



Steyning Neighbourhood Development Plan 2019-2031: Regulation 16 **Habitats Regulations Assessment Addendum**

November 2021





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Address: County Hall, Market Road, Chelmsford, Essex, CM1 1QH

Contact no: 0333 013 6840

Email: placeservicesecology@essex.gov.uk

Website: www.placeservices.gov.uk

VAT number: GB 104 2528 13



Report Checking and Version Control

Prepared by:

Hamish Jackson | Ecological Consultant | hamish.jackson@essex.gov.uk

Sue Hooton | Principal Ecological Consultant | sue.hooton@essex.gov.uk

Report version control:

Version	Date	Author	Description of changes
1.1	09.11.2021	Sue Hooton	Drafted
1.2	10.11.2021	Hamish Jackson	Reviewed
1.3	11.11.2021	Sue Hooton	Issued
1.4	18.11.2021	Sue Hooton	Re issued

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1. Introduction

- 1.1 The purpose of this Habitats Regulations Assessment Addendum is to screen the Steyning Neighbourhood Development Plan for likely significant effects in relation to water quantity on the Arun Valley Habitats sites as identified by Natural England's Position Statement on Water Neutrality (September 2021).
- 1.2 Steyning Neighbourhood Development Plan is currently at examination through written representations. The Neighbourhood Development Plan sets out the vision, spatial and planning policies that will guide development in Steyning parish in the period up to 2031 but does not allocate any land for development.
- 1.3 The Conservation of Habitats and Species Regulations 2017 (as amended) requires the Competent Authority to undertake a Habitat Regulations Assessment (HRA) before making a decision about permission for any plan or project, which may result in a likely significant effect upon a Habitats (European) Site.
- 1.4 The Habitats Regulations Assessment screening for Neighbourhood Development Plans in Horsham District Steyning Screening (18 October 2019) indicates that at the time of writing with the mitigation embedded in the Horsham District Planning Framework, it was considered possible without mitigation to rule out likely significant effect from the Regulation 16 Steyning Neighbourhood Development Plan. Natural England's Regulation 16 consultation response to the Steyning Neighbourhood Development Plan in August 2020 was that they had no specific representation.
- 1.5 However, in September 2021 Natural England issued a Position Statement on water neutrality which impacts on the whole of the Horsham District. For all plans and projects, this has triggered an additional requirement to screen for likely significant effects on Arun Valley Special Area for Conservation (SAC), Arun Valley Special Protection Area (SPA) and Arun Valley Ramsar site from the increased demand for mains water in the Sussex North Water Resource Zone.
- 1.6 Southern Water supplies water to Crawley Borough, Horsham District, the northern part of Chichester District and South Downs National Park Authority from its Sussex North Water Resource Zone (WRZ) as shown by the map in Appendix 1)). Within this WRZ there are a number of water sources, one of which is a groundwater source at Hardham – one of a number of groundwater and surface water abstractions around Pulborough.
- 1.7 Developments within Sussex North WRZ must therefore must not add to this impact and one way of achieving this is to demonstrate water neutrality. In addition, the Gatwick Sub regional Water Cycle Study concluded that water neutrality is required for Sussex North to enable sufficient water to be available to the region. Natural England has therefore advised Horsham District and Chichester District Councils and Crawley Borough

Council, that development in the Sussex North WRZ part of the Gatwick sub-region must not add to this adverse effect. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.

- 1.6 Significant concerns regarding the current Southern Water abstraction at Hardham (and any increase in abstraction required to serve planned development), have been raised by the Environment Agency and Natural England. The latter has advised that it cannot conclude with certainty that this process is not having an adverse impact on site integrity through a reduction in water levels and potential water quality impacts that are leading deterioration of habitat at designated sites including Amberley Wild Brooks SSSI, Pulborough Brooks SSSI that are part of Arun Valley SPA, Arun Valley SAC and Arun Valley Ramsar site. Water Neutrality has been proposed as a potential means to allow development to proceed without increasing abstraction from Hardham.

