sites in the wash lands of the Arun floodplain (Pulborough Brooks and Amberley Wild Brooks SSSIs).
- 5.1.7** The habitats of the Arun Valley SPA/Ramsar site comprise mostly wet grassland habitat, and as such are water dependent. At Pulborough Brooks SSSI and Amberley Wildbrooks SSSI there is active water level management through a variety of inflow control structures, internal control structures and other management activities (for example pumping water between ditches).
- 5.1.8** The site is hydrologically connected with the River Arun. However, inflow of water from the river is theoretically prevented by the use of tidal flap valves on all of the outfall structures. The aquatic ecological interest of the SPA/Ramsar is associated with the network of ditches and drainage channels that dissect the grassland habitats. Many of these ditches support ecologically notable aquatic and marginal (river bank) plants, as well as aquatic snails, beetles and dragonflies.
- 5.1.9** The RSPB already manages part of the SPA to provide suitable habitats for the birds that are the qualifying feature for the site. This involves managing water levels to provide extensive flooding in the winter. (In a typical winter, water abstraction is not a problem; in dry winters, more careful management is required.) The Environment Agency has produced Water Level Management



Plans for both Amberley Wildbrooks (the SSSI linked to the SAC) and Waltham Brooks and plans to prepare one for Pulborough in due course.

- 5.1.10** During the most recent condition assessment process, 100% of Amberley Wild Brooks SSSI, and Pulborough brooks SSSI were judged to be meeting Public Service Agreement (PSA) targets to bring SSSIs into favourable or recovering condition. Waltham Brook SSSI was assessed as being 100% unfavourable condition but recovering. The Arun Valley SPA, Ramsar and SAC were judged to be in favourable condition.

## **5.2    *The Mens SAC***

- 5.2.1** The Mens SAC lies in Chichester District around 1km west of the district boundary and south-west of Billingshurst. It is one of the most extensive examples of Wealden Woodland in West Sussex, important for its size, structural diversity and the extremely rich fungal and lichen floras. The wood supports a diverse community of breeding birds, and is the locality of a nationally endangered species of fly.

- 5.2.2** The Mens qualifies as a SAC for the Annex I habitat “Beech forests on acid soils” and the Annex II species, the Barbastelle bat.

## **5.3    *Other European Sites***

- 5.3.1** No other European sites are present within Horsham District.
- 5.3.2** Other European sites outside of the district and within potential impact distance of developments in the district were screened out in 2012 (TEC, 2012). The Preferred Strategy has no additional cause to screen any of these sites back into the AA process. The HRA of the Mid Sussex District Plan (Mid Sussex District Council, 2013) identified a potential adverse effect of disturbance on birds in the Ashdown Forest SAC arising from new housing development within 7km of the SAC. The nearest point of Horsham District to the Ashdown Forest SAC is 14.7km and is therefore well outside of the impact distance.
- 5.3.3** No additional European sites have been designated since the Preferred Options AA.

## **5.4    *Site Conservation Objectives***

- 5.4.1** The Conservation Objectives defined for The Mens SAC and the Arun Valley SAC/SPA/Ramsar sites are set out in Annex 1 together with the conditions necessary for maintaining site integrity.

## 6. Assessment of Effects on Site Integrity

### 6.1 Impact Pathways

**6.1.1** The impact pathways identified in the Screening Report at Preferred Options stage are shown in Table 2.

Impact	Effect	Sites Potentially Affected
Increased water demand from new housing.	Low river flows/ groundwater levels and consequent water availability issues in wetland sites.	Arun Valley SPA/SAC/Ramsar
Increased waste water from new housing.	Water quality deterioration in wetland sites, especially eutrophication through high phosphorus levels.	Arun Valley SPA/SAC/Ramsar
Increased housing development causing faster run-off and higher flood peaks.	Heightened downstream flood risk in wetland sites, damaging vegetation through prolonged deep flooding in winter, while summer floods threaten invertebrates and make essential site management difficult or impossible.	Arun Valley SPA/SAC/Ramsar
Housing development.	Disrupted flight paths and feeding areas for bat populations present within sites.	The Mens SAC

**Table 2 Summary of Impact Pathways on European Sites**

- 6.1.2** Each of these issues was assessed in depth in the 2012 AA and is summarised and updated where necessary here.

