Wisborough Green Neighbourhood Plan

Habitat Regulations Assessment

Wisborough Green Parish Council

September 2026

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Quality information

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1. Introduction

1.1 Background

1.1.1 AECOM was appointed by Wisborough Green Parish Council to assist in undertaking a Habitats Regulations Assessment (HRA) for the emerging Wisborough Green Neighbourhood Plan (WGNP). This is to inform Wisborough Green Parish Council of the potential effects of new development within the parish on internationally designated wildlife sites, and how they are being addressed in the WGNP.

1.1.2 The objectives of the assessment are to:

- Identify any aspects of the Neighbourhood Plan that would cause an adverse effect on the integrity of Habitats sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs)) including, as a matter of Government policy, Ramsar sites, either in isolation or in combination with other plans and projects, and
- To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.

1.1.3 The HRA of the WGNP is required to determine if there are any realistic linking pathways present between a Habitats site and the Neighbourhood Plan and where Likely Significant Effects cannot be screened out, an analysis to inform Appropriate Assessment to be undertaken to determine if adverse effects on the integrity of the Habitats sites will occur as a result of the Neighbourhood Plan alone or in combination.

1.2 Legislation

1.2.1 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment continues, as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019[1].

[1] These don't replace the 2017 Regulations but are just another set of amendments.

1.2.2 The HRA process applies the 'Precautionary Principle'[2] to Habitats sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the Habitats site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question. **Figure 1** below sets out the legislative basis for Appropriate Assessment.

1.2.3 Plans and projects that are associated with potential adverse impacts on Habitats sites may still be permitted if there are no reasonable alternatives 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)

The Regulations state that:

"*A competent authority, before deciding to … give any consent for a plan or project which is likely to have a significant effect on a European site … shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives… The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site*".

Figure 1: The legislative basis for Appropriate Assessment

1.2.4 Over time the phrase 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'.

1.2.5 In spring 2018 the 'Sweetman' European Court of Justice ruling[3] clarified that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats site that would otherwise arise) should **not** be taken into account when forming a view on Likely Significant Effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA has been cognisant of that ruling.

1.3 Scope of the Project

1.3.1 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following Habitats sites should be included in the scope of an HRA assessment:

- All Habitats sites within the boundary of Wisborough Green Parish; and,

[2] The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: *"When human activities may lead to morally unacceptable harm* [to the environment] *that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".*

[3] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

- Other Habitats sites within 10km shown to be linked to development in the parish through a known 'pathway' (discussed below).

1.3.2 Generally, it is uncommon for development plans to have significant impacts on Habitats sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size and the average vehicle commuting distance of a UK resident is approximately 10km. It should be noted that the presence of a conceivable impact pathway linking a Plan to a Habitats site does not mean that Likely Significant Effects (LSEs) will occur.

1.3.3 In some cases, development impacts can extend beyond 10km, particularly where hydrological pathways are involved, which is why the source-pathway-receptor concept is also used to help determine whether there are potential pathways connecting development to Habitats sites. This takes site-specific sensitivities into account, including issues such as nutrient neutrality or water levels, quantity and flow.

1.3.4 Briefly defined, impact pathways are routes by which the implementation of a policy within a Neighbourhood Plan document can lead to an effect upon a Habitats site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could affect Habitats sites through, for example, disturbance of ground-nesting birds.

1.3.5 Given an initial assessment of the relevant Habitats sites and the impact pathways present, this HRA will discuss (at least as far as the LSEs stage) the following Habitats sites:

- The Mens SAC
- Ebernoe Common SAC
- Arun Valley SPA/Ramsar
- Arun Valley SAC
- Duncton to Bignor Escarpment SAC

1.3.6 For the HRA, the views of the statutory nature conservation advisors, namely Natural England, will be sought as part of the consultation process on the scope of the Habitats sites assessed. An introduction to the qualifying features (species and habitats), Conservation Objectives, and threats and pressures to the integrity of these Habitats sites are set out in Chapter 3.

1.3.7 In order to fully inform the HRA, several studies and online information databases have been consulted. These include:

- Future development proposed (and, where available, HRAs) for the adjoining authorities
- Road traffic statistics from the Department for Transport (https://roadtraffic.dft.gov.uk);
- Journey-to-work data from the Population Census 2021 (https://www.nomisweb.co.uk/sources/census_2021_od);
- Southern Water's Water Resources Management Plan 2024;

- The HRAs produced for the adopted Chichester Local Plan (2025) and South Downs National Park Local Plan (2019) as well as those of adjoining authorities;
- The HRA produced for the emerging South Downs Local Plan (2026)
- Site Improvement Plans and Supplementary Conservation Advice Notes for relevant Habitats sites published by Natural England;
- The UK Air Pollution Information System (www.apis.ac.uk); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk).

1.4 Quality Assurance

1.4.1 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.

1.4.2 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2019).

2. Methodology

2.1 Introduction

2.1.1 The HRA has been carried out with reference to the general EC guidance on HRA[4] and general guidance on HRA published by government in July 2019 and 2021[5]. AECOM has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.

2.1.2 **Figure** 2 below outlines the stages of HRA. 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.

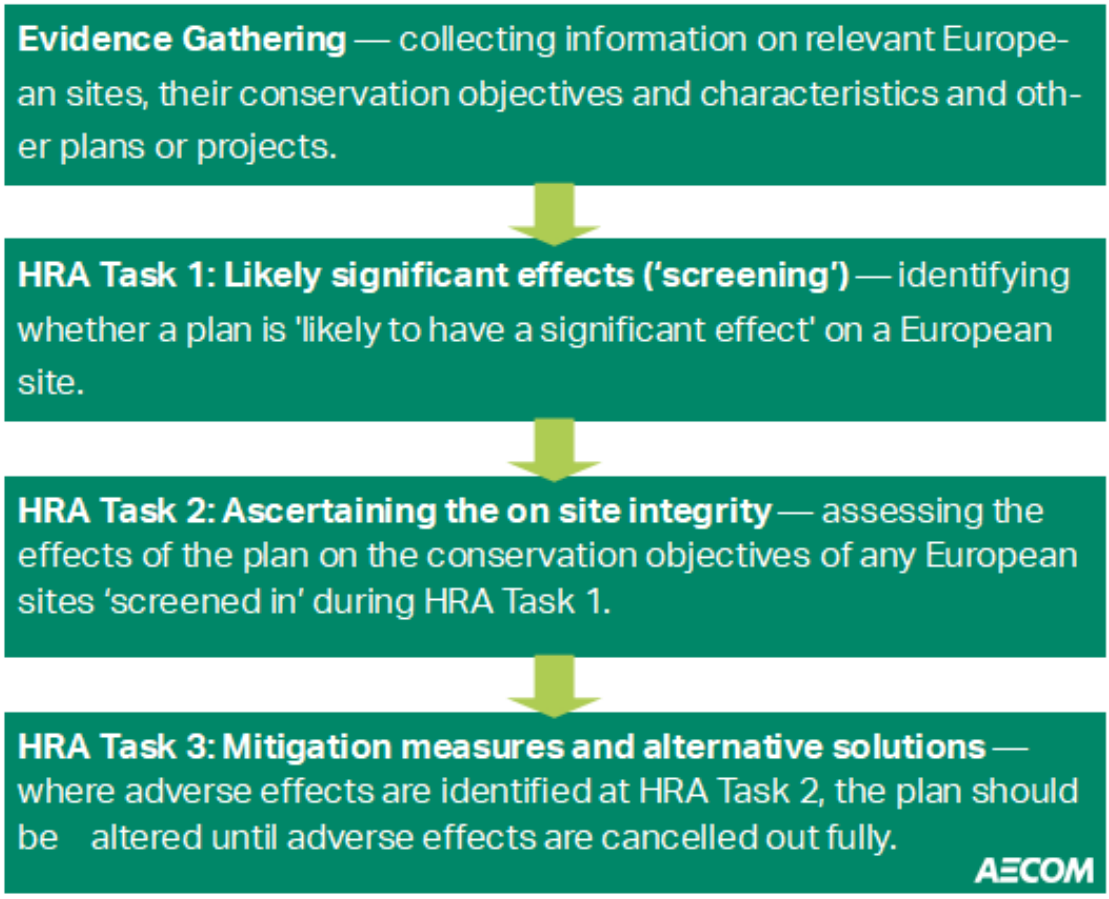


Figure 2: Four Stage Approach to Habitats Regulations Assessment.

[4] European Commission (2021): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.
[5] https://www.gov.uk/guidance/appropriate-assessment and https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

2.2 Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects (LSEs)

2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for Likely Significant Effects (LSEs), essentially a high-level 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 Habitats sites?"*

2.2.2 The objective is to filter out those Plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon Habitats sites, usually because there is no mechanism for a negative interaction.

HRA Task 2 – Appropriate Assessment (AA)

2.2.3 Where it is determined that a conclusion of 'no Likely Significant Effects (LSEs)' cannot be drawn, the analysis proceeds 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 compared to the screening stage.

2.2.4 By virtue of the fact that it follows screening for LSEs, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. 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 would take any policies or allocations that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the Habitats site(s)). A decision by the European Court of Justice[6] concluded that measures intended to avoid or reduce the harmful effects of a proposed Plan or project on a Habitats site may no longer be considered by competent authorities at the screening for LSEs stage of HRA. That ruling has been taken into account in producing this HRA.

2.2.5 Also, in 2018 the Holohan ruling[7] 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].

[6] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[7] Case C-461/17

HRA Task 3 – Avoidance and Mitigation

2.2.6 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and / or avoid adverse effects on Habitats sites. There is considerable precedent concerning the level of detail that a Neighbourhood Plan needs to contain regarding mitigation for impact pathways on Habitats sites (e.g. regarding recreational pressure). The implication of this precedent is that it is not necessary for all measures 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.

2.2.7 When discussing mitigation for a Neighbourhood Plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the detail of the mitigation measures themselves since a Neighbourhood Plan document is a high-level policy document.

2.2.8 In any Neighbourhood Plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at the Plan level. This is because either:

- The policy in question does not contain any specifics as to what will be delivered or where, and so cannot be assessed in detail at the Plan level. In these cases, the Appropriate Assessment focusses on precautionary mitigation that can be included in the plan to ensure that whatever proposals come forward will not result in adverse effects on integrity; or
- The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) are related to how the development will be designed and constructed, and therefore cannot be assessed in detail at the plan level. In these instances, the Appropriate Assessment focusses on available mitigation measures, the extent to which such measures would be achievable and effective, and whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any internationally designated sites.

2.2.9 There are several court rulings of relevance to the level of detail required in the HRA for a Plan. The Court of Appeal[8] has ruled that providing the Council (competent authority) is duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)[9]. In this case the High Court ruled that for '*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations*'.

[8]No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

[9]High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

2.2.10 In these instances, the advice of Advocate-General Kokott[10] is also worth considering. She commented that: *'It would …hardly be proper to require a greater level of detail in preceding plans* [rather than planning applications] *or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure* ***to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure'*** [emphasis added].

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

2.3.1 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 Habitats site(s) in question.

2.3.2 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.

2.4 Scope of the HRA

2.4.1 There is no guidance that dictates the physical scope of an HRA of a plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary "zones", i.e. a source-pathway-receptor approach. Current guidance suggests that the following international sites be included in the scope of assessment:

- All sites within the WGNP Area (the area covered by the WGNP); and
- Other sites shown to be linked to development within the WGNP Area through a known "impact pathway" (discussed below).

2.4.2 Specifically, this refers to:

- The Mens SAC
- Ebernoe Common SAC
- Arun Valley SPA/Ramsar
- Arun Valley SAC

[10] Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49
http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN

- Duncton to Bignor Escarpment SAC

2.4.3 This was based upon a search within the parish boundary and a 10km zone surrounding it as well as consideration of the vulnerabilities of these sites. The above sites were subjected to the initial screening exercise. It should be noted that the presence of a conceivable pathway linking the district to a Habitats site does not mean that LSEs will occur.

3. Habitats Sites

3.1 The Mens SAC

Introduction

3.1.1 The Mens is an extensive area of mature beech *Fagus sylvatica* woodland rich in lichens, bryophytes, fungi and saproxylic (dead wood) invertebrates. It is developing a near-natural high forest structure, in response to only limited silvicultural intervention over the 20th century, combined with the effects of natural events such as the 1987 great storm. The site also supports an important population of barbastelle bat *Barbastella barbastellus*[11].

Qualifying Features[12]

3.1.2 Annex I habitats that are a primary reason for selection of this site:

- Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*)

3.1.3 Annex II species present as a qualifying feature, but not a primary reason for selection of this site:

- Barbastelle Barbastella barbastellus

Conservation Objectives[13]

3.1.4 The site's conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying features' listed above).

3.1.5 The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:

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

[11] https://publications.naturalengland.org.uk/publication/5642356338458624 [accessed 10/09/2026]

[12] https://sac.jncc.gov.uk/site/UK0012716 [accessed 10/09/2026]

[13] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK0012716 [accessed 10/09/2026]

Threats / Pressures to Site Integrity[14]

3.1.6 The following threats / pressures to the integrity of The Mens SAC have been identified in Natural England's Site Improvement Plan:

- Forestry and woodland management
- Habitat connectivity
- Invasive species
- Change in land management
- Air pollution: Risk of atmospheric nitrogen deposition
- Public access / disturbance

3.2 Arun Valley SPA / Ramsar

Introduction[15]

3.2.1 The Arun Valley in West Sussex is located just north of the South Downs escarpment about 15 km inland from the south coast of England. It consists of low-lying grazing marsh, largely on alluvial soils, but with an area of peat derived from a relict raised bog. Variation in soils and water supply lead to a wide range of ecological conditions and hence a rich flora and fauna. Southern parts of the Arun Valley are fed by calcareous springs, while to the north, where the underlying geology is Greensand, the water is more acidic.

3.2.2 The history of management of fields, and their water levels, determines the plant communities present, with drier fields dominated by meadow grasses, Crested Dog's-tail *Cynosurus cristatus* and Perennial Rye-grass *Lolium perenne*. In wetter areas, rushes, sedges and Tufted Hair-grass *Deschampsia cespitosa* are more frequent. Ungrazed fields have developed into fen, scrub or woodland. Fen areas consist of Common Reed *Phragmites australis*, Reed Sweet-grass *Glyceria maxima* and Greater Tussock-sedge *Carex paniculata*, often with scattered elder Sambucus sp. and sallow scrub. On firmer ground, there is Alder *Alnus glutinosa*, Willow *Salix sp.*, Birch *Betula sp.*, and sallow, with Oak *Quercus robur* and Hazel *Corylus avellana* woodland on the driest ground. The ditches and margins between grazing marsh fields have an outstanding aquatic flora and invertebrate fauna. The Arun Valley supports important numbers of wintering waterbirds, which feed in the wetter, low-lying fields and along ditches.

[14] https://publications.naturalengland.org.uk/publication/5548316158853120 [accessed 10/09/2026]

[15] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK9020281 [accessed 10/10/2026]

SPA Qualifying Features[16]

3.2.3 Qualifying individual species listed in Annex I of the Wild Birds Directive (Article 4.1):

- Bewick's swan *Cygnus columbianus bewickii*

3.2.4 Qualifying assemblage 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 Features[17]

3.2.5 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.

