



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

8th April 2020

Dear Russell,

Ref: Proposed New Access, Broomhurst Farm, Lyminster Road, Lyminster, West Sussex, BN17 7QQ.

Many thanks for instructing the Ecology Partnership to report on the impacts of the proposals of the development of a new access at Broomhurst Farm, Lyminster on the designated sites within the local area.

The Ecology Partnership have reviewed the proposed development with regards to protected designated nature conservation sites in the local area with particular focus on Arun Park SSSI and Arun Valley SPA, SAC, Ramsar site.

Proposals

The proposals on site are to construct a new access way, flint wall and sliding driveway gates. The approximate location of the proposed driveway are shown in the Figure 1.



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 2km 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 7.7km 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 a 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, location of site highlighted with yellow circle. Designated sites indicated by light green hatching) – Source Magic Maps Accessed April 8th 2020

Discussion

Arundel Park SSSI

The proposed development site does not lie within the SSSI or indeed adjacent to the SSSI boundaries. The site does, however, fall within its impact risk zones of the SSSI as well as other designated sites within the local area. These zones are identified through assessing the sensitivities of the site and the risks of impacts associated with a range of differing development types, for example large scale industrial developments or small residential developments of limited unit

numbers. If the development falls within any of these categories, the LPA should consult with Natural England on the likely risks.

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

1. DOES PLANNING PROPOSAL FALL INTO ONE OR MORE OF THE CATEGORIES BELOW?	2. IF YES, CHECK THE CORRESPONDING DESCRIPTION(S) BELOW. LPA SHOULD CONSULT NATURAL ENGLAND ON LIKELY RISKS FROM THE FOLLOWING:
All Planning Applications	
Infrastructure	Airports, helipads and other aviation proposals.
Wind & Solar Energy	
Minerals, Oil & Gas	Planning applications for quarries, including: new proposals, Review of Minerals Permissions (ROMP), extensions, variations to conditions etc. Oil & gas exploration/extraction.
Rural Non Residential	
Residential	
Rural Residential	
Air Pollution	Livestock & poultry units with floorspace > 500m ² , slurry lagoons > 750m ² & manure stores > 3500t.
Combustion	General combustion processes >50MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.
Waste	
Composting	
Discharges	
Water Supply	

Figure 3: SSSI Impact Risk Zones for the proposed development site – Source Magic Maps

Accessed April 8th 2020

The proposals are for a new vehicular access. It is not considered that the development falls under the categories for Infrastructure, Minerals Oils & Gas, Air Pollution or Combustion. 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 any 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 7.7km 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 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 of one vehicular access. 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 vehicular access 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, Arun Valley SAC, SPA and Ramsar or other designated sites within the local area due to the limited nature of the works and distances between them. Any impacts of the development of the new vehicular 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