

Report to Inform Habitats Regulations Assessment of the Walberton Neighbourhood Plan

Walberton Parish Council

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Quality information

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1. Introduction

Scope of project

- 1.1 AECOM was appointed by Walberton Parish Council to undertake a Habitats Regulations Assessment (HRA) for the Walberton Regulation 14 Neighbourhood Plan 2015-2035. This is to inform the planning group and local councils of the potential effects of Neighbourhood Plan (NP) development on European Sites and how they are being, or should be, addressed in the draft NP.
- 1.2 The adopted Arun District Local Plan (LP) 2011-2031 was subject to an initial HRA in 2013, followed by an Appropriate Assessment in 2017. The primary conclusion of the Appropriate Assessment was a need to address water quality, loss of functionally linked land, introduction of non-native species and recreational pressure to European Sites that are located within the Arun District or within the influence catchment of European Sites as a result of development growth set out in the LP. The 2017 HRA recommended policy mechanisms for this that are reflected in the adopted Local Plan, and where applicable, discussed herein.
- 1.3 The Arun LP does not allocate specific development sites in Walberton, and at the time the HRA of the Arun LP was prepared the quantum of development in Walberton was not final. However, the overall scale of growth expected within the district was assessed (20,000 dwellings). The objective of this particular HRA is therefore not to assess the scale of growth at Walberton (as this was covered at LP HRA level) but to identify if any NP site allocation and/or other policies have the potential to cause an adverse effect on the integrity of Natura 2000 or European Designated Sites (Special Areas of Conservation, SACs, Special Protection Areas, SPAs, and Ramsar sites designated under the Ramsar convention), either in isolation or in combination with other plans and projects, and to determine whether site-specific or policy mitigation measures are required.

Legislation

- 1.4 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (as amended) and concerns the protection of European sites. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.
- 1.5 The HRA process applies the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Conservation of Habitats and Species Regulations 2017 (as amended)

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

“A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority [the Local Planning Authority] may reasonably require for the purpose of the assessment under regulation 105... [which sets out the formal process for determination of ‘likely significant effects’ and the appropriate assessment]”

Box 1: The legislative basis for HRA

- 1.6 It is therefore important to note that this report has two purposes:

- To assist the Qualifying Body (Walberton Parish Council) in preparing their plan by recommending (where necessary) any adjustments required to protect European sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
 - On behalf of the Qualifying Body, to assist the Local Planning Authority (Arun District Council) to discharge their duty under Regulation 105 (in their role as 'plan-making authority' within the meaning of that regulation) and Regulation 106 (in their role as 'competent authority').
- 1.7 As 'competent authority', the legal responsibility for ensuring that a decision of 'likely significant effects' is made, for ensuring an 'appropriate assessment' (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.
- 1.8 Over the years, 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of "Appropriate Assessment". Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

2. Methodology

Introduction

- 2.1 Figure 1 below outlines the stages of HRA according to current Ministry of Housing, Communities and Local Government guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

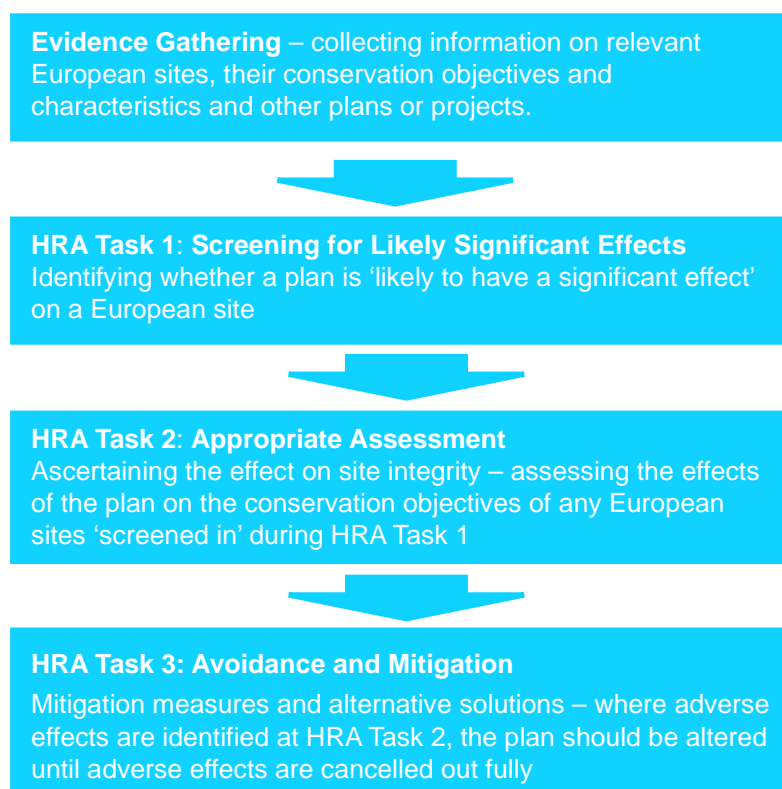


Figure 1: Four Stage Approach to Habitats Regulations Assessment. Source GOV.UK, 2019.

HRA Task 1 – Likely Significant Effects (LSE)

- 2.2 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

- 2.3 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report.

HRA Task 2 – Appropriate Assessment (AA)

- 2.4 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is not a technical term. In other words, there are no

particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.

- 2.5 During July 2019 the Ministry of Housing, Communities and Local Government published guidance for Appropriate assessment¹. Paragraph: 001 Reference ID: 65-001-20190722m explains: *'Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured'*.
- 2.6 As this analysis follows on from the screening process, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment takes any policies or allocations that could not be dismissed following the high-level screening analysis and analyses the potential for an effect in more detail, with a view to concluding whether there would be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).
- 2.7 A decision by the European Court of Justice² concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. The UK is no longer part of the European Union. However, as a precaution, it is assumed for the purposes of this HRA that EU case law regarding Habitat Regulations Assessment will still be considered informative jurisprudence by the UK courts. That ruling has therefore been considered in producing this HRA.
- 2.8 Also, in 2018 the Holohan ruling³ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that *'As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area'* [emphasis added]. This has been taken into account in the HRA process.

HRA Task 3 – Avoidance and Mitigation

- 2.9 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Neighbourhood Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.10 In evaluating significance, AECOM has relied on professional judgement and the LP HRA regarding development impacts on the European sites considered within this assessment.
- 2.11 When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Development Plan document is a high-level policy document. A Neighbourhood Plan is a lower level constituent of a Local Development Plan.

¹ <https://www.gov.uk/guidance/appropriate-assessment#what-are-the-implications-of-the-people-over-wind-judgment-for-habitats-regulations-assessments> [Accessed: 07/01/2020].

² People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

³ Case C-461/17

Confirming Other Plans and Projects That May Act 'In Combination'

- 2.12 It is a requirement of the 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.
- 2.13 In considering the potential for combined regional housing development to impact on European sites the primary consideration is the impact of visitor numbers – i.e. recreational pressure and urbanisation.
- 2.14 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans (which in themselves may have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in-combination assessment is therefore of greatest relevance when the plan or policy would otherwise be screened out because its individual contribution is inconsequential.

3. European Sites

Arun Valley SPA / Ramsar

Introduction

- 3.1 The Arun Valley SPA / Ramsar comprises an area of wet meadows on the floodplain of the River Arun between Pulborough and Amberley. The grassland is neutral wet and subject to winter as well as occasional summer flooding. An extensive network of drainage ditches runs through the SPA, providing habitat for biodiverse aquatic flora and invertebrate communities. Additionally, the site is also classified as a Site of Community Importance (SCI) for little whirlpool ram's-horn snail *Anisus vorticulus*.
- 3.2 The plant communities present in the fields are primarily determined by the management history and water levels present. For example, the drier fields are dominated by meadow grasses, such as crested dog's-tail *Cynosurus cristatus* and perennial rye-grass *Lolium perenne*. In wetter areas rushes, sedges and tufted hair-grass *Deschampsia cespitosa* are more frequent. The ungrazed fields have developed into fen, scrub and woodland. Fen areas comprise common reed *Phragmites australis* and greater tussock-sedge *Carex paniculate*. On drier ground there is alder *Alnus glutinosa*, willow *Salix* sp. and birch *Betula* sp.
- 3.3 Most notably the Arun Valley SPA supports important numbers of wintering waterfowl, such as Bewick's swan *Cygnus columbianus bewickii*, shoveler *Anas clypeata*, teal *Anas crecca* and wigeon *Anas Penelope*. These feed in the wetter, low-lying fields of the floodplain adjacent to drainage ditches.

SPA Qualifying Features⁴

- 3.4 Qualifying individual species listed in Annex I of the Wild Birds Directive (Article 4.1)
 - Bewick's swan *Cygnus columbianus bewickii*
- 3.5 Qualifying assemblages of species (Article 4.2)

During the non-breeding season the SPA regularly supports an assemblage of waterfowl with the area regularly supporting 27,241 individual waterfowl (5 year peak mean for 1992/93 to 1996/97) including: Shoveler *Anas clypeata*, teal *Anas crecca*, wigeon *Anas penelope*, Bewick's swan *Cygnus columbianus bewickii*.

Ramsar Qualifying Features⁵

- 3.6 The Arun Valley qualifies as a Ramsar site under the following Ramsar criteria:

Criterion 2

The site holds seven wetland invertebrate species listed in the British Red Data Book as threatened. One of these, *Pseudamnicola confusa*, is considered to be endangered. The site also supports four nationally rare and four nationally scarce plant species.

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.

⁴ <http://publications.naturalengland.org.uk/publication/4567444756627456> [Accessed on the 02/03/2020]

⁵ <https://jncc.gov.uk/jncc-assets/RIS/UK11004.pdf> [Accessed on the 02/03/2020]

Criterion 5

Assemblages of international importance

Species with peak counts in winter: 13,774 waterfowl (5 year peak mean 1998/99-2002/03)

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 1998/99-2002/03)

Conservation Objectives⁶

- 3.7 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.8 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

Threats / Pressures to Site Integrity⁷

- 3.9 The following threats / pressures to the site integrity of the Arun Valley SPA / Ramsar have been identified in Natural England's Site Improvement Plan:
- Inappropriate water levels
 - Water pollution
 - Inappropriate ditch management

Arun Valley SAC

Introduction

- 3.10 The Arun Valley SAC, largely overlapping with the Arun Valley SPA / Ramsar, is a 487.48ha site comprising humid / mesophile grassland (95%), inland water bodies (2%) and bogs / marshes (2%). Given the overlap with the SPA / Ramsar (discussed in the previous section), the ecological characteristics are similar. However, the SAC is primarily designated for the ramshorn snail *Anisus vorticulus*. The snail occurs across a range of sites in southern and eastern England, with the Arun Valley being one of the three main population centres in the UK. Two of the core sites for the ramshorn snail lie in the wash lands of the Arun floodplain: the Pulborough Brooks and Amberley Wild Brooks SSSIs.

Qualifying Features⁸

- 3.11 Annex II species that are a primary reason for selection of this site:
- Ramshorn snail *Anisus vorticulus*

⁶ <http://publications.naturalengland.org.uk/publication/4567444756627456> [Accessed on the 02/03/2020]

⁷ <http://publications.naturalengland.org.uk/publication/5353882309885952> [Accessed on the 02/03/2020]

⁸ <https://sac.incc.gov.uk/site/UK0030366> [Accessed on the 02/03/2020]

Conservation Objectives⁹

- 3.12 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.13 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of 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.

Threats / Pressures to Site Integrity¹⁰

- 3.14 The following threats / pressures to the site integrity of the Arun Valley SAC have been identified in Natural England's Site Improvement Plan:
- Inappropriate water levels
 - Water pollution
 - Inappropriate ditch management
- 3.15 Potential loss of functionally linked habitat has also been identified as a concern, although it is not mentioned in the Site Improvement Plan.

Singleton and Cocking Tunnels SAC

Introduction

- 3.16 The Singleton and Cocking Tunnels SAC comprises two disused brick railway tunnels located in rural Sussex. A large proportion of the tunnels lies within the South Downs National Character Area, but the northern entrance of the Cocking tunnel is within the Wealden Greensand National Character Area. The reason for designation of these tunnels is that they are a primary location for hibernating bats in south-east England. In addition to the two qualifying species, barbastelle and Bechstein's bats, six other species of bat have been documented, including Natterer's bat *Myotis nattereri*, Daubenton's bat *Myotis daubentoni*, brown long-eared bat *Plecotus auritus* and Brandt's *Myotis brandti* / whiskered bat *Myotis mystacinus*.

Qualifying Features¹¹

- 3.17 Annex II species present as a qualifying feature, but not a primary reason for site selection
- Barbastelle *Barbastella barbastellus*
 - Bechstein's bat *Myotis bechsteinii*

Conservation Objectives¹²

- 3.18 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

⁹ <http://publications.naturalengland.org.uk/publication/4924283725807616> [Accessed on the 02/03/2020]

¹⁰ <http://publications.naturalengland.org.uk/publication/5353882309885952> [Accessed on the 02/03/2020]

¹¹ <https://sac.incc.gov.uk/site/UK0030337> [Accessed on the 02/03/2020]

¹² <http://publications.naturalengland.org.uk/publication/6518329883754496> [Accessed on the 02/03/2020]

- 3.19 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of 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.

