



ecosupport

Shadow HRA

Land to the South of Sundown,
Aldingbourne

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1.0 INTRODUCTION

1.1 Background

Mr Richard Brooks commissioned Ecosupport Ltd to conduct an Ecological Assessment of the land to the south of Sundown to inform an application for the proposed redevelopment of the site. This should be read in conjunction with the Phase I Ecological Report (Ecosupport Ltd, 2020).

This document has been produced to provide further assessment of the presence of any potential significant impacts upon nearby Barbastelle (*Barbastella barbastellus*) maternity roosts situated within Slindon Park woods to the east of the site. These maternity woods, and the site itself, fall within the 12km buffer of Singleton and Cocking Tunnels Special Area of Conservation.

As the proposals lie within the habitats regulations assessment buffer, under the Conservation of Habitats and Species Regulations 2017, Arun District Council (ADC) represents the Competent Authority (CA) responsible for ensuring that the proposals will not cause any adverse impacts to the integrity of the site. Assessment for potential impacts upon European sites is undertaken via the Habitats Regulations Assessment (HRA) process.

This document aims to inform the Screening Assessment that ADC will undertake to determine whether the HRA should progress to the Appropriate Assessment (AA) stage in relation to Singleton and Cocking Tunnels SAC, as part of the determination of the overall viability of the proposals, and therefore represents a Shadow HRA.

This document should be read in conjunction with the corresponding application forms, documents and plans which accompany the application.

1.2 Aim

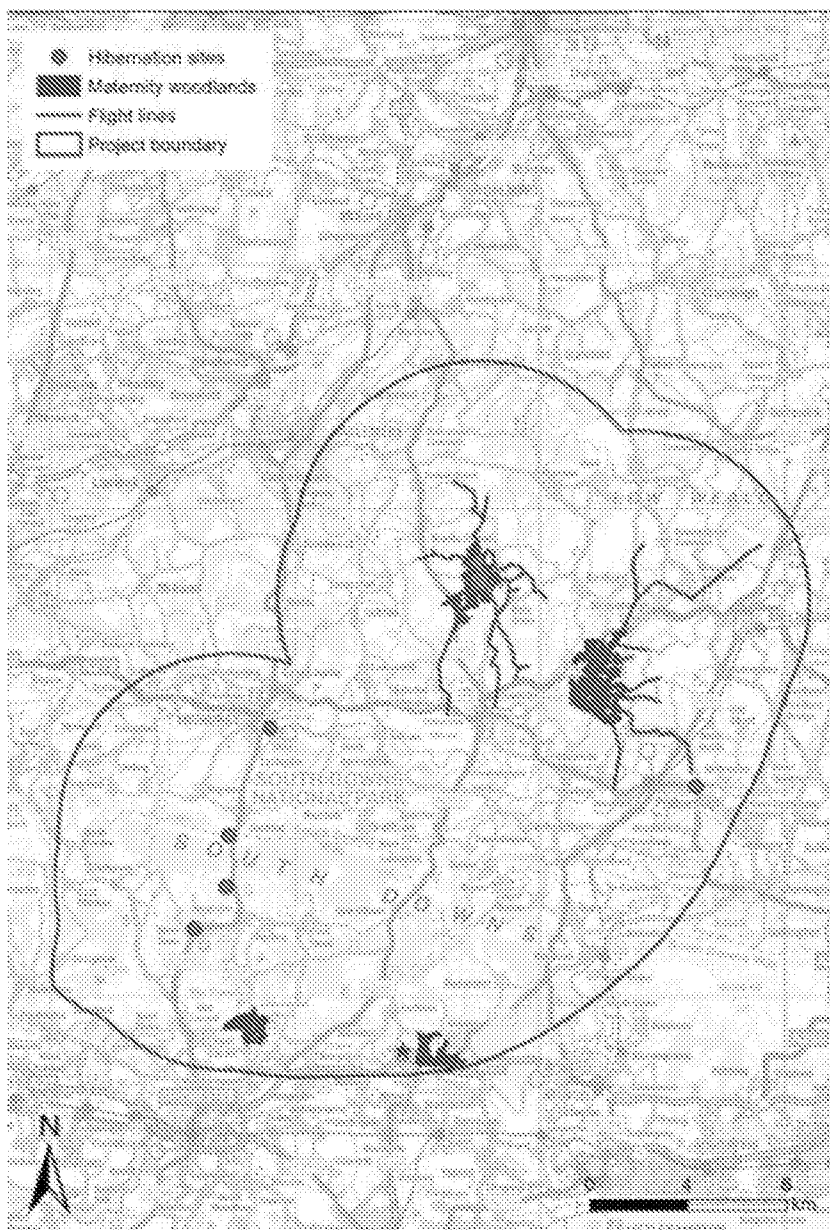
The aim of this document is to assess, insofar as is practicable and possible, whether there exist any potential implications of the proposals with regards to the requirements of the Habitats Regulations, by identifying and, where present, evaluating the significance of any likely impacts upon the integrity of the Barbastelle maternity colonies at Slindon Woods, and therefore, the qualifying features of Singleton and Cocking Tunnels SAC.