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)

[16] https://publications.naturalengland.org.uk/publication/4567444756627456 [accessed 10/10/2026]
[17] https://jncc.gov.uk/jncc-assets/RIS/UK11004.pdf {accessed 10/10/2026]

Conservation Objectives[18]

3.2.6 The site's conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying features' listed above).

3.2.7 The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and 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 populations of each of the qualifying features
- the distribution of qualifying features within the site

Threats / Pressures to Site Integrity[19]

3.2.8 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

3.3 Arun Valley SAC

Introduction[20]

3.3.1 The Arun Valley SAC is situated within the South Downs National Character Area (NCA Profile 125) in West Sussex, just north of the South Downs escarpment about 15 km inland from the south coast of England. It consists of low-lying grazing marsh, largely on alluvial soils, but with an area of peat derived from a relict raised bog. Variation in soils and water supply lead to a wide range of ecological conditions and hence a rich flora and fauna. Southern parts of the Arun Valley are fed by calcareous springs, while to the north, where the underlying geology is Greensand, the water is more acidic.

18 https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK9020281 [accessed 10/09/2026]

19 https://publications.naturalengland.org.uk/publication/5353882309885952 [accessed 10/09/2026]

20 https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK0030366 [accessed 10/09/2026

3.3.2 The history of management of fields, and their water levels, determines the plant communities present, with drier fields dominated by meadow grasses, Crested Dog's-tail Cynosurus cristatus and Perennial Rye-grass Lolium perenne. In wetter areas, rushes, sedges and Tufted Hair-grass Deschampsia cespitosa are more frequent. Ungrazed fields have developed into fen, scrub or woodland. Fen areas consist of Common Reed Phragmites australis, Reed Sweet-grass Glyceria maxima and Greater Tussock-sedge Carex paniculata, often with scattered elder Sambucus sp. and sallow scrub. On firmer ground, there is Alder Alnus glutinosa, Willow Salix sp., Birch Betula sp., and sallow, with Oak Quercus robur and Hazel Corylus avellana woodland on the driest ground. The ditches and margins between grazing marsh fields have an outstanding aquatic flora and invertebrate fauna.

3.3.3 The Arun Valley supports important numbers of wintering waterbirds, which feed in the wetter, low-lying fields and along ditches.

Qualifying Features[21]

3.3.4 Annex II species that are a primary reason for selection of this site:

- Ramshorn snail *Anisus vorticulus*

Conservation Objectives[22]

3.3.5 The site's conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying features' listed above).

3.3.6 The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:

- the extent and distribution of qualifying natural habitats and habitats of the qualifying species
- the structure and function (including typical species) of qualifying natural habitats
- the structure and function of the habitats of the qualifying species
- the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- the populations of each of the qualifying species
- the distribution of qualifying species within the site

[21] https://publications.naturalengland.org.uk/publication/4924283725807616 [accessed 10/09/2026]

[22] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK0030366 [accessed 10/09/2026]

Threats / Pressures to Site Integrity[23]

3.3.7 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

3.4 Duncton to Bignor Escarpment SAC

Introduction[24]

3.4.1 Duncton to Bignor Escarpment is approximately 214.47 ha in size and is situated within both the South Downs National Character Area (NCA Profile 125) and National Park. The site itself is an example of mature beech *Fagus sylvatica* woodland located on a steep scarp face of the South Downs. The site has developed over chalk which is overlain in places by a clay-with-flints capping. The resulting soil conditions have produced beech dominated mosaic with: ash *Fraxinus excelsior* woodland, scrub and chalk grassland.

3.4.2 The high habitat quality present at Duncton to Bignor Escarpment has allowed many rare plants to flourish such as white helleborine *Cephalanthera damasonium*, yellow bird's nest *Monotropa hypopitys*, and limestone fern *Gymnopcarpium robertianum*.

3.4.3 The scrubby woodland is also home to the largest British colony of the rare snail Helicodonta obvoluta, and a notable assemblage of rare moth species, many of which are dependent on the scrubby woodland at Duncton Down.

Qualifying Features[25]

3.4.4 Annex I habitats that are a primary reason for selection of this site:

- *Asperulo-Fagetum* beech forests

Conservation Objectives[26]

3.4.5 The site's conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying features' listed above).

[23] https://publications.naturalengland.org.uk/publication/5353882309885952 [accessed 10/09/2026]

[24] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK0030138 [accessed 10/09/2026]

[25] https://sac.jncc.gov.uk/site/UK0030138 [accessed 10/09/2026]

[26] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK0030138 [accessed 10]/09/2026]

3.4.6 The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:

- the extent and distribution of qualifying natural habitats and habitats of the qualifying species
- the structure and function (including typical species) of qualifying natural habitats
- the structure and function of the habitats of the qualifying species
- the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- the populations of each of the qualifying species
- the distribution of qualifying species within the site

Threats / Pressures to Site Integrity[27]

3.4.7 According to the Site Improvement Plan 'No current issues affecting the Natura 2000 feature(s) have been identified on this site'.

3.5 Ebernoe Common SAC

Introduction[28]

3.5.1 Ebernoe Common is an extensive complex of ancient woodland and former wood pasture in West Sussex, five miles south-east of Haslemere. The site lies on the Cretaceous Weald Clay and falls within the Low Weald National Character Area (NCA 121). The central core of the site, approximately a third of the total area, forms Ebernoe Common National Nature Reserve.

3.5.2 It is a varied site with a range of woodland communities and age structures which have developed due to differences in underlying soils and past management. This range of conditions together with a long continuity of woodland cover has in turn resulted in the site supporting an outstanding diversity of species: Barbastelle and Bechstein's bats, which favour ancient woodland, breed in the site because it provides suitable roosting and feeding habitats. While Bechstein's feed exclusively in the woodland, Barbastelles commute into the surrounding countryside using the woodland corridors which branch out from the site. In addition, the native trees, particularly those with old growth characteristics, support rich lichen and fungal communities, including a number of rare and scarce species, and the woodland complex as a whole supports a diverse breeding bird assemblage.

[27] https://publications.naturalengland.org.uk/publication/5623422855938048 [accessed 10/09/2026]

[28] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK0012715 [accessed 10/09/2026]

Qualifying Features[29]

3.5.3 Annex I habitats that are a primary reason for selection of this site

- Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*)

3.5.4 Annex II species that are a primary reason for selection of this site

- Barbastelle *Barbastella barbastellus*
- Bechstein's bat *Myotis bechsteinii*

Conservation Objectives[30]

3.5.5 The site's conservation objectives apply to the site and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying features' listed above).

3.5.6 The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:

- the extent and distribution of qualifying natural habitats and habitats of the qualifying species
- the structure and function (including typical species) of qualifying natural habitats
- the structure and function of the habitats of the qualifying species
- the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- the populations of each of the qualifying species
- the distribution of qualifying species within the site

Threats / Pressures to Site Integrity[31]

3.5.7 The following threats / pressures to the site integrity of Ebernoe Common SAC have been identified in Natural England's Site Improvement Plan:

- Forestry and woodland management
- Offsite habitat availability / management
- Habitat fragmentation
- Change in land management
- Hydrological changes
- Air pollution: risk of atmospheric nitrogen deposition

[29] https://sac.jncc.gov.uk/site/UK0012715 [accessed 10/09/2026]

[30] https://designatedsites.naturalengland.org.uk/ConservationAdvice.aspx?SiteCode=UK0012715 [accessed 10/09/2026]

[31] https://publications.naturalengland.org.uk/publication/6364242571689984 [accessed 10/09/2026]

- Public Access / Disturbance

4. Test of Likely Significant Effects

4.1 Background to Wisborough Green Parish

4.1.1 The NP states "*The Parish of Wisborough Green is an area of approximately 1756 hectares which lies in the north western corner of West Sussex, 3 miles from the border with Surrey. It has a population of 1414 with a density of 1.4 persons per hectare (the average for the South East being 4.5).*

It is a typical rural English Village with a picturesque central village green, pond, church and shop located in the historic and Conservation Area of the village. The south western part of the Parish lies within the South Downs National Park.

Together with Loxwood, Kirdford, Plaistow and Ifold, and a small part of Linchmere Parish, the Parish of Wisborough Green forms the northern part of the Plan Area in the Chichester district which is separated from the southern district Parishes by the South Downs National Park. The South Downs National Park Authority is the Local Planning Authority for the area within the National Park Boundary"

4.1.2 The NP text quoted above references population data from the 2011 Census. Updated 2021 Census data indicates that Wisborough Green Parish had a population of 1,520 residents living in 629 households.

4.2 Physical scope of the HRA

4.2.1 There are five Habitats Sites which are described in the previous section that lie within 10km of Wisborough Green Parish. These are The Mens SAC, Ebernoe Common SAC, Duncton to Bignor Escarpment SAC, Arun Valley SAC and Arun Valley SPA/ Ramsar.

4.2.2 Duncton to Bignor Escarpment SAC is located approximately 7.5km from the southern boundary of Wisborough Green Parish, although the allocations proposed by Wisborough Green Parish Council are all located in the northern half of the Parish, over 12km from the SAC. The Natural England Site Improvement Plan for this SAC also states that there are no current threats or pressures that may impact the integrity of this Habitats Site[32]. However, the A272 which extends through the Parish connects to the A285 at Petworth and leads directly past Duncton to Bignor Escarpment SAC towards the popular employment hub of Chichester. Therefore, this site is screened in for further consideration of air quality impacts as a result of increased residential development in the Parish.

[32] Natural England Site Improvement Plan – Duncton to Bignor Escarpment, Available at: http://publications.naturalengland.org.uk/publication/5623422855938048 [accessed 10/09/2026]

4.2.3 The Arun Valley SAC, SPA and Ramsar is located south of the Parish and from initial inspections of aerial imagery, there are no connecting major roads from the Parish to within 200m of these Habitats Sites. Therefore, air quality is screened out in relation to these sites. Additionally, these Habitats Sites are the only sites out of those considered in this assessment that are sensitive to water quality and hydrological changes as specified in the Natural England Site Improvement Plan[33]. This impact pathway is considered in relation to these Sites. The SPA/Ramsar and the SAC are designated for their populations of wintering birds, notably the Bewick's swan, and the little ramshorn snail respectively. The Ramsar site is also designated for a number of other rare aquatic plants and invertebrates. These qualifying species are sensitive to development. Therefore, recreational pressure and loss of functionally linked land are also considered further in relation to these sites.

4.2.4 Although The Mens SAC is located directly west of the Parish and partially within the Parish in the southern section, and therefore lies within the accepted catchment to be screened in for likely significant effects of water quality and hydrological changes to level and flow, this site is upstream of the Parish on the River Kird. Therefore, surface run off from impermeable surfaces created within the allocations proposed in the WGNP would travel east within the River Kird away from this Habitats Site. Additionally, the closest site allocation (Ansell's Yard) to The Mens SAC is located approximately 500m from the edge of the SAC and connects to the River Kird outside of the SAC. Ansell's Yard is a partially brownfield site. Therefore, the development of this site will only result in a minimal increase in hardstanding. Run-off is therefore deemed unlikely to materially impact the water quality or flow levels of The Mens SAC. Ebernoe Common is also located upstream of Wisborough Green along the River Kird. Therefore, this site is screened out of further assessment with regard to water quality and water quantity, level and flow.

4.2.5 However, both The Mens SAC and Ebernoe Common SAC are designated for their populations of rare UK bat species and have been screened in for further consideration regarding recreational pressure, air quality and loss of functionally linked land.

4.2.6 Based on conclusions drawn from Natural England Site Improvement Plans and previous HRA work undertaken for surrounding parishes, a summary of the impact pathways that require consideration regarding increased development within the Wisborough Green Parish and the aforementioned Habitats Sites. These are:

- Effects on functionally linked land
- Recreational pressure
- Air quality
- Water Quality
- Changes to water quantity, level and flow

[33] Natural England Site Improvement Plan – Arun Valley, available at: http://publications.naturalengland.org.uk/publication/5353882309885952 [accessed 10/09/2026]

4.3 Atmospheric Pollution (Nitrogen Deposition)

4.3.1 The main emitted pollutants of concern for Habitats sites are oxides of nitrogen (NOx), ammonia (NH_3) and sulphur dioxide (SO_2) and are summarised in **Table 1**. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges[34]. NOx can also be toxic at very high concentrations (far above the annual average Critical Level). Elevated NOx and NH_3 also increases the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems depending on sensitivity, extent of area affected and other factors. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This can have adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats[35] [36].

Table 1: Main sources and effects of air pollutants on habitats and species[37]

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. Total SO_2 emissions in the UK have decreased substantially since the 1980's and our concentrations are now generally very low. 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 likely to become one of the most important contributors to SO_2 emissions in the UK.	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. However, SO_2 background levels have fallen considerably since the 1970's and are presently 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.

[34] https://www.apis.ac.uk/ .
[35] 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.
[36] 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.
[37] Information summarised from the Air Pollution Information System (http://www.apis.ac.uk/).

Pollutant	Source	Effects on habitats and species
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO_2, NOx, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most contributed to lower sulphate levels. 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.	Gaseous precursors (e.g. SO_2) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. This can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include the lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants. 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.
Ammonia (NH_3)	Ammonia is a reactive, soluble alkaline gas 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. It is also emitted from the catalytic converters of certain vehicles, particularly petrol cars. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_X emissions to produce fine ammonium (NH_4+) - containing aerosol. Due to its significantly longer lifetime, NH_4+ may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	The negative effect of NH_4+ may occur via direct toxicity when uptake exceeds detoxification capacity and via N accumulation. 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. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.

Pollutant	Source	Effects on habitats and species
Nitrogen oxides (NO_x)	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. Nitrogen oxides, particularly from traffic, have been consistently falling for many years, notwithstanding an increase in traffic on the network, due to improved vehicle emissions technology.	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 NOx for all vegetation types has been set to 30 ug/m3. Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. 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.
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 originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. However, at a local scale, road traffic makes a significant contribution. The N pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are 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. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions involving NOx, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). 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.	Concentrations of O_3 above 40 ppb can be toxic, to both humans and wildlife, and can affect buildings. High O_3 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.

4.3.2 Emissions of NOx and, at a local scale, ammonia can reasonably be expected to increase as a result of the Plan, primarily due to an increase in the volume of commuter traffic associated with housing growth.

4.3.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NOx concentration (critical threshold) for the protection of vegetation is 30 μgm^{-3}, that for ammonia is 3 μgm^{-3} (1 μgm^{-3} for

lower plants) and the threshold for sulphur dioxide is 20 μgm^{-3}. Additionally, ecological studies have determined 'Critical Loads'[38] of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH_3).

4.3.4 According to the Department for Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (**Figure 3** and reference[39]). Additionally, guidance from Natural England[40] indicates that 200m is an appropriate screening distance for the impacts of air quality as a result of road traffic emissions. Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive Habitats sites may arise due to implementation of the Plan.

