



Land off Arundel Road

*Information to Inform an
Habitat Regulations Assessment*

10 MARCH 2026

Commissioned by

Harlequin Developments,
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1. Introduction

1.1. Background

- 1.1.1. Derek Finnie Associates was commissioned by Harlequin Developments to undertake an Ecological Assessment in relation to an area of land referred to as Land off Arundel Road, Fontwell, West Sussex, herein referred to as the 'Site' (Figure 1). Harlequin Developments is submitting a detailed planning application for the erection of 64 residential dwellings with access off Arundel Road, together with associated parking, open space, play space, landscaping, drainage and infrastructure.
- 1.1.2. The Site is located approximately 10.7km to the south of Singleton & Cocking Tunnels Special Area of Conservation (SAC), which is designated for the populations of barbastelle and Bechstein's bats it supports.
- 1.1.3. Although the Site is outside the National Park, 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. Therefore, Arun District Council (ADC) have requested the applicant submit information to inform a Habitat Regulations Assessment (HRA) as the Site lies within this 12km buffer. 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).
- 1.1.4. 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

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, which covers approximately 2.7ha, comprises a semi-improved grass field, which appears to have been sub-divided into several horse grazing paddocks in the past. Outgrown hedgerows are present along the east and southern boundaries, whilst a linear belt of broad-leaved plantation woodland is present along the northeast boundary.
- 3.1.2. The A27 Arundel Road runs contiguous with the Site's northeast boundary, whilst existing residential dwellings lies to the west and, to a lesser extent, to the south,

3.2. Proposed Development

- 3.2.1. The submitted application seeks the construction of up to 64 residential dwellings including affordable housing and a new community use building with all matters reserved other than access.

3.3. Potential Impacts

- 3.3.1. As the proposed residential development at Arundel Road 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 10.7km 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 Arundel Road to severe bat flight lines needs to be examined.

4. Impact Screening

3.4. Flight Lines

- 3.4.1. Information of barbastelle bat flight lines has previously been provided by Arun District Council which 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.
- 3.4.2. 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 550m away from the Site.

3.5. On Site Surveys

- 3.5.1. Bat surveys undertaken within the Site itself were also reviewed. The surveys data have been submitted in support of the planning application. Whilst common bat species were noted foraging around the Site, no evidence of barbastelle bat was encountered.

3.6. On Site Impacts

- 3.6.1. The hedgerows around the perimeter of the Site will be retained throughout the development with no new significant breaks in the existing hedgerows. Additional native re-enforcement and buffer planting being incorporated into the landscape proposals. The lighting scheme for the project will also give due consideration to bat usage within the Site, retaining dark corridors around the periphery of the Site through the usage of

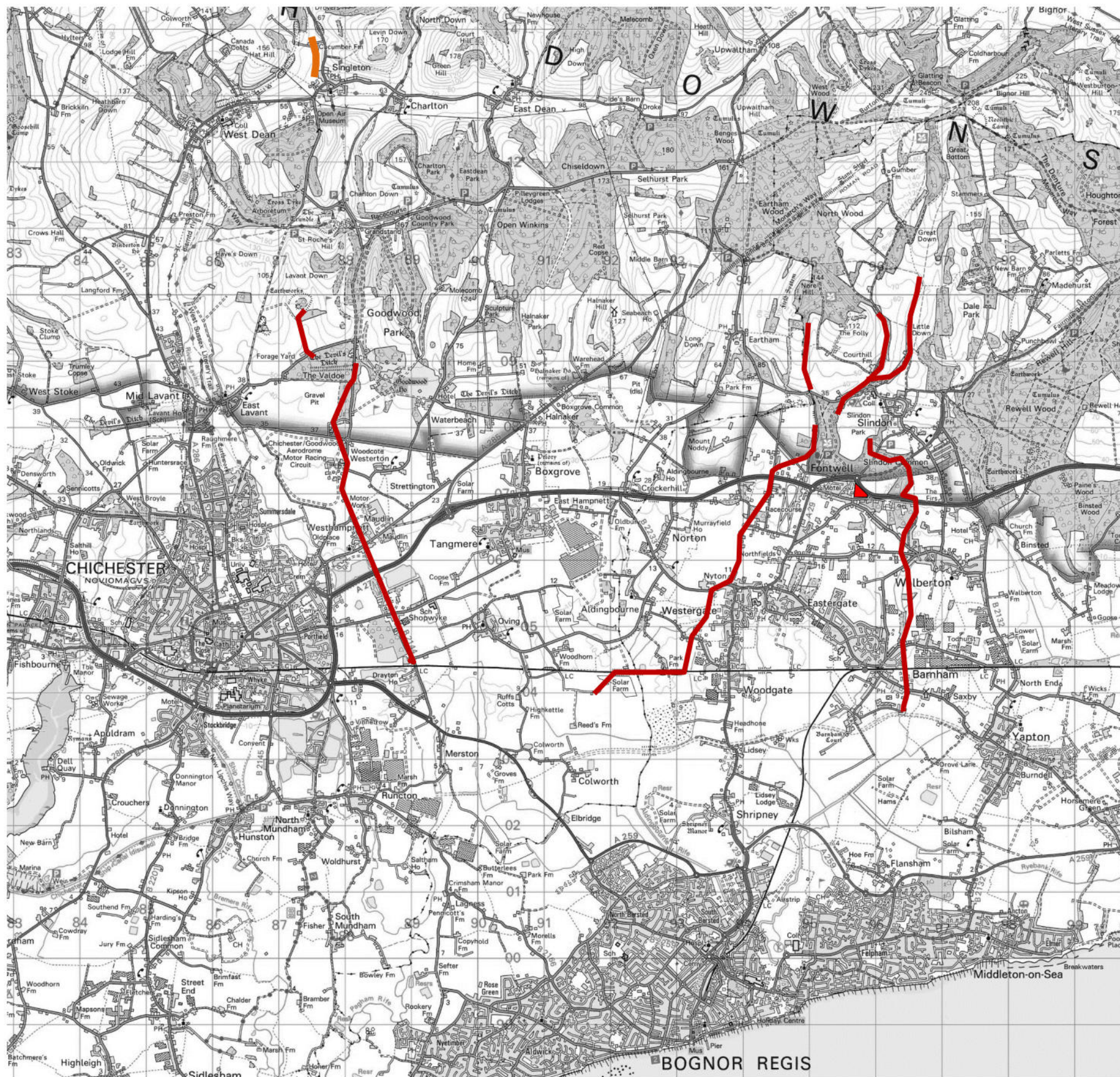
3.7. Screening

- 3.7.1. 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 A27 trunk road which is contiguous with the northern site boundary 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;
 - the proposal will introduce a sensitive lighting scheme around the new development; and
 - boundary vegetation will be retained and re-enforced with native species.

- 3.7.2. 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 Fontwell upon Singleton & Cocking Tunnels SAC was reviewed. The proposal for 64 new dwellings located 10.7km 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.



Legend:

-  Barbastelle flight line
-  SAC
-  Development Site



Drawing No: Figure 1

Title: Bat Flight Lines

Date: March 2026

Project: Land off Arundel Road

Client: Harlequin



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Derek Finnie Associates offers over 30 years of professional ecological expertise to a wide range of clients, principally within the development arena, but also offering advice to the public and voluntary sectors. Based in Wokingham within the Thames Valley, we are ideally located to provide services to developers within the south and south-east of England.

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