Threats / Pressures to Site Integrity¹³

- 3.20 Natural England's Site Improvement Plan identifies the following threats and pressures for the integrity of the Singleton and Cocking Tunnels SAC:
- Habitat connectivity
 - Habitat fragmentation
 - Public access / disturbance
 - Air pollution: Risk of atmospheric nitrogen deposition

Duncton to Bignor Escarpment SAC

Introduction

- 3.21 The Duncton to Bignor Escarpment SAC is approx. 214.47ha in size and comprises a variety of habitats including broad-leaved deciduous woodland (80%), heath / scrub (10%) and dry grassland (5%). Most characteristic of the SAC is the mature beech *Fagus sylvatica* woodland on a steep escarpment of the South Downs. The prevailing soil conditions have produced beech-dominated woodland with interspersed ash *Fraxinus excelsior*, scrub and chalk grassland.
- 3.22 Overall, the SAC has a high habitat quality and harbours rare plants such as white helleborine *Cephalanthera damasonium*, yellow bird's nest *Monotropa hypopitys* and limestone fern *Gymnopcarpium robertium*. Furthermore, rare animal species are also found in the scrubby woodland, including the rare snail *Helicodonta obvoluta* and a notable assemblage of rare moth species.

Qualifying Features¹⁴

- 3.23 Annex I habitats that are a primary reason for selection of this site:
- *Asperulo-Fagetum* beech forests

Conservation Objectives¹⁵

- 3.24 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 3.25 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;

¹³ <http://publications.naturalengland.org.uk/publication/5755291169718272> [Accessed on the 02/03/2020]

¹⁴ <https://sac.jncc.gov.uk/site/UK0030138> [Accessed on the 02/03/2020]

¹⁵

<http://nepubprod.appspot.com/publication/6492790347268096?category=6528471664689152&.sm.au=iVVQHJHRNDN6HSk7> [Accessed on the 02/03/2020]

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which the qualifying natural habitats rely.

Threats / Pressures to Site Integrity¹⁶

3.26 Natural England's Site Improvement Plan does not identify any current threats / pressures to the site integrity of the Duncton to Bignor Escarpment SAC.

Solent and Dorset Coast SPA

Introduction

3.27 The Solent and Dorset Coast pSPA was proposed to protect important marine foraging areas for three species of tern (common tern, sandwich tern, little tern). The site is located on the south coast of England in the British Channel, extending from the Isle of Purbeck in the west to Bognor Regis in the east.

3.28 The main rationale underpinning the potential designation is that the four breeding tern species have recorded mean foraging ranges between 4.5km and 12.2km from their nesting sites, with maximum distances of 15.2km and 49km respectively. Given that the ranges identified for little terns (which underpin many of the SPA site boundaries on the south coast of England) are unlikely to be representative for the larger tern species, boat-tracking studies of individual foraging birds were undertaken. The results fed into habitat usage models for each tern species, accounting for the maximum identified foraging range around tern colonies.

3.29 Since its identification as a pSPA, Natural England has confirmed the recommendation of the Solent and Dorset Coast pSPA to be classified on the basis of the available scientific evidence. The Solent and Dorset Coast SPA was formally designated on the 16th January 2020.

Qualifying Features¹⁷

3.30 Species listed under Annex I of the Birds Directive:

- Sandwich tern *Sterna sandvicensis*; 441 pairs representing 4.01% of the GB breeding population (count between 2008 – 2014)
- Common tern *Sterna hirundo*; 492 pairs representing 4.77% of the GB breeding population (count between 2009 – 2014)
- Little tern *Sternula albifrons*; 63 pairs representing 3.31% of the GB breeding population (count between 2009 – 2014)

Conservation Objectives¹⁸

3.31 Because the site has only recently been designated, Natural England has not published conservation objectives yet.

Threats / Pressures to Site Integrity¹⁹

3.32 Natural England is yet to publish a Site Improvement Plan for the Solent and Dorset Coast. However, the threats and pressures to site integrity are likely to be similar than for other European sites designated for terns. Potential issues include:

¹⁶ <http://publications.naturalengland.org.uk/publication/5623422855938048> [Accessed on the 02/03/2020]

¹⁷ <https://sac.incc.gov.uk/site/UK0030138> [Accessed on the 02/03/2020]

¹⁸ http://nepubprod.appspot.com/publication/6492790347268096?category=6528471664689152&_sm_au=iVVQHJHRNDN6Hsk7 [Accessed on the 02/03/2020]

¹⁹ <http://publications.naturalengland.org.uk/publication/5623422855938048> [Accessed on the 02/03/2020]

- Public access / disturbance
- Fisheries: Commercial marine and estuarine
- Water pollution
- Changes in species distributions
- Climate change
- Changes to site conditions
- Biological resource use
- Air pollution: Risk of atmospheric nitrogen deposition
- Hydrological changes
- Extraction: Non-living resources.

Pagham Harbour SPA and Ramsar Site

Introduction

3.33 Pagham Harbour comprises an extensive central area of saltmarsh and tidal mudflats, with surrounding habitats including lagoons, shingle, open water, reed swamp and wet permanent grassland. The intertidal mudflats are rich in invertebrates and algae and provide important feeding areas for birds.

3.34 Most of the site is a Local Nature Reserve and a Marine Conservation Zone (MCZ) managed by West Sussex County Council.

Features of European Interest

3.35 Pagham Harbour SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive²⁰.

3.36 During the breeding season:

- Common Tern *Sterna hirundo*: 0.5% of the breeding population in Great Britain (1996); and
- Little Tern *Sternula albifrons*: 0.3% of the breeding population in Great Britain (5-year mean, 1992-1996).

3.37 Over winter:

- Ruff *Philomachus pugnax*: 1.4% of the population in Great Britain (5-year peak mean 1995–1999); and

3.38 This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species.

3.39 Over winter:

- Dark-bellied Brent Goose *Branta bernicla bernicla*: 0.6% of the population (5-year peak mean 1991/2–1995/6).

3.40 Pagham Harbour Ramsar site qualifies under one of the nine **Ramsar** criteria²¹.

Table 1. Pagham Harbour Ramsar site criteria

²⁰ <http://jncc.defra.gov.uk/pdf/SPA/UK9012041.pdf> [accessed 01/04/2020]

²¹ <https://jncc.gov.uk/jncc-assets/RIS/UK11052.pdf> [accessed 01/04/2020]

Description of criterion

Pagham Harbour

6	A wetland should be considered internationally important if it regularly supports 1% of the individuals in a population of one species or subspecies of waterbird.	Dark-bellied brent goose <i>Branta bernicla bernicla</i> : 2512 individuals, representing an average of 1.1% of the populations (5-year peak mean 1998/99-2002-03) Black-tailed godwit <i>Limosa limosa islandica</i> : 377 individuals, representing an average of 1% of the population (5-year peak mean 1998/99–2002/03).
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Conservation Objectives²²

3.41 'Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.'

Threats/ Pressures to Site Integrity

3.42 Natural England's Site Improvement Plan identifies the following threats and pressures for the integrity of Pagham Harbour SPA:

- Physical modification,
- Public access/ disturbance,
- Water pollution,
- Fisheries: commercial activities and recreational activities; and
- Change in land management.

4. Impact Pathways

Water Quality

- 4.1 An increased amount of residential or employment development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can result in an increased nutrient input to European sites leading to unfavourable conditions²³ ²⁴. Diffuse pollution, for example due to urban run-off, has been identified during an Environment Agency Review of Consents process and a joint Environment Agency and Natural England evidence review, as being a major pollutant for aquatic ecosystems.
- 4.2 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:
- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
 - Eutrophication, the enrichment of plant nutrients in water, increases all biological activity and leads to significant changes in the composition and structure of aquatic food webs. Two of the most frequent eutrophication effects are shifts in algal species compositions and the frequency of nuisance algal blooms²⁵. These blooms have a multitude of consequences, including changes in vascular plant production (and biomass and species composition), reduced water clarity, increased pH, dissolved oxygen depletion and, ultimately, an increased likelihood of death of ecologically and economically important animal species²⁶. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.
 - Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.
 - Increased discharge of treated sewage effluent can result in high levels of macroalgal growth, smothering sandflats and mudflats, and in increased scour (as a result of greater flow volumes).
- 4.3 At sewage treatment works, additional residential development increases the risk of effluent escape into aquatic environments in addition to consented discharges to the catchment. In many urban areas, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.
- 4.4 The most likely problem arising from the Walberton NP is the discharge of treated sewage effluent, that could increase the input of phosphorus and nitrogen into the Arun Valley SPA / Ramsar and/or the Solent and Dorset Coast SPA. Water quality is listed as one threat to the site integrity of these European sites in the respective Natural England Site Improvement Plans. Given the relatively long distances between Walberton Parish and European Sites; direct surface runoff from urban areas is not considered to be relevant in this instance.
- 4.5 Water quality issues are typically tackled at the Local Plan level with the involvement of water companies, Natural England and the Environment Agency. These organisations operate on a

²³ Rabalais, N.N., 2002. Nitrogen in aquatic ecosystems. *AMBIO: A Journal of the Human Environment*, 31(2), pp.102-113.

²⁴ Howarth, R.W. and Marino, R., 2006. Nitrogen as the limiting nutrient for eutrophication in coastal marine ecosystems: evolving views over three decades. *Limnology and Oceanography*, 51(1part2), pp.364-376.

²⁵ Smith V.H., Joye S.B. & Howarth R.W. 2006. Eutrophication of freshwater and marine ecosystems. *Limnology and Oceanography* 51: 351-355.

²⁶ Smith V.H., Tilman G.D. & Nekola J.C. 1999. Eutrophication: Impacts of excess nutrient inputs on freshwater, marine, and terrestrial ecosystems. *Environmental Pollution* 100: 179-196.

strategic scale and wastewater is treated as sewage works serving multiple parishes. Therefore, issues of water quality at Walberton are inherently in-combination with neighbouring parishes. The wastewater treatment works (WwTW) serving Walberton Parish is Lidsey WwTW²⁷ that discharges into the English Channel. Considering the distance of 7km and the lack of hydrological links to the Arun Valley SPA/Ramsar impacts from water pollution as a result of NP development is not expected to impact these sites.

4.6 Based upon the most recent advice provided by Natural England²⁸, Walberton is not located within the treated wastewater catchment that affects the Solent European sites or within which nutrient neutrality (i.e. ensuring that development does not add to existing nutrient burdens) must be achieved.

4.7 The overarching LP requires all development to ensure sewage capacity is available for development:

4.8 *'To ensure good water quality in the District, all major developments must:*

b. Demonstrate, where it will materially increase foul and/or surface water discharges, adequate drainage capacity exists or can be provided as part of the development. Where adequate capacity does not exist, there will be a requirement that facilities are adequately upgraded prior to the completion and occupation of development. In sewerred areas, there will be a general presumption against the use of non mains foul water drainage.'

4.9 *'3. Lidsey Wastewater Treatment Works Catchment Area*

4.10 *Major development within this area must also be accompanied by a full Drainage Impact, Assessment which must take account of surface water disposal and foul water disposal.*

Although minor developments are unlikely to raise significant flood risk due to the cumulative impact all development within this area must also be accompanied by a Drainage Impact Assessment that must take account of both the individual and cumulative impact upon foul water disposal; flood storage capacity and surface water drainage or flood flows within the Lidsey Wastewater Treatment Works Catchment Area. Adoption Arun Local Plan 2011-2031 (July 2018) Arun District Council 225 18 Water.

Where surface water and foul water drainage systems are approved as part of the consideration of a planning application, conditions may be imposed upon the permission relating to dates for implementation or other detailed technical requirements. In order to discharge conditions, the developer will be required to submit a statement from a suitably qualified and experienced engineer that the measures have been adequately and satisfactorily implemented.'

4.11 Given these over-arching requirements and the fact that Walberton lies outside the area in which Natural England require nutrient neutrality to be established, no adverse effect on the SPA will arise either alone or in combination with other plans and projects.

4.12 Based upon this, Arun Valley SAC/SPA/Ramsar and the Solent and Dorest Coast SPA are scoped out from further discussion.

Water resources

4.13 New residential development could lead to increased water abstraction for public water supply. The Arun District is served by Portsmouth Water and Southern Water and receives water from a wide area including two major aquifers, the Chalk and the Lower Greensand, that underlie the Arun and Western Streams CAMS area. These aquifers are a source of springs and streams that help to support surface water flows and water dependent habitats including those at Pagham Harbour SPA/Ramsar and Arun Valley SPA/Ramsar.

²⁷ Arun District Council (2012). Lidsey Foul Water Treatment Catchment Area. Available online: <https://www.arun.gov.uk/lidsey-foul-water/>, accessed: 30/03/2020

²⁸ Natural England (2020). Advice on achieving Nutrient Neutrality for new development in the Solent Region. Available online: <https://www.push.gov.uk/wp-content/uploads/2020/03/Achieving-nutrient-neutrality-for-new-development-in-the-Solent-region-Marrch-2020.pdf>, accessed: 30/03/2020

- 4.14 Arun LP HRA identified that: *'The Chichester Chalk CAMS Water Resource Management Unit, which covers the majority of western Arun and within which Pagham Harbour lies, is assessed as 'over licensed', which means that if existing licences were used to their full allocation they would have the potential to cause unacceptable environmental impacts at low flows.'*
- 4.15 The resources and impacts of public water supply are best tackled at LP level and was assessed in the Arun LP HRA. Therefore, the conclusions of that HRA are acknowledge here:
- 4.16 *'Portsmouth Water's Water Resource Management Plan (WRMP; 2011) seeks to manage the balance of supply and demand within its water supply area through a combination of measures. It aims to ensure there is sufficient water available for use for a growing population while also meeting the Environment Agency's sustainability reductions:*
- *A compulsory metering programme utilising Automatic Meter Reading (AMR) technology with seasonal tariffs over a 15 year period from 2015 to 2030;*
 - *A programme of leakage savings delivering a 3MI/d leakage reduction between 2015 and 2020;*
 - *The construction of a Washwater Recovery Plant at Farlington Water Treatment Works in 2017/18; and*
 - *The development of Havant Thicket Winter Storage Reservoir, to maximise the surplus winter yield of its existing Havant and Bedhampton Springs abstraction licences which has undergone Habitats Regulations Assessment, between 2025 and 2035.'*
- 4.17 *It can be concluded that there will be no adverse effects on the ecological integrity of Pagham Harbour SPA/Ramsar as a result of water abstraction to supply new development. Further avoidance and mitigation measures are not needed.'*
- 4.18 It was concluded for Southern Water that *'only least-cost solution, there are no further interventions identified as being required until the end of the planning period, with the supply demand balance being satisfied through the optimisation of inter-zonal bulk transfers, the continuation of the inter-company bulk import from Portsmouth Water and the benefits of the supply and demand side interventions made during AMP5.*
- 4.19 *As a result of this strategy, Southern Water states that there is sufficient water to supply planned new developments while maintaining an adequate supply-demand balance throughout the planning period (2035).'*
- 4.20 It is considered, Arun Council have demonstrated a sound understanding for the environmental impacts of excessive water abstraction and are collaborating with Portsmouth Water and Southern Water to improve water resource use throughout the district. These efforts will directly apply to water resources at Walberton Parish. Therefore, likely significant effects to European Sites with regards to water resources and abstraction are not expected and scoped out from further discussion.