## **6.2 Water availability.**

- 6.2.1** The issue here is that the rising population associated with the level of new housing proposed in the plan could place increased demand on water resources which in turn could lead to low flows in the River Arun or a lower level of groundwater that feeds the wetland habitats in the Arun Valley SPA/SAC/Ramsar.
- 6.2.2** Water supply in Horsham District comes from a mixture of river and groundwater sources, principally through the Hardham Treatment works. There have been a number of studies and reviews of the subject since the issue was first identified in the HRA of the Core Strategy in 2006.
- 6.2.3** The Arun Valley SPA Sustainability Study (AVSSS) 2008 concluded that the Amberley Wildbrooks SSSI and Waltham Brooks SSSI parts of the SPA were in fact not connected with the groundwater impacted by abstraction for Hardham Treatment works, and that while there was some connection between the Pulborough Brooks SSSI and groundwater the impacts of abstraction even at higher levels than currently licensed would be negligible.
- 6.2.4** Southern Water's Water Resources Management Plan (WRMP) 2009 included a number of demand management and supply side initiatives to ensure continued provision of water to the rising population of the Sussex North Water Resource Zone, including Horsham District. These initiatives included a new intake at Hardham from the tidal River Arun, completed in 2012. The WRMP suggests that these interventions will meet the supply balance after 2012 and no further interventions are identified as being required until the end of the planning period (2035).
- 6.2.5** The AA at Preferred Strategy stage made policy recommendations on this issue (Table 3 below) to ensure a finding of no adverse effect on site integrity.

Recommendation (TEC, 2012)	Corresponding text Preferred Strategy (HDC 2013)
Therefore we recommend that HDC continue to embed water efficiency in policy and to support the water company's demand management schemes.	<b>Draft Policy 37: Flooding</b>  6. In order to maintain water quality, all development proposals must be in accordance with the objectives of the Water Framework Directive, and accord with the findings of the Gatwick Sub -Region Water Cycle Study with respect to water quality, water supply and wastewater treatment.

**Table 3 Comparison of Preferred Strategy Text with Preferred Options Recommendations – Water Availability**

- 6.2.6** While the text in Draft Policy 37 can be seen to meet the recommendation in the previous AA we recommend a further wording change in the interests of clarity. The current text refers only water quality as the purpose of the policy whereas the second part of the sentence refers also to water supply. Since the AA relevance is in relation to the potential impacts of providing additional water supply to residents on water availability at the European sites we propose the words “and water availability in rivers and wetlands” are inserted in the first line after “water quality”.
- 6.2.7** With the inclusion of Draft Policy 37 it can be concluded that the effects of the planning framework on water availability will not have an adverse effect on site integrity of Arun Valley SPA/SAC/Ramsar sites.

Officer Comment: This recommendation has been incorporated in the Proposed Submission document

### **6.3** *Water Quality*

- 6.3.1** Some of the Waste Water Treatment Works (WwTW) in the District have been judged by the Environment Agency Regulator to be at risk of failing to meet discharge water quality standards. This issue could be made worse by higher demands on the system from the increased population associated with new housing. Recent upgrading works at two of the critical WwTW (Hardham and Coldwaltham) have improved the efficiency of removing key nutrients, especially phosphorus.
- 6.3.2** Lower water quality in the River Arun could adversely affect site integrity of the River Arun SPA/SAC/Ramsar site through effects on sensitive qualifying feature species such as the Ramshorn Snail (*Anisus vorticulus*).
- 6.3.3** The capacity of Horsham and Billingshurst WwTWs to accommodate higher volumes arising from major housing developments while remaining within discharge consents for phosphorus has been questioned. Southern Water has a statutory duty to serve new development, and seeks to deliver additional capacity in parallel with development, within permit or license constraints, as set by the Environment Agency. The Water Company has stated that provided there is a policy to co-ordinate developments with the provision of necessary infrastructure then the investment required will be secured and it should be possible to proceed within environmental constraints.
- 6.3.4** The Environment Agency in turn has statutory duties to ensure compliance with the Water Framework Directive, which requires no deterioration in the ecological status of water bodies and enhancement of status of aquatic ecosystems and associated wetlands. It pursues a number of measures to achieve these objectives including control of discharge consents to rivers and abstraction licences from groundwater sources.
- 6.3.5** To ensure a finding of no adverse effect on site integrity of the River Arun SAC/SPA/Ramsar Site policy wording recommendations were made at Preferred Options stage.
- 6.3.6** The 2012 AA stage made policy recommendations on this issue (Table 4 below) to ensure a finding of no adverse effect on site integrity.

