



Habitats Regulations Assessment Screening Statement

Petworth Neighbourhood Development Plan

September 2017

Updated February 2018 - For ease, new text is shown in *italics*, deleted text is ~~struck~~ through.

1. Introduction

- I.1 The purpose of this screening statement is to provide a screening opinion as to whether there might be any potential likely significant effects on internationally important wildlife sites (also known as European sites) that may be affected by the Petworth Neighbourhood Development Plan (NDP), and therefore whether further Habitats Regulations Assessment work is required.

Habitats Regulations Assessment Screening

- I.2 Habitats Regulations Assessment (HRA) refers to the requirement for any plan or project to assess the potential implications for European sites. The need for HRA is set out within the EC Habitats Directive 92/43/EC which is transposed into British Law. Article 6(3) of the EU Habitats Directive provides that:

“Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

- I.3 The first stage of the HRA process involves an assessment or screening of whether the plan is likely to have a significant effect on one or more European sites either alone or in combination. This can include consideration of avoidance measures. The objective is to ‘screen out’ those plans and projects (or site allocations/policies) that can, without detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites.
- I.4 If screening determines that there is the potential for likely significant effects, further HRA work would be required in the form of an Appropriate Assessment which considers the impact on the integrity of the European site in more detail.

This report

- I.5 In this report, the likely significant effects screening is undertaken in two parts:
- Impact pathway screening - The policies in the NDP are reviewed to identify potential impact pathways.
 - Likely significant effects screening - Where potential impact pathways are identified, these are considered further to determine if the NDP alone, or in combination with other relevant plans or projects, is likely to result in a significant effects.
- I.6 The information used for this screening statement has been gathered from the HRA for the Pre-Submission South Downs Local Plan, which was published in September 2017, and as such, this screening report should be read in conjunction with it.
- I.7 It should be noted that the South Downs Local Plan and its accompanying HRA has not been tested and accepted at Examination. Whilst this is the case, the Pre-Submission South Downs Local Plan did recognise that some of the housing requirement quantum would be allocated through NDPs. It therefore set out the expected quantum of development for these various

settlements, and this figure was taken into account in the HRA Report for the Pre-Submission South Downs Local Plan. The Submission Petworth NDP makes provision for the quantum of development as expected in the Pre-Submission South Downs Local Plan and as such the evidence and findings of the HRA Report for the Pre-Submission South Downs Local Plan provide an important basis for the HRA screening of this NDP.

- 1.8 This screening statement has regard to the conservation objectives of the relevant European sites. It also makes reference to other plans and projects (the emerging South Downs Local Plan and other Local Plans/Core Strategies as appropriate).

The Petworth Neighbourhood Development Plan

- 1.9 The Petworth NDP ~~is currently under~~ *was submitted in September 2017 and has been through an independent examination Submission Consultation. The examiners report was issued in January 2018.* The NDP includes general policies to guide development. It also includes ~~3~~ 4 allocations for a net increase of approximately ~~150~~ 163 homes, an extension to an employment site, and designation of local green spaces. *This additional small allocation for housing and resultant increase in housing numbers is the subject of a consultation in February / March 2018.*
- 1.10 When adopted, NDPs will be used by the local planning authority to determine planning applications for the Neighbourhood Areas that they cover. The parish predominantly falls within the South Downs National Park and a small part of the Chichester District planning area. Therefore the policies for the NDP, once adopted, will form the planning policy for that part of the National Park, in the Parish of Petworth and for that part of the Chichester District planning area.

Relevant European sites

- 1.11 The European wildlife sites relevant to this neighbourhood development plan are:
- Duncton and Bignor Escarpment Special Area of Conservation (SAC)
 - Ebernoe Common SAC
 - The Mens SAC
- 1.12 Full details for the reason for designation, conservation objectives and key vulnerabilities are set out in Appendix I.

2. Impact pathway screening

- 2.1 Table I below sets out the screening of each of the policies included in the Petworth NDP, identifying if potential impact pathways are present. Where no impact pathways are identified, the policy can be screened out (indicated by green shading) because there is no mechanism for an adverse effect on designated sites.