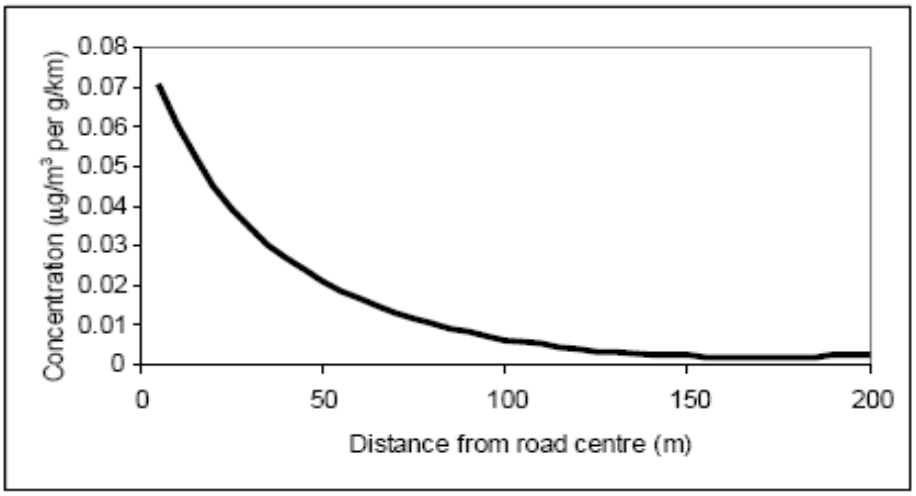


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road

4.3.5 The following Habitats sites within 10km of the Wisborough Green Parish boundary are sensitive to atmospheric nitrogen deposition, primarily due to the presence of nutrient-limited habitats and / or species and lie within 200m of major roads (**the sites in bold are taken forward into the following HRA chapters**):

- **The Mens SAC**
- **Duncton to Bignor Escarpment SAC**
- **Ebernoe Common SAC**

4.3.6 A review of the WGNP indicates that LSEs in relation to atmospheric pollution cannot be excluded for several policies due to the allocation of residential / employment growth and the concomitant increase in commuter traffic. The following policies need to be taken forward to Appropriate Assessment:

[38] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.
[39] Available at: http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013 [Accessed on the 06/01/2026]
[40] Available at: https://publications.naturalengland.org.uk/publication/4720542048845824 [Accessed on the 17/04/2026]

- Policy OAR1: Development Allocation
- Policy EDR3: Site Specific Policy - Commercial Areas
- Policy SS2: Greenways Nursery (now called Grenways Park), Kirdford Road
- Policy SSR5: Stable Field (now called Barnfield Shaw)
- Policy SSR6: Tanglewood, Kirdford Road
- Policy SSR7: Winterfold Garden, Durbans Road 81-82
- Policy SSR8: Ansells Yard, Kirdford Road
- Policy SSR9: Land South of A272 85-86
- Policy SSR10: Paddock Farm Field, south of A272 87-88
- Policy SSR11: Tanyards, Petworth Road

4.4 Recreational Pressure

4.4.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels[41], and impacts on Habitats protected sites[42] [43]. This applies to any habitat, but recreational pressure from housing growth is of particular significance for Habitats sites designated for their bird interest. Different Habitats 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. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents.

Trampling Damage, Nutrient Enrichment and Wildfires

4.4.2 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage, which dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

[41] Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* **5**. https://doi.org/10.1093/jue/juz019
[42] Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.
[43] Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

- Wilson & Seney[44] examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- Cole et al[45] conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphology was found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- Cole [46] conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no differential impact on vegetation cover.
- Cole & Spildie[47] experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.

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

[45] 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

[46] 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.

[47] 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

- In heathland sites, trampling damage can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates[48]. Species that burrow into flat surfaces such as the centres of paths, are likely to be particularly vulnerable, as the loose sediment can no longer maintain their burrow. In some instances, nature conservation bodies and local authorities resort to hardening paths to prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.

4.4.3 A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews, e.g**.** footnote 49). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually[50]. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components[51]. Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

Bird Disturbance

4.4.4 Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. by damaging habitat or reducing bird fitness in less obvious ways such as through inducing stress responses). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While such changes are less noticeable, they might result in major population-level changes by altering the balance between immigration / birth and emigration / death[52].

[48] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.
[49] Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.
[50] Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* **11**:16-19.
[51] Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.
[52] Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

4.4.5 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and time spent responding to disturbance is time that is not spent feeding[53]. Disturbance therefore increases energetic expenditure while reducing energetic intake, which can adversely affect the 'condition' and ultimately survival of birds. Additionally, displacement of birds from one feeding site to another can increase the pressure on the resources available within alternative foraging sites, which must sustain a greater number of birds[54]. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar[55] [56].

4.4.6 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Disturbance in winter may be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, this may be counterbalanced by fewer recreational users in the winter months and lower overall sensitivity of birds outside the breeding season. Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking[57]. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers[58]. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type is a factor that ought to be taken into account in HRAs.

[53] Riddington, R. *et al*. (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* **43**:269-279.
[54] Gill, J.A., Sutherland, W.J. & Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* **12**: 67-72.
[55] Clarke R.T., Liley D., Sharp J.M., Green R.E. (2013). Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. https://doi:10.1371/journal.pone.0072984.
[56] Liley D. & Clarke R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. Biological Conservation **114**: 219-230.
[57] Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.
[58] Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* **29**: 124-132.

4.4.7 With respect to heathland birds specifically, Liley and Clarke[59,60] found that the density of European nightjar *Caprimulgus europaeus* was directly related to the amount of surrounding development, with sites surrounded by higher levels of development supporting fewer nightjars. The species' breeding success appears to be much higher at less visited sites[61], with path proximity correlating strongly with nest failure, up to 225m from the path edge. Although Dartford warblers do not appear to be as sensitive to human disturbance (possibly as they are not ground-nesting), their breeding parameters are still affected by disturbance levels from humans and their pets[62].

Summary

4.4.8 Several Habitats sites within and in proximity to Wisborough Green Parish are designated for habitats and species that are sensitive to recreational pressure. The increase in residential development allocated in the WGNP would lead to an increase in the local population and demand for access to outdoor spaces. The HRA process needs to adequately assess potential recreational pressure effects of the Plan on these Habitats sites.

4.4.9 Overall, the following Habitats sites within 10km of the Wisborough Green Parish boundary are sensitive to increased recreational access, due to the allocation of residential development in the WGNP (the sites in **bold** are taken forward into the following HRA chapters):

- **The Mens SAC**
- **Ebernoe Common SAC**
- **Arun Valley SPA/Ramsar**
- **Arun Valley SAC**

4.4.10 A review of the emerging WGNP indicates that LSEs in relation to recreational pressure cannot be excluded for several policies due to the allocation of residential growth and a concomitant increase in the local population. The following policies need to be taken forward to Appropriate Assessment:

- Policy OAR1: Development Allocation
- Policy SS2: Greenways Nursery (now called Grenways Park), Kirdford Road

[59] Liley, D. & Clarke, R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* **114**: 219-230.
[60] Liley, D. & Clarke, R.T. (2002) The impact of human disturbance and human development on key heathland bird species in Dorset. Sixth National Conference (eds Underhill, J.C. & Liley, D.). RSPB, Bournemouth.
[61] Murison, G. (2002). The Impact of Human Disturbance on the Breeding Success of the Nightjar *Caprimulgus europaeus* on Heathlands in South Dorset, England. English Nature.
[62] Murison, G.C. (2007). The impact of human disturbance, urbanisation and habitat type on a Dartford warbler *Sylvia undata* population. PhD thesis, University of East Anglia.

- Policy SSR5: Stable Field (now called Barnfield Shaw)
- Policy SSR6: Tanglewood, Kirdford Road
- Policy SSR7: Winterfold Garden, Durbans Road 81-82
- Policy SSR8: Ansells Yard, Kirdford Road
- Policy SSR9: Land South of A272 85-86
- Policy SSR10: Paddock Farm Field, south of A272 87-88
- Policy SSR11: Tanyards, Petworth Road

4.5 Loss of Functionally Linked Land

4.5.1 While most Habitats 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 necessarily the case. A diverse array of qualifying species including birds, bats and amphibians are not always confined to the boundary of designated sites.

4.5.2 For example, the highly mobile nature of waterfowl necessarily means that areas of habitat of crucial importance to the maintenance of the bird populations lie outside the physical limits of Habitats sites. Despite not being designated, these habitats are integral to the maintenance of the structure and function of Habitats sites. Therefore, land use plans that may result in the loss of functionally linked habitat need to be subject to further assessment.

4.5.3 There is now an abundance of authoritative examples of HRA cases on plans affecting bird populations, where Natural England recognised the potential importance of functionally linked land22. For example, bird surveys in relation to a previous HRA established that approximately 25% of the golden plover population in the Somerset Levels and Moors SPA were affected while on functionally linked land, and this required the inclusion of mitigation measures in the relevant plan policy wording. Another important case study originates from the Mersey Estuary SPA / Ramsar, where adjacently located functionally linked land had a peak survey count of 108% of the 5 year mean peak population of golden plover. Similar to the above example, this led to considerable amendments in the planning proposal to ensure that the site integrity was not adversely affected.

4.5.4 Generally, functionally linked (but non-designated) land parcels may not be immediately obvious. An assessment of existing data sources (e.g. bird atlases showing species distributions, Environmental Record Centre data, results from bespoke bird surveys) might be required to firmly established functional linkage to Habitats sites. In some instances, data may not be available at all, requiring further survey work.

4.5.5 Although this section has focussed on direct loss of functionally linked habitat, other effects on such habitat can arise short of direct habitat loss that could affect the usability of that habitat, such as noise and lighting disturbance adjacent to areas of functionally-linked land or habitat used as bat commuting routes.

4.5.6 Overall, the following Habitats sites within 10km of the Wisborough Green Parish boundary are sensitive to loss or disturbance of functionally linked land, the allocation of development in the WGNP (the sites in **bold** are taken forward into the following HRA chapters):

- **The Mens SAC**
- **Ebernoe Common SAC**
- **Arun Valley SPA/Ramsar**

4.5.7 A review of the WGNP indicates that LSEs in relation to loss or disturbance of functionally linked land cannot be excluded for several policies due to the allocation of development and the potential for the loss or disturbance to functionally linked habitats. The following policies need to be taken forward to Appropriate Assessment:

- Policy OAR1: Development Allocation
- Policy EDR3: Site Specific Policy - Commercial Areas
- Policy INR1: Pedestrian Access and Footway Provision
- Policy SS2: Greenways Nursery (now called Grenways Park), Kirdford Road
- Policy SSR5: Stable Field (now called Barnfield Shaw)
- Policy SSR6: Tanglewood, Kirdford Road
- Policy SSR7: Winterfold Garden, Durbans Road 81-82
- Policy SSR8: Ansells Yard, Kirdford Road
- Policy SSR9: Land South of A272 85-86
- Policy SSR10: Paddock Farm Field, south of A272 87-88
- Policy SSR11: Tanyards, Petworth Road

4.6 Water Quality

4.6.1 An increase in the extent of residential or employment development can lead to reduced water quality of surface freshwater bodies, such as rivers and lakes. Sewage and industrial effluent discharge can result in an increased nutrient input to Habitats sites leading to unfavourable conditions. 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 contributor to pollution in aquatic ecosystems.

4.6.2 Water quality is an important determinant of the nature and condition of qualifying habitats and species in Habitats sites. Declining 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 have additional detrimental effects (even at lower levels), such as increased vulnerability to disease and changes in wildlife behaviour.
- Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms,

which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication, deoxygenates water further, exacerbating the ongoing oxygen depletion. In the marine environment, nitrogen is the main growth-limiting plant nutrient and so eutrophication is primarily associated with discharges containing bioavailable 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).

4.6.3 At sewage treatment works, catering for a growing population increases the risk of effluent escaping 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.

4.6.4 The main risk associated with the WGNP is an increase in the discharge of treated sewage effluent from Wastewater Treatment Works (WwTWs) serving Wisborough Parish. This may increase nutrient concentrations (phosphorus is the main limiting nutrient in freshwater habitats) in Habitats sites that are hydrologically connected to waterbodies receiving sewage effluent.

4.6.5 Overall, the following Habitats sites are sensitive to negative changes in water quality, primarily due to increased discharge volumes of treated sewage effluent from WwTWs (**sites in bold are taken forward to the following chapters of the HRA**):

- **Arun Valley SPA / Ramsar**
- **Arun Valley SAC**

4.6.6 A review of the WGNP indicates that LSEs in relation to changes to water quantity, level and flow cannot be excluded for several policies:

- Policy OAR1: Development Allocation
- Policy SS2: Greenways Nursery (now called Grenways Park), Kirdford Road
- Policy SSR5: Stable Field (now called Barnfield Shaw)
- Policy SSR6: Tanglewood, Kirdford Road
- Policy SSR7: Winterfold Garden, Durbans Road 81-82
- Policy SSR8: Ansells Yard, Kirdford Road
- Policy SSR9: Land South of A272 85-86
- Policy SSR10: Paddock Farm Field, south of A272 87-88
- Policy SSR11: Tanyards, Petworth Road

4.7 Water Quantity, Level and Flow

4.7.1 The unique nature of wetlands combines shallow water, high levels of nutrients and high primary productivity. These conditions are ideal for the growth of organisms at the basal level of food webs, which sustain a wide range of birds, mammals, fish and amphibians. Overwintering and migrating wetland bird species are particularly reliant on these food sources, as they need to build up enough nutritional reserves to sustain their long migration routes.

4.7.2 Wetland habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of water is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrate or plant species. This might lead to the loss of the structure and functioning of wetland habitats. There are two mechanisms through which urban development might negatively affect the water level in Habitats Sites:

- The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce the water levels in Habitats Sites sharing the same catchment.
- The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often this pluvial flooding results in downstream inundation of watercourses and the potential flooding of wetland habitats.

4.7.3 The qualifying species of the Arun Valley SPA / Ramsar / SAC are all sensitive to hydrological changes, potentially resulting from changes in the hydrological regime in the wider catchment of the Arun Valley.

4.7.4 The ramshorn snail, the SAC's qualifying feature, ideally requires minimum summer water depths of 0.5-1m. Ramshorn snails are unable to survive periods of ditch drying. Winter flooding within natural limits is likely to be important for this species to colonise new ditches, an essential prerequisite for maintaining a healthy population. Natural England specifies that at least 30% of ditches should not exceed 1m in depth.

4.7.5 The qualifying waterfowl species of the Arun Valley SPA / Ramsar require naturally fluctuating water levels within set limits for loafing, roosting and foraging. Furthermore, the Ramsar is designated for its outstanding assemblage of wetland plants and invertebrates, all of which depend on appropriate water levels throughout at least parts of their life cycle.

4.7.6 Increases to the quantity and rate of water delivery can result in summer flooding and prolonged / deeper winter flooding. This in turn results in the reduction of suitable feeding and roosting sites for birds. For example, in areas where water is too deep, most waders will be unable to reach their

food sources close to the ground. Generally, wetlands within and downstream of urban areas are likely to have some limited capacity to absorb some of the surface water runoff from pavement and buildings, thereby providing flood control and preventing water logging of crops. However, if this capacity is exceeded, there might be adverse effects on the integrity of such sites.

