



Russell McCourty  
Folkes Architects  
The Old Forge,  
6 Church Street,  
Storrington,  
West Sussex  
RH20 4LA

24<sup>th</sup> March 2020

Dear Russell,

**Ref: Proposed Storage Barn, Broomhurst Farm, Lyminster Road, Lyminster, West Sussex, BN17 7QQ. Arun District Planning reference: LY/4/20/PL**

Many thanks for instructing the Ecology Partnership to report on the impacts of the proposals of the development at Storage Barn, Broomhurst Farm, Lyminster on the designated sites within the local area. Please accept this letter of report as a technical response to the request for further information from the planning depart at Arun District Council on the above site and development. For ease of reference the validation request is shown below in full below;

*'Please provide a biodiversity survey and report for the site due to the site being in the Arun Valley and the Arundel Park Site of Scientific Interest. Please refer to the Local Validation requirements and the guidance notes for the Biodiversity Checklist for further information.'*

The Ecology Partnership have reviewed the proposed development in response to this request, the location and extent of the designated sites mentioned above and considered any impacts on the these designations resulting from the development.

## Proposals

The proposals on site are to erect a single detached storage barn at Broomhurst Farm (red line of the approximate location in figure 1 below). The storage barn is to be used for storage of farm materials.



*Figure 1: Approximate location of the development*

## Designated Sites of Concern within the Local Area

Arundel Park Site of Special Scientific Interest (SSSI) is located approximately 1.9km north-west of the sites red line boundary. Arundel Park SSSI is designated for its number of rare and notable species of invertebrates, diverse breeding bird community, it's importance for overwintering birds and examples of species-rich chalk grassland containing several plants uncommon in Sussex.

Further afield lies Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, which is located approximately 7.6km north of the sites red line boundary. The

site is designated a SAC as it holds one of the three main population centres of ramshorn snails (*Anisus vorticulus*) within the UK. It was designated as an SPA as it supports a population of Bewick Swan (*Cygnus columbianus bewickii*), which is classed as endangered within Europe, as well as its overall waterfowl assemblage. The site was designated as a Ramsar site due to its rich aquatic flora and fauna, outstanding ornithological importance for wintering waterfowl and breeding birds, and its wetland invertebrate species.

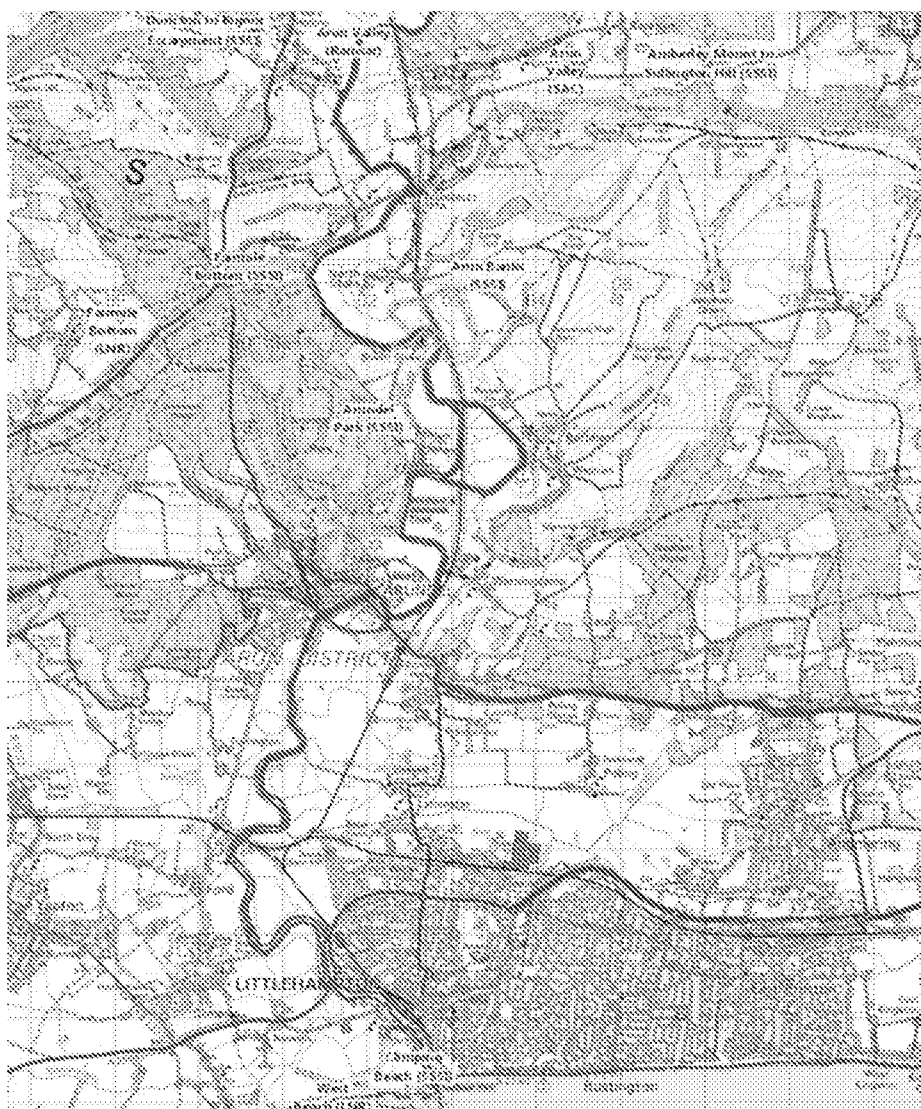


**Figure 2: Location of site compared to designated sites within the local area (Site indicated by red star. Designated sites indicated by light green hatching) – Source Magic Maps Accessed March 23<sup>rd</sup> 2020**