1.3 Designated Sites

Slindon Park woods, owned and managed by the National Trust, lies approximately 450m away from the application site. The woods have been identified as supporting maternity colonies of Barbastelles. This forms part of a county-wide network of Special Areas of Conservation (SACs), maternity woods and commuting routes used by

Barbastelles (see **Fig 1**), including Ebernoe Common, The Mens, and Singleton and Cocking Tunnels SACs. The site itself falls within the 12km consultation zone for Singleton and Cocking Tunnels SAC which will form the focus of this report.

Figure 1. Location of Barbastelle maternity woods identified by the West Sussex Bat project (2015). The approximate location of the application site is identified by a blue star.



1.4 Conservation Objectives

Natural England has set out objectives for each European site in the UK. These define what constitutes the 'Favourable Conservation Status' of each feature that qualifies each designated site or Annex species and describes broad targets that should be met if the feature is to be judged as 'favourable'. The broad basis of the objectives is to avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species. This will ensure the

integrity of the site is maintained and that the site makes a full contribution to achieving the 'Favourable Conservation Status' of each of the qualifying features (in this case Barbastelle Bats).

As the maternity woods support a qualifying species of the Singleton and Cocking Tunnels SAC, the conservation objectives of this designated site will be considered.

The objectives for Singleton and Cocking Tunnels SAC are to maintain or restore:

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

1.5 Application Site

The Singleton and Cocking Tunnels SAC lies approximately 9.3km north west of the site (**Figure 2**) and the site is 450m from a Barbastelle maternity woodland (**Figure 1**), which forms part of a network of habitats used by a qualifying species of the SAC.

A detailed black and white map of the South Downs National Park area. The map shows the coastline of Dorset and Hampshire, with numerous villages and towns labeled, including Bournemouth, Christchurch, Poole, and Dorchester. The South Downs Way is clearly marked, winding through the hills. Major roads are shown with route numbers like A26, A265, A29, A206, and A205. The map also includes various landmarks, such as the Needles, and numerous smaller features like farms, woods, and local businesses. The title 'SOUTH DOWNS NATIONAL PARK' is prominently displayed in the upper center.

1.6 Proposals

Proposals will see the construction of one new dwelling on-site.

2.0 HRA PRINCIPLES

2.1 Introduction to the HRA Process

The Conservation of Habitats and Species Regulations 2017 ('Habitats Regulations') transposes the European Habitats Directive 1992 into UK domestic law.

The following information has been provided by the Habitats Regulations Handbook (Tyldesley & Chapman, 2018).

Under Article 6(3) all Member States, via their collection of 'Competent Authorities' (in this case HCC) must ensure any plan or project requiring authorisation under their jurisdiction will result in no significant adverse effect upon the integrity of European designated sites' qualifying features. Only adverse effects are considered; proposals that could result in beneficial effects upon the European site's conservation objectives do not form the basis of HRA.

This assessment has a number of phases, and is collectively referred to as a Habitats Regulation Assessment (HRA) (Natural England, 2017). The HRA process must be applied before a plan or project which may affect a European site can be lawfully authorised.

The first stage of the HRA process is a Screening Assessment (SA), where all proposals are screened for potential Likely Significant Effects upon European sites, both in isolation and in combination with other plans and proposals in the locality. If the SA concludes that such impacts cannot be excluded, the HRA progresses to the Appropriate Assessment (AA) stage, to classify such impacts and determine whether effects upon the integrity of the European site can be ruled out. If the SA concludes that no significant impacts are likely to result from the scheme, however, the scheme is screened out and no further HRA consideration is required.