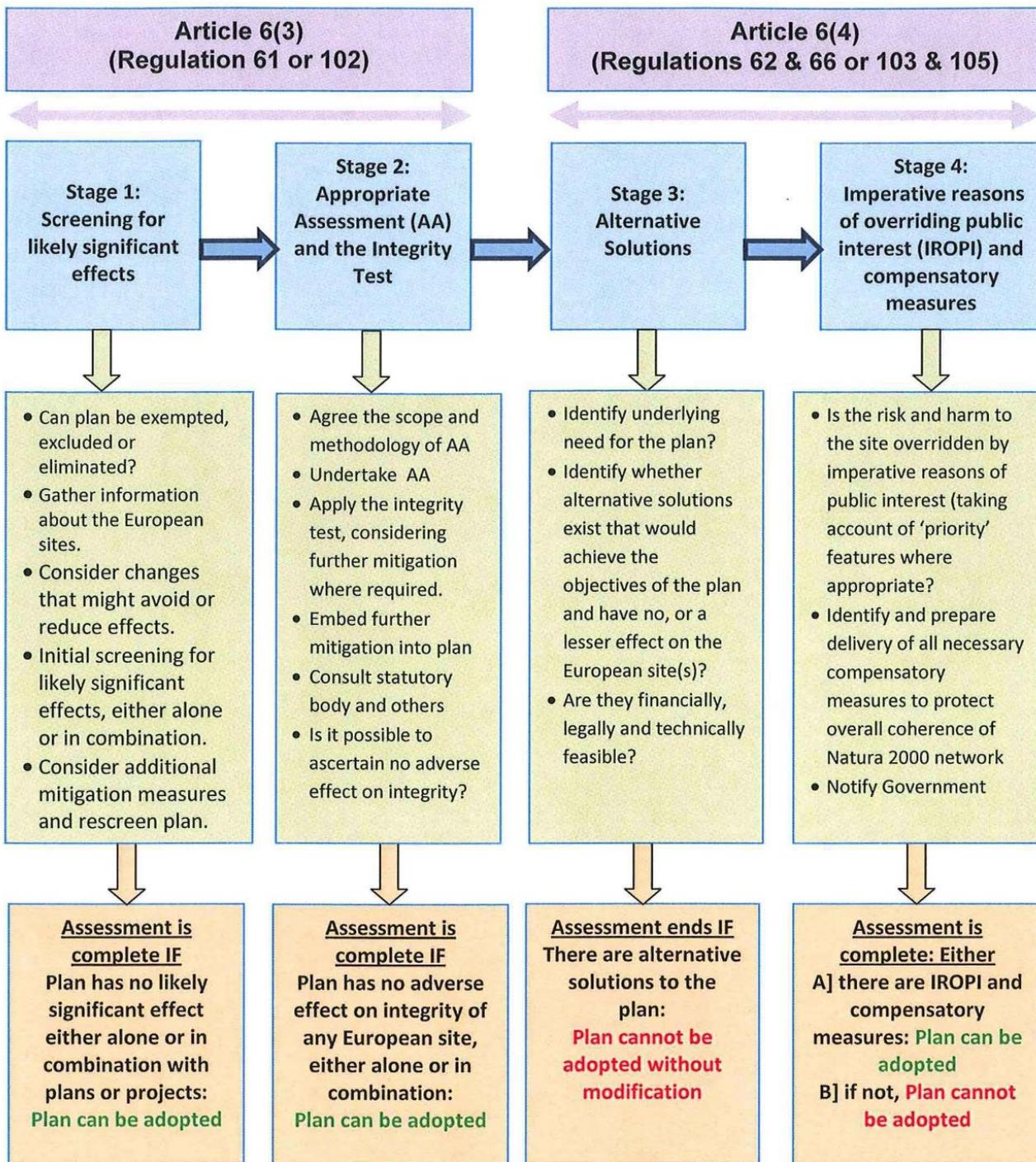
2. Previous Habitats Regulations Assessment Work

- 2.1 The Steyning Neighbourhood Development Plan has been supported by the Steyning Habitats Regulations Assessment Screening report undertaken by Horsham District Council dated 18 October 2019. Natural England provided a formal response to the consultation on the Steyning Neighbourhood Plan dated 19 August 2020 (ref 323647) that it did not have any specific comments on the plan.
- 2.2 As there is a legal requirement for Habitats Regulations Assessment of Plans prior to being adopted, this Habitats Regulations Assessment Addendum seeks to provide an update on the single issue of water neutrality.