4.7.7 The River Kird runs through Wisborough Green and feeds the Upper Arun which in turn, flows into the Arun floodplain. Although the quanta of the site allocations proposed in the WGNP are insufficient to produce a notable difference in surface water run-off and are located at sufficient distance from the River Kird for this to be reasonably dismissed as an issue, problems from water abstraction due to increased development in the Parish could occur.

4.7.8 By allocating 86 new residential dwellings, the WGNP would inevitably increase the water demand in the parish. Resulting excessive changes to the hydrological integrity, such as through effects on water flow and volume, in the Arun Valley SAC / SPA / Ramsar are most likely to occur as a result of increased water abstraction for public water supply.

4.7.9 The WGNP could result in changes to the water quantity, level and flow in the catchment of several Habitats sites, if it required additional abstractions from sources that are hydrologically connected to these sites. This may alter the water level within the designated sites themselves with potential cascading effects on qualifying species or habitats. Overall, the following Habitats sites are considered to be sensitive to changes in water quantity, level and flow (**sites in bold are taken forward to the following chapters of the HRA**):

- **Arun Valley SPA / Ramsar**
- **Arun Valley SAC**

4.7.10 A review of the WGNP indicates that LSEs in relation to changes to water quantity, level and flow cannot be excluded for several policies as they will increase demand for clean drinking water and proliferate urban surfaces within Wisborough Green Parish:

- Policy OAR1: Development Allocation
- Policy SS2: Greenways Nursery (now called Grenways Park), Kirdford Road
- Policy SSR5: Stable Field (now called Barnfield Shaw)
- Policy SSR6: Tanglewood, Kirdford Road
- Policy SSR7: Winterfold Garden, Durbans Road 81-82
- Policy SSR8: Ansells Yard, Kirdford Road
- Policy SSR9: Land South of A272 85-86
- Policy SSR10: Paddock Farm Field, south of A272 87-88
- Policy SSR11: Tanyards, Petworth Road

5. Appropriate Assessment

5.1 Introduction

5.1.1 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.

5.1.2 By virtue of the small amount of growth the NP specifies for Wisborough Green, the main impact pathways of concern to this HRA (effects on functionally linked land, water quality, air quality, recreational pressure, and hydrological changes including water abstraction) are inherently 'in combination' with neighbouring plans and projects. However, for completeness, potential impacts of the 86 net residential dwellings allocated within Wisborough Green Parish in isolation are also assessed.

5.1.3 The Chichester District Council Local Plan allocated up to 75 residential dwellings within Wisborough Green Parish over the plan period 2021 – 2039. Additionally, there is an unbuilt balance of 11 dwellings from the previous iteration of the WGNP, which are retained, leading to a total allocation of 86 new dwellings. The WGNP allocates these dwellings between seven sites which will be appropriately assessed below. However, when taken in the context of 11,484 dwellings to be delivered in the plan period 2021-2039 by Chichester District Council, the growth allocated in the WGNP is unlikely to change the in-combination conclusions of the Local Plan Review HRA.

5.1.4 The test of likely significant effects indicates that some policies may have likely significant effects on the Habitats Sites due to loss of functionally linked land, recreational pressure, air quality, water quality and changes water quantity, level and flow including water abstraction. At the screening stage, the following policies were screened in requiring further assessment:

- OA1: Development Allocation: allocates a total of 86 new dwellings, including those carried forward from the previous plan period and further dwellings allocated in line with the Chichester Local Plan;
- Policy EDR3: Site Specific Policy - Commercial Areas: supports the commercial redevelopment of the Newpound commercial area and Wharf Farm commercial site on the current footprints;
- Policy SS2: Greenways Nursery (now called Greenways Park), Kirdford Road
- Policy SSR5: Stable Field (now called Barnfield Shaw)
- Policy SSR6: Tanglewood, Kirdford Road
- Policy SSR7: Winterfold Garden, Durbans Road 81-82
- Policy SSR8: Ansells Yard, Kirdford Road
- Policy SSR9: Land South of A272 85-86

- Policy SSR10: Paddock Farm Field, south of A272 87-88
- Policy SSR11: Tanyards, Petworth Road

5.2 Atmospheric Pollution

The Mens SAC

5.2.1 The Mens SAC sensitivity to atmospheric nitrogen deposition was established in the LSEs section. Furthermore, it was also documented that the site directly adjoins the A272, a potential commuter route for Wisborough Green residents given that the A272 passes directly through Wisborough Green. An assessment of detailed habitat mapping on MAGIC indicates that qualifying woodland occurs throughout the entire SAC boundary along the A272.

5.2.2 The A272 is an A road that connects the districts of Horsham and Chichester on a west-east trajectory. The Department for Transport's road traffic statistics showed an Annual Average Daily Traffic (AADT) flow of 3813 cars, 939 Light Goods Vehicles and 186 Heavy Goods Vehicles at manual count point 6848 (towards the centre of the SAC) in 2025. While clearly not as busy as many dual A roads, it is possible that this road link would need to accommodate further traffic under future development scenarios, including the WGNP.

5.2.3 The designated habitat for this SAC is beech woodland. According to APIS, the minimum Critical Load of nitrogen for beech woodland is 10 kg/N/ha/yr. APIS also identifies that the existing nitrogen deposition rate is approximately 19.7 kg/N/ha/yr. Therefore, nitrogen deposition rates are already in exceedance of the critical load. The Critical Level for ammonia for beech woodlands is 3 µg NH_3/m^3. However, the site is also partially designated for its rich lichen and bryophyte populations which have a Critical Level of 1 µg NH_3/m^3. As such, it is this lower Level for ammonia that will be used in this assessment. APIS also identifies that the existing average ammonia concentrations are 1 µg NH_3/m^3, and thus already at the critical level for the SACs lichen and bryophyte populations.

5.2.4 With regards to NOx the critical level is set at 30 ug/m^3 and the average NOx concentration at or below 6.8 µg/m3 for all SAC parcels, which is well below this. Due to improvements in vehicle emissions technology (as reflected in the Defra Emission Factor Toolkit) NO_X concentrations are forecast to continue to fall notwithstanding the expected increase in traffic due to development across West Sussex. As both baseline and all future concentrations are forecast to be below the Critical Level of 30 ug/m^3 it can be concluded that NO_X itself will not have an adverse impact upon the SAC and will only be considered further within the assessment as a source of nitrogen deposition.

5.2.5 In addition, unlike some other SACs the Air Pollution Information System shows that road traffic is a minor source of nitrogen at The Mens SAC (6.4%). In contrast, nearly a third (31.8%) of atmospheric nitrogen at the SAC derives from agriculture (fertiliser and livestock combined). Unlike road traffic (which has a very localised impact zone) agriculture and non-agricultural waste will affect nitrogen deposition across the entire SAC.

5.2.6 Whilst some increase in vehicle movements may arise as a result of new housing, these would be dispersed across the local road network and are unlikely to lead to a measurable increase in traffic flows at a level sufficient to affect atmospheric pollution at the SAC. Ultimately some traffic arising from the parish may utilise the A272 with traverses The Mens SAC. An assessment of air quality on The Mens SAC was undertaken for the HRA of the adopted Chichester Local Plan, and this made an allowance for all traffic growth expected over the plan period on the A272 including from other plans and projects. It was concluded that ammonia impacts on the SAC could not be dismissed on mathematical grounds and an Air Quality Mitigation Strategy was jointly produced by Chichester and Horsham Councils in 2024 to address this issue.

5.2.7 Given the relatively small scale of development proposed within the WGNP, the absence of major road links in close proximity to the SAC, and the fact that Horsham and Chichester District Councils are implementing a strategic Air Quality Mitigation Strategy for the A272 past The Mens SAC, **it is considered that the WGNP will not result in adverse effects on the integrity of The Mens SAC regarding atmospheric pollution.**

Duncton to Bignor Escarpment SAC

5.2.8 The critical load for nitrogen deposition for this Habitats Site is 5-15 kg/N/ha/yr. APIS states that exceedance of this range would cause "…*changes in ground vegetation and mycorrhiza, nutrient imbalance and changes in soil fauna*." Currently, nitrogen deposition is between 20.6 and 20.1 kg/N/ha/yr across the SAC, with the minimum still above the maximum range given by APIS as acceptable.

5.2.9 The Critical Level for ammonia for beech woodlands is 3 µg NH_3/m^3. However, the site is also partially designated for its rich lichen and bryophyte populations which have a Critical Level of 1 µg NH_3/m^3. As such, it is this lower Level for ammonia that will be used in this assessment. APIS also identifies that the existing average ammonia concentrations are 1 µg NH_3/m^3, and thus already at the critical level for the SACs lichen and bryophyte populations.

5.2.10 With regards to NOx the critical level is set at 30 ug/m^3 and the average NOx concentration is at or below 7.1 µg/m^3 for all SAC parcels, which is well below this. Due to improvements in vehicle emissions technology (as reflected in the Defra Emission Factor Toolkit) NO_X concentrations are forecast to continue to fall notwithstanding the expected increase in traffic due to development across West Sussex. As both baseline and all future concentrations are forecast to be below the Critical Level of 30 ug/m^3 it can be concluded that NO_X itself will not have an adverse impact upon the SAC and will only be considered further within the assessment as a source of nitrogen deposition.

5.2.11 The HRA of the Chichester Local Plan concludes that *"traffic growth on the A285 over the Local Plan period will not materially interfere with the conservation objective target for this SAC to reduce air pollution to below critical levels and loads. Traffic is only a minor source of ammonia and nitrogen at this SAC (6%) and only affects an area local to the A285. Nitrogen deposition due to traffic has been improving since at least 2012 and is expected to continue to improve in the future, such that even allowing for traffic growth there will still be a large net reduction in nitrogen deposition by 2040. The contribution of Chichester Local Plan to nitrogen will be small (a maximum of 3% of the critical load) and very localised (imperceptible at distances greater than 60m from the road) and is probably over-estimated due to inability at this stage to account for the large uptake of electric vehicles that can be expected in the second half of the plan period."* [63]

5.2.12 The HRA of the South Downs Local Plan concluded that no adverse effect on the integrity of the SAC would arise from traffic-related nitrogen deposition, either alone or in combination with other projects and plans, including growth expected across Chichester District at the time of the assessment. Moreover, this SAC is located over 12km from the settlement of Wisborough Green (further by road), which is where the nearest allocation is made. A zone of 10km is typically used to screen in European sites vulnerable to reductions in air quality. This is based on the average UK car journey being approximately 10.6km[64]. **It is therefore considered that a conclusion of no adverse effect on integrity can be drawn for this SAC.**

5.3 Recreational Pressure

The Mens SAC & Ebernoe Common SAC

5.3.1 Public access/disturbance has been cited in the Natural England Site Improvement Plans for The Mens SAC and Ebernoe Common SAC due to concern over the existing light levels at each site and the potential impact of increased light levels on the resident bat populations. However, site allocation at Wisborough Green are too far from either SAC to affect light levels.

5.3.2 Ebernoe Common SAC and The Mens SAC mainly receive visitors during daylight hours which provides little opportunity for overlap between visitors and bat activity although recently it has been noted that there has been an increase in cyclists using high powered headlamps at night in order to enjoy off-road cycling. However, given the quanta of the allocations proposed and the low levels of overlap between human activity and bat foraging it is possible to conclude no likely significant effects of recreational pressure on Ebernoe Common and The Mens SAC as a result of development within Wisborough Green Parish. Light levels from human sources is cited in the Natural England Site Improvement Plans for both sites as a potential issue

[63] https://www.chichester.gov.uk/media/38556/Habitats-Regulations-Assessment-January-2023/pdf/CDC_Local_Plan_HRA_2023_Final.pdf?m=1684402254580 [accessed 14/09/2026]

[64] GOV.UK (2026). *Average number of trips made and distance travelled*. https://www.gov.uk/government/statistical-data-sets/nts01-average-number-of-trips-made-and-distance-travelled, [accessed 15/09/2026]

however given the low quanta of the allocations proposed for Wisborough Green Parish, the associated increase in visitors is not predicted to significantly impact the foraging behaviour of bats using these SACs.

5.3.3 The Mens SAC is also designated for its mature beech forests. Veteran and mature trees within the SAC are potentially vulnerable to trampling and soil compaction. It is well known that the soil conditions surrounding mature trees affect their roots, mycorrhizal fungi, nutrient uptake and growth rate. Recreational activities undertaken around the base of such trees are likely to lead to compacted soil with less space for air and water, both essential for plant growth. Over time this may negatively impact trees in the SAC. However, Natural England's Site Improvement Plan does not specify recreational pressure as a threat or pressure to the SAC's beech forest, indicating that the overall recreational use of the site is limited. This is supported by a review of published walking routes in the ViewRanger application, which does not show any routes traversing the SAC.

5.3.4 **Given this evidence, it is considered that the WGNP will not result in adverse effect on The Mens SAC or at Ebernoe Common SAC in relation to recreational pressure impacting the qualifying mature beech forest or the qualifying populations of Bechstein's and barbastelles**

Arun Valley SPA/ SAC/ Ramsar

5.3.5 The component parts of the SPA / Ramsar are the following SSSIs: Pulborough Brooks SSSI, Waltham Brooks SSSI and Amberley Wild Brooks SSSI. These subcomponents all lie within the South Downs National Park and Wisborough Green Parish lies 3.6km from the SAC/SPA/Ramsar. This is within typical core recreational catchments for inland Habitats sites, which are usually around 5-7km. Further detail on the nature and the management of the component SSSIs is discussed here.

5.3.6 While disturbance is a potential impact pathway for the Arun Valley sites, it is not listed as a threat or pressure in Natural England's Site Improvement Plan. This is most likely because the two most sensitive parts of the SPA / Ramsar (Amberley Wild Brooks SSSI and Pulborough Brooks SSSI) are under appropriate management regimes from the RSPB.

5.3.7 For example, the Amberley Wild Brooks reserve is not actively promoted as a visitor attraction. The RSPB website explicitly highlights that the reserve is not capable of accommodating a large number of visitors due to its conservation sensitivity. The reserve does not provide any specific facilities or cater for group bookings, reducing the number of visitors likely to visit. Access within the site is restricted to the Wey South Path in order to minimise bird disturbance. Pulborough Brooks SSSI is usually open to the public but access is managed through a network of hides. The most sensitive parts of the site are also designated as dog exclusion zones. Moreover, a per visit charge for non-RSPB members is in place, which will limit the number of casual walkers.

5.3.8 Regarding the Waltham Brooks SSSI there is some concern regarding recreational pressure, which is documented in consultation comments from the Coldwaltham Meadows Conservation Trust and the Sussex Wildlife Trust on the adopted South Downs Local Plan. The primary risk here would be an increase in visitor pressure (particularly involving dog walkers) disturbing grazing livestock which are used to manage the Waltham Brooks SSSI, the condition of which is 'Recovering'. However, the closest allocation in the WGNP is over 9km away from this part of the SPA and therefore outside the expected recreational catchment.

5.3.9 Given that recreational pressure is not identified as a specific issue in the Site Improvement Plan such a small number of dwellings will not result in a material change in recreational activity at the site even in combination with the small amounts of housing planned around the site in the Horsham Local Plan and South Downs Local Plan. Additionally, whilst the edge of the parish is located approximately 3.6km from the Habitats Site, the allocations proposed in the emerging neighbourhood plan are located approximately 7.4km from the Habitats Sites which is beyond a realistic recreational distance for these sites.