Recommendation (TEC, 2012)	Corresponding text Preferred Strategy (HDC 2013)
Support provision of new infrastructure to enable treatment of wastewater to high environmental standards, as set by the Environment Agency.	<p><b>Draft Policy 37</b></p> <p>6. In order to maintain water quality, all development proposals must be in accordance with the objectives of the Water Framework Directive, and accord with the findings of the Gatwick Sub -Region Water Cycle Study with respect to water quality, water supply and wastewater treatment.</p>
Require phasing of developments when existing infrastructure and treatment capacity is insufficient to meet the increased demand. (This would be particularly important for any development at the strategic site at East of Billingshurst which is dependant on upgrading of the Billingshurst WwTW and reassessment of any associated consent from EA).	<p><b>Draft Policy 38</b></p> <p>The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development or suitable arrangements having been put in place for the improvement of the infrastructure, services and community facilities made necessary by the development.</p> <p>Where there is a need for extra capacity this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment and amenities of local residents are not adversely affected.</p> <p>Arrangements for provision or improvement, including in terms of access to facilities, to the required standard will be secured by planning obligation / Community Infrastructure Levy, or in some cases conditions attached to a planning permission, so that the appropriate improvement can be completed prior to occupation of the development, or the relevant phase of the development.</p>
Separate surface water run-off from foul sewers. This will provide more efficient use of foul sewers, and reduce the risk of foul water flooding.	<p><b>Draft Policy 24</b></p> <p>The high quality of the District's environment will be protected through assessing proposals against the following criteria and local guidance documents.</p> <p>Development will be expected to ensure that they:</p>

	d. Ensure development does not give rise to the pollution of any watercourse, groundwater, or result in the contaminated run-off to surface water sewers;
All new developments for more than 10 dwellings should submit a Water Sustainability and Drainage Assessment as part of their application. This should ensure that the developer has contacted Southern Water to determine if capacity exists for foul and surface water provision and, if not, ensure that plans are in place for provision ahead of the development's occupation.	[No corresponding policy wording can be identified in the Strategy]. However the following text appears in Chapter 9  9.6 In order to demonstrate compliance with this policy [Climate Change] and the Sustainable Construction policy (policy ref), a Sustainability Statement will be requested, proportionate to the scale of development, to be submitted with planning applications.

**Table 4 Comparison of Preferred Strategy Text with Preferred Options Recommendations – Water Quality**

- 6.3.7** While in some cases the adopted policy wording does not exactly follow the previous AA recommendations the effects can be seen to deliver the intentions.
- 6.3.8** With the inclusion of these draft policies and supporting text it can be concluded that the effects of the planning framework on water quality will not have an adverse effect on site integrity of Arun Valley SPA/SAC/Ramsar sites and no further changes are recommended for the Preferred Submission.

#### **6.4 Flood risk**

- 6.4.1** While winter flooding of parts of the Arun Valley SAC/SPA/Ramsar is an important part of the sites ecological value, more frequent or prolonged flooding can be damaging. Complete and prolonged flooding can remove important habitat for qualifying feature bird species in the SPA, such as lapwing and wigeon and can also disrupt grazing management necessary for maintaining the site at Favourable Conservation Status.
- 6.4.2** The frequency and duration of winter flooding at Pulborough Brooks has increased significantly in the last twenty years while 2012 recorded the first extended summer flooding. The causes of increased flooding are believed to include the effects of climate change and land-use changes in the catchment such as building on flood plains and faster run-off from hard surfaces associated with development.
- 6.4.3** Extensive and prolonged flooding across southern England in the 2013/14 winter has underlined the recognition of changing background environmental trends caused by climate change. The Met Office warned in March 2014 that the UK

should expect a higher frequency of extreme weather events. The Intergovernmental Panel on Climate Change (IPCC) stated in March 2014 that climate change was already causing profound impacts on every continent and that impacts, including increased flooding, would become more significant over the next few decades as a result of past carbon emissions.