3. Approach to Habitats Regulations Assessment Addendum

- 3.1 The Habitats Regulations Assessment screening report for Steyning Neighbourhood Development Plan (Horsham DC, 2019) complied with Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended). Therefore, this Habitats Regulations Assessment Addendum should be in read in conjunction with the Habitats Regulations Assessment screening report Steyning screening (2019).
- 3.2 The Habitats Regulations Assessment Addendum addresses the need for additional screening of the Steyning Neighbourhood Development Plan at Regulation 16, for hydrological changes to assess if the Plan is legally compliant and sound.
- 3.3 Figure 1 outlines the stages of the Habitats Regulations Assessment process for Neighbourhood Development Plans.

Figure 1 Outline of the Four Stage Approach to the Assessment of Plans under the Habitats Regulations



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4. Brief description of the Habitats sites within scope of this assessment

- 4.1 Based on the threat from increased water resources identified by Natural England's Position Statement Interim Approach (September 2021), the Steyning Neighbourhood Development Plan needs assessment for potential hydrological changes to the Arun Valley SAC/ SPA/ Ramsar site.
- 4.2 Arun Valley SAC, SPA and Ramsar site supports 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.
- 4.3 Further details are provided in Appendix 2.

5. Review of Water Neutrality issues

- 5.1 This section of this Report aims to:
- Screen the Steyning Neighbourhood Development Plan for its potential to impact upon the Arun Valley Habitats sites.
 - Assess the potential for in combination effects from other projects and plans in the area.
 - Identify if there are any outstanding issues that need further investigation.

Screening and Impact Pathways - Water Quantity

- 5.2 Natural England's substantive advice (Position Statement Interim Approach (September 2021)) triggers further assessment in relation of potential impacts from the Steyning Neighbourhood Development Plan on the Arun Valley Habitat sites.
- 5.3 For the single issue of water quantity, impacts from development could include hydrological changes due to increased demand for water resources
- 5.4 As the Steyning Neighbourhood Development Plan lies within the Sussex North Water Resource Zone, there is potential for it to affect the Arun Valley Habitats sites in combination with other plans and projects.
- 5.5 However, as the Plan does not allocate any land for development, there are no predicted effects from the policies in the Steyning Neighbourhood Development and this impact pathway can be screened out from further assessment.

- 5.6 Natural England has advised Horsham District Council that the matter of water neutrality should be resolved in partnership through Local Plans across the affected authorities, where policy and assessment can be agreed and secured to ensure that water use is offset for all new developments within Sussex North. To achieve this Natural England is working in partnership with all the relevant authorities to secure water neutrality collectively through a strategic approach.
- 5.7 Whilst the water neutrality strategy is evolving, Natural England advises that decisions on planning applications should await its completion. However, if there are applications which a planning authority deems critical to proceed in the absence of the strategy, then Natural England advises that any application needs to demonstrate water neutrality. It will also need to be ensured that measures are not already proposed (for example in Southern Water's Management Plan) to avoid double-counting. Any mitigation must be suitably certain in order to comply with the Habitats Regulations and Caselaw. If the application cannot demonstrate, through an Appropriate Assessment, the required water neutrality, Natural England advise that it is either revised to achieve this in line with its interim approach or awaits completion of the strategic approach.
- 5.8 This Habitats Regulations Assessment Addendum screening exercise explores whether there will be any Likely Significant Effect resulting from the Plan's policies. This section considers each policy in turn and the results of the screening exercise for water quantity is recorded in Table 1.