Disturbance and Recreational Pressure

4.21 Recreational use of a European site has the potential to:

- Prevent appropriate management or exacerbate existing management difficulties;
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl.

4.22 Different types of European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex^{29 30 31 32}.

Disturbance

4.23 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites as they must sustain a greater number of birds.

4.24 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushed more readily, more frequently, at greater distances and for longer. In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths.

4.25 However, the outcomes of many of these studies should be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population. A literature review undertaken for the RSPB also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These factors have to be taken into account when attempting to predict the impacts of future recreational pressure on European sites.

4.26 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds the less likely it is to result in disturbance.

4.27 The factors that influence a species' response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.

4.28 It should be emphasised that recreational use is not inevitably a problem. Many European sites are also nature reserves managed for conservation and public appreciation of nature. At such

²⁹ Wilson, J.P. & Seney, J.P. (1994) Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* 14: 77-88.

³⁰ Cole, D.N. (1995a) Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214.

Cole, D.N. (1995b) Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224.

³¹ Cole, D.N. (1995c) Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

³² Cole, D.N. & Spildie, D.R. (1998) Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71.

- sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.
- 4.29 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at European sites involves location of new development away from such sites; Local Development Frameworks (and other strategic plans) provide the mechanism for this. Where avoidance is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space.
- 4.30 Access management – restricting access to some or all of a European site - is not usually within the remit of the Parish or District Council and restriction of access may contravene a range of Government policies on access to open space, and Government objectives for increasing exercise, improving health etc. However, active management of access may be possible, such as that practised on nature reserves.
- 4.31 Habitat management is not within the direct remit of the Parish Council. However, the Council can help to set a framework for improved habitat management by promoting collaboration with neighbouring parishes and the LPA.
- 4.32 Provision of alternative recreational space can help to attract recreational users away from sensitive European sites and reduce pressure on the sites. For example, some species for which European sites have been designated are particularly sensitive to dogs, and many dog walkers may be happy to be diverted to less sensitive sites. However, the location and type of alternative space must be attractive to users for this to be effective.
- 4.33 Work was completed in 2010 by Arun District Council regarding visitor surveys for Pagham Harbour SPA. In summary, this work identified that 8.7% of the visitors to the Arun sections of the SPA/Ramsar site come from within 500m, 49.7% come from within 5km, 52.9% come from within 6km and 57.4 % come from within 10km. Beyond 10km the visitors origins are very dispersed. This indicates that the largest single contribution to visits to the SPA comes from the 5-6km zone.
- 4.34 Considering Pargham Harbour SPA is located 10.2km from Walberton Parish, well outside the 5-6km expected influence zone, recreational issues are scoped out from further discussion. In addition, Arun Valley SAC/SPA/Ramsar lies 7km from the parish boundary, this distance is also considered too great to lead to likely significant effects to the European Sites as a result of recreational pressure. Therefore, Arun Valley SAC/SPA/Ramsar is also scoped out from further discussion.

Loss of Functionally Linked Habitat

- 4.35 While most European sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not always the case. A diverse array of qualifying species including birds, bats and amphibians are not confined to the boundary of designated sites.
- 4.36 For example, the highly mobile nature of both wildfowl and heathland birds implies that areas of habitat of crucial importance to the maintenance of their populations are outside the physical limits of European sites. Despite not being part of the formal designation, this habitat is still integral to the maintenance of the structure and function of the interest feature on the designated site and, therefore, land use plans that may affect such areas should be subject to further assessment. Examples of other mobile qualifying species are great-crested newts and bats.

Bat SACs

- 4.37 Bats are known to travel considerable distances from their roosts to feeding sites. For example, in a 2001 study, female adult Bechstein's bats regularly undertook commuting distances of up to 1km³³. Another study found that lesser horseshoe bats generally foraged within 600m of the

³³ Kerth G., Wagner M. & Koenig B. 2001. Roosting together, foraging apart: Information transfer about food is unlikely to explain sociality in female Bechstein's bats (*Myotis bechsteinii*). Behavioral Ecology and Sociobiology 50: 283-291.

nursery roost, with a single individual foraging up to 4.2km from the roost³⁴. For Bechstein's bats, the Core Sustainance Zone (CSZ) around the Singleton and Cocking Tunnels SAC is 1.5km, within which all habitat suitable for use by foraging Bechstein's bats (primarily broad-leaved woodland) and associated commuting features such as river corridors and mature hedgerows should be preserved. This is based upon radio-tracking evidence for the home ranges of several Bechstein's bat populations. Bechstein bat radio-tracking projects have established that individuals generally remain within approx. 1.5km of their roosts³⁵. Furthermore, a 2001 radio-tracking study in the Ebernoe Common SAC, showed that the maximum distance travelled by tagged individuals was 1,407m, with an average of 735.7m³⁶.

- 4.38 However, barbastelle bats, the second qualifying species of the Singleton and Cocking Tunnels SAC, tend to commute much longer distances to their favoured foraging habitats and hibernation sites than Bechstein's bats. A study on barbastelle bats determined that home range distances show considerable inter-individual differences, with bats traveling between 1 and 20km to reach their foraging areas³⁷. In 2016, the Bat Conservation Trust published guidelines on how to determine CSZs for bats and highlighted that barbastelles have a mean maximum CSZ of 6.47km³⁸. Overall, both spring migrations, or regular foraging trips, might take bat species relatively far beyond designated site boundaries. Given that the Singleton and Cocking Tunnels SAC is protected for its use as a hibernation site, the main issue for the SAC is the protection of commuting structures in the landscape to ensure that the roost is not isolated.
- 4.39 In addition, South Downs National Park Authority and Natural England have devised Bat SAC Protocol³⁹ that affords protection and mitigation to SACs and functionally linked habitat of Bat SACs within Sussex. This protocol introduces an extended buffer of 12km to include the following bat habitats:
- Flightlines - – these are key commuting routes from roosts to foraging (or feeding) areas used by the bats, and
 - Foraging areas - these are the areas of land where bats feed. Barbastelle bats can forage 10-15 kilometres from the roosting sites and they prefer wet meadows and riparian habitats.
- 4.40 On the basis of this, two screening thresholds for Bat SACs are used and divided as follows:
- **6.5km** – All potential impacts on barbastelle and Bechstein's bats within this Key Conservation Area, and
 - **12km** – All potentially significant impacts on barbastelle and Bechstein's bats to their flightlines, within a Wider Conservation Area to be assessed.

Bird SPAs

- 4.41 Over winter the Arun Valley supports 115 Bewick's swans, representing approximately 1.6% of Britain's migratory population⁴⁰. The Bewick's swan is a highly migratory bird species that spends summer in Russia. However, during the autumn months these swans migrate to northern Europe where they feed upon a diet of grasses, sedges and aquatic plants. The Arun Valley consists of mixed wet grasslands that provides optimal over wintering habitat for these species. In addition, much of the wider surrounding area of Arun consists of floodplain grazing marsh due to the periodic flooding of the River Arun; also supporting suitable over wintering grounds. The Bewick's

³⁴ Bontadina F., Schofield H. & Naef-Daenzer B. (2002). Radio-tracking reveals that lesser horseshoe bats (*Rhinolophus hipposideros*) forage in woodland. *Journal of Zoology* 258: 281-290.

³⁵ Schofield H. & Morris C. (2000). Ranging Behaviour and Habitat Preferences of Female Bechstein's Bats in Summer. Vincent Wildlife Trust.

³⁶ Fitzsimmons P., Hill D., Greenaway F. (2002). Patterns of habitat use by female Bechstein's bats (*Myotis bechsteinii*) from a maternity colony in a British woodland.

³⁷ Zeale M.R.K., Davidson-Watts I. & Jones G. (2012). Home range use and habitat selection by barbastelle bats (*Barbastella barbastellus*): Implications for conservation. *Journal of Mammalogy* 93: 1110-1118.

³⁸ Bat Conservation Trust. (2016). Core Sustainance Zones: Determining zone size. Available at https://cdn.bats.org.uk/pdf/Resources/Core_Sustainance_Zones_Explained_04.02.16.pdf?mtime=20190219173135 [Accessed on the 14/10/2019].

³⁹ Natural England and South Downs National Park Authority (2018) Draft Landscape Scale Protocol for the Sussex Bat Sites. Available online: <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-15-Draft-Sussex-Bat-SACProtocol.pdf>, accessed 01/04/2020

⁴⁰ JNCC (2001) SPA Description: Arun Valley (www.jncc.defra.gov.uk)

swan has seen recent declines of 27% from 1995 to 2005⁴¹ with national trends indicating continual declines. Preservation of significant habitat for Bewick's swan, whether it occurs within or outside the SPA and Ramsar site boundary is therefore essential.

4.42 Part of Walberton Parish lies within the Arun Valley SPA Impact Risk Zone. Within Arun Local Plan 2013 (updated 2017) HRA two impact risk zones were identified:

- **Impact Risk Zone 1** – where development is likely to have adverse impact to over wintering foraging habitats of migrant bird species⁴². As such, comprehensive ornithological studies must be conducted within proposed development sites before planning permission is granted.
- **Impact Risk Zone 2** – this is a 500m buffer beyond zone 1 and is where functionally linked habitat is present and could therefore impact over wintering bird populations. Only in certain circumstances where developments are likely to cause net loss in function links should ornithological surveys be conducted.

4.43 Part of Walberton Parish lies in the western extremity of Impact Risk Zone 2.

4.44 The following European sites within influence catchment of Walberton Parish are considered to be potentially susceptible to the loss of functionally linked land as a result of NP development (sites in bold are taken forward into the following chapters; note that there are also no further bat SACs within 12km of the Parish):

- **Arun Valley SPA / Ramsar (located approx. 7km to the north-east of Walberton Parish)**
- **Singleton and Cocking Tunnels SAC (located approx. 10.2km to the north-west of Walberton Parish (i.e. in-line with the Sussex Bat protocol 12km impact zone))**

Atmospheric Pollution (through Nitrogen Deposition)

4.45 The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia (NH₃) and sulphur dioxide (SO₂) and are summarised in Table 2.. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges⁴³. NOx can also be toxic at very high concentrations (far above the annual average critical level). However, in particular, high levels of NOx and NH₃ are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere is widely known to enhance soil fertility and to lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{44 45}.

Table 2: Main sources and effects of air pollutants on habitats and species⁴⁶

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	The main sources of SO ₂ are electricity generation, and industrial and domestic fuel combustion. However, total SO ₂ emissions in the UK have decreased substantially since the 1980's. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO ₂ have been documented in busy ports. In future years shipping is	Wet and dry deposition of SO ₂ acidifies soils and freshwater, and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.

⁴¹ Rees, E.C. & Beekman, J. Submitted. Bewick's Swan: a population in decline. British Birds.

⁴² GOV (2020) *SSSI Impact Risk Zones (England)*. Available online: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones>, accessed: 01/04/2020

⁴³ http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm, accessed 01/04/2020.

⁴⁴ Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. **2006**. Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* 38: 161-176

⁴⁵ Dijk, N. **2011**. Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation *Global Change Biology* 17: 3589-3607

⁴⁶ Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>)

Pollutant	Source	Effects on habitats and species
	likely to become one of the most important contributors to SO ₂ emissions in the UK.	However, SO ₂ background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	<p>Leads to acidification of soils and freshwater via atmospheric deposition of SO₂, NO_x, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.</p> <p>Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, increased N emissions may cancel out any gains produced by reduced S levels.</p>	<p>Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.</p> <p>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants.</p> <p>Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.</p>
Ammonia (NH ₃)	<p>Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock.</p> <p>Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) - containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant trans-boundary issue).</p> <p>While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.</p>	<p>The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation.</p> <p>Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen.</p> <p>As emissions mostly occur at ground level in the rural environment and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.</p>
Nitrogen oxides (NO _x)	<p>Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes.</p> <p>In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles.</p>	<p>Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO_x for all vegetation types has been set to 30 ug/m³.</p> <p>Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification.</p> <p>In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.</p>
Nitrogen deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO _x) or reduced (e.g. NH ₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly	<p>All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally.</p> <p>Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are</p>

Pollutant	Source	Effects on habitats and species
	<p>originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices.</p> <p>The N pollutants together are a large contributor to acidification (see above).</p>	<p>most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species.</p> <p>N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.</p>
Ozone (O ₃)	<p>A secondary pollutant generated by photochemical reactions involving NO_x, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above).</p> <p>Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.</p>	<p>Concentrations of O₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings.</p> <p>High O₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.</p>

- 4.46 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping⁴⁷. Ammonia emissions originate from agricultural practices⁴⁸, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with the Walberton NP.
- 4.47 NO_x emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NO_x footprint (92%) through the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁴⁹. Emissions of NO_x could therefore be reasonably expected to increase because of a higher number of vehicles due to implementation of the Local Plan Documents.
- 4.48 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µgm⁻³; the threshold for sulphur dioxide is 20 µgm⁻³. In addition, ecological studies have determined 'critical loads'⁵⁰ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃).
- 4.49 The Department of Transport's Transport Analysis Guidance stipulates that, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant⁵¹ (Figure 2). This is therefore the distance that has been used throughout this HRA in order to determine whether European sites are likely to be significantly affected by development outlined in the Local Plan.