If an AA is required, following its completion, permission should only be granted if the Competent Authority is satisfied that, based upon the best available scientific information and in light of any suitable mitigation measures, the proposed scheme will result in no significant adverse effects upon the integrity of the European site through appropriate measures being established, either alone or in combination with other plans or projects in the area. The only exception to this is when further tests as described in Article 6(4) can be met, as detailed below. This process requires consultation with, and the agreement of, Natural England to ensure the requirements of the Habitats Regulations are satisfied prior to authorisation of the proposals.

In line with Regulation 10 of the Habitats Regulations, European sites are taken to comprise Ramsar sites, Special Protection Areas (SPA) and Special Areas of Conservation (SAC).

A precautionary approach must be adopted in HRA, and where a loss of site integrity cannot be ruled out (i.e. a 'significant impact' is likely to occur), the proposals may only be authorised under very exceptional circumstances (such as overriding public interest and with no viable alternative, as detailed in full under Article 6(4)) and following consultation with the European Commission.

Unless further consideration of over-riding public interest is required, the Directive sets out a two-stage process:

1. Screening for Likely Significant Effect. If likely significant effect cannot be ruled out, on the basis of objective information without extensive investigations, then the HRA will proceed to:
2. Appropriate Assessment of the project in the light of relevant sites' conservation objectives.

The recent (2017) CJEU judgement 'People Over Wind and Sweetman vs. Coillte Teoranta (C-323/17)' has changed the way in which Competent Authorities must address the HRA process. Any measures that are incorporated into a project specifically to address impacts to international sites can no longer be considered to avoid or reduce (mitigate) a likely significant effect, unless the avoidance effects of a particular feature of the development are essential for the delivery of that project regardless of any effect that feature may have in avoiding or mitigating impacts to the International site.

2.2 Assessing Significance

The HRA Screening Assessment requires the Competent Authority to determine whether a project is likely to have a *significant* effect upon the integrity of the relevant European site, either alone or in combination with other projects or plans.

Terminology:

Likelihood: A likely effect is one that cannot be ruled out on the basis of objective information. Ordinarily, 'likely' might be considered to mean that an effect is probable or might well happen. However, the Waddenzee case (ECJC-127/02) in the European Court ruled that a project should be the subject of an Appropriate Assessment if:

‘...it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site either individually or in combination with other plans and projects’.

‘Objective’, in the context of HRA, means information based upon clear, verifiable fact rather than subjective opinion. Conclusions of either nature must be based upon credible evidence rather than supposition or speculation.

Significance: Where a project, either alone or in combination with other plans or projects, could undermine the site’s conservation objectives, the effects on the site must be considered to be significant. The relevant consideration is the potential effect on the ecological functioning of the site, rather than consideration solely on the proportion or area of the habitats or species affected on a site. These effects may be direct or indirect, and could relate to works within the European site itself, or beyond its boundaries but which might cause impacts to qualifying mobile features within the site when they are outside it.

Effect: It is therefore apparent that the first task is to identify the effects that could follow from the implementation of the project, and how and to what level they might affect any given International site.

3.0 LIKELY SIGNIFICANT 'ALONE' EFFECTS

3.1 Introduction

This section evaluates whether the proposals are likely to result in any significant adverse effects upon the conservation objectives and/or qualifying features of Singleton and Cocking Tunnels SAC, based upon the details of the scheme in isolation.

3.2 Construction Impacts

3.2.1 Disturbance

This pathway is defined as impacts from development which changes the extent or distribution of a qualifying habitat or the habitats of qualifying species within a European site, thereby reducing the population or restricting the distribution of qualifying species.

As construction works will take place during daylight hours and will not require the use of artificial light, it is considered unlikely the works will result in direct disturbance to local foraging and commuting Barbastelles. Although scattered trees are present these were not considered suitable to support roosting bats.