Table 1: Summary of findings from the HRA screening

Policy 10	Will Policy have Likely Significant Effect on a Habitats Site in respect of Water Quantity?	Recommendations
<p>SNDP1 GREEN INFRASTRUCTURE & BIODIVERSITY</p> <p>SNDP1.1 Development proposals will be supported, where they protect and, wherever possible, enhance the green infrastructure, natural capital and valued landscape features of the Parish, and add to the potential for carbon sequestration. Valued landscape features include, but are not limited to;</p> <ul style="list-style-type: none"> a) Green road verges; b) Accessible green space; c) Public Rights of Way and their settings; d) Hedgerows; e) Trees, copses and woods, including ancient woodland and orchards; f) River corridors. <p>SNDP1.2 Development proposals, which result in a biodiversity net gain will be supported, particularly when such proposals would increase the amount of publicly accessible green infrastructure.</p>	No, Category A	No specific recommendations

<p>SNDP2: RESPONSIBLE ENVIRONMENTAL DESIGN</p> <p>SNDP2.1 All new development must be designed responsibly, considering the impact it will have on the environment over its lifetime.</p> <p>SNDP2.2 As a minimum, all developments should accord with the National Design Guide and seek to:</p> <ul style="list-style-type: none"> a) Incorporate existing hedgerows, trees, woodlands, banks, ponds, watercourses and other natural features, such as green corridors, into the design. b) Provide additional indigenous habitat on site where possible through planting and the creation of new wildlife corridors. c) Incorporate indigenous plant species into landscaping schemes, avoiding species which would not normally be found within the parish. d) Utilise landscaping to minimise negative visual impacts and actual urbanising impact of any new built form. e) Incorporate permeable hard landscaping and sustainable urban drainage solutions. f) Design buildings so that they are energy efficient, ensuring they are sited and orientated to optimise passive solar gain, use high quality and thermally efficient building materials. g) Be energy self-sufficient, utilising renewable energy sources wherever possible. h) Promote the use of non-motorised or zero-emission transport modes. 	No, Category A	No specific recommendations
<p>SNDP3: CONTRIBUTION TO CHARACTER</p> <p>SNDP3.1 Support is given to development proposals which demonstrate how they will positively contribute towards Steyning's character, taking into consideration the most recent character assessment of the area (currently the Steyning Character Assessment 2019).</p> <p>SNDP3.2 Development shall protect the amenity of neighbours, and respond to the scale, mass, height, building materials and form of neighbouring properties.</p>	No, Category A	No specific recommendations
<p>SNDP4: IMPROVING OUR FACILITIES</p> <p>SNDP4.1 Development proposals will be supported which:</p> <ul style="list-style-type: none"> a) Improve the health and wellbeing of our community; OR b) Improve recreational facilities for local people; OR c) Improve public / non-motorised transport infrastructure; OR 	No, Category A	No specific recommendations

d) Provide new or improved essential infrastructure to serve our community.		
SNDP5: NEW COMMUNITY INFRASTRUCTURE		
SNDP5.1 Any CIL funds raised by development within the Plan Area and paid to Steyning Parish Council will be used to support infrastructure projects identified as a priority by the Parish Council.	No, Category A	No specific recommendations
SNDP5.2 The Parish Council will maintain an Infrastructure Delivery Plan identifying priority infrastructure projects		
SNDP6: LOCAL GREEN SPACE		
SNDP6.1 The following green areas, as defined on the Policies Map, are designated and protected as Local Green Spaces, in line with the NPPF: a) Bayards Field (because of its beauty, historic significance and tranquillity. It also provides a key view from, and an important landscape fringe to, the Conservation Area) b) Fletcher's Croft (because of its recreational value and also because it provides a key viewpoint of the Church) c) Mill Field (because of its beauty and tranquillity. It also provides key views into the Conservation Area and acts as an important landscape fringe to the Conservation Area.) d) Sweetland Field (because of its beauty and tranquillity) e) The Rifle Range (because of its beauty, historic significance, recreational value, tranquillity and wildlife)	No, Category A	No specific recommendations
SNDP6.2 Proposals on Local Green Space will be considered as if they were proposed on Green Belt.		