⁴⁷ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

⁴⁸ Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* 32: 309-313

⁴⁹ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

⁵⁰ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

⁵¹ <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013> [Accessed on the 01/04/2020]

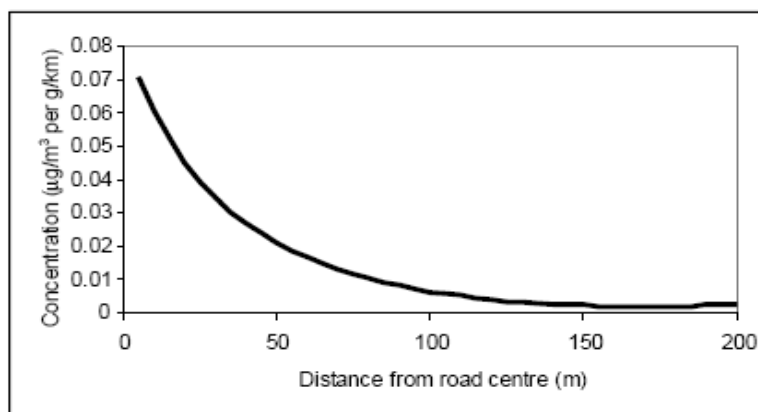


Figure 2: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT⁵²)

- 4.50 Exhaust emissions from increased vehicle usage linked to residential and employment development are capable of adversely affecting most plants and potentially altering community composition. Considering this, an increase in the net population and potential employment growth as a result of the Walberton NP could result in increased traffic adjacent to European sites that are sensitive to atmospheric pollution.
- 4.51 Overall, the following European site within 10km of Walberton Parish is considered to be susceptible to atmospheric pollution arising from development in the Parish (sites in bold are taken forward into the following chapters):
- **Duncton to Bignor Escarpment SAC (located approx. 5km to the north of Walberton Parish)**
- 4.52 The Duncton to Bignor Escarpment SAC is sensitive to nitrogen deposition due to its qualifying feature *Asperulo-Fagetum* beech forests (empirical critical load of 10-20 kg N/ha/yr)⁵³. Likely consequences of exceedance impacts include changes in ground vegetation and mycorrhiza, a nutrient imbalance and changes to the soil fauna.

⁵² <http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf> [Accessed on the 01/04/2020]

⁵³ <http://www.apis.ac.uk/src/select-a-feature?site=UK0030138&SiteType=SAC&submit=Next> [Accessed on the 05/03/2020]

5. Test of Likely Significant Effects

Introduction

5.1 The initial scoping of impact pathways and relevant European sites identified that the following require consideration:

Loss of Functionally Linked Land

- Singleton and Cocking Tunnels SAC
- Arun Valley SPA / Ramsar

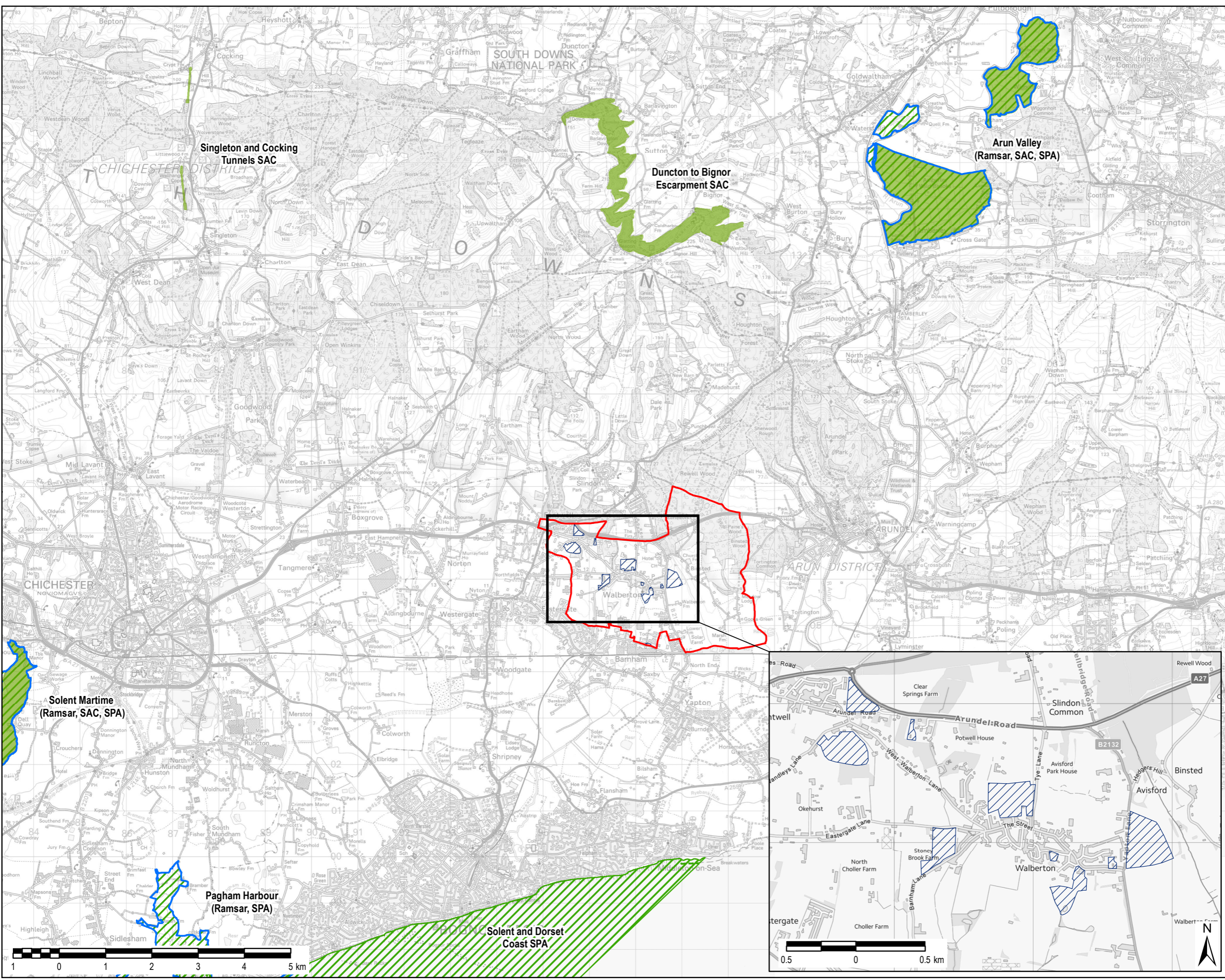
Atmospheric Pollution

- Duncton to Bignor Escarpment SAC

5.2 The policies contained within the Walberton NP are screened for their Likely Significant Effects (LSEs) on European sites using the list above. The full results of the LSEs Test for the Walberton Neighbourhood Plan are presented in Appendix A.

Figure 3: Walberton Parish in relation to European Sites.

File Name: I:\5004 - Information Systems\60571087 - Walberton NP Steering Group\Figure 3 - Walberton Parish in Relation to European Sites.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

LEGEND

- Walberton Neighbourhood Plan Area
- Housing Allocation
- Ramsar
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)

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Purpose of Issue **DRAFT**

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Loss of Functionally Linked Habitat

Arun Valley SPA / Ramsar

- 5.3 The Arun Valley SPA / Ramsar is designated for its overwintering population of Bewick's swan as well as a waterbird assemblage of European importance. Regarding the issue of functionally linked habitat, Bewick's swans are the SPA's / Ramsar's main feature that requires consideration. Generally, the swans overwinter on shallow freshwater lakes or marshes, near grasslands that are prone to flooding. However, in recent decades, this species also forages on cultivated land, such as pasture, cereals, stubble fields, sugar beet and oil seed rape. Site-specific evidence for the Arun Valley SPA / Ramsar indicates that Bewick's swans forage in a range of sites to the south of the SPA / Ramsar, between Arundel and Amberley⁵⁴. However, it is also documented that Bewick's swans will fly up to 10km from their roost sites to feed⁵⁵. Using this information, Natural England established two Functionally Connected Land (FCL) Impact Risk Zones.
- 5.4 An online review of the SSSI Impact Risk Zones indicates that Impact Risk Zone 2 only extends to about 6.5km from the SPA / Ramsar. Walberton Parish lies approx. 6.7km to the south-west of the Arun Valley SPA / Ramsar and therefore near the outer boundary of Impact Risk Zone 2. Clearly, considering the maximum range that Bewick's swans travel to off-site foraging areas (up to 10km), the sites allocated within the Walberton NP lie within the ranging distance of the swans.
- 5.5 Therefore, LSEs of the Walberton NP on the Arun Valley SPA / Ramsar regarding the loss of functionally linked habitat cannot be excluded. The site is screened in for Appropriate Assessment as a precautionary measure.
- 5.6 The following policies contained within the Plan are screened in for Appropriate Assessment:
- **Policy HP3 – S & G Motors, Arundel Road, Fontwell** (provides for a minimum of 28 net new dwellings adjacent to the A27)
 - **Policy HP4 – Land at the rear of Woodacre, Arundel Road, Fontwell** (provides for a minimum of 2 net new dwellings adjacent to the A27)
 - **Policy HP5 – Land at the rear of Woodcroft, West Walberton Lane, Walberton** (Provides for 8 net new dwellings in Walberton))
 - **Policy HP14 – Dower House** (Provides for 6 net new dwellings in Walberton)
 - **Policy HP15 – Longwall** (Provides for 3 net new dwellings in Walberton)
 - **Policy HP16 – Sussex Business Park** (Provides for 11 net new dwellings in Walberton)
 - **Policy HP17 – Gracelands Farm** (Provides for 2 net new dwellings in Walberton)
 - **Policy HP18 – Fontwell Field (National Trust Field)** (Provides for 40 net new dwellings in Walberton)
 - **Policy CL1 – Businesses** (Provides for a potential upgrade and extension to existing employment sites in Walberton Parish)

Singleton and Cocking Tunnels SAC

- 5.7 The Singleton and Cocking Tunnels SAC is designated for its populations of barbastelle bats and Bechstein's bats, which are known to depend on functionally linked habitat outside the designated site boundary. Natural England's Site Conservation Objectives Supplementary Advice Note highlights that both bat species use flightlines from roosts to surrounding habitat and foraging areas. These flightlines will extend beyond the site boundary into the wider local landscape.

⁵⁴ Thomas, A. (2014). The Birds of Sussex. BTO books. 608pp.

⁵⁵ Stroud, D.A., Bainbridge, I.P., Maddock, A., Anthony, S., Baker, H., Buxton, N., Chambers, D., Enlander, I., Hearn, R.D., Jennings, K.R., Mavor, R., Whitehead, S. & Wilson, J.D. (2016). The status of UK SPAs in the 2000s: The Third Network Review. JNCC, Peterborough. 1,108pp.

Typical flightlines include linear hedgerows, waterways, scrubland and woodland edges, and tracks.

- 5.8 Furthermore, radio-tracking studies have shown that bats make significant use of land parcels outside the site boundary for foraging activity. This is particularly the case for barbastelle bats, which can forage in wet meadows and riparian habitats between 10 and 15km from their roost site. In contrast, Bechstein's bats tend to forage in woodland closer to their roost sites, with more limited home ranges.
- 5.9 The Singleton and Cocking Tunnels SAC is located approx. 10.2km to the north-west of Walberton Parish, and as such the Parish is within the screening distance for functionally linked habitat of the SAC. Due consideration must therefore be given to any development proposals that might result in the loss of greenfield sites and flightlines used by bats originating from the SAC. As such, there is the potential for LSEs of the Walberton NP on the Singleton and Cocking Tunnels SAC and the site is screened in for Appropriate Assessment.
- 5.10 The following policies and site allocations contained within the Plan are screened in for Appropriate Assessment:
- **Policy HP3 – S & G Motors, Arundel Road, Fontwell** (provides for a minimum of 28 net new dwellings adjacent to the A27)
 - **Policy HP4 – Land at the rear of Woodacre, Arundel Road, Fontwell** (provides for a minimum of 2 net new dwellings adjacent to the A27)
 - **Policy HP5 – Land at the rear of Woodcroft, West Walberton Lane, Walberton** (Provides for 8 net new dwellings in Walberton))
 - **Policy HP14 – Dower House** (Provides for 6 net new dwellings in Walberton)
 - **Policy HP15 – Longwall** (Provides for 3 net new dwellings in Walberton)
 - **Policy HP16 – Sussex Business Park** (Provides for 11 net new dwellings in Walberton)
 - **Policy HP17 – Gracelands Farm** (Provides for 2 net new dwellings in Walberton)
 - **Policy HP18 – Fontwell Field (National Trust Field)** (Provides for 40 net new dwellings in Walberton)
 - **Policy CL1 – Businesses** (Provides for a potential upgrade and extension to existing employment sites in Walberton Parish)

Atmospheric Pollution

Duncton to Bignor Escarpment SAC

- 5.11 The Duncton to Bignor Escarpment SAC is designated for its *Asperulo-Fagetum* beech forests, which are sensitive to atmospheric pollution via nitrogen deposition. According to APIS (the Air Pollution Information System), the empirical critical nitrogen load is 10 – 20 kg N/ha/yr. Exceedance impacts have been identified as changes in ground vegetation and mycorrhiza, nutrient imbalance and changes in soil fauna. The current nitrogen deposition to the SAC is 22.8 kg N/ha/yr, which lies above the identified critical nitrogen load. Therefore, the potential effect of the Walberton NP on the Duncton to Bignor Escarpment SAC regarding the impact pathway atmospheric pollution requires consideration.
- 5.12 While it is noted that the Duncton to Bignor Escarpment SAC lies in a relatively rural area of the South Down National Park, it also lies directly adjacent to the A285, which connects the urban centre of Chichester with the northern area of Chichester District. In 2018 there was an Annual Average Daily Traffic (AADT) flow of 7,410 cars, 1,824 light goods vehicles and 268 heavy good vehicles at manual count point 56670 (situated to the north of the Duncton to Bignor Escarpment SAC on the A285). While the count point does not lie near Walberton, it is considered representative of the traffic flow past the SAC because there are no other major settlements in the area that are likely to absorb much of the traffic. Overall, it is reasonable to conclude that the

SAC lies within 200m of a major road, the screening distance that is used for atmospheric pollution.