- 6.4.4** Avoidance and mitigation measures were recommended in the Preferred Options AA to ensure a finding of no adverse effect on site integrity of the Arun Valley SAC/SPA/Ramsar site in respect of flood risk.

Recommendation (TEC, 2012)	Corresponding text Preferred Strategy (HDC 2013)
<p>The policy on Climate Change should be strengthened so that “climate change adaptation measures <b>should</b> be integrated where technically feasible into development design to increase flood storage capacity in the District, particularly in the Arun catchment”.</p>	<p><b>Draft Policy 34</b></p> <p>Development should also be flexible enough to adapt to climate change, particularly in terms of flood risk, water supply and changes to the Districts landscape. The following adaption measures could be integrated into development design to reduce vulnerability;</p> <ul style="list-style-type: none"> <li>• Increase flood storage capacity in new and existing building stock;</li> <li>• Use green infrastructure to minimise heating of the urban environment, provide attenuation for surface water runoff and assist habitat migration;</li> <li>• Include measures which promote the conservation of water;</li> <li>• Use of design measures and construction techniques that provide resilience to climate change (opportunities for natural ventilation and solar heat gain).</li> </ul>
<p>Policy must make clear that, as all of the proposed strategic sites are on greenfield sites, Sustainable Drainage Systems (SuDS) for the attenuation of surface water need to be an integral part of any new development. This is essential to ensure that there is no increase in runoff or volume of surface water, and therefore no increase in the risk of flooding. Where existing problems with</p>	<p><b>Draft Policy 37</b></p> <p>3. Where technically feasible, all developments will be expected to incorporate water management measures which reduce the risk of flooding and ensure flood risk is not increased elsewhere. This should include the use of sustainable drainage systems (SuDS).</p>

flooding or surface water control exist, they should not add to the problems, but rather should seek to reduce and/or address any existing problems.	
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**Table 5 Comparison of Preferred Strategy Text with Preferred Options Recommendations – Flood Risk**

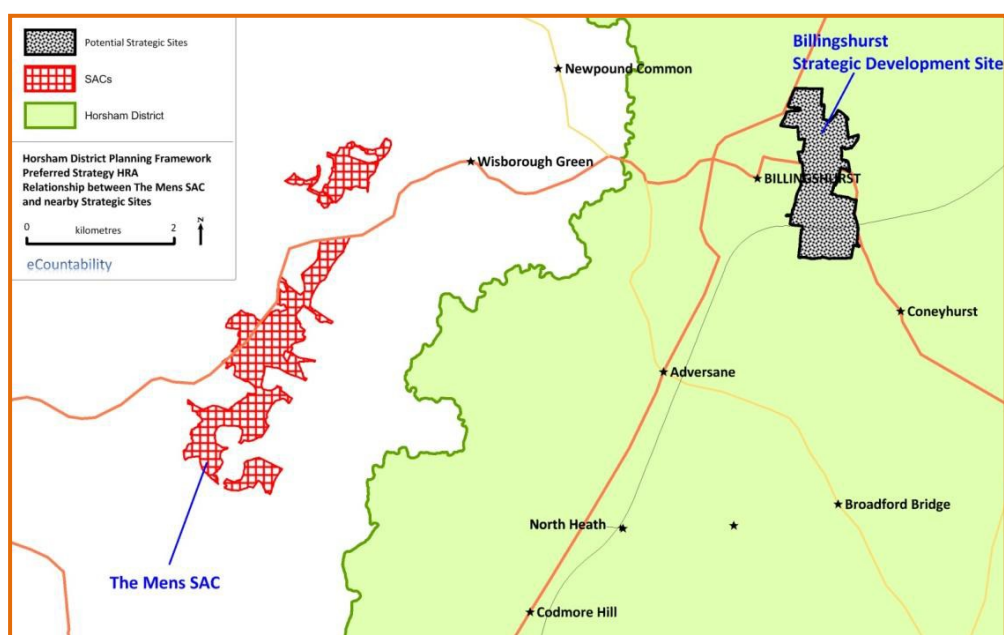
- 6.4.5** Draft Policy 37 can be seen to fulfil the recommendation in the previous AA. Draft Policy 34 states that [the following measures] could be integrated into development design. The word “could” here may apply that it is optional, or could be interpreted that only some of the measures will be appropriate in each case. In the light of the recent flooding event and the stronger warnings of the probability of severe weather events and flooding from the Met Office and IPCC, and in the interests of clarity we recommend that the “could” should be replaced by “should”, perhaps again qualified by “where technically feasible”.
- 6.4.6** With the inclusion of these draft policies, as amended by the recommendation above, it can be concluded that the effects of the planning framework on flood risk will not have an adverse effect on site integrity of Arun Valley SPA/SAC/Ramsar sites.