- 5.9 There are no recommendations for the policies in this Neighbourhood Development Plan as they have all been assigned to Category A (no negative effect) with no need to amend policy text.
- 5.10 However, there will be a need for any development subsequently coming forward which is likely to result in increased demand for mains water to be subject to a project level HRA for water neutrality and secure sufficient mitigation measures, to avoid a Likely Significant Effect on the Arun Valley Habitats sites at planning application stage in combination with other plans and projects.
- 5.11 In terms of providing certainty at examination that the Plan is sound, it may therefore be helpful to add text on water neutrality to the Biodiversity & the Environment section of Chapter 2 of the Steyning Neighbourhood Development Plan. This will explain the predicted impacts of future development, without mitigation, to result in adverse effects

on Arun Valley Habitats sites. The following additional text below (underlined) is therefore recommended:

With reference to Natural England's Position Statement for Applications within the Sussex North Water Resources Zone (September 2021 – Interim Approach), Steyning lies with this Water Supply Zone which includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar site. As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, Natural England advises that developments within this zone must not add to this impact.

Natural England has advised that this matter should be resolved in partnership through Local Plans across the affected authorities, where policy and assessment can be agreed and secured to ensure water use is offset for all new developments within Sussex North. To achieve this Natural England is working in partnership with all the relevant authorities to secure water neutrality collectively through a water neutrality strategy. Whilst the strategy is evolving, Natural England advises that decisions on planning applications should await its completion. However, if there are applications which a planning authority deems critical to proceed in the absence of the strategy, then Natural England advises that any application needs to demonstrate water neutrality.

Developments within Steyning must therefore must not add to this impact and one way of achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.

- 5.12 As the Regulation 16 Steyning Neighbourhood Development Plan will not affect any of the sensitive features of the Arun Valley SAC/SPA/Ramsar site, the LPA can consider that, without mitigation, the Plan is not likely to result in a 'likely significant effect' (LSE) to Arun Valley SAC/SPA/Ramsar site, when considered *alone*.
- 5.13 With no predicted effects from the Regulation 16 Steyning Neighbourhood Development Plan alone and no credible evidence of any real risk from this Plan *in combination* with other plans and projects, there is no need for this Habitats Regulations Assessment to progress to Habitats Regulations Assessment Stage 2: Appropriate Assessment.
- 5.14 Consequently, it is highlighted that this additional Habitats Regulations Assessment Addendum screening report does not alter the conclusions of the Habitats Regulations Assessment Screening report undertaken by Horsham District Council dated 18 October 2019 such that Appropriate Assessment is required.