5.3.10 **Overall, it is concluded that there will not be adverse effects on the integrity of these SAC/SPA/Ramsar sites as a result of the WGNP regarding recreational pressure.**

5.4 Loss of Functionally Linked Land

The Mens SAC & Ebernoe Common SAC

5.4.1 The Mens SAC and Ebernoe Common SAC are designated for their populations of rare bats; Bechstein's and barbastelle. Bats are not expected to be confined to the boundaries of Habitats Sites and are anticipated to forage within the wider vicinity; In 2016, the Bat Conservation Trust published guidelines on how to determine Core Sustenance Zones (CSZs) for bats and highlighted that barbastelles have a mean maximum CSZ of 6.47km. However, data collated by the Bat Conservation trust to determine the CSZ for different bats suggests a CSZ of 3km for Bechstein's bats due to their rarity and specialised habitat requirements. However, in a 2001 study, female adult Bechstein's bats regularly undertook commuting distances of up to 1km[65].

5.4.2 Radio-tracking studies have been undertaken to identify core foraging areas for these particular SACs. These reports have identified that the barbastelles of The Mens SAC forage to the east of the SAC, principally on the floodplain of the River Arun from close to Horsham in the north to Parham in the south. They also cross to the Adur floodplain. In some cases, the bats travelled up to 12.2km to visit foraging areas. The currently available radio-tracking evidence indicates that 75% of the bat population forage within 9km of the SAC although it is conceivable for barbastelle bats of the SAC to use a wider area for activities such as migrating between hibernation roosts and summer roosts.

[65] 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*). *Behavioural Ecology and Sociobiology* **50**: 283-291.

5.4.3 For Ebernoe Common, radio tracking of barbastelle bats in August 2008 by the Sussex Wildlife Trust showed that some bats travelled up to 10.46km from their roosts within the SAC however the average distanced travelled by barbastelles in this study was 5.1km which is a marked decrease on the same study conducted 10 years previously. Bats were particularly noted using established flight lines such as the River Kird which extends east from the SAC towards Kirdford and Wisborough Green.

5.4.4 Barbastelle bats generally forage in woodland canopy and forest margins, although they may also forage in more open areas. In order to get to suitable foraging areas, they use linear features in the landscape, such as hedgerows, waterways, blocks of scrub, wooded rides, roads and tracks, and can traverse extensive areas of unsuitable habitats. Both commuting features and foraging areas can lie far beyond the designated site boundary. Natural England's Site Conservation Objectives Supplementary Advice Note for this SAC states that the target in relation to flightlines is set as 'restore', because many flightlines are now fragmented (e.g. by breaks in hedgerows, road infrastructure or light pollution).

5.4.5 Natural England advice to South Downs National Park Authority related to the HRA of their Local Plan proposed the following zone-based approach when assessing potential impact pathways for these SACs:

- A '**key conservation area'** – for any development proposed within 6.5km of the SAC, all impacts will be considered; and
- A '**wider conservation area'** – for any development proposed 6.5 - 12km from the SAC, significant impacts or severance of flightlines will be considered. This area encompasses the full extent from the SAC in which bats may forage.

5.4.6 This is reflected in the Sussex Bat Protocol[66]. The WGNP Site allocations all fall within the 'key conservation area' zone for both The Mens SAC and Ebernoe Common SAC, and within the aforementioned CSZ for both species from both sites. Additionally, they all contain instances of what can be considered functionally linked habitat for bats:

- **Policy SSR7: Winterfold Garden** (This site allocates 5 dwellings). This site is located in the north western part of the parish and currently forms open garden space to the residential developments adjacent. Currently the site includes hedgerows with trees bordering a small grassland space which could provide suitable foraging habitat for bats from The Mens SAC or Ebernoe Common SAC. The site connects to more hedgerows leading north east that could be used as navigational of foraging features of barbastelle bats. **It is however advisable that further precautions regarding the development of this site are taken via detailed bat surveys and design for planning applications.**

[66] https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-15-Draft-Sussex-Bat-SAC-Protocol.pdf

- **Policy SSR8: Ansells' Yard** – (This site is allocated for 26 dwellings). This site is 518m from The Mens SAC at its closest. It is located in the north western part of the parish. The site includes both grassland and hedgerows with trees and connects to Boxall Brook, all of which could act as foraging habitat for barbastelle bats and is identified as a green infrastructure feature on the Parish Ecological Networks map. The main concerns for this allocation are the potential for loss of foraging habitat as well as for operational light pollution (during or post-construction) affecting the bat's use of the surrounding hedgerows and Boxall Brook or the River Kird as foraging habitat. Approximately half the site already consists of hardstanding and buildings, providing an existing baseline of human activity. There is a known key flightline associated with The Mens SAC forming the southern boundary of the site. However, the total site area is 1.2ha so, using a typical housing density of 35 dwellings per hectare, only approximately 72% of the site area would be required for housing delivery. There is therefore no reason to consider that the development could not be designed in order to retain, and enhance, the barbastelle corridor to the south, including ensuring that any site lighting is kept sufficiently far from the corridor that lux levels remain low. **It is therefore advisable that further precautions regarding the development of this site are taken via detailed design for planning applications**. **Neighbourhood Plan policy is therefore required to ensure this is done and that the application would only be supported if key linear features of relevance to barbastelle were preserved.**
- **Policy SSR9: Land South of A272** (This site allocates 15 dwellings). This site is located in the north of the parish and currently forms greenfield paddock and fields. Currently the site includes hedgerows with trees and a wildlife pond which could provide suitable foraging habitat for bats from The Mens SAC or Ebernoe Common SAC. The site connects to more hedgerows leading west that could be used as navigational of foraging features of barbastelle bats. **It is however advisable that further precautions regarding the development of this site are taken via detailed bat surveys and design for planning applications.**
- **Policy SSR10: Paddock Farm Field, south of A272** (This site allocates 10 dwellings). This site is located in the north of the parish and currently forms greenfield paddock and fields. Currently the site includes hedgerows with trees which could provide suitable foraging habitat for bats from The Mens SAC or Ebernoe Common SAC. The site connects to more hedgerows leading west that could be used as navigational of foraging features of barbastelle bats. **It is however advisable that further precautions regarding the development of this site are taken via detailed bat surveys and design for planning applications.**
- **Policy SSR11: Tanyards, Petworth Road** (This site allocates up to 12 dwellings). This site is located in the north of the parish and currently forms fields. Currently the site includes hedgerows with trees which could provide suitable foraging habitat for bats from The Mens SAC or Ebernoe Common SAC. The site connects to more hedgerows leading west and south that could be used as navigational of foraging features of barbastelle bats. **It is however advisable that further precautions regarding the development of this site are taken via detailed bat surveys and design for planning applications.**

5.4.7 While Greenways Park, Tanglewood Nursery and Barnfield Shaw are also identified as sites within the Neighbourhood plan, these sites already have extant planning permission, with Greenways park being partially developed with 3 of the 10 caravans in occupation, construction having begun at Tanglewood Nursery in 2026 with the development at Barnfield Shaw already having been completed in 2025. Given this, **the WGNP will not lead to additional adverse effects regarding loss of functionally linked land due to the development of either of these sites.**

Existing Policy Protection

5.4.8 The Chichester Local Plan protects The Mens SAC, Ebernoe Common SAC and other internationally designated bat sites from loss of functionally linked land under **Policy NE6: Chichester's Internationally and European Designated Sites** which states:

> *"Development proposals on greenfield sites and sites that support, or are in close proximity to, suitable commuting and foraging habitats (including mature vegetative linear features such as woodlands, hedgerows, riverine and wetland habitats) within the following ranges (as shown on the policies map) should have due regard to the possibility that barbastelle and Bechstein's bats will be utilising the site. Such proposals will be required to incorporate necessary surveys and ensure that key features (foraging habitat and commuting routes) are retained, in addition to a suitable buffer to safeguard against disturbance:*
>
> *a) Key Conservation Area – 6.5km: all impacts to bats must be considered given that habitats within this zone are considered critical for sustaining the populations of bats within the SACs; and*
>
> *b) Wider Conservation Area – 12km: significant impacts on severance to flight lines to be considered.*
>
> *The scale of the buffer will need to be determined on a case-by-case basis, informed by bat activity survey work and would take account of the species involved and their sensitivity to disturbance/artificial lighting and the natural screening provided by existing surrounding vegetation.*
>
> *Regard should be had to the Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol (2018), or any subsequent equivalent document."*

5.4.9 Linear features and suitable foraging habitat within the Parish are also protected under **Policy ENR1: Green Infrastructure** of the WGNP which states:

> "*Development must avoid strategic and local biodiversity or habitat sites, local sites and stepping stones or corridors (including those identified in the Green Infrastructure/Ecology Network Map available on the Village website) that would or could harm existing ecological assets, Wisborough Green's wildlife network and ecological/habitat connectivity between the national and internationally important sites…*
>
> *Development proposals should:*

1. Protect existing assets

Retain and protect existing trees, ancient woodland, veteran trees, species-rich hedgerows, ponds, streams, ditches, wetlands and other green and blue infrastructure unless exceptional circumstances can be demonstrated.

2. Maintain ecological connectivity

Maintain and strengthen ecological networks by safeguarding continuous habitat corridors linking woodland, hedgerows, watercourses and other semi-natural habitats. Development should avoid fragmentation of these corridors.

3. Protect bat habitat

Where development may affect bat habitat or commuting routes it must:

• retain existing dark corridors;

• minimise artificial lighting;

• avoid severing established flight lines;

• provide appropriate habitat buffers where necessary;

• incorporate measures identified through ecological assessment to maintain favourable conservation status."

5.4.10 There is a long history of development being delivered whilst taking into account roosting, commuting, and foraging locations for bats. The National Planning Policy Framework (NPPF) sets out government policy regarding consideration of biodiversity in planning decisions. Under the NPPF the presence of a protected species (such as the barbastelle bat) is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat, as such all bat species are protected irrespective of whether they are associated with an SAC. This would be through the detailed design of individual developments, the delivery of the developments and relevant planning obligations. This could include provisions including habitat retention, habitat enhancements and designing lighting for the development that will not expose boundary features of retained/ enhanced habitats to artificial illumination greater than 0.5 lux through a combination of careful luminaire and lighting column design and physical separation between the relevant corridors and the built footprint of the development. The SAC and present of functionally-linked habitat on the boundaries of the allocated sites therefore do not provide a fundamental obstacle to site allocations that may be utilised by barbastelle bats as impacts to bats can be 'designed out' at the site development and masterplanning stage.

5.4.11 **Given this it is considered that a policy framework would exist to ensure no adverse effects on the integrity of the Mens SAC or Ebernoe Common SAC as a result of development within the Parish.**

Arun Valley SPA/Ramsar

5.4.12 The Arun Valley SPA / Ramsar is designated for its population of Bewick's swans and an assemblage of overwintering waterfowl, including shoveler, teal and wigeon. Of the species, Bewick's swans are most dependent on functionally linked grassland and arable land for foraging. The importance of functionally linked habitat outside the Arun Valley SPA / Ramsar resulted in Natural England establishing two Impact Risk Zones surrounding the SPA, in which residential developments (or other forms of urbanisation) have a high probability of resulting in the loss of functionally linked habitat. The dependence of Bewick's swans on land beyond the designated site boundary means that residential and employment development within Wisborough Green Parish might have the potential to result in the loss of functionally linked habitat.

5.4.13 Natural England's Conservation Objective Supplementary Advice states "*Supporting habitat includes improved pasture, autumn-sown crops, over-wintered stubbles and oil seed rape outside the SPA. Bewick's swan is an overwintering species on the Arun Valley and regularly occur in nationally and internationally important numbers in the area, and whilst not restricted to using this habitat, they will feed on species-poor wet grassland, probably to maximise their intake of the most productive grasses and their associated invertebrates, to maintain their food reserves during the cold winter months. Principle habitats within and surrounding the site include; Grazing marsh, water fen and reedbeds, mesotrophic – species rich and poor grasslands, surrounding arable land, open water, rivers and ditches.*"

5.4.14 Whilst all of the site allocations proposed in the Wisborough Green NP include instances of grassland (most likely species poor), none come close to exceeding the accepted 2ha area that, if lost could significantly impact populations of wintering Bewick's swan. Additionally, the majority of the site allocations are completely enclosed by hedgerows which block the sight lines to the wider landscape rendering these allocations less suitable. The most suitable allocations to support passing Bewick's swans are those located closest to the River Kird or containing ponds. These are discussed below.

- **WG19-2: Ansell's Yard** – This site, whilst being the largest of those proposed in the Wisborough Green NP is still fairly small (1.6ha), is majority hardstanding and is completely enclosed by hedgerow which blocks sight lines to the wider landscape. Additionally, the grassland present within this land parcel appears to be managed making this unsuitable habitat for Bewick's swan.

5.4.15 The Chichester District Council Local Plan Review HRA[67] states that "research to the location of the area of functionally linked supporting habitat identifies no areas within Chichester District Council authority boundary and outside the South Downs National Park Authority that serve as functionally linked supporting habitat for the SPA. As such, there is no realistic impact pathway linking this site to the Local Plan Review."

[67] https://www.chichester.gov.uk/media/38556/Habitats-Regulations-Assessment-January-2023/pdf/CDC_Local_Plan_HRA_2023_Final.pdf?m=1684402254580 [accessed 14/09/2026]

5.4.16 The South Downs Local Plan states "Development proposals on greenfield sites within 5km of the Arun Valley SPA, as shown on the Policies Map, will undertake an appraisal as to whether the land is suitable for wintering Bewick's Swan. If it is suitable then surveys will be undertaken to determine whether the fields are of importance to the swan population. If so, appropriate alternative habitat would be required before development could proceed."[68]

5.4.17 However, given that the site allocations for Wisborough Green are all located further than 5km from the SPA, this considered unnecessary.

5.4.18 **Given that none of the site allocations proposed in the Wisborough Green NP are suitable to provide functionally linked habitat to Bewick's swan, it can be concluded that there will be no adverse effects on the integrity of these Habitats site as a result of increased residential development in Wisborough Green Parish.**

5.5 Water Quality (discharge of treated sewage effluent)

Arun Valley SPA/Ramsar/SAC

5.5.1 Section 4 of this report established that the Arun Valley SPA / Ramsar / SAC is particularly sensitive to negative impacts on water quality, because all its qualifying species either directly or indirectly depend on good water quality.

5.5.2 New housing within the Parish detailed within the WGNP would result in increased sewage production. The growth area of Wisborough Green is served by Wisborough Green WwTW that discharges into the water body the River Kird which is upstream of the Upper Arun SSSI and the Arun Valley SPA/SAC/Ramsar within the same hydrological catchment.

5.5.3 Whilst the quantity of new housing detailed within the WGNP is modest in itself (86 dwellings), impacts could potentially arise 'in combination' with other existing and future development connected to Wisborough Green WwTW and with other developments contributing to phosphate discharge into the hydrological catchment of the Arun Valley SPA/SAC and Ramsar. Natural England's Site Improvement Plan links the threat to water quality in the SPA / Ramsar / SAC directly to point-source pollution from WwTWs.