Officer Comment: These recommendations have now been incorporated into the Preferred Submission



## 6.5 *Bat populations at the Mens SAC*

**6.5.1** The key issue (potential pathway of significant impact) that was identified as requiring further examination through AA was the potential impacts of development and land use changes on the flightpaths and feeding areas of Barbastelle bats, a qualifying feature at the Mens SAC. The location of The Mens SAC in relation to the Horsham District boundary and the strategic site at Billingshurst is shown in Figure 7.



**Figure 7 – Relationship between Strategic Housing Sites and the Mens SAC.**

**6.5.2** Since the 2012 Appropriate Assessment the proposed strategic site at Adversane/North Heath has been removed from the Planning Framework. Through its location this had been the strategic site that had the greatest potential for adverse impact on the Mens SAC through disruption of Barbastelle bat flightpaths and feeding areas. The proposed strategic site east of Billingshurst does not overlap with the recorded bat flightlines and foraging areas (Greenaway, 2008). Nevertheless bat radio-tracking survey has only made records of a small proportion of the colony at the Mens SAC and the use of the proposed strategic site at Billingshurst cannot be ruled out.

**6.5.3** The Chichester Local Plan (Chichester District Council, 2013) includes only small developments in the vicinity of the SAC and to the north of it in areas where bat flightlines and foraging areas have not been recorded (URS, 2013); therefore there is no “In Combination Effect” that requires consideration.

Recommendation AA (TEC, 2012)	Corresponding text Preferred Strategy (HDC 2013)
<p>Further to any necessary discussions between Chichester District Council, the SDNP and HDC it is proposed that in order to protect the important foraging areas and commuting routes for these bats, a Bat Sustenance Zone within 12 kilometres of the important roost at the Mens SAC should be shown in the HDPF PO. Development proposals affecting foraging habitat, including river valleys, hedgerows and scrub land, or access to these foraging areas within the Bat Sustenance Zone should be considered against the following criteria:</p> <ul style="list-style-type: none"> <li>• “development will not be permitted where it would directly or indirectly harm a statutorily protected animal or plant species, or would damage, destroy or lead to the deterioration of a breeding site, foraging area or resting place of a European protected species.</li> <li>• development will not be permitted where it would harm features within the bat sustenance zone supporting the integrity of The Mens SAC, unless it could be fully mitigated by the creation or enhancement of habitat.</li> </ul>	<p>Draft Policy 32</p> <p>6. Any development with the potential to impact Pulborough Brooks SPA or the Mens SAC will be subject to a HRA to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the HRA of this plan.</p> <p>[Note: the reference in this policy to “Pulborough Brooks SPA” should be changed to “Arun Valley SPA/SAC/Ramsar Site”, the correct title. Pulborough Brooks SSSI forms a part of the Arun Valley SPA/SAC/Ramsar Site.]</p>
<p>Notes that some policies will help to mitigate any potential adverse effects.</p>	<p><b>Draft Policy 23</b></p> <p>The Natural Environment and landscape character of the District, including the settlement pattern, together with protected landscapes and habitats will be protected against inappropriate development.</p> <p>The Council will support</p>