6 Recommendations

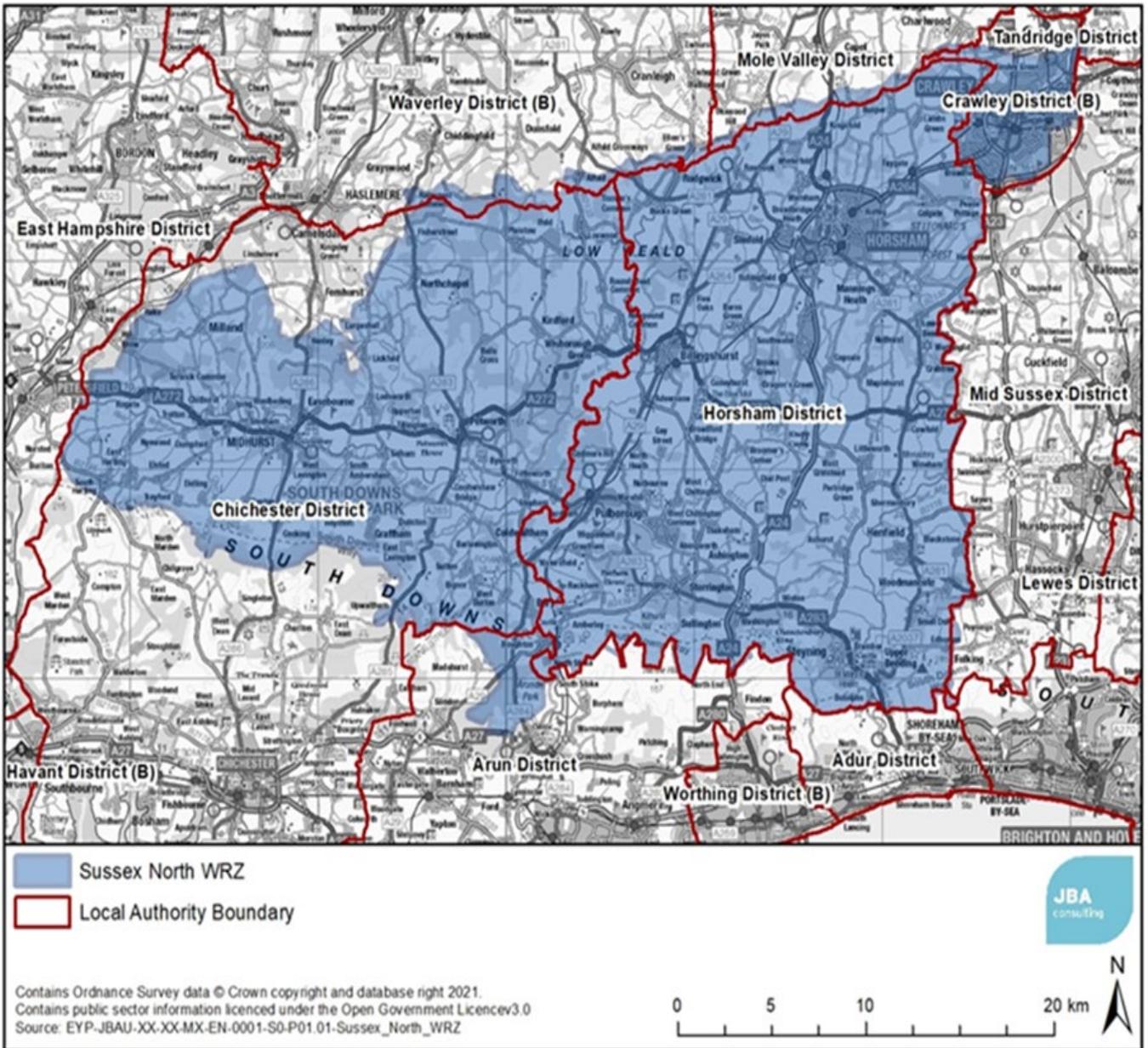
- 6.1 Whilst the conclusion of no likely significant effect at Plan level is supported by the Habitats Regulations Assessment Addendum screening process above, the sole recommendation to add supporting text to the Plan is precautionary. Including an explanation of how projects at aims to ensure that projects at application stage can avoid predicted adverse effects on the integrity of the Arun Valley SPA, SAC and Ramsar site. This will need to be assessed in a project level Habitats Regulations Assessment which provides a means of checking for any further risks unforeseen at the Plan level, and for developing project specific mitigation measures in greater detail within a project level Appropriate Assessment.
- 6.2 The additional text aims to ensure that the Regulation 16 Steyning Neighbourhood Development Plan protects the Habitats sites from any plan level impacts.

7 Conclusion

- 7.1 Following the update set out in this Habitats Regulations Assessment Addendum, it is concluded that the Regulation 16 Steyning Neighbourhood Development Plan is not predicted to result in any Likely Significant Effect on the designated features of the Arun Valley Habitats sites, either alone or in combination with other plans and projects.
- 7.2 The content of the Regulation 16 Steyning Neighbourhood Development Plan has therefore been screened out for any further assessment and Horsham DC can demonstrate its compliance with the Conservation of Habitats and Species Regulations 2017 (as amended).
- 7.3 Therefore, Horsham District Council can demonstrate that the Regulation 16 Steyning Neighbourhood Development Plan is legally and procedurally compliant and therefore sound.