5.5.4 Policy NE17 of the Chichester Local Plan states that:

"*Development proposals will be permitted that demonstrate:*

a) the development has no adverse impact on the quality of water bodies and groundwater, nor will it prevent future attainment of favourable conservation status, taking into account agreed mitigation measures where necessary;

b) the development contributes positively to the water environment and its ecology and does not adversely affect surface and ground water quality;

[68] South Downs Local Plan (2019), Available at: https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf [accessed 20/01/2021]

c) no surface water from new development will be discharged to the public foul or combined sewer system;

d) development is phased to align with the delivery and operation of new or improved wastewater infrastructure where this is required;

e) the provision of water infrastructure is not considered detrimental to the water environment, including existing abstractions, river flows, water quality, fisheries, amenity and nature conservation; and

f) that foul water from the development will be discharged to the public foul sewer. Alternatives will only be considered if it is demonstrated that all options for connection to the public foul sewer have been explored and that such connection is not possible."

5.5.5 Given this existing policy provision from the Chichester Local Plan, it is concluded that the WGNP will not result in an adverse effect on the integrity of these Habitats site with regard to water quality.

5.6 Water Quantity Level and Flow

Arun Valley SPA/SAC/Ramsar

Abstraction

5.6.1 The proposed NP could result in increased abstraction of water resources for the potable water supply which could materially reduce the volume of fresh water that enters the floodplain around the Arun Valley SPA / SAC / Ramsar with potential cascading effects on its qualifying species and habitats. In this case, this refers to the ditch system within this European Site which supports the little Ramshorn snail in particular.

5.6.2 The potable water in Wisborough Green Parish is supplied by Southern Water who published a Water Resource Management Plan in December 2024 outlined the resourcing for the water supply areas until 2075. In this WRMP, Wisborough Green is included within the Central area specifically within the Sussex North Water Resource Zone. The breakdown of water resourcing for this area as specified by the WRMP is as follows: 51% rivers, 35% groundwater, 8% reservoirs and 6% transfers[69].

5.6.3 Water companies respond to supply-demand deficits by considering development options required to meet the growing water demand in the WRMP period. These options may involve a combination of demand management (e.g. investments to reduce leakage reduction, install smart meters, etc.) and supply-side (e.g. bulk water transfer, desalination, water reuse schemes and new groundwater / river abstractions). Typically, demand management is regarded as less 'invasive' and preferable regarding the environment, but it is often not sufficient to meet the growing water demand. In contrast, the exploitation of new water resources or increases to existing abstractions are considered primary means through which adverse effects on Habitats sites might occur.

[69] Southern Water (2024) Water Resources Management Plan, Available at: https://www.southernwater.co.uk/media/skxkckqe/7792_wrmp_non_technical_summary_final.pdf [accessed 14/09/2026]

5.6.4 The HRA of the preferred programme and strategic alternative options for the Central WRZ (the WRZ relevant to Wisborough Green) documented that any potential effects on the Arun Valley SPA / Ramsar / SAC arising from any of the options included in the preferred strategy can be successfully avoided with project-level measures[70].

5.6.5 The Chichester Local Plan requires new residential development to achieve certain water efficiency standards. Policy NE17 of the Local Plan states that:

"*All new residential proposals must demonstrate that a maximum water consumption of 110 litres per person per day including external water use will be achieved, and lower water use will be encouraged.*"

5.6.6 Following the introduction of strategic measures, including changes to abstraction licensing, Natural England confirmed in October 2025 that previous water neutrality requirements affecting the Arun Valley catchment have been withdrawn. This reflects an updated position that water resources are now managed through a strategic regulatory framework.

5.6.7 **Given the above, it is considered, with the existing policy framework in place, that the Neighbourhood Plan would have no adverse effect either alone or in-combination with other plans and projects.**

6. Conclusions

6.1.1 This HRA assessed the potential implications of the policies and site allocations included in the Wisborough Green Neighbourhood Plan on the following Habitats sites:

- The Mens SAC
- Ebernoe Common SAC
- Arun Valley SPA/Ramsar
- Arun Valley SAC
- Duncton to Bignor Escarpment SAC

6.1.2 Considering the scale and location of growth and site-specific ecological sensitivities, the impact pathways that required consideration were atmospheric pollution, recreational pressure, loss of functionally linked land, water quantity, level and flow, and water quality. All identified impact pathways were taken forward to Appropriate Assessment.

[70] Southern Water (2024) Annex 18: Habitats regulations Assessment of the water resource management plan 2024, Available at: https://www.southernwater.co.uk/media/b45jc3w1/annex-18-habitat-regulations-assessment-report.pdf [accessed 14/09/2026]

6.2 Atmospheric Pollution

The Mens SAC

6.2.1 The Mens SAC is sensitive to atmospheric nitrogen deposition and directly adjoins the A272. The Department for Transport's road traffic statistics showed an Annual Average Daily Traffic (AADT) flow of 3813 cars, 939 Light Goods Vehicles and 186 Heavy Goods Vehicles at manual count point 6848 (towards the centre of the SAC) in 2025.

6.2.2 APIS shows that road traffic is a minor source of nitrogen at The Mens SAC (6.4%). In contrast, nearly a third (31.8%) of atmospheric nitrogen at the SAC derives from agriculture (fertiliser and livestock combined). Unlike road traffic (which has a very localised impact zone) agriculture and non-agricultural waste will affect nitrogen deposition across the entire SAC.

6.2.3 Whilst some increase in vehicle movements may arise as a result of new housing, these would be dispersed across the local road network and are unlikely to lead to a measurable increase in traffic flows at a level sufficient to affect atmospheric pollution at the SAC. Ultimately some traffic arising from the parish may utilise the A272 with traverses The Mens SAC. An assessment of air quality on The Mens SAC was undertaken for the HRA of the adopted Chichester Local Plan, and this made an allowance for all traffic growth expected over the plan period on the A272 including from other plans and projects. It was concluded that ammonia impacts on the SAC could not be dismissed on mathematical grounds and an Air Quality Mitigation Strategy was jointly produced by Chichester and Horsham Councils in 2024 to address this issue.

6.2.4 Given the relatively small scale of development proposed within the WGNP, the absence of major road links in close proximity to the SAC, and the fact that Horsham and Chichester District Councils are implementing a strategic Air Quality Mitigation Strategy for the A272 past The Mens SAC, **it is considered that the WGNP will not result in adverse effects on the integrity of The Mens SAC regarding atmospheric pollution.**

Duncton to Bignor Escarpment SAC

6.2.5 The critical load for nitrogen deposition for this Habitats Site is 5-15 kg/N/ha/yr. APIS states that exceedance of this range would cause "…*changes in ground vegetation and mycorrhiza, nutrient imbalance and changes in soil fauna*." Currently, nitrogen deposition is between 20.6 and 20.1 kg/N/ha/yr across the SAC, with the minimum still above the maximum range given by APIS as acceptable. APIS also identifies that the existing average ammonia concentrations are 1 µg NH_3/m^3, and thus already at the critical level for the SACs lichen and bryophyte populations.

6.2.6 With regards to NOx the critical level is set at 30 ug/m^3 and the average NOx concentration is at or below 7.1 µg/m^3 for all SAC parcels, which is well below this. Due to improvements in vehicle emissions technology (as reflected in the Defra Emission Factor Toolkit) NO_X concentrations are forecast to continue to fall notwithstanding the expected increase in traffic due to development across West Sussex. As both baseline and all future concentrations are forecast to be below the Critical Level of 30 ug/m^3 it can be concluded that NO_X itself will not have an adverse impact upon the SAC and will only be considered further within the assessment as a source of nitrogen deposition.

6.2.7 The HRA of the Chichester Local Plan concludes that *"traffic growth on the A285 over the Local Plan period will not materially interfere with the conservation objective target for this SAC to reduce air pollution to below critical levels and loads. Traffic is only a minor source of ammonia and nitrogen at this SAC (6%) and only affects an area local to the A285. Nitrogen deposition due to traffic has been improving since at least 2012 and is expected to continue to improve in the future, such that even allowing for traffic growth there will still be a large net reduction in nitrogen deposition by 2040. The contribution of Chichester Local Plan to nitrogen will be small (a maximum of 3% of the critical load) and very localised (imperceptible at distances greater than 60m from the road) and is probably over-estimated due to inability at this stage to account for the large uptake of electric vehicles that can be expected in the second half of the plan period."* [71]

6.2.8 The HRA of the South Downs Local Plan concluded that no adverse effect on the integrity of the SAC would arise from traffic-related nitrogen deposition, either alone or in combination with other projects and plans, including growth expected across Chichester District at the time of the assessment. Moreover, this SAC is located over 12km from the settlement of Wisborough Green (further by road), which is where the nearest allocation is made. A zone of 10km is typically used to screen in European sites vulnerable to reductions in air quality. This is based on the average UK car journey being approximately 10.6km[72]. **It is therefore considered that a conclusion of no adverse effect on integrity can be drawn for this SAC.**

[71] https://www.chichester.gov.uk/media/38556/Habitats-Regulations-Assessment-January-2023/pdf/CDC_Local_Plan_HRA_2023_Final.pdf?m=1684402254580 [accessed 14/09/2026]

[72] GOV.UK (2026). *Average number of trips made and distance travelled*. https://www.gov.uk/government/statistical-data-sets/nts01-average-number-of-trips-made-and-distance-travelled, [accessed 15/09/2026]

6.3 Recreational Pressure

The Mens SAC & Ebernoe Common SAC

6.3.1 Site allocations at Wisborough Green are too far from either SAC to affect light levels. Ebernoe Common SAC and The Mens SAC mainly receive visitors during daylight hours which provides little opportunity for overlap between visitors and bat activity although recently it has been noted that there has been an increase in cyclists using high powered headlamps at night in order to enjoy off-road cycling. However, given the quanta of the allocations proposed and the low levels of overlap between human activity and bat foraging it is possible to conclude no likely significant effects of recreational pressure on Ebernoe Common and The Mens SAC.

6.3.2 The Mens SAC is also designated for its mature beech forests. Veteran and mature trees within the SAC are potentially vulnerable to trampling and soil compaction. However, Natural England's Site Improvement Plan does not specify recreational pressure as a threat or pressure to the SAC's beech forest, indicating that the overall recreational use of the site is limited.

6.3.3 **Given this evidence, it is considered that the WGNP will not result in adverse effect on The Mens SAC or at Ebernoe Common SAC in relation to recreational pressure impacting the qualifying mature beech forest or the qualifying populations of Bechstein's and barbastelles**

Arun Valley SPA/ SAC/ Ramsar

6.3.4 Wisborough Green Parish is located 3.6km from the Arun Valley Habitats Sites. This is within typical core recreational catchments for inland Habitats sites, which are usually around 5-7km.

6.3.5 While disturbance is a potential impact pathway for the SPA / Ramsar, it is not listed as a threat or pressure in Natural England's Site Improvement Plan. This is most likely because the two most sensitive parts of the SPA / Ramsar (Amberley Wild Brooks SSSI and Pulborough Brooks SSSI) are under appropriate management regimes from the RSPB.

6.3.6 Regarding the Waltham Brooks SSSI there is some concern regarding recreational pressure, which is documented in consultation comments from the Coldwaltham Meadows Conservation Trust and the Sussex Wildlife Trust on the South Downs Local Plan. The primary risk here would be an increase in visitor pressure (particularly involving dog walkers) disturbing grazing livestock which are used to manage the Waltham Brooks SSSI, the condition of which is 'Recovering'. However, the closest allocation in the WGNP is over 9km away from this part of the SPA and therefore outside the expected recreational catchment.

6.3.7 Given that recreational pressure is not identified as a specific issue in the Site Improvement Plan such a small number of dwellings will not result in a material change in recreational activity at the site even in combination with the small amounts of housing planned around the site in the Horsham Local Plan and South Downs Local Plan. Additionally, whilst the edge of the parish is located approximately 3.6km from the Habitats Site, the allocations proposed in the emerging neighbourhood plan are located approximately 7.4km from the Habitats Sites which is beyond a realistic recreational distance for these sites.

6.3.8 **Overall, it is concluded that there will not be adverse effects on the integrity of these SAC/SPA/Ramsar sites as a result of the WGNP regarding recreational pressure.**

6.4 Loss of Functionally Linked Land

The Mens SAC & Ebernoe Common SAC

6.4.1 The Mens SAC and Ebernoe Common SAC are designated for their populations of rare bats.

6.4.2 Radio-tracking studies have been undertaken to identify core foraging areas for these particular SACs. These reports have identified that the barbastelles of The Mens SAC forage to the east of the SAC, principally on the floodplain of the River Arun from close to Horsham in the north to Parham in the south. They also cross to the Adur floodplain. In some cases, the bats travelled up to 12.2km to visit foraging areas. The currently available radio-tracking evidence indicates that 75% of the bat population forage within 9km of the SAC although it is conceivable for barbastelle bats of the SAC to use a wider area for activities such as migrating between hibernation roosts and summer roosts.

6.4.3 For Ebernoe Common, radio tracking of barbastelle bats in August 2008 by the Sussex Wildlife Trust showed that some bats travelled up to 10.46km from their roosts within the SAC however the average distanced travelled by barbastelles in this study was 5.1km which is a marked decrease on the same study conducted 10 years previously. Bats were particularly noted using established flight lines such as the River Kird which extends east from the SAC towards Kirdford and Wisborough Green.

6.4.4 Natural England advice to South Downs National Park Authority related to the HRA of their Local Plan proposed the following zone-based approach when assessing potential impact pathways for these SACs:

- A '**key conservation area'** – for any development proposed within 6.5km of the SAC, all impacts will be considered; and
- A '**wider conservation area'** – for any development proposed 6.5 - 12km from the SAC, significant impacts or severance of flightlines will be considered. This area encompasses the full extent from the SAC in which bats may forage.

6.4.5 This is reflected in the Sussex Bat Protocol[73]. The WGNP Site allocations all fall within the 'key conservation area' zone for both The Mens SAC and Ebernoe Common SAC. Additionally, they all contain instances of what can be considered functionally linked habitat for bats. It is advised that further precautions regarding the development of this site are taken via detailed bat surveys and design for planning applications

6.4.6 The Chichester Local Plan protects The Mens SAC, Ebernoe Common SAC and other internationally designated bat sites from loss of functionally linked land under **Policy NE6: Chichester's Internationally and European Designated Sites.** Additionally, Linear features and suitable foraging habitat within the Parish are also protected under **Policy ENR1: Green Infrastructure** of the WGNP

6.4.7 **Given this it is considered that an adequate policy framework exists to ensure no adverse effects on the integrity of the Mens SAC or Ebernoe Common SAC as a result of development within the Parish.**

Arun Valley SPA/Ramsar

6.4.8 The Arun Valley SPA / Ramsar is designated for its population of Bewick's swans and an assemblage of overwintering waterfowl. Of the species, Bewick's swans are most dependent on functionally linked grassland and arable land for foraging.

6.4.9 Whilst all of the site allocations proposed in the Wisborough Green NP include instances of grassland (most likely species poor), none come close to exceeding the accepted 2ha area that, if lost could significantly impact populations of wintering Bewick's swan. Additionally, the majority of the site allocations are completely enclosed by hedgerows which block the sight lines to the wider landscape rendering these allocations less suitable.