- 5.13 Walberton Parish lies in the north-west of Arun District within relatively easy reach of the A285. It is noted that most Walberton residents (and within the wider Arun District) are most likely to work in the city of Chichester. However, some residents might also commute to settlements in the centre of Chichester District. A review of a representative potential commuter route between Walberton village and Petworth (a settlement in the central part of Chichester District), shows that the fastest route would involve the A27 – A285 link past the Duncton to Bignor Escarpment SAC. Therefore, as a precautionary measure, it is concluded that LSEs of the Walberton NP on the Duncton to Bignor Escarpment SAC regarding the impact pathway atmospheric pollution cannot be excluded. The site is therefore screened in for Appropriate Assessment.
- 5.14 The following policies contained within the Plan are screened in for Appropriate Assessment:
- **Policy HP3 – S & G Motors, Arundel Road, Fontwell** (provides for a minimum of 28 net new dwellings adjacent to the A27)
 - **Policy HP4 – Land at the rear of Woodacre, Arundel Road, Fontwell** (provides for a minimum of 2 net new dwellings adjacent to the A27)
 - **Policy HP5 – Land at the rear of Woodcroft, West Walberton Lane, Walberton** (Provides for 8 net new dwellings in Walberton))
 - **Policy HP14 – Dower House** (Provides for 6 net new dwellings in Walberton)
 - **Policy HP15 – Longwall** (Provides for 3 net new dwellings in Walberton)
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 - **Policy CL1 – Businesses** (Provides for a potential upgrade and extension to existing employment sites in Walberton Parish)

6. Appropriate Assessment

Introduction

- 6.1 The law does not prescribe how an appropriate assessment should be undertaken or presented but the appropriate assessment must consider all impact pathways that have been screened in, whether they are due to policies alone or to impact pathways that arise in combination with other projects and plans. That analysis is the purpose of this section. The law does not require the ‘alone’ and ‘in combination’ effects to be examined separately provided all effects are discussed.
- 6.2 The Arun LP did not allocate an amount of residential development in Walberton village. This is because the LP only allocated a total of 10,750 dwellings within Arun out of their requirement of 20,000 net residential dwellings to be delivered by the end of the plan period. The remaining requirement of 9,250 dwellings was to be strategically allocated throughout the plan period. Therefore, the total mass of development across Arun was assessed for by the Local Plan HRA but detailed site allocations at Walberton since this time were not assessed. Walberton Parish is allocated by the LP as a ‘suburban centre’ for a stratified approach to the provision of new housing development by the end of the LP (and NP) period. Therefore, the 68 residential allocations of the NP on new allocations (and the further 32 dwellings carried over from saved sites) make up part of the 9,250 strategic allocations within Arun.
- 6.3 By virtue of the small amount of growth specified for village and the distance to the closest European sites, the main impact pathways of concern to this HRA (Loss of functionally linked habitat, water quality and air quality) are inherently ‘in combination’ with all other growth in the Arun Local Plan and neighbouring plans and projects. However, for completeness, the potential impacts of 68 net residential developments within Walberton Parish in isolation are also assessed.
- 6.4 The HRA screening exercise undertaken in Chapter 4, Appendix A, Table 4 indicated 8 Policies (allocates 68 dwellings on new allocations and a further 32 on saved sites) that may have likely significant effects European Sites due to loss of functionally linked land, water quality and air quality issues.

Loss of Functionally Linked Habitat

Arun Valley SPA / Ramsar

- 6.5 The Test of LSEs section screened in the loss of functionally linked land in relation to the Arun Valley SPA / Ramsar as a precautionary measure. This was due to Walberton Parish being located on the fringe of Impact Risk Zone (IRZ) 2 for Bewick’s swans, the area in which the swans routinely forage and that supports the integrity of the SPA / Ramsar. It was also considered that the Parish lies well within the maximum foraging distance recorded for Bewick’s swans.
- 6.6 Therefore, the suitability of the sites allocated for development for supporting Bewick’s swans is assessed in the first instance. The key parameters that guide this assessment include distance to the Arun Valley SPA / Ramsar (the likelihood of site use decreases with distance from the SPA / Ramsar as evidence by Natural England’s IRZs), habitat type (Bewick’s swans predominantly forage in agricultural stubble, but may also be found in wet grassland) and site size (it is generally assumed that sites should be at least 2ha in size to support wintering waterfowl). Table 2 provides a summary of the 8 residential sites allocated in the Walberton NP, summarising these key parameters.

Table 3: Residential site allocations proposed in the Walberton NP, listing the distance (km) to the Arun Valley SPA / Ramsar, habitat type on site and site size (ha).

Policy	Site Name	Distance to Arun Valley SPA / Ramsar	Habitat type	Site size (ha)
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Policy HP3	S & G Motors, 9km Arundel Road, Fontwell		Brownfield site 0.7 with thin strip of woodland
Policy HP4	Land at the rear of 9.1km Woodacre, Arundel Road, Fontwell		Clusters of trees 0.2 and grassland
Policy HP5	Land at the rear of 9km Woodcroft, West Walberton Lane, Walberton		Clusters of trees 1.3 and grassland
Policy HP14	Dower House 9km		Scattered trees 0.2 and modified gardens
Policy HP15	Longwall 8.8km		Scattered trees 0.2 and a small grazed area
Policy HP16	Sussex Business 10.1km Park		Brownfield site 0.5 with industrial development
Policy HP17	Gracelands Farm 8.9km		Treeline and 0.3 small section of grassland
Policy HP18	Fontwell Field 9.1km (National Trust Field)		Grassland 2.7 (grazed by the National Trust)

- 6.7 Most importantly, all site allocations lie beyond the boundary of the IRZ 2 identified by Natural England. However, except for one site (Sussex Business Park), all lie within the maximum foraging distances recorded for Bewick's swans and were thus assessed in more detail. On further investigation, it can be confirmed that none of the allocations comprise agricultural land, which is the most important habitat type for Bewick's swans outside the SPA / Ramsar. Most allocations include scattered trees or tree clusters, which are unsuitable as Bewick's swan supporting habitat. In addition, 7 allocations range in size between 0.2ha and 1.3ha, which is much too small to realistically support 1% of the SPA's / Ramsar's Bewick's swan population.
- 6.8 Policy HP18 (Fontwell Field) is the only allocation that is sufficiently large (2.7ha) and comprises habitat that might realistically be used by swans from the SPA / Ramsar. However, this site is grazed by the National Trust and is likely to be frequently accessed by the public, meaning that disturbance levels are likely to be too high. Furthermore, the site lies relatively far from the SPA / Ramsar (9.1km), well outside IRZ 2. Given that IRZs 1 and 2 encompass most Bewick's swan records outside the SPA / Ramsar, it is very unlikely that Fontwell Field would be used by 1% of the swan population.
- 6.9 The loss of habitat that is functionally linked to the Arun Valley SPA / Ramsar was also considered in the HRA of the Arun Local Plan, the overarching planning document guiding the NPs in its constituent parishes. The HRA focussed primarily on the larger strategic sites (e.g. Land north of Toddington Land, LEGA, Ford) that lie within IRZ 2 of the SPA / Ramsar. Additionally, Neighbourhood Plans (e.g. Arundel Parish which lies at a distance of 6km from the SPA / Ramsar) within IRZ 2 were also considered. However, Walberton Parish – situated to the west of Arundel – was not assessed. Furthermore, Natural England advises that in IRZ 2 it is only the development of the larger strategic sites that are of concern. This was highlighted by a 2016

agreement between Arun District Council, Natural England and RSPB, which concluded that the allocations in Arundel Parish would not require overwintering bird surveys.

- 6.10 Overall, given the nature and situation of the allocations, and the evidence base from the HRA of the overarching Arun Local Plan, it is concluded that the Walberton NP **will not result in adverse effects on the integrity of the Arun Valley SPA / Ramsar alone.**
- 6.11 Since the site allocations are determined not to be suitable supporting habitat for Bewick's swans, **it is concluded that the Walberton NP will also not result in adverse 'in-combination' effects with development plans of surrounding parishes.**

Singleton and Cocking Tunnels SAC

- 6.12 The Test of LSE section screened in the loss of functionally linked land in relation to the Singleton and Cocking Tunnels SAC. This was due to Walberton Parish being located approx. 10.2km to the south-east of the SAC, which is the distance within which development can be assumed to have an impact on the commuting and foraging behaviour of barbastelle bats.
- 6.13 Research on the Core Sustenance Zones (CSZs) is based on radio-tracking studies that have measured the mean maximum foraging radius of all individuals of a specific bat species extending outwards from their roost sites. This metric was chosen over the maximum individual foraging radius as it is less biased by outliers. The 2016 Bat Conservation Trust Advice Note identifies a generic CSZ of 6.5km for barbastelle bats.
- 6.14 However, since then the South Downs National Park Authority and Natural England have jointly published the Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol. The protocol aims to facilitate sustainable development while helping to protect the integrity of SACs that are designated for their bat interest. Specifically, the protocol establishes a 12km Wider Conservation Area (WCA) surrounding the Ebernoe SAC, the Mens SAC and the Singleton and Cocking Tunnels SAC. In this WCA all significant impacts or severance of flightlines are to be assessed. Given that Walberton Parish lies within 12km from the Singleton and Cocking Tunnels SAC, the housing sites allocated in the NP require further consideration.
- 6.15 Therefore, as a first step in the Appropriate Assessment the suitability of the site allocations to support barbastelle bat was assessed. This exercise aimed particularly at identifying whether any of the sites contain linear habitat features (e.g. hedgerows, woodland edges, streams) or foraging habitats (e.g. riparian habitat, wet grassland) that might be used by bats from the SAC.

Table 4: Residential site allocations proposed in the Walberton NP, listing the distance (km) to the Singleton and Cocking Tunnels SPA / Ramsar, the habitat type on site and the site size (ha).

Policy	Site Name	Distance to Singleton and Cocking Tunnels SAC	Habitat type	Site size (ha)
Policy HP3	S & G Motors, Arundel Road, Fontwell	11.1km	Brownfield with thin strip of woodland; no obvious linear features	0.7
Policy HP4	Land at the rear of Woodacre, Arundel Road, Fontwell	11.2km	Clusters of trees and grassland; no obvious linear features	0.2
Policy HP5	Land at the rear of Woodcroft, West	11.3km	Clusters of trees and grassland	1.3

Walberton Lane, Walberton				
Policy HP14	Dower House	12.7km	Scattered trees and modified gardens	0.2
Policy HP15	Longwall	13.1km	Scattered trees and a small grazed area	0.2
Policy HP16	Sussex Business Park	13.7km	Brownfield site with industrial development	0.5
Policy HP17	Gracelands Farm	11.3km	Treeline and small section of grassland	0.3
Policy HP18	Fontwell Field (National Trust)	10.8km	Grassland (grazed by the National Trust)	2.7

- 6.16 It is noted that 5 of the 8 site allocations lie within the 12km WCA of the Singleton and Cocking Tunnels SAC and therefore need to be considered further. The site allocations HP14 (Dower House), HP15 (Longwall) and HP16 (Sussex Business Park) are all beyond 12km from the SAC and thus will not result in adverse effects on site integrity.
- 6.17 Site allocations HP3 (S & G Motors), HP4 (Land at the rear of Woodacre), HP5 (Land at the rear of Woodcroft) and HP17 (Gracelands Farm) all comprise scattered clusters of trees and small areas of grassland. However, review of satellite imagery indicates that none of the site allocations provide distinctive linear habitat features that are likely to be of significance for the SAC population. In addition, there are no obvious riparian or wet grassland foraging areas immediately south of these allocations that provide obvious destination for the bats.
- 6.18 Site HP18 (Fontwell Field) is the closest allocation to the Singleton and Cocking Tunnels SAC at a distance of 10.8km. The allocation is triangular in shape, comprises grassland and is surrounded by linear habitat features (hedgerows and treelines) on all sides. However, as was determined in relation to the other sites, the linear features do not appear to be part of a wider commuting corridor for barbastelle bats. There are also no water bodies close to the site, which is likely to primarily comprise dry grassland. Dry grassland is considered to be less suitable for foraging barbastelle bats, which prefer wet grassland. Overall, it is considered unlikely that site HP18 is significant for commuting or foraging barbastelle bats from the SAC.
- 6.19 In assessing the impact pathway functionally linked habitat, due account must also be given to the well-established barrier effect of major roads on bats. There is considerable evidence to suggest that roads act as barriers between bat roosts and foraging sites. For example, major roads have been shown to significantly affect bat habitat use by resulting in major detours and searches for crossing points⁵⁶. In this study only 3 out of 34 radio-tracked individuals crossed a four-lane motorway. Another study demonstrated that the rate of bat crossing decreased with increasing distance between mature hedgerows on either side of the road (i.e. with increasing road width)⁵⁷. All sites allocated in the Walberton NP are south of the A27, which is a major four-lane severing the Parish from the Singleton and Cocking Tunnels SAC. It is considered that this decreases the likelihood of barbastelle bats making significant use of functionally linked habitat

⁵⁶ Kerth G. & Melber M. (2009). Species-specific barrier effects of a motorway on the habitat use of two threatened forest-living bat species. *Biological Conservation* 142: 270-279.