Table 1: Impact pathway screening

Petworth NDP Policy Reference	Impact pathway
PPI Settlement Boundary	<p>Potential impact pathways.</p> <p>This policy sets the settlement policy boundary of the village and various other policies in the Petworth NDP apply specifically within the defined settlement policy boundary. It does not identify a particular amount or particular location of development.</p>
PP2 Core Planning Principles	<p>No impact pathways. Screened out.</p> <p>This policy that requires development proposals to take into account cumulative impacts within the Petworth NDP area.</p>
Policy H1: Allocate land for approximately 150 new homes	<p>Potential impact pathways.</p> <p>This policy sets the approximate number of new homes (<u>150</u> / 63) and the three <i>four</i> sites across which they are distributed are : H5 Rotherlea <i>approximately</i> 23 homes, H6 The Square Field <i>approximately</i> 30 homes, <i>approximately</i> H7 Petworth South <i>approximately</i> 100 homes, and H8 Land South of Rothermead <i>approximately</i> 10 homes.</p> <p>The potential impact pathways are:</p> <ul style="list-style-type: none"> - Loss of supporting habitat (Barbastelle bats associated with The Mens SAC and Ebernoe Common SAC) - Recreational pressure (The Mens SAC, Ebernoe Common SAC and Duncton to Bignor Escarpment SAC) - Air quality (The Mens SAC, Ebernoe Common SAC and in combination)
Policy H2: Integrate windfall sites	<p>Potential impact pathways.</p> <p>This policy allows for small residential development on infill and redevelopment sites within the settlement boundary subject to design and meeting other relevant requirements in the NDP/development plan.</p> <p>The potential impact pathways are:</p> <ul style="list-style-type: none"> - Recreational pressure (The Mens SAC, Ebernoe Common SAC and Duncton to Bignor Escarpment (SAC) - Air quality (The Mens SAC, Ebernoe Common SAC and in combination)

Policy H3: Housing Type and Mix	<p>No impact pathways. Screened out.</p> <p>This policy sets requirements for a mix of dwellings types. It does not set the amount of development or the location of development.</p>
Policy H4: Affordable Housing Provision	<p>No impact pathways. Screened out.</p> <p>This policy sets the proportion of affordable housing to be delivered in residential development. It does not set the amount of development or the location of development</p>
Policy H5: Rotherlea	<p>Potential impact pathways.</p> <p>This policy proposes 23 new homes at this location and sets out a series of development requirements.</p> <p>The potential impact pathways are:</p> <ul style="list-style-type: none"> - Loss of supporting habitat (Barbastelle bats associated with The Mens SAC and Ebernoe Common SAC) - Recreational pressure (The Mens SAC, Ebernoe Common SAC and Duncton to Bignor Escarpment SAC) - Air quality (The Mens SAC, Ebernoe Common SAC and in combination)
Policy H6: The Square Field	<p>Potential impact pathways.</p> <p>The policy proposes 30 new homes at this location and sets out a series of development requirements.</p> <p>The potential impact pathways are:</p> <ul style="list-style-type: none"> - Loss of supporting habitat (Barbastelle bats associated with The Mens SAC and Ebernoe Common SAC) - Recreational pressure (The Mens SAC, Ebernoe Common SAC and Duncton to Bignor Escarpment SAC) - Air quality (The Mens SAC, Ebernoe Common SAC and in combination)
Policy H7: Petworth South	<p>Potential impact pathways.</p> <p>The policy proposes 100 new homes at this location and sets out a series of development requirements.</p> <p>The potential impact pathways are:</p>