Therefore, direct disturbance of bats using the site for foraging and commuting via light and noise will not occur. **Impacts associated with light and noise can therefore be scoped out of the HRA.**

3.2.2 Habitat Alteration

No opportunities are present on-site or within close proximity of the site for roosting bats, and therefore the proposals will not result in any associated direct impacts via roost damage or destruction. Potential impacts are therefore limited to those associated with foraging and commuting habitat.

Natural England proposes a 12km wide impact zone around all Sussex Bat SACs. Within this zone the full extent of the range of foraging areas required by bats must be considered.

Habitats within the area of impact consists of managed improved grassland. This was dominated by common grass species with frequent patches of moss and Common Nettle (*Urtica dioica*), frequent Clover (*Trifolium Sp.*), Dock (*Rumex Sp.*), Creeping Buttercup (*Ranunculus repens*), Dandelion (*Taraxacum officinale*) and Daisy (*Bellis perennis*), occasional Cat's-ear (*Hypochaeris radicata*), Cow Parsley (*Anthriscus sylvestris*), Ground Ivy (*Glechoma hederacea*), Germander speedwell (*Veronica chamaedrys*) and rare Wild Strawberry (*Fragaria vesca*), Wood Avens (*Geum urbanum*), Wild Angelica (*Angelica sylvestris*) and Hogweed (*Heracleum sphondylium*). The

majority of this area is subject to continual management, evident through the lack of diversity within the sward structure.

Scattered trees and an ornamental hedgerow are also present on-site, although these all fall beyond the works area and will be protected by Heras fencing.

Although the improved grassland is species-poor, the loss of this habitat to make way for the development will result in a small reduction in bat foraging habitat across the application area. Evidence shows Barbastelles typically forage in areas of broadleaved woodland, field margins and unimproved grasslands (BCT, 2016), it is therefore considered that the small loss of improved grassland is **unlikely to significantly impact Singleton and Cocking Tunnels SAC**.

3.2.3 Air Pollution

Due to the very limited scope of the works (the construction of one dwelling) it is considered unlikely the works will result in significant emissions of dust into the local environment compared to baseline levels. In addition, Slindon Park woods lie approximately 450m away from the site boundary which is well beyond the 100m radius that large airborne dust particles normally deposit. Habitats within 100m of the application site are largely confined to managed amenity grassland gardens, scattered trees and hedgerows.

Taking into account the nature of the proposals, the temporary nature of any dust-emitting works, the distance of the Barbastelle maternity colonies and suitable habitat, it is concluded that dust-related impacts, should they occur, are **highly unlikely to result in any significant adverse effects upon the Singleton and Cocking Tunnels SAC**.

3.2.4 Water Pollution

This pathway is defined as impacts from development of a site which are thought to contain contaminants whose mobilisation during remediation, demolition or construction could result in pollution of a qualifying habitat or habitat of a qualifying species, thereby limiting the function of the habitat or altering the supporting processes on which it relies.

This could occur by causing the pollutants to be released into the atmosphere in close proximity to the habitat, or introducing pollutants to an aquatic environment that is hydrologically connected with the habitat. Pollution impacts could also occur as a result of a pollution incident during construction on a site which is hydrologically connected with a qualifying habitat or habitat of a qualifying species.

The site itself does not contain or lie close to any waterbodies and has no direct pathway to local water systems. Water pollution via chemicals is therefore considered

highly unlikely to occur, and impacts upon local riparian and open water habitats, particularly favoured Barbastelle foraging habitat, is considered highly unlikely.

Pollution via increased nutrient levels or chemicals is, therefore, considered highly unlikely to result in any significant adverse impacts upon the integrity of Singleton and Cocking Tunnels SAC.

3.3 Operation Impacts

3.3.1 Disturbance due to Increased Activity

This pathway is defined as impacts from development which results in heightened activity or increased operational noise within the development site, thereby causing changes in the distribution of qualifying species within a European site or important supporting area, displacing the species from otherwise suitable habitats, and thereby reducing individual survival rates and risking a population reduction. This could be due to the proximity of the allocation site to the European site/supporting area and/or the absence of existing topographic features, structures or vegetation which may serve to sufficiently screen the activity or attenuate the noise.

Although Slindon Park woods is open to the public, the addition of a single dwelling to the surrounding area is not considered to result in a significant increase in the visitor pressure compared to the current baseline levels. In addition, the estate is already managed for visitors by the National Trust and is considered to have the infrastructure in place to minimise the impact of recreational pressure on important habitats within the estate boundary.