⁵⁷ Abbott IM, Butler F & Harrison S. (2012). When flyways meet highways - The relative permeability of different motorway crossing sites to functionally diverse bat species. *Landscape and Urban Planning* 106: 293-302.

in Walberton Parish, although it is possible some barbastelles south of the A27 may hibernate in the tunnels.

- 6.20 A review of the Walberton NP highlights that it contains some protective policy wording regarding biodiversity corridors. **Policy VE10 Biodiversity Corridors** stipulates that *'development within or immediately adjacent to the Biodiversity corridors... will only be supported where it can be clearly demonstrated the proposals will not give rise to any significant harm to the integrity or function of the Biodiversity Corridors.'* The policy goes on to state that *'developers will be required to demonstrate how the impact of the proposed development will be mitigated or avoided.'* The Biodiversity Corridors are identified in Schedule 5 of the NP.
- 6.21 It is difficult to judge whether a site (or components thereof) is / are used as foraging habitat or commuting routes, solely from satellite imaging. Given that parts of Walberton Parish fall within the 12km Wider Conservation Area surrounding the Singleton and Cocking Tunnels SAC and to be precautionary regarding the potential severance of commuting lines of barbastelle bats, it was recommended in the first iteration of this HRA that the following text (or similar) is inserted into **Policy VE10 (Biodiversity Corridors)**, or another appropriate policy: ***'In order to be fully compliant with the Habitats Directive relating to the Singleton and Cocking Tunnels SAC qualifying species, proposals for the development of greenfield sites within the Parish (some of which falls within the SAC's 12km Wider Conservation Area) must evaluate whether there is a potential for the loss of suitable foraging habitat and / or the severance of commuting flightlines, such as in the form of semi-natural meadows, mature treelines, hedgerows and watercourses. If so, such features must be preserved unless surveys demonstrate that they are not used by barbastelle bats. Care must also be taken through development design to ensure that such retained features are not subject to artificial lighting.'*** Suitable wording, reduced in length from that in this recommendation, has now been added to Policy VE10. Given the inclusion of this requirement it is concluded that there will be no adverse effects of the Walberton NP on the site integrity of Singleton & Cocking Tunnels SAC, alone or in-combination with other Plans.

Atmospheric Pollution

- 6.22 Due to the nature of the impact pathway this assessment is inherently in combination with other projects and plans since the amount of growth in Walberton alone is too small to significantly effect air quality from increased traffic movements.

Duncton to Bignor Escarpment SAC

- 6.23 It is to be noted that an assessment of air quality impacts lies outside the standard remit of a Neighbourhood Plan HRA, as it typically requires an Air Quality Impact Assessment (AQIA) which is done 'in-combination' with the growth in surrounding authorities. The Walberton NP provides for 68 net new dwellings, which are unlikely to cause LSEs in their own right but might have in-combination effect with the cumulative growth in the region.

General Setting of the SAC

- 6.24 When assessing the potential atmospheric pollution impact of a Plan on a designated site, an initial assessment of the relative locations of sites should be carried out. The Duncton to Bignor Escarpment SAC is located in the eastern part of Chichester District in a relatively rural area of the South Downs National Park. However, it lies directly adjacent to the A285, which runs from Chichester near the south coast to the northern parts of the district. While the A285 lies outside of Walberton Parish, some residents might be using the A285 to commute to settlements outside of Arun District, in the north of Chichester District. The A285 connects to the A27 in the north of Walberton Parish via Britten's Lane. As such, new residents in the north of Walberton Parish might be travelling north, using Britten's Lane to connect with the A285.
- 6.25 As noted in the Test of LSEs section, a large proportion of the traffic originating from Arun District (including that from Walberton Parish) is likely to flow south into the urban centre of Chichester, but at least some commuter journeys might flow northward past the Duncton to Bignor Escarpment SAC. The general setting of the SAC in relation to the A285 highlights that

atmospheric pollution impacts should be considered in relation to the Walberton NP, 'in-combination' with the growth in surrounding parishes and districts.

Commuter Traffic

- 6.26 A second integral step of the Appropriate Assessment of atmospheric pollution is an analysis of commuter traffic, as this establishes the likelihood of new residents regularly passing (and thereby affecting) the SAC. It is the regular commuting journeys (i.e. potentially passing sensitive sites twice a day) that are likely to contribute the largest air quality effects. It is noted that the pattern of commuter traffic analysed here, only reflects the current pattern of motorised travel within the region and it is not necessarily the case that future residents will follow the same transport links. However, given that route choice is likely to be based on minimising journey time and that the prevailing road infrastructure is unlikely to change substantially, journey-to-work data are considered to be a useful starting point for assessing atmospheric pollution effects of road traffic. Such data is not available for individual parishes and is therefore assessed at the overarching level of districts; in this case Arun District.
- 6.27 According to Journey to Work data from the 2011 census⁵⁸, considerably more people commute to a destination outside of Arun (20,928 journeys), than people commuting into the authority (7,119 journeys). The three most common destinations for journeys to work arising from Arun are the authorities Chichester (8,199 people, 39.2%), Worthing (4,582 people, 21.9%), and Horsham (1,535 people, 7.3%). Clearly, the largest proportion of Arun residents travels to Chichester District, the authority in which the Duncton to Bignor Escarpment SAC is located. However, it is likely that most of these journeys will be undertaken to the south of Chichester District, including Chichester itself and other urban settlements surrounding it. Except for Midhurst and Petworth, there are very few major settlements in the northern section of Chichester District that are likely to be destinations for Arun residents. However, it cannot be excluded that some of the traffic resulting from the Walberton NP would go past the Duncton to Bignor Escarpment SAC on the A285.
- 6.28 Only two of the top ten authorities contributing to commuter traffic inflow into Arun are notable. Of the total daily inflow of 7,119 people, most derive from Worthing (2,472 people, 34.7%) and Chichester (1,955 people, 27.5%). Given that the Walberton NP does not explicitly allocate net new employment development (it only provides for the potential extension of existing employment sites), it is not expected that there will be an increase in the number of journeys into Arun via the identified A285 – A27 road link as a result of the Plan. It is expected that most of the inward traffic flow from Chichester District to Arun District occurs along the A27, far away from the Duncton to Bignor Escarpment SAC.
- 6.29 It is to be noted that these data do not include journeys to work that both start and end in Arun District and the approximately 12% of commuter trips that are carried out on foot, by bike or by public transport. Therefore, the actual proportion of regular commuter journeys that might pass the Duncton to Bignor Escarpment SAC is likely to be even lower than the above results suggest.

'In-Combination' Air Quality Modelling

- 6.30 Walberton Parish is covered by the Arun Local Plan, which provides the overarching guidance policies for its Parish constituents. The Arun Local Plan HRA does not consider the atmospheric pollution impact pathway and therefore provides no 'in-combination' framework in which to place the Walberton NP. However, the South Downs National Park (SDNP) Local Plan HRA considered the air quality impacts of the projected growth in the SDNP authority 'in-combination' with the growth in surrounding authorities, which was modelled by AECOM. This would have included the projected growth in Arun District and the area covered by the Walberton NP.
- 6.31 The Air Quality Impact Assessment (AQIA) compared the air quality effects of different growth scenarios – The 'Do-Nothing' scenario, which modelled the future traffic flows at identified traffic links without the effects of the emerging Local Plans and the 'Do Something' scenario, which included the 'in-combination' air quality effects of the SDNP and other surrounding authorities. Link 10 of the AQIA investigated the A285, directly adjacent to the Duncton to Bignor Escarpment SAC. The results show that the baseline NO_x concentrations at this link are below the critical level for vegetation, most likely due to the relatively low traffic flows on this 'A' road. Moreover, they are forecast to remain below the critical level even with traffic growth partly due to the modest

⁵⁸ Available at <https://www.nomisweb.co.uk/census/2011/wu03uk>, accessed 01/04/2020

growth forecast and partly due to the accompanying improvement in exhaust emissions technology. The very small scale of change in NO_x is reflected in nitrogen deposition. The SDNP Local Plan HRA concluded that this in combination air quality effect was not significant in ecological terms and therefore concluded that there would be no adverse effects on the site integrity of the Duncton to Bignor Escarpment SAC due to the in-combination traffic growth.

- 6.32 Overall, it is therefore concluded that there will be no adverse effects of the Walberton NP on the site integrity of the Duncton to Bignor Escarpment SAC regarding the impact pathway atmospheric pollution, alone or in-combination with other Plans.

7. Conclusions

- 7.1 For those policies brought forward for appropriate assessment the appropriate safeguarding policy wording has been added. With those recommendations incorporated into the Neighbourhood Plan it is concluded that no adverse effect would occur on the integrity of European Sites.

Appendix A

Table 5. Screening table showing the Test of Likely Significant Effects (LSEs) results of policies contained within the Walberton Neighbourhood Plan. Where a screening result is shaded in green there will be no LSEs on European sites. Orange shading means that there is a potential for LSEs on European sites from the impact pathways identified in the box.

Policy	Description	Test of Likely Significant Effects (LSEs)
The Village Environment		
Policy VE1 Designation of Local Green Spaces	<p>– The PC has designated the areas shown in Schedule 4 as Local Green Space. Proposals for development of these areas will not be permitted, except for specific necessary infrastructure where there is no reasonable alternative site available and where the benefits of development can be shown to outweigh any harm, and impact is minimised.</p> <p>The PC has designated two further areas of land shown in Schedule 4a and Map 1 as Local Green Space. Proposals for development of these areas will not be permitted, except for specific necessary infrastructure where there is no reasonable alternative site available and where the benefits of development can be shown to outweigh any harm, and impact is minimised.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that protects Local Green Space areas in Walberton from development, except where no reasonable alternative sites for necessary infrastructure are available.</p> <p>Overall, this is a positive policy that ensures greenspaces are available locally for residents to carry out recreational activities.</p> <p>The policy is therefore screened out from Appropriate Assessment.</p>
Policy VE2 Horticultural Development	<p>– 1. New glasshouse, polytunnel and associated packhouse development will be supported provided that:</p> <p>a. It is of a height and bulk which would not significantly damage the character or appearance of the surrounding landscape, unless it can be demonstrated that the need for a larger scale development is outweighed by the economic benefit of the scheme to the rural economy;</p> <p>b. It relates sympathetically to the natural, built and historic environment;</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy providing detailed guidance on horticultural development, including its implication for water pollution, surface water drainage, general impact on views across the landscape and noise levels.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>

- c. Pollution to soil, water or air generated from the development into the surrounding environment, including the cumulative effects, is within regulated acceptable limits;
- d. Long public views across substantially open land are retained;
- e. Adequate water resources are available or can be provided (ie. above ground reservoirs);
- f. Adequate surface water drainage capacity exists or can be provided as part of the development;
- g. Vehicular access from the site to the road network is adequate and uses roads capable of accommodating the vehicle movements likely to be generated by the development without detriment to highway safety and the residual cumulative impact to residential amenity is not severe;
- h. There is minimal impact on health or general amenity resulting from internal artificial lighting after 6.00 pm on the occupants of nearby residential properties and minimal impact on the appearance of the site in the landscape by the minimisation of light spillage and glare to keep the natural environment intrinsically dark at night;
- i. Noise levels resulting from machinery usage, vehicle movement, or other activity on the site, which when measured against the existing ambient noise levels in the locality would not be likely to unacceptably disturb occupants of nearby residential properties or would not be likely to adversely affect enjoyment of the countryside;
- j. Any glasshouse structure(s) and/or polytunnel(s) and or/packhouse(s) deemed redundant to the horticultural or agricultural industry on the development site, are removed and the land is remediated from any contaminated material(s) and the land is used only for the direct diversification of horticulture or other productive green environment or a countryside-based enterprise activity which supports the rural economy.

<p>k. Proposals include full details of new landscaping, screening and of any trees or vegetation to be retained on the site; and</p> <p>l. The applicant has submitted sustainability and options appraisals, mitigation measures, and a soil resources plan for the development site</p> <p>2. Replacement or renewal of an existing glasshouse structure will be permitted where: a. It is in the same position on the site as the existing structure; and b. It is broadly of the same height and bulk as the existing structure; where the criteria for new glasshouse structure shall apply.</p> <p>3. Redevelopment of under-used, redundant or derelict glasshouses, polytunnels or packhouses will be supported provided that:</p> <p>a. The redundancy of the structure or building to the owner and the horticultural or agricultural industry is proven by the applicant to the satisfaction of the PC; and</p> <p>b. The land is remediated from any contaminated material(s) and the land is used for the direct diversification of horticulture or other productive green environment or is a countryside-based enterprise activity which supports the rural economy; and</p> <p>c. All proposed works include full details of new landscaping, screening and of any trees or vegetation or structures to be retained on the site.</p> <p>4. Proposals for redevelopment of horticultural sites for non-horticultural purposes will be considered on a case by case basis.</p>	
<p>Policy VE3 – Protection of Trees and Hedgerows</p> <p>Development will be permitted where it can be demonstrated that trees and hedgerows contributing to local amenity will not be damaged or destroyed. A suitably qualified person should be engaged to make an appropriate assessment in connection with any proposed development. However, development that damages or results in the loss of ancient trees/ trees of arboricultural and amenity value or loss of hedgerows or significant ground cover and habitat</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that protects trees and hedgerows from damage and destruction. Policy VE3 is a positive policy at it helps conserve connecting wildlife corridors in Walburton. This is particularly relevant to the Singleton and Cocking Tunnels</p>