6.4.10 The Chichester District Council Local Plan Review HRA[74] states that "research to the location of the area of functionally linked supporting habitat identifies no areas within Chichester District Council authority boundary and outside the South Downs National Park Authority that serve as functionally linked supporting habitat for the SPA. As such, there is no realistic impact pathway linking this site to the Local Plan Review."

6.4.11 The South Downs Local Plan states "Development proposals on greenfield sites within 5km of the Arun Valley SPA, as shown on the Policies Map, will undertake an appraisal as to whether the land is suitable for wintering Bewick's Swan. If it is suitable then surveys will be undertaken to determine whether the fields are of importance to the swan population. If so, appropriate alternative habitat would be required before development could proceed."[75]

[73] https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-15-Draft-Sussex-Bat-SAC-Protocol.pdf
[74] https://www.chichester.gov.uk/media/38556/Habitats-Regulations-Assessment-January-2023/pdf/CDC_Local_Plan_HRA_2023_Final.pdf?m=1684402254580 [accessed 14/09/2026]
[75] South Downs Local Plan (2019), Available at: https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf [accessed 20/01/2021]

6.4.12 However, given that the site allocations for Wisborough Green are all located further than 5km from the SPA, this considered unnecessary.

6.4.13 **Given that none of the site allocations proposed in the Wisborough Green NP are suitable to provide functionally linked habitat to Bewick's swan, it can be concluded that there will be no adverse effects on the integrity of these Habitats site as a result of increased residential development in Wisborough Green Parish.**

6.5 Water Quality (discharge of treated sewage effluent)

Arun Valley SPA/Ramsar/SAC

6.5.1 New housing within the Parish detailed within the WGNP would result in increased sewage production. The growth area of Wisborough Green is served by Wisborough Green WwTW that discharges into the water body the River Kird which is upstream of the Upper Arun SSSI and the Arun Valley SPA/SAC/Ramsar within the same hydrological catchment.

6.5.2 Whilst the quantity of new housing detailed within the WGNP is modest in itself (86 dwellings), impacts could potentially arise 'in combination' with other existing and future development connected to Wisborough Green WwTW.

6.5.3 The Chichester Local Plan requires new residential development to achieve certain water efficiency standards. Policy NE17 of the Local Plan states that:

"*All new residential proposals must demonstrate that a maximum water consumption of 110 litres per person per day including external water use will be achieved, and lower water use will be encouraged.*"

6.5.4 Following the introduction of strategic measures, including changes to abstraction licensing, Natural England confirmed in October 2025 that previous water neutrality requirements affecting the Arun Valley catchment have been withdrawn. This reflects an updated position that water resources are now managed through a strategic regulatory framework.

6.5.5 **Given the above, it is considered, with the existing policy framework in place, that the Neighbourhood Plan would have no adverse effect either alone or in-combination with other plans and projects.**

6.6 Water Quantity Level and Flow

Arun Valley SPA/SAC/Ramsar

Abstraction

6.6.1 The potable water in Wisborough Green Parish is supplied by Southern Water who published a Water Resource Management Plan in December 2024 outlined the resourcing for the water supply areas until 2075. In this WRMP, Wisborough Green is included within the Central area specifically within the Sussex North Water Resource Zone. The breakdown of water resourcing for this area as specified by the WRMP is as follows: 51% rivers, 35% groundwater, 8% reservoirs and 6% transfers[76].

6.6.2 The HRA of the preferred programme and strategic alternative options for the Central WRZ documented that any potential effects on the Arun Valley SPA / Ramsar / SAC arising from any of the options included in the preferred strategy can be successfully avoided with project-level measures[77].

6.6.3 The Chichester Local Plan requires new residential development to achieve certain water efficiency standards. Policy NE18 of the Local plan requires

"*All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. This is to be achieved by ensuring that… New residential development is designed to utilise no more than 85 litres of mains supplied water per person per day;… any remaining mains-supplied water use from the development is offset such that there is no net increase in mains-supplied water use within the WRZ compared with pre-development levels.*

6.6.4 **It is considered, with the existing policy framework in place, that the Neighbourhood Plan would have no adverse effect either alone or in-combination with other plans and projects.**

[76] Southern Water (2024) Water Resources Management Plan, Available at: https://www.southernwater.co.uk/media/skxkckqe/7792_wrmp_non_technical_summary_final.pdf [accessed 14/09/2026]

[77] Southern Water (2024) Annex 18: Habitats regulations Assessment of the water resource management plan 2024, Available at: https://www.southernwater.co.uk/media/b45jc3w1/annex-18-habitat-regulations-assessment-report.pdf [accessed 14/09/2026]

Appendix A Likely Significant Effects (LSEs) Screening

Table 2: Likely Significant Effects (LSEs) screening assessment of policies contained in the WGNP.

Where the 'LSEs Screening Outcome' column is shaded orange, LSEs of the policy cannot be excluded, and it is taken forward to Appropriate Assessment (AA). Where that final column is shaded green, a realistic pathway of impact is not present, and the policy is screened out from AA.

Policy Number & Name	Policy Content	LSEs Screening Outcome
Policy OAR1: Development Allocation	The Wisborough Green Neighbourhood Plan 2021-2039 will provide for a minimum of 86 dwellings. These 86 dwellings are the Chichester Local Plan allocation of 75 dwellings and the unbuilt balance of 11 dwellings from Policy SS3 in the extant Neighbourhood Plan. The dwellings will be provided on 7 allocated sites as defined in site specific policies SSR5, SSR6, SSR7, SSR8, SSR9, SSR10 and SSR11 consistent with the spatial strategy for the village. Greenways Nursery (SS2) has yet to be fully developed; as at 2026, 3 dwellings out of the 10 have been provided. Accordingly, the allocation on this site will be carried forward to the reviewed NP.	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings for the Plan Area which detailed further in subsequent policies. However, this policy, generally speaking, may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality • Water quality • Water quantity level & flow Therefore, this policy is screened in for further assessment
Policy OAR2: Spatial Strategy	The Parish welcomes appropriate sustainable development, which will be supported providing it complies with the following criteria: a. New development will be located within the settlement boundary (unless on an allocated site), or Rural Exception Site as defined in the Chichester Local Plan 2021-2039. b. It retains the compact nature of the village so that people can access the central facilities, including the shop, school and village services, within, or in close proximity to the existing footway network. c. Local Green Gaps (shown in Figure 11, page 40) are retained as these must be kept open to protect the village form; they mark the gateways to the village and ensure that the	**No Likely Significant Effects. Screened out.** This is a development management policy relating to sustainable development that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.

	settlement does not encourage coalescence along radial routes and impact on the wider countryside. d. It does not impact unacceptably on the Conservation Area, Listed buildings, open space areas, prominent views, biodiversity, significant trees or neighbouring amenity and that in this way will conserve the strong village character. e. The design of any proposal will reflect the village character identified in the Village Design Statement and protect identified character of the individual site's context. f. Regard is demonstrably had to the wider landscape impact of proposals upon the South Downs National Park.	
Policy OAR3: Settlement Boundary	Within the Settlement Boundary (as defined by Figure 11, page 40), development that complies with the policies in this NP, the Policy S2 in the Chichester Local Plan and the NPPF will be supported. Development outside the Settlement Boundary will only be permitted on the proposed sites allocated in this NP or in accordance with the Chichester Local Plan.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy OAR4: Small-Scale Housing Sites - Windfall (4 or less dwellings)	The Wisborough Green NP will support proposals for small-scale housing development within the Settlement Boundary, provided that: a. The total of dwellings and site coverage do not cause overdevelopment of the plot in comparison with the characteristics of neighbouring plots. b. The scheme will not adversely affect the significance of any heritage assets unless in accordance with NP Policy ENR3, Chichester Local Plan P10 or the NPPF. c. The scheme will not result in the loss of valuable trees, hedges or other natural features that form part of the character of the Parish and the biodiversity is maintained or enhanced. d. The development is well integrated within the existing village and maintains the residential amenity of neighbours.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy OAR5: Local Green Gaps	Development proposed within the Local Green Gaps identified in Figure 11 (page 40) will only be supported in exceptional circumstances and must comply with the following criteria to be acceptable: a. The proposal retains the openness of the Local Green Gaps, visually and physically delineating the break between the central core and outlying areas. b. The proposal does not cause harmful change to the Local Green Gap. c. The proposal should be accompanied by a landscape and visual impact assessment to demonstrate no diminution in openness and views in the Local Green Gap.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.

	d. Proposals should be accompanied by a mitigation plan showing how the Local Green Gap can be enhanced by planting and other amelioration. e. Important trees and hedgerows within the Local Green Gaps should be retained as part of any development proposal. f. Positive community uses of the open areas in the Local Green Gaps will be supported, such as community sports use, accessible wildlife trails, where these can enhance visual impact and biodiversity and enhance the range of facilities available.	
Policy OAR6: Development in the Neighbourhood Plan Area within the South Downs National Park (SDNP)	Any development in the Neighbourhood Plan Area, that lies within the SDNP, must be consistent with the National Park Purposes, pay due regard to the Duty and be compliant with the SDNP Local Plan 2014-2033. Any development should conserve and enhance the Special Qualities of the SDNP, which includes but is not limited to, the tranquillity and dark skies.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy OAR7: Land Adjoining the South Downs National Park (SDNP)	Development (including rural exception sites) within the land adjoining the SDNP that contributes to the setting of the Park will only be permitted where it conserves and does not detract from the visual qualities and essential characteristics of the National Park, and in particular should not adversely affect the views into and of the Park by virtue of its location or design, in compliant with the SDNP Local Plan. Assessment of such development proposals should have regard to the SDNP Local Plan (2014-2033) and in line with NPPF Policy N6 page 91.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy OAR8: Flood Risk	Refer to Chichester Local Plan Policy NE16 Flood Risk and Water Management, pages 87-90. All new development within the NP Area must not increase flood risk to surrounding areas.	**No Likely Significant Effects. Screened out.** This policy specifically relates to the flood risk in the Parish and how this impacts where new development will be permitted. It does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy ENR1: Green Infrastructure	Development proposals will be supported where they demonstrate that they conserve, restore and enhance the parish's blue-green infrastructure network. Development must avoid strategic and local biodiversity or habitats sites, local sites and stepping stones or corridors (including those identified in the Green Infrastructure/Ecology Network Map available on the village website) that would or could harm existing ecological assets, Wisborough Green's wildlife network and ecological/habitat connectivity between the national and internationally important sites. Where it is robustly demonstrated that avoidance is not possible,	**No Likely Significant Effects. Screened out.** This is a development management policy relating to the protection of natural features that support protected species and that sets out key development criteria and does not specifically allocate sites for development.

	harm should be minimised and adequately mitigated, providing biodiversity net gain in line with Local Plan Policy NE5 Biodiversity and Biodiversity Net Gain. Development proposals should: 1. Protect existing assets Retain and protect existing trees, ancient woodland, veteran trees, species-rich hedgerows, ponds, streams, ditches, wetlands and other green and blue infrastructure unless exceptional circumstances can be demonstrated. 2. Maintain ecological connectivity Maintain and strengthen ecological networks by safeguarding continuous habitat corridors linking woodland, hedgerows, watercourses and other semi-natural habitats. Development should avoid fragmentation of these corridors. 3. Protect bat habitat Where development may affect bat habitat or commuting routes it must: ▪ retain existing dark corridors; ▪ minimise artificial lighting; ▪ avoid severing established flight lines; ▪ provide appropriate habitat buffers where necessary; ▪ incorporate measures identified through ecological assessment to maintain favourable conservation status. 4. Deliver measurable enhancement 5. Development should provide a measurable enhancement of green infrastructure through measures such as: ▪ native tree and hedgerow planting; ▪ restoration of hedgerows; ▪ new ponds and wetlands; ▪ species-rich grassland; ▪ natural SuDS; ▪ habitat creation for priority species; ▪ enhancement of watercourses. 6. Integrate sustainable drainage Surface water management should use multifunctional SuDS designed to deliver biodiversity, landscape, water quality and amenity benefits as well as flood attenuation. 7. Landscape-led design	Therefore, no impact pathways exist to Habitats Sites.

	Green infrastructure shall form part of the site's primary design framework and should be planned from the outset rather than incorporated as residual space. 8. Long-term management Where new blue-green infrastructure is provided, proposals should include arrangements for its long-term management and maintenance to ensure continuing ecological value.	
Policy ENR2: Landscape Character and Open Views	Any development should maintain the local character of the landscape and should not cause unacceptable loss or diminution of significant views that currently provide open field aspects or views from the village centre or other open spaces. Where development has a harmful impact on landscape character or open views, the development will not be permitted unless the proposal can demonstrate that mitigation can be achieved on land within the applicant's control and will reduce any harm to an acceptable level.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy ENR3: Conserving and Enhancing the Heritage Historic Environment	New development must respect and maintain the distinctive character of the area, landscape and heritage assets. Planning permission will be supported where it can be demonstrated that the following criteria have been met: 1. In accordance with legislation and national policy, the proposal conserves and enhances the special interest and settings of designated and non-designated heritage assets including: i. Listed buildings (as listed in the Village Design Statement and Historic England website). ii. Buildings of local importance including locally listed and positive buildings, as identified in the Village Design Statement; iii. Historic buildings or structures/features, including bridges, of local distinctiveness and character; iv. Buildings within a Conservation Area; v. Historic Parks or Gardens, both registered or of local importance and historic landscapes; vi. Monuments and sites and areas of archaeological potential or importance and their setting; and vii. Historic structures and features, including bridges of local distinctiveness and character. 2. Development is of a high architectural and built quality and sensitively contributes to the village environment. 3. Development retains, conserves and is in keeping with the character of existing designed or natural landscapes and the individual identity of the settlement is maintained.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.