8 Appendix

Appendix 1. Sussex North Water Resource Zone





Appendix 2. Characteristics of Arun Valley Habitats Sites

This appendix contains information about the Arun Valley Habitats Sites included in the scoping for this HRA Addendum. Information about each site's area, the site descriptions, qualifying features and pressures and threats are drawn from Natural England's Site Improvement Plans (SIPs) and the Standard Data Forms or Ramsar Information Sheets available from the JNCC website. Site conservation objectives are drawn from Natural England's website and are only available for SACs and SPAs. Supplementary Advice has also been added to describe the range of ecological attributes that are most likely to contribute to a site's overall integrity and key vulnerabilities to consider within Habitats Regulations assessments.

Site name	Area (ha)	Qualifying Features	Conservation objectives (only available for SACs & SPAs)	Key vulnerabilities / factors affecting site integrity
Arun Valley				
<p>The Arun Valley in West Sussex is located just north of the South Downs escarpment. 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. Southern parts of the Arun Valley are fed by calcareous springs, while to the north, where the underlying geology is Greensand, the water is more acidic. The history of management of fields, and their water levels, determines the plant communities present, with drier fields dominated by meadow grasses, Crested Dog's-tail <i>Cynosurus cristatus</i> and Perennial Rye-grass <i>Lolium perenne</i>. In wetter areas, rushes, sedges and Tufted Hair-grass <i>Deschampsia cespitosa</i> are more frequent. Ungrazed fields have developed into fen, scrub or woodland. Fen areas consist of Common Reed <i>Phragmites australis</i>, Reed Sweet-grass <i>Glyceria maxima</i> and Greater Tussock-sedge <i>Carex paniculata</i>, often with scattered elder <i>Sambucus</i> sp. and willow scrub. On firmer ground, there is Alder <i>Alnus glutinosa</i>, Willow <i>Salix</i> sp., Birch <i>Betula</i> sp., and willow, with Oak <i>Quercus robur</i> and Hazel <i>Corylus avellana</i> woodland on the driest ground. The ditches and margins between grazing marsh fields have an outstanding aquatic flora and invertebrate fauna. The Arun Valley supports important numbers of wintering waterbirds, which feed in the wetter, low-lying fields and along ditches. The Arun Valley SPA is situated within the South Downs National Character Area (NCA Profile 125).</p>				
Arun Valley Ramsar	528.6	<p>Ramsar criterion 2</p> <p>The site holds seven wetland invertebrate species listed in the British Red Data Book as threatened. One of these, <i>Pseudamnicola confusa</i>, is considered to be</p>	N/A	N/A



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)

Species/populations identified subsequent to designation for possible future consideration under criterion 6:

- Species with peak counts in winter: Northern pintail , *Anas acuta*, NW Europe 641 individuals, representing an average of 1% of the population (5 year peak mean 1998/9-2002/3)