	<p>will be resisted. Development proposals must be designed to retain wherever possible ancient trees, trees of good arboricultural and amenity value and hedgerows. Proposals should be accompanied by a survey that establishes the health and longevity of any affected trees or hedgerows and a management plan to demonstrate how they will be so maintained.</p>	<p>SAC, which is designated for mobile bats that depend on functionally linked habitats outside the European site boundary. Bats use hedgerows (and other linear features) for navigation and the maintenance of hedgerows is important to help them navigate to off-site foraging habitats.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy VE4 – Conservation Areas and Areas of Special Character</p>	<p>Proposals that adversely affect the setting of the two Conservation Areas will not be supported. New development must protect the open/rural character of the Conservation Area's setting and sustain or enhance the visual connections between the village's core and its rural hinterland, including longer views to the South Downs, which contribute to the character of the Conservation Area.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that protects Walberton's Conservation Areas and its rural character.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy VE5 – Buildings and Structures of Special Character</p>	<p>Buildings and Structures of Special Character as designated by ADC (Source ADC - SPD - Buildings and Structures of Character. Adopted September 2005) are of significant local interest and contribute to the Parish's distinctiveness: development proposals relating to them will be expected to retain their local distinctiveness and removal of part or all of them will not be permitted unless it can be demonstrated that they cannot be put to an alternative beneficial or viable use.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management protecting the distinctiveness of buildings and structures of special character.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy VE6 – Protection of Watercourses</p>	<p>Support and promote river catchment management approaches that integrate sustainable land management, wildlife conservation, surface and groundwater quality and flood risk management.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy protecting the wildlife, surface water quality and groundwater quality of watercourses. Policy VE6 is positive as the protection of water quality in watercourses</p>

	<p>connecting to the sea will also benefit the Dorset and Solent Coast SPA, which is sensitive to aquatic pollution.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy VE7 – Surface Water Management New development should aim to reduce the overall level of flood risk:</p> <p>a. Surface water management measures will be required for development proposals to ensure that the risk of flooding both on-site and downstream is not significantly increased. No development shall commence until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the local planning authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations. Winter groundwater monitoring to establish highest annual ground water levels and Percolation testing to BRE Digest 365, or similar approved, will be required to support the design of any infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details</p> <p>b. Consideration should be given to the use of Sustainable Urban Drainage Systems (SUDS) as alternatives to conventional drainage where appropriate. Sustainable Urban Drainage Systems on private property must conform to the recommendations of the SUDS Manual produced by CIRIA</p> <p>c. Where necessary a site specific Flood Risk Assessment must demonstrate that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall</p> <p>d. There is a presumption against culverting and the constricting of watercourses and their immediate environs</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that aims at reducing the overall level of flood risk through use of surface water management measures including Sustainable Urban Drainage Systems (SUDS). However, there is no mechanism through which the use of such measures could affect the relevant European sites.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>

<p>Policy VE8 – ‘Unlit village’ status</p>	<p>Development proposals which detract from the unlit environments of the Parish will not be supported. New lighting will be required to conform to the highest standard of light pollution restrictions in force at the time. Security and other outside lighting on private and public premises will be restricted or regulated to be neighbourly in its use including floodlighting at equine establishments and on sports fields or sports grounds.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that protects the unlit environments in Walberton from light pollution. Importantly, this will minimise light pollution in commuting corridors for bats, the qualifying features of the Singleton and Cocking Tunnels SAC.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy VE9 – Rural Buildings</p>	<p>The re-use, conversion and adaptation of rural redundant buildings (with the exception of glasshouses) for small businesses, recreation, or tourism purposes will be supported in principle subject to the following criteria:</p> <ol style="list-style-type: none"> a. The building is structurally sound and capable of conversion without substantial reconstruction b. The use proposed is appropriate to a rural location c. The conversion/adaptation works respect the local character of the surrounding area and/or buildings d. The use proposed will not have an adverse impact on any archaeological, architectural, historic or environmental features e. The local road system is capable of accommodating the traffic generated by the proposed new use and adequate parking can be accommodated within the site 	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that supports the reuse and conversion of rural buildings for small businesses, providing certain criteria are met. The policy explicitly states that adverse impacts on environmental features must not occur.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>

<p>Policy VE10 Biodiversity Corridors</p>	<p>– Proposals that have a positive impact on the local ecology will be encouraged, subject to other policy constraints.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p>
	<p>New development within or immediately adjacent to the Biodiversity corridors identified in Schedule 5 will only be supported where it can be clearly demonstrated the proposals will not give rise to any significant harm to the integrity or function of the Biodiversity Corridors. Developers will be required to demonstrate how the impact of the proposed development will be mitigated or avoided. Proposals should include a management plan to ensure that effective long-term management and enhancement of the corridors can be achieved.</p>	<p>This is a development management policy that supports development proposals with a positive impact on local ecology. In contrast, it also stipulates that new development should not affect the integrity of identified Biodiversity Corridors.</p>
	<p>When new development is proposed on Greenfield sites within the protection zone of the Singleton and Cocking Tunnels SAC, it will only be supported if the developer can demonstrate that the change in use will not result in the loss of suitable habitat used by barbastelle bats for foraging and commuting.</p>	<p>Policy VE10 will help protect green corridors which are potentially used by bats stemming from the Singleton and Cocking Tunnels SAC. The policy thus protects the bats' ability to navigate to and forage in functionally linked habitats.</p>
		<p>The policy does not provide for a location and / or quantum of residential or employment development.</p>
		<p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy VE11 Archeology</p>	<p>– Development proposals that may impact on the following non-designated archaeological sites, shown Schedule 6, must respect the site as a heritage asset. Development will not be supported unless developers can demonstrate that an alternate location is not possible. If development is essential, the area to be disturbed will first be subject to a full archaeological survey, the results of which will be published.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p>
	<p>1. Land at Hundred House Copse being the location of an Iron Age earthworks and, in the same area, the suspected Anglo Sussex Moot Mound</p>	<p>This is a development management policy that protects four identified archaeological sites from negative impacts arising from development proposals. However, the protection of these sites has no implications for European sites.</p>
	<p>2. The site of a medieval tile kiln in the field opposite the Black Horse Public House</p>	<p>The policy does not provide for a location and / or quantum of residential or employment development.</p>
	<p>3. The route of the Roman Road as identified by the 2016 LIDAR survey.</p>	<p>It is therefore screened out from Appropriate Assessment.</p>
	<p>4. The ANA (DWS 8478) on the east side of Yapton Lane opposite Blacksmiths Corner.</p>	

<p>Policy VE12 – Flint Walls</p>	<p>Development proposals which would seek to remove or replace the flint walls located within the BUAB will not be supported:</p> <ol style="list-style-type: none"> 1. That part of Tye Lane up to 500m. south of the A27 road. 2. Properties on the west side of Yapton Lane between the Golf Course and the A27 and the gateways to Walberton Place and Spindlewood 3. Properties in Dairy Lane, including Pigeon House Farm 4. Properties in Binsted Lane. <p>New developments within the Conservation Areas will be required to provide flint walls or incorporate flint-work into boundary walls fronting onto the highway.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that protects flint walls in Walberton from removal.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy VE13 – Distinctive views and vistas</p>	<p>Development proposals should respect and, wherever possible, enhance distinctive views and vistas by ensuring that their visual impact on these views is carefully and sympathetically controlled. The following views (accessible to the public) and set out in detail in Appendix A have been identified as especially important: View 1: Looking west towards Walberton Village Green and pond View 2: Looking east from Yapton Lane across open fields View 3: Looking south across Pigeon House Farm View 4: Choller Farm Looking southwest towards Barnham View 5: View across Fontwell Meadows View 6: View southwest from Binsted Lane across the golf course and Binsted Valley View 7: View of Binsted Park from Binsted Lane east View 89: View across the fields from North Pound</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that protects 6 identified distinctive views and vistas from development proposals. Proposals should enhance these vistas wherever possible. However, views and vistas have no specific implication for European sites.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Housing Policies</p>		
<p>Policy HP1 – Built Up Area Boundary</p>	<p>Proposals for development within the built-up area boundary of Walberton, defined in Schedule 2 will generally be permitted, subject to meeting the requirements of other policies set out in the Plan.</p> <p>Proposals for development outside of the built-up area boundary, that do not accord with development plan policies in respect of the</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy identifying that proposals in the built-up area boundary will generally be permitted. It further</p>

	<p>countryside, will be resisted unless it is for essential utility infrastructure, where the benefits outweigh any harm, and it can be demonstrated that no reasonable alternative sites are available.</p>	<p>specifies that proposals outside the built-up area will not be permitted if they do not accord with countryside policies.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy HP2 – Windfall Sites</p>	<p>Permission will be granted for residential developments on infill and redevelopment sites within the built up area boundary subject to the following conditions being met:</p> <ul style="list-style-type: none"> a. The scale and design of the development is appropriate to the size and character of the settlement. b. The built and landscape character is conserved or enhanced, especially where the character of the area is specifically recognised, such as the Conservation Areas and Listed Buildings. c. The proposal creates safe and accessible environments that offer good access via a range of transport modes; d. Land is demonstrated to be used effectively and comprehensively; e. Wildlife must be conserved or enhanced <p>Applicants should demonstrate how the proposal will integrate effectively with existing development and meet with the requirements of other policies in this Plan. Any new development with a significant traffic impact will only be supported if that impact can be mitigated via developer contributions to measures agreed with the highway authority. Traffic impact includes effects of adverse road safety, congestion and pollution on both the main roads and rural lanes.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a housing policy which allows for residential development (windfall sites) on infill and redevelopment sites within the built-up area. Because the specified sites are within the built-up area and are already developed, it is considered that this policy will have no implication for a potential loss of functionally linked habitats for bats (from the Singleton and Cocking Tunnels SAC) and Bewick’s swans (from the Arun Valley SPA / Ramsar).</p> <p>Furthermore, the policy does not provide for a specific location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy HP3 – S & G Motors Arundel Road Fontwell</p>	<p>The Plan allocates land for a mixed residential development for a minimum of 28 dwellings on this site as shown on the Proposals Plan provided that the proposals include at least twelve units of sheltered accommodation and eight age related affordable/starter homes to be</p>	<p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is a housing policy providing for a minimum of 28 dwellings at S & G Motors Arundel Road (Fontwell). Regarding the potential loss of</p>

	<p>delivered in two phases over the period of the Plan and provides access to the adjoining site (see Policy HP 4).</p>	<p>functionally linked land both alone and 'in-combination', the site allocation was assessed using satellite imagery. The site is an existing brownfield site with industrial buildings and a thin strip of woodland in its eastern section. Given its habitat and its small size (approx. 0.7ha) it is considered to be unsuitable for Bewick's swans from the Arun Valley SPA / Ramsar. While the site is within the 12km Wider Conservation Area of the Singleton and Cocking Tunnels SAC (approx. 11.1km distance), it is not considered that the small on-site cluster of trees is an integral flightline for SAC bats. Therefore, the impact pathway loss of functionally linked habitat is screened out from Appropriate Assessment.</p> <p>However, the following impact pathways on Duncton to Bignor Escarpment SAC cannot be excluded:</p> <ul style="list-style-type: none"> • Atmospheric pollution <p>The site allocation is therefore screened in for Appropriate Assessment.</p>
<p>Policy HP4 – Land at the rear of Woodacre Arundel Road Fontwell</p>	<p>The Plan allocates land on this site as shown on the Proposals Plan for development of 2 houses.</p>	<p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is a housing policy providing for a minimum of 2 houses on land at the rear of Woodacre Arundel Road (Fontwell). Regarding the potential loss of functionally linked land both alone and 'in-combination', the site allocation was assessed using satellite imagery. The 0.2ha site comprises areas of trees and grassland. However, given its habitats and small size it is considered to be unsuitable for Bewick's swans from the Arun Valley SPA / Ramsar. While the site is within the 12km Wider Conservation Area of the Singleton and Cocking Tunnels SAC (approx. 11.2km distance), it is not considered that the small on-site cluster of trees is an integral flightline for SAC bats. Therefore, the impact pathway loss of functionally linked habitat is screened out from Appropriate Assessment.</p>

	<p>However, the following impact pathways on Duncton to Bignor Escarpment SAC cannot be excluded:</p> <ul style="list-style-type: none"> • Atmospheric pollution <p>The site allocation is therefore screened in for Appropriate Assessment.</p>
<p>Policy HP5 – Land at the rear of Woodcroft, West Walberton Lane Walberton</p>	<p>The Plan allocates land on this site as shown on the Proposals Plan for 8 houses of a style and size comparable to those on neighbouring plots of a similar size. Access must be from Arundel Road, Fontwell and not from West Walberton Lane.</p> <p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is a housing policy providing for 8 houses on land at the rear of Woodcroft, West Walberton Lane, Walberton. Regarding the potential loss of functionally linked land both alone and ‘in-combination’, the site allocation was assessed using satellite imagery. The 1.3ha site lies adjacent to the A27 and urban development, mainly comprising scattered trees and some open grassland. However, given its habitats and small size it is considered to be unsuitable for Bewick’s swans from the Arun Valley SPA / Ramsar. In contrast, the site is within the 12km Wider Conservation Area of the Singleton and Cocking Tunnels SAC (approx. 11.3km distance) and might constitute functionally linked habitat for SAC bats.</p> <p>The following impact pathways on European sites cannot be excluded:</p> <ul style="list-style-type: none"> • Loss of functionally linked habitat • Atmospheric pollution <p>The site allocation is therefore screened in for Appropriate Assessment.</p>
<p>Policy HP6 – 2020 Housing Mix and Construction</p>	<p>Proposals providing a range of house types and tenures appropriate to the site size will be supported. A proportion of housing is required to meet the needs of our ageing population who wish to downsize.</p> <p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a housing management policy that addresses the requirement for delivering mixed housing to meet the needs of Walberton’s ageing</p>

