

Land North of Lee's Yard

Information to Inform an Habitat Regulations Assessment

February 2022



T: 0118 989 10 86
E: info@derekfinnie.com
W: www.derekfinnie.com

20 Soames Place, Mulberry Grove
Wokingham, Berkshire RG40 5AT



Derek Finnie Associates Ltd. Registered in England and Wales Company No. 08152615

COMMISSIONED BY
Thakeham Partnership Ltd
on behalf of Southern Home Ownership
Thakeham House
Summers Place
Stane Street
Billingshurst
West Sussex
RH14 9GN

Land North of Lee's Yard

Information to Inform an

Habitat Regulations Assessment

February 2022

Report Ref: DFA22008V2

Derek Finnie Associates Ltd

20 Soames Place
Wokingham
Berkshire
RG40 5AT

info@derekfinnie.com

© Derek Finnie Associates Ltd 2022



CONTENTS

1 INTRODUCTION..... 3

1.1 Background..... 3

2 RELEVANT EUROPEAN SITES AND THEIR DESCRIPTION..... 4

2.1 Singleton & Cocking Tunnels Special Area of Conservation..... 4

3 PROPOSED DEVELOPMENT AND POTENTIAL IMPACTS..... 5

3.1 The Site 5

3.2 Proposed Development..... 5

3.3 Potential Impacts..... 5

4 IMPACT SCREENING 6

4.1 Flight Lines..... 6

4.2 On Site Impacts..... 6

4.3 Screening 6

5 SUMMARY 7

FIGURES

Figure 1. Bat Flight Lines 8



1 INTRODUCTION

1.1 Background

- 1.1.1 Derek Finnie Associates has been commissioned by Thakeham Partnerships Ltd on behalf of Southern Home Ownership Ltd (The Applicant) to provide ecological advice in relation to a residential development at Lee's Yard, Woodgate, herein referred to as the 'Site'. The Site benefits from Outline Planning Permission for 38 new dwellings, with associated works. The outline permission was granted by Arun District Council on 30th October 2020 (Ref: AL/21/20/OUT) subject to certain conditions.
- 1.1.2 The outline planning application for the Site was supported by several ecology survey reports undertaken by The Lizard Landscape Design and Ecology.
- 1.1.3 Thakeham submitted a Reserved Matters application for the site in December 2021 (Ref: AL/141/21/RES) which is under determination. As a result of this, Arun District Council (ADC) have requested information to Inform a Habitat Regulations Assessment.
- 1.1.4 At 11.8km, the application site is just within the 12km buffer of the Singleton & Cocking Tunnels Special Area of Conservation (SAC). The SAC is designated for the populations of barbastelle and Bechstein's bats it supports.
- 1.1.5 Policy SD10 of the South Downs National Park Local Plan advises that in the 12km buffer, significant impacts on bats or severance of flight lines should be considered. HRA under the Conservation of Habitats and Species Regulations 2017 (as amended) should be requested by the competent authority, in this case ADC, if a plan or project is deemed "likely to have a significant effect" on a European Site (i.e. a SPA, SAC, or by extension, a Ramsar site, collectively known as Natura 2000 sites).
- 1.1.6 The following report, therefore, has been prepared to provide a sufficient level of information to allow ADC to determine if the proposed development of the Site would have a significant effect on the integrity of the Singleton & Cocking Tunnels SAC and/or its qualifying features.



2 RELEVANT EUROPEAN SITES AND THEIR DESCRIPTION

2.1 Singleton & Cocking Tunnels Special Area of Conservation

- 2.1.1 The Singleton and Cocking Tunnels SAC covers 2.45ha and is of International importance as the most important sites for hibernating bats in south-east England.
- 2.1.2 The SAC comprises two disused brick railway tunnels, located in rural Sussex, once formed part of the Chichester to Midhurst railway line. They now support, during the winter months, large numbers of hibernating bats, and are the only known location in Britain for the Mouse-eared bat *Myotis myotis*. Eight species have been found in all; those best represented include Natterer's *Myotis nattereri*, Daubenton's *Myotis daubentoni*, brown long-eared *Plecotus auritus* and Brandt's *Myotis brandti*/Whiskered *Myotis mystacinus* (these two cannot normally be distinguished in the field, but are both known to occur here). Other species regularly occur in small numbers.
- 2.1.3 However, the SAC is designated for its resident populations of barbastelle and Bechstein's bats it supports, both of which are listed on Annex 2 of the Habitats Directive.
- 2.1.4 Policy SD10 of the adopted South Downs National Park required any greenfield development within 12km of the SAC to consider potential severance of flight lines of these bat species:

Strategic Policy SD10: International Sites

The Mens SAC, Ebernoe Common SAC and Singleton & Cocking Tunnels SAC

1. Development proposals on greenfield sites and sites that support or are in close proximity to suitable commuting and foraging habitat (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) 6.5km: Key conservation area – 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) 12km: Wider conservation area – significant impacts or severance to flightlines to be considered.