	4. The integrity of the predominantly open and undeveloped character of the area, including the openness of the views in and around the village and towards the South Downs National Park is not undermined, diminished or reduced.	
Policy ENR4: Non-Designated Heritage Assets	Development proposals that may affect the significance of a Local Heritage Asset, as described in Appendix X, must take that significance into account in demonstrating that the scale of any proposed harm to or loss of the heritage asset is justified.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy ENR5: Local Green Space	The Plan has designated the areas as detailed above and shown in Figure 11, page 55 as Local Green Space. Proposals for inappropriate development of any land designated as Local Green Space will not be permitted except in very special circumstances. The provision of services by statutory undertakers where no other alternative is available and satisfactory mitigation can be achieved may be supported.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy ENR6: Local Open Space	The Plan has designated the areas as detailed above and shown in Figure 11, page 55, as Local Open Space. Proposals for development on sites of open space value will be expected to enhance the existing use and community value. Development that does not do this will not be permitted unless an equivalent area of open space is provided of the same size, suitability and accessibility as the existing open space.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy CDR1: Retention of Assets of Community Value	Development proposals that will enhance the viability and community value of registered Assets of Community Value will be supported. Development proposals that would result in either the loss of the asset or in significant harm to the community value and use of an asset will not be permitted unless it can be clearly demonstrated that the operation of the asset, or the ongoing delivery of the community value of the asset, is no longer economically viable, typically because the site has been marketed at a reasonable price for at least a year for that and any other suitable employment or service trade uses and no interest in acquisition has been expressed. Reference should be made to Local Plan Appendix C for marketing guidance and additional information required to support planning applications.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy DSR1: Vernacular for New Developments	This policy will apply to all new developments of one or more houses, and replacement dwellings.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not

	All new housing should continue to reflect the character and historic context of existing developments within the Parish. However, contemporary and innovative materials and design will be supported where positive improvement can be robustly demonstrated without detracting from this historic context. a. The provisions on the built environment contained in the Village Design Statement and in the CDC Local Plan policies will be required. b. Materials in any new development should compliment the established vernacular in the use of natural, local resources and colours. c. Height should be restricted to two storey with careful design of roof elevations particularly on rising ground. In general, clay, slate or stone should be used. d. Developments should be enhanced by landscaping with existing trees and hedges preserved whenever possible. e. Any new development in the Conservation Area, adjacent to a Listed building or buildings of historic interest and/or open space as defined in Policies ENR5 & ENR6 should be sensitively designed to conserve and enhance the setting, form and character of the building and/or space. f. Any development resulting in the loss of ancient woodlands, including the loss of aged/veteran trees outside the ancient woodland, will not be supported. g. The following items must also be considered early in the design process and sympathetically integrated into the overall scheme. ▪ Screened bin stores and recycling facilities ▪ Cycle stores ▪ Meter boxes ▪ Flues and ventilation ducts ▪ Gutters and pipes ▪ Satellite dishes and telephone lines ▪ Lighting h. Electric gates at the entrance of a development will not be supported.	specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy DSR2: Parking Provision and Standards	To ensure that adequate parking capacity is provided, development proposals should, unless demonstrably justified, comply with the following requirements: 1. Designated Off-Street Parking: New residential development within WG will provide an adequate level of off-street parking for residents. The following minimum standards will apply: 1 bed dwellings - 1.5 off-street parking spaces	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.

	2 bed dwellings - 2 off-street parking spaces 3 bed dwellings - 2.5 off-street parking spaces 4+ bed dwellings - 3 off-street parking spaces 2. Garages as Off-Street Parking: Garages are counted as off-street parking space and the following internal dimensions should apply: Single garage - 3m width by 6m depth; providing 0.5 parking space according to WSCC guidelines. Double garage - 5.7m width by 6m depth; providing 1 parking space according to WSCC guidelines. 3. Visitor Parking: New residential development will provide adequate designated additional, and signed, parking spaces for visitors at a minimum of 1 space per 2 dwellings, either in lay-bys adjacent to streets and publicly available, or on street. 4. Public Parking: Minimum parking for all non-residential uses should be provided in accordance with the WSCC parking standards unless it is demonstrated through a site-specific assessment that an alternative level of provision is required/sufficient to ensure there is no detrimental impact on the local highway network. ▪ Projected staff numbers and trip rates. ▪ Projected visitor numbers where possible. ▪ The user group of staff/visitors (including shift patterns) ▪ Public transport accessibility. 5. Electric Vehicles In order to respond to changing needs, EV charging facilities should be installed and operational to provide for anticipated future demand for electric vehicles, in accordance with WSCC Parking Standards Policy.	
Policy EDR1: Development of New and Existing Business	The development of new and expanding business will be supported provided if it: a. Would not have a detrimental effect on the surrounding landscape character in accordance with NP Policy ENR2. b. Would not have an unacceptable impact on nearby residential and other uses. c. Would not lead to an unacceptable impact on the local highway network or traffic in Wisborough Green village; refer to NP Policy DSR2. d. Would conserve and enhance the special interest and setting of designated and non-designated heritage assets. e. Would conserve and enhance local distinctiveness with the recorded Character Areas (as identified in the Village Design Statement), preventing gradual erosion by continuous	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.

	physical expansion of commercial and business development into the assessed character of an area. Existing commercial capacity will be retained wherever possible and the change of use of brownfield sites where businesses are viable will not be supported, in line with Local Plan Policy E2 Employment Development with guidance provided in Appendix C. In these circumstances, mixed domestic and commercial home/work units may be considered.	
Policy EDR2: Encourage and Support Home Working	The provision of live/work units, or retail/commercial units within new developments or through conversion, will be supported where economically sustainable in accordance with Neighbourhood Plan policies and where they will be retained in perpetuity through a S106 agreement. Support will be given where such units do not impinge on the peaceful enjoyment of the surrounding residential environment. Such development must give broad support to the development and growth of the local economy, this being achieved by flexible and progressive planning in order to encourage business innovation.	**No Likely Significant Effects. Screened out**. This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy EDR3: Site Specific Policy - Commercial Areas	Support will be given to suitable commercial redevelopment of the Newpound commercial area, and at the Wharf Farm commercial site, subject to the redevelopment: a. Being contained within the current site area (previously developed land) and not spilling into the surrounding countryside. b. Existing building height not being exceeded. c. Conforming with the requirements of NP Policy EDR1 (where relevant). d. Providing off-street parking provision for staff and visitors in accordance with NP Policy DSR2. e. Offering opportunities for business and employment.	**Likely Significant Effects. Screened in.** This policy specifically relates to development within a certain area of the Parish designed to fulfil a particular role relating to business and employment. Although this policy does not quantify the development, it is necessary to consider the impact pathways that could arise.
Policy INR1: Pedestrian Access and Footway Provision	Kirdford Road only A new footway will be provided along Kirdford Road with planning applications for individual sites allocated within this NP (Policies SSR5, SSR6, SSR8) demonstrating that the relevant section of footway, as identified on Figure 13 is being provided and/or funded and secured through an appropriate legal agreement. The new footpath on Public Highway land shall be built to WSCC Standard Detail Public Footpath (Rural) Type 5 with consideration to minimising the impact on Root Protection Zones. Any other sections of the footway not on Public Highway land shall be surfaced in keeping with the rural setting and suitable for Root Protection Zones.	**Likely Significant Effects. Screened in.** This policy specifically relates to development within a certain area of the Parish, namely the construction of a footway along Kirdford road. This policy may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land Therefore, this policy is screened in for further assessment

Policy INR2: Street Lighting and Dark Night Skies	The importance of dark night skies will be respected throughout the Parish as a priority for the importance of residents, visitors and wildlife. For commercial and residential developments, including extensions and improvements to existing buildings, external lighting should in the first instance be avoided. Where demonstrated as being necessary for safety purposes, an external lighting scheme should be submitted demonstrating that the scheme does not detract from the unlit environment of the Parish and is designed to minimise light pollution, its impact on the environment and wildlife. For new development sites, the scheme shall include detailed lux plans for the entire site and demonstrate that: a. The Institute of Lighting Professionals (ILP) obtrusive light limitation guidance for E1 Environmental Zone is not exceeded. b. Visual impact is minimised with consideration to ground surface reflectivity, number of lights, illumination and intensity and overall footprint. c. The measured and observed sky quality in the surrounding area is not reduced and visibility of light from surrounding areas is minimised. d. Biodiversity impact is minimised and that key habitats, particularly woodlands, are safeguarded and not considered as a natural shield to lighting. e. Where necessary, mitigation measures are incorporated into the scheme to include proximity sensors, timers, angling and shielding of lights etc. f. Street lighting and high lighting columns will not be permitted. Lighting on new developments is only permitted for safety purposes and shall be low-level lighting where possible. g. Building design limits unnecessary light spill features such as skylights and lantern lights. Where such features have been included, automatic dusk to dawn blinds to be installed.	**No Likely Significant Effects. Screened out.** This is a development management policy that sets out key development criteria and does not specifically allocate sites for development. Therefore, no impact pathways exist to Habitats Sites.
Policy SS2: Greenways Nursery (now called Grenways Park), Kirdford Road	Land known as Greenways Nursery is allocated for the use of land for the stationing of caravans for residential purposes for 10 no. plots together with the formation of additional hard standing in accordance with the terms of the application Ref: WR/13/00744, dated 7 March 2013, subject to the conditions set out in the Appeal Decision dated 30 December 2014. a. Access, turning area and vehicle parking to be provided. b. Visibility splays of 2.4m x 120m on each side of the access must be provided. c. A scheme of landscaping is required with schedule of plants. The scheme shall make particular provision for the conservation and enhancement of biodiversity on the site. d. The existing hedge and tree screen along the site's north-west and south-east boundaries shall be retained.	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings to be provided at a specific location. However, this policy, generally speaking may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality

	e. Refuse bin storage and cycle storage within the site to be provided.	• Water quality • Water quantity level & flow Therefore, this policy is screened in for further assessment
Policy SSR5: Stable Field (now called Barnfield Shaw)	Land known as Stable Field is allocated for 8 residential dwellings on Area A and open space for community and sport use on Area B for the period 2021- 2039. The Planning Application, WR/22/00618/FUL (Erection of 8 no. dwellings with associated vehicular and pedestrian access, infrastructure, car parking, landscaping and open space) was permitted on 17 April 2024 with a Section 106 Agreement. The site has been built with first occupation in the Summer 2025.	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings to be provided at a specific location. However, this policy, generally speaking may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality • Water quality • Water quantity level & flow Therefore, this policy is screened in for further assessment
Policy SSR6: Tanglewood, Kirdford Road	Land known as Tanglewood Nursery is allocated for 10 residential dwellings for the period 2021-2039. The Planning Application, WR/24/02069/FUL (Development of 10 no. dwellings including landscaping, parking and access), was permitted on 17 December 2025 with a Section 106 Agreement. Construction started in 2026.	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings to be provided at a specific location. However, this policy, generally speaking may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality • Water quality • Water quantity level & flow Therefore, this policy is screened in for further assessment

Policy SSR7: Winterfold Garden, Durbans Road 81-82	Land known as Winterfold Garden is allocated for 5 dwellings. The development must meet the requirements of the policies set out in the Chichester Local Plan, this NP and the Wisborough Green Village Design Statement. In addition: a. Due to the close proximity to the Conservation Area, the site will be developed with high quality and sensitively designed properties, no more than two storeys, with pitched roofs. The surrounding area is predominantly two storey buildings, as evidenced in the Village Design Statement, which is considered an appropriate height for development of this site and consistent with the site allocations of the extant Neighbourhood Plan. b. Vehicular access to the site is to be provided from a single point on Durbans Road with visibility splays secured appropriate to the speed of traffic and accounting for roadside parking relating to the nearby public house. c. Vehicular parking should be provided on-site in accordance with the requirements set in NP Policy DSR2. d. There should be no restrictive covenant that restricts the use of on and off street parking spaces for personal vehicles belonging to tradespersons (up to transit van size). e. To include a restrictive covernant to prevent the parking of caravans and motorhomes on and off street. f. No gated development in line with NP Policy DSR1. g. To ensure the provision of adequate car parking on the site is maintained in accordance with NP Policy DSR2, the following permitted development rights to be removed:	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings to be provided at a specific location. However, this policy, generally speaking may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality • Water quality • Water quantity level & flow Therefore, this policy is screened in for further assessment
Policy SSR8: Ansells Yard, Kirdford Road	Land known as Ansells Yard is allocated for 26 dwellings, including affordable housing. The development must meet the requirements of the policies set out in the Chichester Local Plan, this NP and the Wisborough Green Village Design Statement. In addition: a. Vehicular parking should be provided on-site in accordance with the requirements set in NP Policy DSR2. b. There should be no restrictive covenant that restricts the use of on and off street parking spaces for personal vehicles belonging to tradespersons. c. To include a restrictive covernant to prevent the parking of caravans and motorhomes on and off street. d. No gated development in line with NP Policy DSR1. e. To ensure the provision of adequate car parking on the site is maintained in accordance with NP Policy DSR2, the following permitted development rights to be removed:	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings to be provided at a specific location. However, this policy, generally speaking may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality • Water quality • Water quantity level & flow

	▪ Garage conversions. ▪ Any conversion that changes parking requirement. f. To provide a footway from the site to the village centre, linking to existing or planned footways, in line with NP Policy INR1.	Therefore, this policy is screened in for further assessment
Policy SSR9: Land South of A272 85-86	Land known as Land South of A272 is allocated for up to 15 dwellings, including affordable housing. Development to be restricted to within the unshaded area as shown in Figure 21 due to flooding risk and to fit with the village form. The development must meet the requirements of the policies set out in the Chichester Local Plan, this NP and the Wisborough Green Village Design Statement. In addition: a. Vehicular parking should be provided on-site in accordance with the requirements set in NP Policy DSR2. b. There should be no restrictive covenant that restricts the use of on and off street parking spaces for personal vehicles belonging to tradespersons. c. To include a restrictive covernant to prevent the parking of caravans and motorhomes on and off street. d. No gated development in line with NP Policy DSR1. e. To ensure the provision of adequate car parking on the site is maintained in accordance with NP Policy DSR2, the following permitted development rights to be removed: ▪ Garage conversions. ▪ Any conversion that changes parking requirement.	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings to be provided at a specific location. However, this policy, generally speaking may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality • Water quality • Water quantity level & flow Therefore, this policy is screened in for further assessment
Policy SSR10: Paddock Farm Field, south of A272 87-88	Land known as Paddock Farm Field is allocated for 10 dwellings, including affordable housing. The development must meet the requirements of the policies set out in the Chichester District Local Plan, this NP and the Wisborough Green Village Design Statement. In addition: a. Vehicular parking should be provided on-site in accordance with the requirements set in NP Policy DSR2. b. There should be no restrictive covenant that restricts the use of on and off street parking spaces for personal vehicles belonging to tradespersons. c. To include a restrictive covernant to prevent the parking of caravans and motorhomes on and off street. d. No gated development in line with NP Policy DSR1.	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings to be provided at a specific location. However, this policy, generally speaking may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality • Water quality • Water quantity level & flow

	e. To ensure the provision of adequate car parking on the site is maintained in accordance with NP Policy DSR2, the following permitted development rights to be removed: ▪ Garage conversions. ▪ Any conversion that changes parking requirement.	Therefore, this policy is screened in for further assessment
Policy SSR11: Tanyards, Petworth Road	Land known as Tanyards is allocated for up to 12 dwellings, including affordable housing. Development to be restricted to within the unshaded area as shown in Figure 24 due to flooding risk, impact upon the Local Green Gap and to fit with the village form. The development must meet the requirements of the policies set out in the Chichester Local Plan, this NP and the Wisborough Green Village Design Statement. In addition: a. Vehicular parking should be provided on-site in accordance with the requirements set in NP Policy DSR2. b. There should be no restrictive covenant that restricts the use of on and off street parking spaces for personal vehicles belonging to tradespersons. c. To include a restrictive covernant to prevent the parking of caravans and motorhomes on and off street. d. No gated development in line with NP Policy DSR1. e. To ensure the provision of adequate car parking on the site is maintained in accordance with NP Policy DSR2, the following permitted development rights to be removed: ▪ Garage conversions. ▪ Any conversion that changes parking requirement.	**Likely Significant Effects. Screened In.** This policy allocates specific quanta of dwellings to be provided at a specific location. However, this policy, generally speaking may have likely significant effects on surrounding Habitats Sites via the following impact pathways: • Loss of functionally linked land • Recreational pressure • Air quality • Water quality • Water quantity level & flow Therefore, this policy is screened in for further assessment