	<ul style="list-style-type: none"> - Loss of supporting habitat (Barbastelle bats associated with The Mens SAC and Ebernoe Common SAC) - Recreational pressure (The Mens SAC, Ebernoe Common SAC and Duncton to Bignor Escarpment SAC) - Air quality (The Mens SAC, Ebernoe Common SAC and in combination)
Policy H8: Land South of Rothermead	<p><i>Potential impact pathways.</i></p> <p><i>The policy proposes approximately 10 new homes at this location and sets out a series of development requirements.</i></p> <p><i>The potential impact pathways are:</i></p> <ul style="list-style-type: none"> - <i>Loss of supporting habitat (Barbastelle bats associated with The Mens SAC and Ebernoe Common SAC)</i> - <i>Recreational pressure (The Mens SAC, Ebernoe Common SAC and Duncton to Bignor Escarpment SAC)</i> - <i>Air quality (The Mens SAC, Ebernoe Common SAC and in combination)</i>
Policy ESD1: Character and Design	<p>No impact pathway. Screened out.</p> <p>This policy sets requirements for development to respond to the specific urban and landscape character of the site and its setting.</p>
Policy ESD2: Housing density	<p>No impact pathways. Screened out.</p> <p>This policy sets the density of residential development on sites. It does not set the amount of development or the location of development. It allows for green space and green infrastructure.</p>
Policy ESD3: Requirements for a Design and Access Statement	<p>No impact pathways. Screened out.</p> <p>This sets requirements for topics that should be covered in a Design and Access Statement accompanying development proposals. It asks for provision for planted 'buffer zones' in accordance with the South Downs National Park Authority Local Plan to allow foraging for internationally important bat colonies and other wildlife.</p>
Policy ESD4: Preserving Local Green Spaces	<p>No impact pathways. Screened out.</p> <p>This policy designates 6 Local Green Spaces.</p>
Policy ESD5: Public Open Spaces	<p>No impact pathways. Screened out.</p> <p>This policy sets out the requirements for new public open space.</p>
Policy ESD6: Landscape and Visual Impact	<p>No impact pathways. Screened out.</p>

	<p>This policy requires landscape-led masterplanning and design and seeks to protect landscape and views.</p>
Policy ESD7: Biodiversity and Trees	<p>No impact pathways. Screened out.</p> <p>This is a positive policy that says that development proposals which result in adverse effects on protected species or designated natural environment features will not be permitted. The policy supported the retention of biodiversity corridors/networks and trees which are important features for the protected Barbastelle bat associated with both The Mens SAC and Ebernoe Common SAC.</p>
Policy ESD8: Sustainable Design	<p>No impact pathways. Screened out.</p> <p>This policy supports innovative approaches to low carbon homes, sustainable use of resources and high energy efficiency where they comply with the development plan.</p>
Policy WS1: Petworth Town Centre	<p>No impact pathways. Screened out.</p> <p>This policy sets the town centre boundary and primary shopping frontages and requirements for town centre uses within the town centre boundary and for those outside of the boundary.</p>
Policy WS2: Visitor economy	<p>Potential impact pathways.</p> <p>This policy sets the hierarchy for considering development proposals which relate to the visitor economy of Petworth town centre.</p> <p>The potential impact pathway is:</p> <ul style="list-style-type: none"> - Air quality (The Mens SAC, Ebernoe Common SAC and in combination)
Policy WS3: Hampers Common Industrial Estate	<p>Potential impact pathways.</p> <p>This policy supports retention and enhancement of employment use of this site. Increased activity could increase the number of vehicle movements.</p> <p>The potential impact pathway is:</p> <ul style="list-style-type: none"> - Air quality (The Mens SAC, Ebernoe Common SAC and in combination)
Policy WS4: Land east of Hampers Common	<p>Potential impact pathways.</p> <p>The potential impact pathways are:</p> <ul style="list-style-type: none"> - Air quality (The Mens SAC, Ebernoe Common SAC and in combination) - Loss of supporting habitat (The Mens SAC and Ebernoe Common SAC)