In addition, Singleton and Cocking Tunnels SAC does not permit public access and will not be impacted by increased visitor pressure.

It is therefore considered highly unlikely the development will result in a significant increase in visitor pressure to either Slindon Park or Singleton and Cocking Tunnels SAC.

3.3.2 Disturbance due to Increased Artificial Light

This impact considers the installation of artificial light post-development for the purpose of the operational phase. Barbastelles are noted for avoiding artificially lit areas. The introduction of a new dwelling will likely result in some level of increase in artificial light spill into immediately surrounding habitats, whether this is through indoor lighting or the installation of external security lighting.

As Barbastelles are unlikely to be reliant on the grassland as foraging habitat, it is considered unlikely that light spill from windows will significantly alter their foraging and commuting behaviour. Inconsiderate placement of external lighting, particularly if directed towards suitable boundary features, could result in a disruption to Barbastelle commuting routes which, in turn, could have a minor impact on the favourable conservation status of the local population. In addition, high light intensity and light with an upward glare could also disrupt opportunistic flight paths through the site.

It is therefore considered the development will likely result in a minor significant impact to the commuting routes of local Barbastelles, therefore, also a **likely minor significant impact to the maternity colony in Slindon Park woods, and Singleton and Cocking Tunnels SAC.**

3.4 Summary of Likely Significant 'Alone' Effects

It is therefore concluded that a minor significant adverse effect exists associated with the proposals in isolation. The following section assesses the presence of any potential 'in combination' effects.

4.0 LIKELY SIGNIFICANT IN-COMBINATION EFFECTS

In some cases, a project may have a likely significant adverse effect upon a European site in isolation from surrounding proposals. In other cases, however, the adverse effects of a project on its own may be either unlikely or insignificant to the ongoing integrity of the European site, but that there may be a number of other plans or projects in the area which could result in 'in combination adverse effects' with the scheme at the focus of the HRA if their individual effects were to be combined.

With regards to Singleton and Cocking Tunnels SAC, the 'alone' effects have been classified as a minor significant effect in HRA terms upon the integrity of the SAC. Planning Finder¹ was used to search for planning applications within 1 mile of the application site. All of these were either for surface drainage works, change of land use, house extensions/alterations, and building conversions. No schemes were identified that would result in a significant reduction of bat foraging habitat or a likely net increase in ambient light levels, either in size of the proposal or the number of proposals.

Due to the relatively low impact of the application's proposals (the construction of 1 dwelling), the low impact of other neighbouring proposals, and the low value of habitats to be lost and impacted, **it is considered unlikely there will be any significant in-combination effects associated with the proposals.**

¹https://www.planningfinder.co.uk/search/near?postcode=bn18+0sr&radius=1&order=date_recent

5.0 CONSIDERATION OF THE 'DO NOTHING' APPROACH

In addition to assessing the potential adverse effects of the scheme being implemented upon the local Barbastelle population and the associated value of the habitats within dispersal range of Singleton and Cocking Tunnel SAC and the Slindon Park woods, it is important to take into consideration the threats posed to Barbastelles by following a 'doing nothing' approach on site (i.e. continuing the current management regime, without implementing the proposed scheme).

The site as a whole is considered to hold site-local level of importance, with the proportion which lies specifically within the works area (i.e. improved grassland) considered to also hold site-local value due to its limited potential for local foraging and commuting bat species (although this is more likely to be of value to more common bats that are more often found foraging in open habitats, such as Pipistrelles (*Pipistrellus* spp)). As the site is currently heavily managed to a short sward height, the ecological value of this grassland is limited. The area is currently unlit by artificial light providing a dark area for less light tolerant local bat species to forage, which may be opportunistically used by low numbers of commuting Barbastelles (especially when considering the higher quality foraging habitats beyond the settlement boundary).

It is considered that a lack of intervention or not proceeding with the agreed proposals will only seek to maintain a habitat of limited value to common local bat species with less light-tolerant species such as Barbastelles likely only using the site opportunistically. Therefore, the proposals will result in a minor negative impact compared to the 'do nothing' approach, however, considering the limited ecological value of habitats to be impacted for Barbastelles, this is not considered to be significant.