## Arundel Park SSSI

The development site lies within the following risk zone categories as detailed within Figure 3.

|                                  |                                                                                                                                                                                                                                               |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>All Planning Applications</b> |                                                                                                                                                                                                                                               |
| <b>Infrastructure</b>            | Pipelines, pylons and overhead cables. Any transport proposal including road, rail and by water (excluding routine maintenance). Airports, helipads and other aviation proposals.                                                             |
| <b>Wind &amp; Solar Energy</b>   | Wind turbines.                                                                                                                                                                                                                                |
| <b>Minerals, Oil &amp; Gas</b>   | Planning applications for quarries, including: new proposals, Review of Minerals Permissions (ROMP), extensions, variations to conditions etc. Oil & gas exploration/extraction.                                                              |
| <b>Rural Non Residential</b>     | Large non residential developments outside existing settlements/urban areas where footprint exceeds 1ha.                                                                                                                                      |
| <b>Residential</b>               | Residential development of 50 units or more.                                                                                                                                                                                                  |
| <b>Rural Residential</b>         | Any residential development of 10 or more houses outside existing settlements/urban areas.                                                                                                                                                    |
| <b>Air Pollution</b>             | Any industrial/agricultural development that could cause AIR POLLUTION (incl: Industrial processes, livestock & poultry units with floorspace > 500m <sup>2</sup> , slurry lagoons > 200m <sup>2</sup> & manure stores > 250t).               |
| <b>Combustion</b>                | General combustion processes >20MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion. |
| <b>Waste</b>                     | Landfill. Incl: inert landfill, non-hazardous landfill, hazardous landfill.                                                                                                                                                                   |
| <b>Composting</b>                | Any composting proposal with more than 75000 tonnes maximum annual operational throughput. Incl: open windrow composting, in-vessel composting, anaerobic digestion, other waste management.                                                  |
| <b>Discharges</b>                |                                                                                                                                                                                                                                               |
| <b>Water Supply</b>              | Large infrastructure such as warehousing / industry where total net additional gross internal floorspace following development is 1,000m <sup>2</sup> or more.                                                                                |

*Accessed March 23<sup>rd</sup> 2020*

The proposals are for a new storage barn. It is not considered that the development falls under the categories for Infrastructure, Wind & Solar Energy, Minerals Oils & Gas, Residential, Rural Residential, Air Pollution, Combustion, Waste, Composting or Discharges Water Supply. The proposals are Rural Non Residential in nature but the footprint is well under 1ha so does not fall within the potential impact details. If the LPA does feel that the development falls within any of the categories above then Natural England should be consulted on potential impacts.

The development site falls outside the boundaries of the SSSI, as such there will be no direct impacts resulting from land take, fragmentation or isolation of habitats within the SSSI boundaries or indeed habitats which would be considered functionally linked. The site is already a functioning farm, and the development will result in a small area of land loss, considered likely to be of low-quality agricultural land. As such no direct impacts are considered.

Indirect impacts, such as alterations to lighting, impacts resulting from construction activities, are not considered likely due to the distances between the development site and the SSSI. As such impacts resulting from the construction is considered to be negligible.

Overall, it is considered that the proposals will not have any significant affects to the integrity of Arundel Park SSSI and no impacts are predicted. It is also anticipated that no additional negative impacts are predicted on any other SSSIs in the local area from the development.

#### *Arun Valley SAC, SPA and Ramsar*

The proposed development site is over 7.5km from the SAC, SPA and Ramsar site. Again, due to the distance of the development site from the designation no direct impacts are predicted from land loss, land take, fragmentation or isolation of habitats within the designated site or within functionally linked land within the wider landscape. A desk top study shows that there is no direct link to the designated site such as watercourses. The habitats which are to be impacted by the development are an extension of the active farm yard and as such, the habitats to be impacted are not considered to be habitats of importance and not habitats which represent habitats located within the SPA SAC. Furthermore, the extent of the proposals and the distance of the development would not result in impacts which would affect the integrity of the designated sites. The scale of the development is small in size and restricted to the construction on one building. The farm is already an operating farm and the development will not lead to an increase in traffic to and from the premises and within the local area. The development is small in scale with a net increase of only one agricultural building and, as such, can be reviewed in isolation (Wealden District Council vs

SoS 2017 EWHC 351) as any impacts are to be so minimal from the development as to be considered 'imperceptible / nugatory' level.

It is considered that the development can be viewed in isolation as impacts are considered to be nugatory. However, it is up to the local authority to assess whether any negative impacts from the development or the development in combination with other developments within the local area and as such trigger the requirement for an appropriate assessment.

### **Conclusion**

It is considered that the proposals will not have any significant adverse impacts on the integrity of either Arundel Park SSSI, or Arun Valley SAC, SPA and Ramsar, due to the limited nature of the works and distances between them. Any impacts of the development of the new building on site is considered to have a imperceptible impact on designated sites within the local area.

Many Thanks,



Chris Jennings BSc (Hons) MSc MCIEEM  
Principal Ecologist