Policy GA1: Parking Requirements	<p>No impact pathways. Screened out.</p> <p>This is a development management policy which sets the parking standards associated with new development.</p>
Policy GA2: Pedestrian and cycle movement	<p>Potential impact pathways.</p> <p>This policy states that development on allocated sites should provide good pedestrian and cycle connections to routes to the town centre and out to surrounding areas. Proposals to enhance and provide new routes around Petworth will be supported.</p> <p>The potential impact pathway is:</p> <ul style="list-style-type: none"> - Recreational pressure (Ebernoe Common SAC, The Mens SAC and Dunction to Bignor Escarpment SAC).
Policy GA3: To protect and increase car parking capacity at Pound Street Car Park	<p>Potential impact pathways.</p> <p>This policy supports proposals to increase car parking capacity in the Pound Street Car Park. There are no specific details about how this might be achieved. As the policy states in the car park, this assessment assumes no extension onto other land.</p> <p>The potential impact pathways are:</p> <ul style="list-style-type: none"> - Air quality (The Mens SAC, Ebernoe Common SAC and in combination)
Policy LW1: Community and leisure facilities	<p>No impact pathways. Screened out.</p> <p>This policy seeks to protect and enhance existing community and leisure facilities. Proposals for new facilities are also supported when in accordance with the NDP/ development plan.</p>
Policy LW2: Playing fields and sports facilities	<p>No impact pathway.</p> <p>This policy seeks to protect existing facilities and sets out the circumstances upon which redevelopment may be considered appropriate.</p>
Policy LW3: Assets of Community Value	<p>No impact pathways. Screened out.</p> <p>This policy relates to the designation and protection of buildings or land of importance to the community.</p>
Policy LW4: Retention of Assets of Community Value	<p>No impact pathways. Screened out.</p> <p>This policy sets out the circumstances under which Assets of Community Value may be considered appropriate for development.</p>

Policy D I: Infrastructure Delivery	No impact pathways. Screened out. This policy is a development management policy relating to supporting infrastructure for new development.
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3. Likely significant effects screening

- 3.1 The impact pathway screening in Table 1 above has identified policies H1, H2, H5, H6, H7, H8, WS2, WS3, WS4, GA2 and GA3 in the Petworth NDP which have potential impact pathways; these policies therefore require a fuller screening assessment as set out in Table 2 below.
- 3.2 Table 2 below draws together the conclusions and includes references to the relevant paragraphs of the South Downs Local Plan Preferred Options HRA report, and additional commentary relating to the proposals and policies within the Petworth NDP.

Table 2: Likely significant effects screening

International Nature Conservation Designation	Summary of the screening outcome in the HRA Report for the Pre-Submission South Downs Local Plan	Further comment	Conclusion
Potential impact pathway: Recreational Pressure			
Ebernoe Common Special Area of Conservation (SAC) and The Mens SAC	<p>Screened out.</p> <p>The majority of those visitors to Ebernoe Common and The Mens do so during daylight hours. Therefore there is limited potential for conflicts between National Park users and bats, although increased levels of off-road cyclists using high-powered headlamps at night to cycle in the National Park have been noted. Given the relatively low level of recreational use of the National Park at times when bats will be foraging, it is possible to conclude that the Local Plan is unlikely to lead to significant adverse effects on the bat interest of Ebernoe Common SAC or The Mens SAC through direct disturbance.</p> <p>Both SACs are also designated for their woodland. An increase in recreational pressure from policies that increase tourism or residential housing could contribute to the degradation of sensitive woodland through for example trampling. However in the Natural England Site Improvement Plans for both SACs,</p>	None.	Screened out.

International Nature Conservation Designation	Summary of the screening outcome in the HRA Report for the Pre-Submission South Downs Local Plan	Further comment	Conclusion
	<p>recreational pressure is not noted as a particular concern.</p> <p>Reference – Paragraphs 4.5.1 and 4.5.2 of the HRA Report for the Pre-Submission South Downs Local Plan.</p>		
<p>Duncton and Bignor Escarpment Special Area of Conservation (SAC)</p>	<p>Screened out.</p> <p>The Site Improvement Plan for the SAC does not identify any specific current requirement for access management improvements. The SAC is located in a rural area in relative isolation from large settlements. The nearest large settlement within the SDNP is Petworth, but this is approximately 5km from the site. Moreover Petworth is located in an area with many other alternate naturalistic areas that can be used for recreation. Due to the low population density surrounding the SAC and the low population density around the SAC and the large amount of alternatives available for recreational activity, likely significant effects can be screened out alone and in combination.</p> <p>Reference – Paragraph 4.8.4 of the HRA Report for the Pre-Submission South Downs Local Plan.</p>	<p>None.</p>	<p>Screened out.</p>