	<p>development proposals which:</p> <ul style="list-style-type: none"> <li>a. Protects, conserves and enhances the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.</li> <li>b. Maintain and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District.</li> <li>c. Maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and ensures no net loss of wider biodiversity.</li> </ul> <p><b>Draft Policy 32</b></p> <ul style="list-style-type: none"> <li>1. The Council is committed to the protection, conservation and enhancement of biodiversity and geodiversity in the District.</li> <li>2. Development proposals will be required to contribute to the enhancement of existing biodiversity, and explore opportunities to create and manage new areas where appropriate. The Council will encourage new development to make a positive contribution to biodiversity through the creation of green spaces, and linkages between sites to create a local and regional network of wildlife corridors and green infrastructure. It will seek to retain and encourage the enhancement of significant features of nature conservation on development sites.</li> <li>3. Where there is felling of protected trees, replacement planning with a suitable species will be required.</li> <li>4. Particular consideration will be given to the hierarchy of sites in the District as follows: <ul style="list-style-type: none"> <li>a. Special Protection Area and Special</li> </ul> </li> </ul>
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	<p>Areas of Conservation</p> <p>b. Sites of Special Scientific interest and national nature reserves</p> <p>c. Sites of nature conservation importance, local nature reserves and areas of Ancient woodland not identified in 1 &amp; 2 above.</p> <p>5. Where development is anticipated to have a direct or indirect adverse impact on sites or features for biodiversity, development will be refused unless it can be demonstrated that:</p> <p>a. the reason for the development clearly outweighs the need to protect the value of the site; and,</p> <p>b. that mitigation and compensation measures are provided</p>
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**Table 6 Comparison of Preferred Strategy Text with Preferred Options AA Recommendations – The Mens SAC**

- 6.5.4** It can be seen that the general biodiversity and green infrastructure policies identified in the previous AA as contributing to the mitigation of this potential adverse effect have been carried forward in the Preferred Strategy.
- 6.5.5** The recommendation for inclusion of a new policy on Bat Sustenance Zones has not specifically been taken forward. However there is a requirement for an HRA of any development with the potential to have an adverse impact on the two mentioned SACs/SPAs in Draft Policy 23 which could be said to cover the intention of the Bat Sustenance Zones recommendation. While it is generally not considered to be best practice to defer the requirement for an HRA to a lower tier (i.e. planning application rather than Local Plan) it can be considered to be appropriate in this case. This position takes account of the withdrawal of the previously considered Adversane/ North Heath strategic site, the absence of a strategic site in the Preferred Strategy with a confirmed overlap with bat flightlines and foraging areas and the uncertainty of location of housing development that may come forward through Neighbourhood Planning.
- 6.5.6** With the inclusion of these draft policies it can be concluded that the effects of the planning framework in relation to bat populations will not have an adverse effect on site integrity of Arun Valley SPA/SAC/Ramsar sites.

Officer Comment: To take into account best practice and ensure that requirements are met a bat sustenance zone has been incorporated into the Proposed Submission and will be shown on the Policies Map.

## 7. Conclusions

- 7.1.1** This Appropriate Assessment has analysed the Horsham District Planning Framework, as expressed by the Preferred Strategy document of July 2013, in relation to the Habitats Regulations 2010.
- 7.1.2** The AA has taken account of the recommendations made in the AA report in 2012 (TEC, 2012), changes to Strategic Site locations since 2012, trends in key background environmental conditions and other reasonably foreseeable plans and projects that could have an adverse effect on European sites in or near Horsham district alone or in combination.
- 7.1.3** The AA concludes that, provided the policies identified as key in this report are retained, and the minor wording change recommended for Policy 34 is adopted, the Horsham District Planning Framework will not have an adverse effect on site integrity of any European site.