2. Proposed use or development of the tunnels comprising the Singleton & Cocking Tunnels SAC will be required to demonstrate that there is no adverse effect on the interest features, including hibernation habitat for Barbastelle and Bechstein's Bats, or on the integrity of the site.



3 PROPOSED DEVELOPMENT AND POTENTIAL IMPACTS

3.1 The Site

- 3.1.1 The Site comprises an improved grassland field surrounded by mix treeline and hedgerows. The field margins are narrow and dominated by tall ruderal vegetation. The north of the site is a small allotment area, surrounded by tall ruderal and dense scrub.
- 3.1.2 The Site is bordered to the east by Willows Caravan Park; to the west by Lidsey Road and residential properties; to the north by the access road and residential properties and to the south by an industrial estate.

3.2 Proposed Development

- 3.2.1 The development comprises the erection of 38 new dwellings, communal work hub and associated car parking & landscaping alongside associated works. Apart for the access into the site, the boundary hedgerows would all be retained.

3.3 Potential Impacts

- 3.3.1 As the proposed residential development at Lees Yard would involve no land take from any Natura 2000 Site, the issues that require consideration are the potential for significant effects to arise from indirect sources.
- 3.3.2 Given the considerable distance to the SAC, at 11.8km at its nearest point and the intervening land uses, the only potential pathway for impact upon the SAC and its qualifying features would be:
- Severance of flight lines for qualifying features through habitat removal and increased light.
- 3.3.3 Therefore, the potential of the development at Lee's Yard to severe bat flight lines needs to be examined.

4 IMPACT SCREENING

4.1 Flight Lines

4.1.1 Information of barbastelle bat flight lines was provided to Thakeham by Arun District Council and comprised a consultancy report *Barbastelle Bats in the South Downs National Park* undertaken on behalf of South Downs National Park Authority. This presents data obtained from radio tracking bats in and around Slindon and Goodwood areas, and covers the area around the proposed development site.

4.1.2 The known flight lines are shown on Figure 1, which show movement of bats from known maternity roost sites to the north, heading south to foraging locations. As can be seen, there are no flight lines in the vicinity of the Site, with the nearest recorded barbastelle being over 600m away from the Site.

4.2 On Site Impacts

4.2.1 The hedgerows around the perimeter of the Site will be retained throughout the development with no new breaks in the existing north-south hedgerows. Additional native re-enforcement and buffer planting being incorporated into the landscape proposals (see Ecology Enhancement Plan, Derek Finnie Associates Report Ref: DFA21089). No street lighting is proposed for the scheme, hence dark corridors will be retained around the periphery of the Site.

4.3 Screening

4.3.1 In reviewing the potential for impacts upon the SAC and its qualifying feature, the following have been considered:

- There are no known bat flight lines close the proposed development site;
- The land immediately to the north of the Site already poses a significant barrier to the movement of light sensitive bat species such as barbastelle;
- no barbastelle bats have been recorded within the Site;
- there is no street lighting proposed within the development; and
- boundary vegetation will be retained and re-enforced with native species.

4.3.2 Therefore, it can be concluded that there would be no additional impacts upon bats and their flight lines as a result of the proposal. As such, impacts upon the SAC and its qualifying features can be screened out and the need for an Appropriate Assessment dismissed.

5 SUMMARY

- 5.1.1 The potential impact of a proposed new residential development in Woodgate upon Singleton & Cocking Tunnels SAC was reviewed. The proposal for 38 new located 11.8km from the SAC was examined for its potential to introduce severance features to potential bat flights lines, particularly for barbastelle bats, a qualifying feature of the SPA.
- 5.1.2 A review of data of barbastelle dispersal routes found that the site does not form part of any known flight lines for this species, no records of barbastelle have been recorded within the Site, the boundary hedgerows will be retained and re-enforced as a result of the proposal and the existing residential development already present to the north forms an existing barrier to bat movement. Therefore, potential impacts upon the SAC and its qualifying features can be screened out; hence, there is no requirement to undertake an Appropriate Assessment.