International Nature Conservation Designation	Summary of the screening outcome in the HRA Report for the Pre-Submission South Downs Local Plan	Further comment	Conclusion
Potential impact pathway: Loss of supporting habitat			
<p>Ebernoe Common Special Area of Conservation (SAC) and The Mens SAC</p>	<p>Screened out.</p> <p>The Barbastelle bat is a designated feature of both The Mens SAC and Ebernoe Common SAC. Beckstein's bats are also a designated feature of Ebernoe Common.</p> <p>Studies for Ebernoe Common have identified a series of flightlines covering a distance of typically 7km, particularly to the south of the SAC (Petworth and Tillington area). Studies for The Mens SAC indicate a foraging range of 9km, and limited radio tracking data has shown foraging routes to the west of the site.</p> <p>Development proposals have potential for likely significant effects upon bat species via direct supporting habitat loss or by disturbances of that habitat during operational or construction phases.</p> <p>Screened out due to Policy SD10: International Sites which requires development proposals within zones set out in the HRA to incorporate necessary surveys, ensure key features are retained and buffer against disturbance.</p>	<p>Policy HI of the Petworth NDP sets the number of new homes and policies H5, H6 H7 and H8 set out the detailed development requirements for each site. Flightlines 5 and 6 run north to south, one at the west edge of Petworth and one at the east edge. Sites H5 and H6 are located adjacent to the settlement boundary of Petworth and contain a linear belt of woodland. Whilst not on one of the identified flightlines, this habitat could potentially be suitable for bats. The west edge of site H7 is part of flightline 6. <i>Site H8 is close to flightline 6, but is bordered by poor quality hedges, with many gaps. The policy includes a requirement to deliver a planting and landscape strategy to the south which will in turn help to consolidate the green features in that area and support a bat population.</i> Policy WS4 is for an employment site. Flightline 6 is located approximately 1km from the east of the allocation. The allocation site is bordered by mature hedges with field trees to the north and east boundaries. Policies H5, H6 and H7 include criteria which seek to enhance amenity and ecology, protect and maintain existing green corridors and the creation of new green corridors. However, it is recommended that policy WS4</p>	<p>Screened out subject to policy WS4 including a criteria to seek to enhance amenity and ecology, protect and maintain existing green corridors and the creation of new green corridors as included for the housing allocations and for policies H5, H6, H7 and WS4 including criteria for suitable bat survey work.</p>

International Nature Conservation Designation	Summary of the screening outcome in the HRA Report for the Pre-Submission South Downs Local Plan	Further comment	Conclusion
	Reference – Paragraphs 7.2.1 to 7.2.12 of the HRA Report for the Pre-Submission South Downs Local Plan.	<p>included a similar criteria as above, and that policies H5, H6, H7 and WS4 require appropriate bat survey work to inform design and layout, in keeping with the requirements of Policy SD10: International Sites in the emerging South Downs Local Plan.</p> <p>The NDP contains other policies which potentially allow other development although does not identify a specific amount or particular locations. Development proposals are considered against all policies in the development plan including ESD7 Biodiversity and Trees which says that development proposals which result in adverse effects on protected species or designated natural environment features will not be permitted , <i>unless the need for or benefits outweigh the loss.</i></p>	
Potential impact pathway: Air Quality			
Ebernoe Common Special Area of Conservation (SAC) and The Mens SAC	Petworth is located on the A272 and A285. Ebernoe Common SAC is located 3km from Petworth along the A285. Duncton to Bignor Escarpment SAC is located 5.5km from Petworth on the A285, and The Mens SAC is located 4.6km from Petworth along the A272. All three SACs are currently above their critical load for nitrogen deposition.	None.	Screened out.

International Nature Conservation Designation	Summary of the screening outcome in the HRA Report for the Pre-Submission South Downs Local Plan	Further comment	Conclusion
	<p>Traffic modelling was undertaken for the quantum of development proposed in the Pre-Submission South Downs Local Plan. This traffic modelling was then used for air quality calculations and ecological interpretation to determine whether there would be adverse effects to the integrity of European sites, including Ebernoe Common SAC and The Mens SAC. This is set out in the Appropriate Assessment within the HRA Report for the Pre-Submission South Downs Local Plan. The methodology for the HRA Report addresses the necessary changes in the methodology for assessing impacts of changes in traffic movements on air quality and consequent impacts on European sites which arose from the outcome of the High Court judgement¹.</p> <p>The HRA Report concludes that even though there will be some traffic increases on the modelled links, the amount of nitrogen deposition is expected to improve over the plan period. The increase in traffic attributed to the South Downs Local Plan slows this slightly, but by an ecologically insignificant amount.</p>		