## 8. Glossary

<b>Appropriate Assessment (AA)</b>	An assessment of the affect of a plan or project on the Natura 2000 network. The network comprises Special Protection Areas under the Birds Directive and Special Areas of Conservation under the Habitats Directive (collectively referred to as European sites)
<b>Avoidance</b>	Prevents impacts on European sites from happening in the first place.
<b>Compensation</b>	Off-site offsetting put in place where a significant impact will occur, where there is no alternative, and where the plan is deemed necessary.
<b>Competent authority</b>	The plan-making / decision-making authority.
<b>Conservation Objectives</b>	A statement of the nature conservation aspirations for a site, expressed in terms of the favourable condition required for the habitats and / or species for which the site was selected.
<b>European sites</b>	Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). Includes Ramsar sites in this report.
<b>Favourable condition</b>	Designated land is adequately conserved and is meeting its 'conservation objectives', however, there is scope for enhancement.
<b>Habitats Directive</b>	Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna.
<b>Habitats Regulations</b>	Formally known as The Conservation of Habitats and Species Regulations 2010 (Statutory Instrument 2010 No 490). These transpose the requirements of the Habitats Directive into domestic legislation.
<b>Imperative reasons of overriding public interest (IROPI)</b>	The Habitats Regulations require competent authorities to establish that there are no alternative solutions before a plan or project can be considered for imperative reasons of overriding public interest. Judgements involve an assessment of the importance of the proposal and

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	whether it is sufficient to override the nature conservation importance of that site.
<b>In-combination</b>	The cumulative effects caused by the project or plan that is currently under consideration, together with the effects of any existing or proposed projects or plans.
<b>Integrity</b>	The integrity of a site is the coherence of its ecological structure and function, across its whole area that enables it to sustain the habitat, complex of habitats and / or the levels of populations of the species for which it was classified.
<b>Member State</b>	Nation state member of the EU
<b>Mitigation</b>	Reduces the impact on site integrity to the point where it no longer has adverse effects.
<b>Natura 2000</b>	A Europe-wide network of sites of international importance for nature conservation established under the European Community Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC; 'Habitats Directive').
<b>Natural England</b>	Natural England works for people, places and nature, to enhance biodiversity, landscapes and wildlife in rural, urban, coastal and marine areas; promote access, recreation and public well-being. Natural England was formed by bringing together English Nature, the landscape, access and recreation elements of the Countryside Agency and the environmental land management functions of the Rural Development Service.
<b>Precautionary principle</b>	Prudent action which avoids the possibility of irreversible environmental damage in situations where the scientific evidence is inconclusive but the potential damage could be significant.
<b>Priority Habitat / Species</b>	Habitats and species identified by the Habitats Directive as being of priority importance. Twenty-three of the UK's 76 habitats are highlighted as important under the Habitats

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	Directive priority habitats.
<b>Qualifying Interest Feature</b>	The reasons why the European site has been recommended for designation (e.g. the endangered species that occupy the SAC; rare habitats that occur there; or threatened birds that breed or over-winter in the SPA).
<b>Ramsar sites</b>	Sites designated as internationally important wetland habitats under the International Convention on Wetlands of International Importance (1976) (Ramsar Convention).
<b>Screening</b>	The process of deciding whether or not a plan or project requires an Appropriate Assessment
<b>Site of Special Scientific Interest (SSSI)</b>	UK national designation identified under the Wildlife and Countryside Act (1981) as being important for wildlife and/or geology. Over half of these sites, by area, are internationally important for their wildlife, underpinning the network of Natura 2000 sites, designated as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites.
<b>Special Area of Conservation (SAC)</b>	Site of European importance for nature conservation designated under the Conservation of Natural Habitats and Wild Flora and Fauna Directive (92/43/EEC).
<b>Special Protection Area (SPA)</b>	Site of European importance for nature conservation designated under the Conservation of Wild Birds Directive (70/409/EEC).



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## 9. References

DCLG (2006): Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.

English Nature guidance notes:

Habitats Regulations Guidance Note 1, The Appropriate Assessment HRGN 1; The Conservation (Natural Habitats %c) Regulations, 1994;

Habitats Regulations Guidance Note 2, Review of existing planning permissions and other consents HRGN2; The Conservation (Natural Habitats %c) Regulations, 1994;

Habitats Regulations Guidance Note 4; Alone or in combination HRGN4;

European Communities (2000) Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/434/EEC; and

European Commission (2001) Assessment of plans and projects significantly affecting Natura 2000 sites

JNCC (2013) website: <http://www.jncc.gov.uk/>

National Planning Policy Framework. Department for Communities and Local Government. March 2012. Available from the DCLG website.