	<p>Any development proposal that includes measures that go beyond the requirements of the current Building Regulations in terms of energy efficiency measures will be supported.</p>	<p>population. The policy also provides support for housing that provides energy efficiency beyond the Building Regulations.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy HP11 – Housing Density</p>	<p>The density of new development shall be appropriate to its location by virtue of size, siting and relationship to existing properties.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a housing management policy that addressed the housing density in new developments.</p> <p>However, the policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy HP13 – Design Guidance</p>	<p>New development which would have an effect on the appearance or character of the surrounding area must be of a high quality of design and must contribute to local character by creating a sense of place appropriate to its location. The Parish has two conservation areas and other visually sensitive points.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a design management policy which stipulates that developments with an effect on the appearance of distinctive areas should have high-quality design and create sense of place.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy HP14 – Dower House</p>	<p>The Plan allocates land on this site as shown on the Proposals Map for 6 (one or two bedroomed) apartments in a one or two storey building. Access to the development must be made from Parsons Walk.</p>	<p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is a housing policy providing for 6 dwellings at Dower House, Walberton. Regarding the potential loss of functionally linked land both alone and 'in-combination', the site allocation was assessed using satellite imagery. The site allocation is located among existing dwellings, contains several trees and gardens. Given its habitat it is considered to be unsuitable for Bewick's swans from the Arun Valley</p>

	<p>SPA / Ramsar. Furthermore, the site lies approx. 12.7km from the Singleton and Cocking Tunnels SAC, which is beyond the 12km Wider Conservation Area in which impacts on bat flightlines must be assessed. Therefore, the impact pathway loss of functionally linked habitat is screened out from Appropriate Assessment.</p> <p>However, the following impact pathways on Duncton to Bignor Escarpment SAC cannot be excluded:</p> <ul style="list-style-type: none"> • Atmospheric pollution <p>The site allocation is therefore screened in for Appropriate Assessment.</p>
<p>Policy HP15 Longwall</p> <p>– The Plan allocates land on this site as shown on the Proposals Map for 3 bungalows with access from The Street</p>	<p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is a housing policy providing for 3 dwellings at Longwall. Regarding the potential loss of functionally linked land both alone and ‘in-combination’, the site allocation was assessed using satellite imagery. The site allocation is located among existing dwellings, contains several trees and a relatively small grazed area. Given its habitat and small size (approx. 0.2ha) it is considered to be unsuitable for Bewick’s swans from the Arun Valley SPA / Ramsar. Furthermore, the site lies approx. 13.1km from the Singleton and Cocking Tunnels SAC, which is beyond the 12km Wider Conservation Area in which impacts on bat flightlines must be assessed. Therefore, the impact pathway loss of functionally linked habitat is screened out from Appropriate Assessment.</p> <p>However, the following impact pathways on Duncton to Bignor Escarpment SAC cannot be excluded:</p> <ul style="list-style-type: none"> • Atmospheric pollution <p>The site allocation is therefore screened in for Appropriate Assessment.</p>

<p>Policy HP16 – Sussex Business Park</p>	<p>The Plan allocates land on this site as shown on the Proposals Map for a mixed development. Three commercial units will be retained on the site, the other buildings will be converted and together with three new builds will bring the total to 11 dwellings.</p>	<p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is a housing policy providing for 11 dwellings and the retention of existing commercial units in Sussex Business Park. Regarding the potential loss of functionally linked land both alone and ‘in-combination’, the site allocation was assessed using satellite imagery. The 0.5ha site allocation is existing brownfield land (industrial development) and is not considered to be suitable functionally linked habitat to the Arun Valley SPA / Ramsar and the Singleton and Cocking Tunnels SAC. Therefore, the impact pathway loss of functionally linked habitat is screened out from Appropriate Assessment.</p> <p>However, the following impact pathways on Duncton to Bignor Escarpment SAC cannot be excluded:</p> <ul style="list-style-type: none"> • Atmospheric pollution <p>The site allocation is therefore screened in for Appropriate Assessment.</p>
<p>Policy HP17 – Gracelands Farm</p>	<p>The Plan allocates land on this site as shown on the Proposals Map for 2 dwellings.</p>	<p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is a housing policy providing for 2 dwellings at Gracelands Farm. Regarding the potential loss of functionally linked land both alone and ‘in-combination’, the site allocation was assessed using satellite imagery. The site allocation is located amidst existing dwellings adjacent to the A27. It contains a small section of grassland and a line of trees. Given its small size (approx. 0.3ha) and its habitats it is considered to be unsuitable for Bewick’s swans. However, it lies at a distance of 11.3km from the Singleton and Cocking Tunnels SAC, and therefore within the Wider Conservation Area for bats.</p> <p>Overall, the following impact pathways on European sites cannot be excluded:</p>

	<ul style="list-style-type: none"> • Loss of functionally linked habitat • Atmospheric pollution <p>The site allocation is therefore screened in for Appropriate Assessment.</p>
<p>Policy HP18 – Fontwell Field (National Trust Field) – The Plan allocates land on this site as shown on the Proposals Plan for 40 dwellings comprising a mixture of one, two and three bedroomed units and four flats.</p> <p>Provision of community child care facilities in line with Policy CL 9 2020.</p>	<p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is a housing policy providing for 40 dwellings and community child care facilities at Fontwell Field. Regarding the potential loss of functionally linked land both alone and ‘in-combination’, the site allocation was assessed using satellite imagery. The site allocation is located to the north and east of existing dwellings adjacent to the A27. The allocation is approx. 2.7ha in size and mostly comprises grassland (owned and grazed by the National Trust). It is bordered by hedgerows and treelines on all sides.</p> <p>The allocation is situated approx. 9.1km to the south-west of the Arun Valley SPA / Ramsar, which is within the Impact Zone for Bewick’s swans. However, given that the allocation does not constitute agricultural land and it is being grazed, it is considered unlikely that it provides suitable functionally linked habitat for Bewick’s swans. However, the allocation lies approx. 10.8km to the south-east of the Singleton and Cocking Tunnels SAC, which places it within the 12km Wider Conservation Area for bats. Therefore, bats might use the site for off-site navigation as well as foraging.</p> <p>Overall, the following impact pathways on European sites cannot be excluded:</p> <ul style="list-style-type: none"> • Loss of functionally linked habitat • Atmospheric pollution <p>The site allocation is therefore screened in for Appropriate Assessment.</p>
<p>Getting Around</p>	

<p>Policy GA1 – Open Access and Permissive Paths</p>	<p>Support will be given to proposals which provide open and permissive footpaths, bridleways and cycle paths within the Parish.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a transport management policy outlining support for development proposals that extend the existing footpath and cycle path network. Overall, this is a positive policy because it encourages people to walk or cycle to their destination, intending to increase the use of sustainable transport modes.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy GA2 – Footpath Bridleway and Cycle Path Network</p>	<p>Support will be given to proposals that improve and extend the existing footpath, bridleway and cycle path network, allowing easier and safer safe access to the local amenities and services, to green spaces, to any new housing and to the open countryside. The loss of existing footpaths, bridleways and cycle paths will be resisted. Where new off-road paths are to be established, wherever possible and appropriate they should be open to all non-motorised users: walkers, cyclists and equestrians. In particular support will be given to :</p> <p>a) proposals that will make the section of the Cycle Route between Walberton Green and Fontwell safe and attractive for walkers and cyclists.</p> <p>b) proposals to extend footways near road junctions on Yapton Lane – especially Blacksmith’s Corner and Hedgers Hill</p> <p>c) proposals that will provide sustainable access by foot and on bike to Havenwood Caravan Park from Binsted</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a transport management policy outlining support for development proposals that improve or extend the existing footpath, bridleway and cycle path network; examples of potential improvements are also given. The policy also stipulates that the loss of existing footpaths, bridleways and cycle paths will be resisted. Overall, this is a positive policy because it encourages people to walk or cycle to their destination, thereby promoting sustainable modes of transport.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy GA3 – Car Parking</p>	<p>Proposals which remove existing parking in the vicinity of existing retail and commercial premises will not be supported. Proposals which reduce existing available parking in the Parish will be resisted.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a transport management policy protecting the existing parking capacity near retail and commercial premises.</p>

	<p>However, the policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy GA4 – School Transport Proposals will be supported that improve transport facilities, especially for children attending schools at Westergate, Walberton, Slindon and Barnham.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a transport management policy supporting improved school transport facilities in Westergater, Walberton, Slindon and Barnham.</p> <p>However, the policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy GA5 – Traffic Management Proposals that significantly increase the level of traffic within the villages will be resisted particular in the case of HGV movements.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a transport management policy that aims at restricting the level of traffic, in particular HGV movements, in Walberton. Policy GA5 is positive because it might reduce the traffic flow along European sites that are sensitive to atmospheric pollution, such as the Duncton to Bignor Escarpment SAC.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy GA6 – A27/A29 Junction West, and Other Strategic Junctions Proposals for the upgrading and remodelling of this junction and others that lie outside the Parish will be considered as negative in effect for parishioners, unless ameliorating works are included in the schemes of upgrade such that additional through traffic is discouraged from using the residential roads of the Parish.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a transport management policy that identifies that the A27/A29 junction will not be supported unless it is ensured that the additional through traffic does not use the residential roads of the Parish.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p>

<p>Policy GA7 – A27 Arundel Bypass</p> <p>The Arundel Bypass is supported in principle but only when taking the route that causes the least damage to countryside to the north of Binsted village within the Parish’s boundary and which does not sever the connection between Binsted and the rest of the Parish.</p> <p>Support will be given to :</p> <p>a) proposals that will ensure that the rerouting of the A27 does not sever Scotland Lane as a sustainable link between the parish and Arundel;</p> <p>b) proposals to ensure walkers, horse riders and cyclists have a safe crossing of the A27 Trunk Road to link the separated parts of the National Park.</p>	<p>It is therefore screened out from Appropriate Assessment.</p> <p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a transport management policy that supports the A27 Arundel Bypass provided it does not damage the countryside around Binsted or sever its connection to the rest of the Parish.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Community Living</p>	
<p>Policy CL1 Businesses</p> <p>– Proposals to upgrade or extend existing employment sites will be supported provided that the impact on the amenities of surrounding properties is acceptable.</p>	<p>Likely Significant Effects of this policy on European sites cannot be excluded.</p> <p>This is an employment management policy supporting the upgrading and extension of existing employment sites will be supported.</p> <p>The policy does not identify a specific quantum of additional employment development, but if such sites were extended significantly, this might result in negative impacts on European sites.</p> <p>The relevant impact pathways are likely to be:</p> <ul style="list-style-type: none"> • Loss of functionally linked habitat • Water quality • Atmospheric pollution <p>The policy is therefore screened in for Appropriate Assessment.</p>
<p>Policy CL2 Commercial Uses</p> <p>– Change of use to Class B1 uses (including light industry) and new development for such uses will be supported, where the impact on surrounding residential and community amenity is not harmful and other policy considerations are complied with. Change to Class B2</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p>

	<p>uses (general industry) or Class B8 (distribution and storage) will be generally be resisted.</p>	<p>This is an employment management policy identifying the type of employment uses that will be supported in Walberton. However, the type of employment use has no effect on European sites.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy CL3 – Retention of Employment Land</p>	<p>Except in respect of sites covered in policies HP 3 and HP 8, proposals for the redevelopment or change of use of land or buildings in employment or service trade use to non-employment uses will not be permitted, unless the existing use can be shown to be no longer economically viable. Evidence should be provided by the developer that the site has been actively marketed, at the market rate current at the time, for a minimum of 12 months and no sale or let has been achieved. However, smaller non-conforming uses with low employment impact in residential surroundings will be considered for residential use under Plan Policy HP 1.</p> <p>Existing businesses will be protected from the introduction of nearby new residential development which may cause their closure or relocation due to noise nuisance.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is an employment management policy detailing the retention of existing employment sites, unless these sites are no longer economically viable. Employment sites are also to be protected from nearby residential development for which they might cause noise nuisance issues.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy CL4 – Tourism and Recreation</p>	<p>Sustainable tourism development proposals and/or extensions to or expansion of existing tourism and recreation uses, will be supported in principle.</p> <p>Proposals relating to land outside the settlement boundary will need to demonstrate that the proposed use is sustainable and will not have an adverse impact on the rural landscape, nor conflict with housing and other policies but will promote the unique characteristics of the area. In all cases appropriate levels of parking facilities must be provided.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a policy stipulating that sustainable tourism development proposals will be supported if they have no adverse impacts on landscape or housing, and appropriate parking is provided.</p> <p>While the policy promotes increased recreational use, no European sites susceptible to recreational pressure have been identified in this HRA.</p> <p>The policy is therefore screened out from Appropriate Assessment.</p>
<p>Policy CL5 – Support Independent Living</p>	<p>New, converted and extended independent living and care homes will be supported provided that the design and scale of development are</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p>

<p>in keeping with the character of the location and that the impact on the amenity of surrounding residential properties is acceptable.</p>	<p>This is a development management policy that details the support for independent living and care homes, which are in keeping with the character surrounding their location.</p> <p>The policy does not provide for a specific location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy CL6 – Health Care Proposals for new medical facilities will be supported.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy supporting proposals for new medical facilities.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy CL7 – Recreation facilities The provision of recreational buildings will be supported provided that their design and scale are in keeping with the local character and that the impact on the residential amenity of surrounding residential properties is acceptable.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy that provides for recreation facilities within Walberton. In principle such facilities are considered positive because they absorb recreation that might otherwise occur in European sites. However, no European sites sensitive to recreational pressure have been identified in relation to Walberton Parish.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>
<p>Policy CL8 – Allotments The provision of new allotments will be supported.</p>	<p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy outlining the support for allotments in Walberton.</p>

<p>Policy CL9 – Provision of community child care facilities</p> <p>The provision of new or improved community child care facilities located in Fontwell will be supported provided that the site is of sufficient size to accommodate a new building, outdoor play-space and good access for staff parking and drop-off.</p>	<p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p> <p>There are no Likely Significant Effects of this policy on European sites.</p> <p>This is a development management policy detailing support for community child-care facilities in Fontwell. However, this provision has no impact pathways linking to European sites.</p> <p>The policy does not provide for a location and / or quantum of residential or employment development.</p> <p>It is therefore screened out from Appropriate Assessment.</p>