6.0 MITIGATION AND ENHANCEMENTS

6.1 Mitigation

As the proposals have been identified to result in a minor significant effect upon Barbastelle Bats, one of the qualifying features of Singleton and Cocking Tunnels SAC, mitigation and compensation measures associated with the proposals that are specific to this species or site are not required.

6.1.1 Lighting Strategy

In accordance to the mitigation hierarchy, the first step to minimising the impact of artificial lighting would be to either avoid the placement of external lighting sources, or specifically for security lighting, to use motion-activated lights (with 1-minute timers).

Any external lights required should be spaced as far apart as possible to minimise light spill and be directed away from boundary scattered trees/hedgerows. Bollard lighting or 'hooded' lights should be used to keep lighting below the horizontal plain and directed to the locations most needed (**Figs 3 + 4**).

Figure 3. (a) Shield 'barn doors' (b) cowl hood; (c) shield and (d) external louvre Images from ILP (2018).

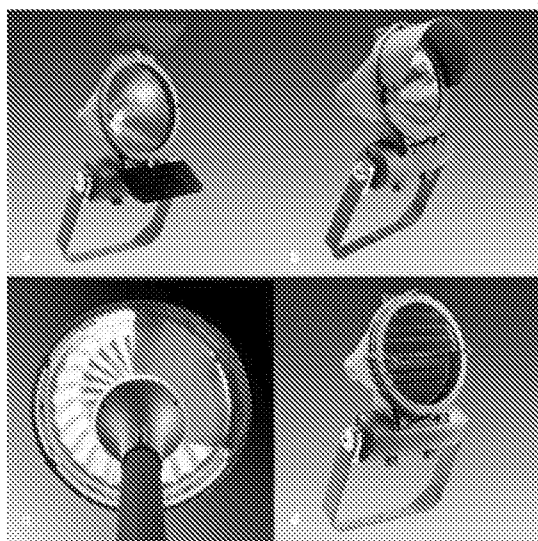


Figure 4. Bollard lighting.



A new document (Guidance Note 08/18 Bats and Artificial Lighting in the UK) has recently been produced via a collaboration between the Institute of Lighting Professionals (ILP) and the Bat Conservation Trust (BCT), which outlines the latest recommendations to minimise the impacts of increased artificial lighting on bats. The key recommendations within this document have been outlined below and will be implemented provided there are no conflicts with any legal limits of illumination (in which case a suitable compromise should be reached).

‘Luminaires come in a myriad of different styles, applications and specifications which a lighting professional can help to select. The following should be considered when choosing luminaires:

- All luminaires should lack UV elements when manufactured. Metal halide, fluorescent sources should not be used. LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white spectrum (ideally <2700Kelvin) should be adopted to reduce blue light component.
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012).
- Internal luminaires can be recessed where installed in proximity to windows to reduce glare and light spill.
- The use of specialist bollard or low-level downward directional luminaires to retain darkness above can be considered. However, this often comes at a cost of unacceptable glare, poor illumination efficiency, a high upward light component and poor facial recognition, and their use should only be as directed by the lighting professional.
- Column heights should be carefully considered to minimise light spill.

- Only luminaires with an upward light ratio of 0% and with good optical control should be used – See ILP Guidance for the Reduction of Obtrusive Light.
- Luminaires should always be mounted on the horizontal, i.e. no upward tilt.

6.2 Enhancement

6.2.1 Bats

A selection of bat boxes will be erected within trees across the site. The Schwegler 2F has been designed as a summer roosting space for bats and has a simple entrance hole at the front. The Schwegler 1FD has been developed specifically for smaller bats as both the interior and the type and size of the entrance hole match the requirements of smaller species. It features two grooved internal wooden front panels with precise spacing between them providing crevice dwelling opportunities. This model has proved highly effective as a nursing area. As well as Pipistrelles (*Pipistrellus Sp.*), Daubenton's (*Myotis daubentonii*) and Brown Long-eared bats (*Plecotus auritus*) have also been recorded roosting within this style of bat box. The 1FF is spacious enough for bats to use as a summer roost or nursery site and is open at the bottom, allowing droppings to fall out so it does not need cleaning. To compensate for fluctuations in temperature in spring and autumn, the 1FF is provided with a roughened rear panel made of hard-wearing wood. Therefore, depending on their individual temperature requirements, the bats can choose between the cooler Woodcrete surface or the warmer wooden panel. The inner dimensions of the 1FF have a reducing width making it ideal for bat species which inhabit crevices such as Pipistrelle and Noctule bats.