¹ Wealden District Council vs Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority, and Natural England. [2017] EWHC 351 (Admin) <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>

International Nature Conservation Designation	Summary of the screening outcome in the HRA Report for the Pre-Submission South Downs Local Plan	Further comment	Conclusion
	<p>Therefore no adverse effects on the integrity of any European sites are expected, alone or in combination with other projects and plans.</p> <p>Reference – Paragraphs 5.3.28 to 5.3.36, and 5.3.43 of the HRA Report for the Pre-Submission South Downs Local Plan.</p>		

- 3.3 Neighbourhood Plans are required to be considered **'in combination'** with other plans and projects which might also effect international nature conservation designation sites. Pathways relating to recreational pressure, loss of supporting habitat and air quality have been explored and screened out through the Local Plan for Arun, Chichester, and Horsham Districts and subsequently through the HRA Report for the Pre-Submission South Downs Local Plan.

4. Conclusion

- 4.1 Is the potential scale or magnitude of any effect likely to be significant?

- a) Alone? **No**
b) In combination with other plans or projects? **No**

- 4.2 It is the conclusion of this screening statement that the Petworth NDP is not likely to result in significant effects with regard to recreational pressure, air quality or loss of supporting habitat for the Ebernoe Common SAC, The Mens SAC and Duncton to Bignor Escarpment SAC, subject to the following recommended amendments:

- It is recommended that policy **WS4** be amended to include a criteria to seek to enhance amenity and ecology, protect and maintain existing green corridors and the creation of new green corridors as included for the housing allocations.
- It is recommended that policies **H5, H6, H7** and **WS4** including criteria for suitable bat survey work which would reflect the requirements of Policy SD10: International Sites of the South Downs Local Plan: Pre-Submission.

Appendix I: Details of relevant European site

Background information on Duncton to Bignor Escarpment SAC, Ebernoe Common SAC and The Mens SAC sites are extracted from Appendix A of the South Downs National Park Local Plan Habitats Regulation Assessment, prepared by AECOM, and published as part of the HRA Report for the Pre-Submission South Downs Local Plan.

5 Duncton to Bignor Escarpment SAC

5.1 Introduction

Duncton to Bignor Escarpment covers 214.47ha. Within the SAC *Asperulo-Fagetum* beech forests occur on steep scarp slopes and on more gently-sloping hillsides in mosaic with ash *Fraxinus excelsior* woodland, scrub and grassland. Much of the beech woodland is high forest but with some old pollards. Rare plants present include the white helleborine *Cephalanthera damasonium*, yellow bird's nest *Monotropa hypopitys* and green hellebore *Helleborus viridis*. The woods also have a rich mollusc fauna.

5.2 Reasons for Designation

Duncton to Bignor Escarpment qualifies as a SAC for the Habitats Directive Annex I habitat of:

- Beech forests on acid soils.

5.3 Historic Trends and Current Pressures

Historically this site has relatively few threats. The JNCC Natura 2000 data sheet documents; 'The escarpment woodland hosts a number of pheasant shoots which, in general, pose no threat to the woodland. Expansion of these shoots from current levels is undesirable. Plantations of non-native conifers are targeted for complete or partial removal. A large resident deer population is controlled by deer stalkers'.

In the most recent Natural England condition assessment process, 92.33% of the component SSSI of the SAC was considered to be in favourable condition.

The key environmental conditions that support the features of European interest have been defined as:

- Appropriate woodland management.

7 Ebernoe Common SAC

7.1 Introduction

Ebernoe Common is a 234.93ha site of international importance as an example of ancient woodland. It contains a wide range of structural and vegetation community types which have been influenced in their development by differences in the underlying soils and past management. The native trees, particularly those with old growth characteristics, support rich lichen and fungal communities, and a diverse woodland breeding bird assemblage. Nationally important maternity roosts for barbastelle bat and Bechstein's bat occur within the woodland.