Treweek Environmental Consultants (2012). Horsham District Planning Framework, Preferred Options, Habitats Regulations Assessment, Appropriate Assessment Report. Horsham District Council.

## Annex 1 Qualifying Features, Conservation Objectives and Vulnerabilities of European Sites

### ARUN VALLEY SPA/ RAMSAR

The Arun Valley consists of three component Sites of Special Scientific Interest. Together these sites comprise an area of wet meadows on the floodplain of the River Arun between Pulborough and Amberley. The neutral wet grassland which is subject to winter, and occasional summer flooding, is dissected by a network of ditches, several of which support rich aquatic flora and invertebrate fauna. The area is of outstanding ornithological importance notably for wintering wildfowl and breeding waders.

#### Qualifying Features

The SPA qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

- Bewick's Swan *Cygnus columbianus bewickii*, 115 individuals representing at least 1.6% of the wintering population in Great Britain (5 year peak mean for 1992/93 to 1996/7)

Additionally the SPA qualifies under Annex 4.2 as over winter the area regularly supports 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97)

#### SPA Conservation Objectives

With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below);

1. Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.
2. Subject to natural change, to maintain or restore:
  - 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 populations of qualifying features;
  - The distribution of qualifying features within the site.

#### Qualifying Features (SPA)

*Cygnus columbianus bewickii* (Bewick's swan – non breeding)

Waterbird assemblage

#### The site qualifies as a Ramsar through criteria 2, 3, 5 and 6:

- Criterion 2 - supports vulnerable, endangered, or critically endangered species or threatened ecological communities
- Criterion 3 - supports populations of plant and/or animal species important for maintaining the biological diversity of a particular biogeographic region
- Criterion 5 - regularly supports 20,000 or more waterbirds
- Criterion 6 - regularly supports 1% of the individuals in a population of one species or subspecies of waterbird.

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### Key Conditions Required to Support Integrity

In order to maintain site integrity the following environmental considerations should be met:

- Appropriate grazing management
- Sympathetic management of lowland wet grassland/grazing marsh (including water level management).
- Minimal disturbance
- Management of the hydrology of the area important. For example, the impact of water abstraction, river maintenance, and ensuring that winter flooding can continue as part of the existing management of the site.

### ARUN VALLEY SAC

Ramshorn snail (*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).

### Conservation Objectives

With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below);

1. Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.
2. Subject to natural change, to maintain or restore:
  - The extent and distribution of qualifying natural habitats and habitats of qualifying species;
  - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species ;
  - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
  - The populations of qualifying species;
  - The distribution of qualifying species within the site.

### Qualifying Features

The site qualifies as a SAC for the species:

- Ramshorn snail (*Anisus vorticulus*)

### Key Conditions Required to Support Integrity

In order to maintain site integrity the following environmental considerations should be met:

- Appropriate ditch management
- Control of shade-inducing marginal vegetation
- good water quality and appropriate ditch levels

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## THE MENS SAC

The Mens remains as one of the most extensive examples of Wealden Woodland in West Sussex. It is important for its size, structural diversity and the extremely rich fungal and lichen floras which occur here. The wood supports a diverse community of breeding birds, and is the locality of a nationally endangered species of fly.

### Conservation Objectives

With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below);

1. Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.
2. Subject to natural change, to maintain or restore:
  - The extent and distribution of qualifying natural habitats and habitats of qualifying species;
  - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species ;
  - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
  - The populations of qualifying species;
  - The distribution of qualifying species within the site.

### Qualifying Features

The Mens qualifies as a SAC for its habitats. The site contains the Habitats Directive Annex I habitats of:

- Beech forests on acid soils

Secondly, the site contains the Annex II species:

- Barbastelle bat

### Key Conditions Required to Support Integrity

In order to maintain site integrity the following environmental considerations should be met:

- Appropriate woodland management.
- Low recreational pressure (because management is minimum intervention and Bridleway degradation by horse riding is a recurring threat)
- Minimal air pollution - may increase the susceptibility of beech trees to disease and alter epiphytic communities.
- Barbastelles require a constant humidity around their roosts; any manipulation of the shrub layer must be carefully considered.