The bat boxes are manufactured from Woodcrete meaning they will last for at least 20 - 25 years making them a valuable long-term ecological enhancement. The bat boxes will be sited on trees using the aluminium nails provided. They should be positioned at a height of between three to six metres from ground level. Bat boxes should ideally be sited in open sunny positions however having them face different directions will provide a variety of micro-habitats.

Lighting on site will be kept to a minimum. Any security lighting installed on-site should be controlled by sensors to ensure prolonged periods of darkness and to minimise the impacts towards commuting and/or foraging bats.

6.2.2 Nesting Birds

Bird boxes will be erected within trees. Ensuring there is a mixture of open and circle fronted will attract an array of species. Also, those constructed of woodcrete are favourable as they will last longer as opposed to wooden boxes.

In addition, a variety of entrance holes sizes will be installed to suit a variety of species i.e.:

- **32mm entrance hole** will attract Great, Blue, Marsh, Coal and Crested Tit, Redstart, Nuthatch, Collared and Pied Flycatcher, Wryneck, Tree and House Sparrow and bats.
- **26mm entrance hole** suits Blue, Marsh, Coal and Crested Tit and possibly Wren. All other species are prevented from using the nest box due to the smaller entrance hole.

6.2.3 Native Planting

6.2.3.1 Wildflowers

In order to attract nocturnal species, it is beneficial that the flowers vary in colour (although pale flowers that are more easily seen in poor light and so attract insects at dusk), fragrance, shape, amount of nectar and time of flowering. Flowers with 'landing platforms' for insects (i.e. flowers from the Daisy and Carrot families) increase opportunities for insects and in turn foraging bats. Native and pollen rich species should be utilised on site.

6.2.3.2 Shrubs

As a general enhancement any proposed new planting should aim for a 70:30 ratio in favour of native species over non-natives and ornamentals. Ideally fruit bearing trees, providing food sources for birds and small mammals, during the autumn and winter, and nest sites during the spring and summer, should be utilised. Species that should be considered include:

- Hawthorn,
- Elder,
- Blackthorn (*Prunus spinosa*),
- Alder Buckthorn (*Frangula alnus*),
- Wild Cherry (*Prunus avium*),
- Crab Apple (*Malus sylvestris*),
- Rowan (*Sorbus aucuparia*).

Shrubs to be considered within the landscape planting include:

- Holly,
- Dogwood (*Cornus sanguinea*),
- Privet (*Ligustrum vulgare*),
- Dog Rose (*Rosa canina*),
- Guelder Rose (*Viburnum opulus*).

7.0 SCREENING CONCLUSION

Referring back to Section 1.4 the Conservation Objectives for Singleton and Cocking Tunnels SAC, with regard to the findings presented within this document, it has been demonstrated that the scheme:

- Will not significantly negatively impact upon the extent and distribution of the habitats utilised by Barbastelles associated with Singleton and Cocking Tunnels SAC;
- Providing mitigation measures outlined in section 6.1 are followed, will not lead to the deterioration of the structure or function of the natural habitats associated with Singleton and Cocking Tunnels SAC;
- Will not have any residual negative impacts upon the supporting processes on which Barbastelles associated with Singleton and Cocking Tunnels SAC rely;
- Providing mitigation measures outlined in section 6.1 are followed, will not negatively impact upon the populations of qualifying species within Singleton and Cocking Tunnels SAC;
- Providing mitigation measures outlined in section 6.1 are followed, will not negatively impact upon the distribution of Barbastelles associated with Singleton and Cocking Tunnels SAC.

This Shadow HRA concludes that, based upon the assessment undertaken in full accordance with best practice guidelines, there will be **no likely significant adverse effects** upon Singleton and Cocking Tunnels SAC or Barbastelles associated with the site/functionally linked habitats. Therefore, ADC as Competent Authority are not required to progress the application to the Appropriate Assessment stage of the HRA process.

8.0 REFERENCES

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