7.2 Reasons for Designation

Ebernoe Common SAC qualifies as a SAC for both habitats and species. Firstly, the site contains the Habitats Directive Annex I habitats of:

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

Secondly, the site contains the Habitats Directive Annex II species:

- Barbastelle bat; and
- Bechstein's bat

7.3 Historic Trends and Current Pressures

Ebernoe Common SAC is owned and managed by Sussex Wildlife Trust (SWT). There is evidence that the Common has contained a mixture of open pasture and high forest for centuries. Ebernoe Nature Reserve is an Open Access site and is fairly well used (SWT estimate up to 3,000 visitors per annum).

In the most recent Natural England condition assessment process, 92.81% of Ebernoe Common SSSI was considered to be in favourable condition with the remainder recovering from unfavourable status

Ebernoe Common is an exceptional site for both barbastelle and Bechstein bats. Most of what is known about the foraging behaviour of barbastelle bats has been derived by studies carried out over the past ten years, and the studies are able to give detailed information on flight lines surrounding Ebernoe Common of the barbastelle bat:

- Greenaway, F. (2004) Advice for the management of flightlines and foraging habitats of the barbastelle bat *Barbastellus barbastellus*. English Nature Research Report, Number 657.
- Greenaway, F. (2008) Barbastelle bats in the Sussex West Weald 1997 - 2008

The barbastelles at Ebernoe Common SAC had flightlines that followed watercourses, particularly the River Kird, and woodland cover for distances of typically 5km. Flightlines outside the SAC are particularly to the south (the Petworth and Tillington area) but also to the west, north and east. There has been less study of the Bechstein bat populations. However, those radio-tracking projects which have been implemented for the species have established that the tracked individuals generally remained within approximately 1.5 km of their roosts. These distances do fit with those identified from radiotracking of Bechstein's that has been undertaken at Ebernoe Common SAC from 2001, which identified that the maximum distance travelled by a tagged Bechstein's bat to its foraging area was 1,407m, with the average 735.7m.

Studies have indicated that barbastelle bat flightlines from Ebernoe Common SAC cross the northern part of Chichester District. Most of this area now lies within the South Downs National Park for strategic planning purposes.

The key vulnerabilities to the SAC are:

- Traditional management to maintain the structural diversity and associated lichen and fungal flora, including appropriate grazing regime.
- The retention of deadwood within the site • Minimal atmospheric pollution - may increase the susceptibility of beech trees to disease and alter epiphytic communities.
- Absence of disturbance.
- In a wider context, bats require good connectivity of landscape features to allow foraging and commuting. For barbastelle bats this is up to 5km from a known roost and up to 1.5km for Bechstein bats.
- Both bat species have close association with woodland. Areas of undesignated woodland adjacent to SAC may be of most importance to population.

- Barbastelles require a constant humidity around their roosts; any manipulation of the shrub layer must be carefully considered.

10 The Mens SAC

10.1 Introduction

The Mens remains as one of the most extensive examples of Wealden Woodland in West Sussex and measures 203.28ha. It is important for its size, structural diversity and the extremely rich fungal and lichen floras which occur here. The wood supports a diverse community of breeding birds, and is the locality of a nationally endangered species of fly.

10.2 Reasons for Designation

The Mens SAC qualifies as a SAC for both habitats and species. Firstly, the site contains the Habitats Directive Annex I habitats of:

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

Secondly the site contains the Annex II species:

- Barbastelle bat

10.3 Historic Trends and Current Pressures

The Mens SAC is owned and managed by Sussex Wildlife Trust. The Mens SAC is important for its barbastelle populations and radio-tracking studies have been undertaken to identify core foraging areas. 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 7km to visit foraging areas. Development within 7km of the SAC has potential to affect barbastelle flightlines or foraging areas.

In the most recent Natural England condition assessment process, 97.32% of The Mens SSSI was considered to be in favourable condition.

The key environmental conditions that support the features of European interest have been defined as:

- Appropriate woodland management.
- Low recreational pressure (because management is by minimum intervention and Bridleway degradation by horse riding is a recurring threat).
- Retention of deadwood
- Minimal air pollution - may increase the susceptibility of beech trees to disease and alter epiphytic communities.
- Barbastelles require a constant humidity around their roosts; any manipulation of the shrub layer must be carefully considered.
- In a wider context, bats require good connectivity of landscape features to allow foraging and commuting.