Arun Valley SAC	487.48	<p>Qualifying Species:</p> <ul style="list-style-type: none"> • Little whirlpool ram's-horn snail <i>Anisus vorticulus</i> 	<p>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;</p> <ul style="list-style-type: none"> – The extent and distribution of the habitats of qualifying species – The structure and function of the habitats of qualifying species – The supporting processes on which the habitats of qualifying species rely – The populations of qualifying species, and, – The distribution of qualifying species within the site. 	<p>Inappropriate water levels</p> <p>Environment Agency is ceasing to administer Internal Drainage Board (IDB) ditches, and water control structures, with the likelihood that management will revert to landowners/Local Authorities. This has implications for management/clearance of the ditches and maintenance of water controlling structures. There could be impacts on water levels, the marginal and in-channel flora and associated species. <i>Anisus vorticulus</i> is not known to tolerate occasional ditch drought (M.Willings, Pers Comm 2014). Bewick's Swan and the majority of water bird assemblage species for which the site is classified require large bodies of in field water and water levels maintained within the ditch systems.</p> <p>The Environment Agency are reviewing management of river bank defences adjacent to the Special Protection Area/Site of Community Importance in the medium term (beyond 10 years) as part of the Lower Tidal River Arun Strategy (LTRAS) project. If the banks are not maintained, there will be a permanent increase in water levels, with added risk of changes in salinity, water levels, and</p>
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			<p>increasing water pollution (rivers Stor and Arun failing for phosphorus levels). <i>Anisus vorticulus</i> is not known to have a tolerance for elevated salinity levels. The majority of Ramsar plant species (also key supporting habitat for <i>A.vorticulus</i> and Bewick's swan) are intolerant of poor water quality. Impacts of increased salinity largely unknown.</p> <p>Water pollution</p> <p>There's a risk that undetected deterioration in the quality of water entering the ditch systems is impacting upon SPA/SCI/Ramsar species. <i>Anisus vorticulus</i> requires good water quality. An important food source for Bewick's swan is <i>Potamogeton</i> spp. (pond weeds), which also requires good water quality, as do the majority of aquatic plant species for which the Ramsar is designated, and which is the essential supporting habitat for <i>A.vorticulus</i>. The rivers Arun and Stor are failing on phosphate levels. Directly linked to this is point source pollution from a sewage treatment works upstream of the site. There may also be a risk of increased levels of nutrients entering the site through flooding, especially if the river banks are not maintained (see issue of changes in</p>
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			<p>water levels). The classified bird species are also vulnerable to increased levels of nutrient enrichment as there is an increased likelihood of certain disease. Increase in growth of vegetation from sustained nutrient enrichment can make the habitat unsuitable for many bird species (Literature Review, Mott McDonald, 2006). Diffuse pollution from agricultural run-off is likely to be contributing to the phosphate levels (this issue is managed via Catchment Sensitive Farming).</p> <p>Inappropriate ditch management</p> <p>This is linked to issue 1 and possible cessation or changes in the method and frequency of ditch management/clearance. <i>Anisus vorticulus</i> is sensitive to changes in, and cessation of ditch management, as are the marginal and in-channel flora. The management requirements of <i>A. vorticulus</i> are little understood, so further research is required. Further surveys are also required- there has not been a full survey of <i>A. vorticulus</i> at Amberley since 1997. A full survey has been undertaken at Pulborough 2013/14, but repeat surveys will be necessary.</p>
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				<p>Disturbance</p> <p>The nature, scale, timing and duration of some human activities can result in the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. Such disturbing effects can for example result in changes to feeding or roosting behaviour, increases in energy expenditure due to increased flight, and desertion of supporting habitat (both within or outside the designated site boundary where appropriate). This may undermine successful feeding and/or roosting, and/or may reduce the availability of suitable habitat as birds are displaced and their distribution within the site contracts. Disturbance associated with human activity may take a variety of forms including noise, light, sound, vibration, trampling, and presence of people, animals and structures</p>
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<p>Arun Valley SPA</p>	<p>530.42</p>	<p>Qualifying species:</p> <ul style="list-style-type: none"> • A037, Bewick's swan; <i>Cygnus columbianus bewickii</i> (non-breeding) <p>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).</p> <p>Qualifying assemblage of species:</p> <p>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:</p> <ul style="list-style-type: none"> • Shoveler; <i>Anas clypeata</i>, • Teal; <i>Anas crecca</i>, • Wigeon; <i>Anas penelope</i>, • Bewick's Swan; <i>Cygnus columbianus bewickii</i> <p>Qualifying habitats (which support wintering birds):</p> <ul style="list-style-type: none"> • MG5 <i>Cynosurus cristatus-Centaurea nigra</i> lowland meadows • MG13-related; Inland wet grassland 	<p>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;</p> <ul style="list-style-type: none"> – 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. 	<p>Similar to the SAC site (above)</p>
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		<ul style="list-style-type: none">• S5 <i>Glyceria maxima</i> (Reed Sweet-grass) swamp• S22 <i>Glyceria fluitans</i> (floating-sweet grass) water-margin vegetation• Network of ditch systems		
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Place Services

Essex County Council

County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840

E: enquiries@placeservices.co.uk

www.placeservices.co.uk

November 2021



Essex County Council