

Jane Moseley,  
County Planning,  
West Sussex County Council,  
Northleigh,  
County Hall,  
Chichester,  
PO19 1RH



30<sup>th</sup> June 2014

Dear Jane,

**Reference No: WSCC/083/13/KD**

**Re: The installation of a well and associated infrastructure including access road and soil bunds, for the drilling of a vertical borehole and contingent horizontal borehole from the same well for the exploration of hydrocarbons for a temporary period of three years.**

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Further Information submitted relating to the above planning application. I would also refer you to our previous comments relating to planning permission WSCC/083/13/KD submitted to you in our letter dated 2/12/2013. These were provided in light of National Park purposes and duty and should be considered in conjunction with this response.

#### **Bats and badgers**

Conservation of and enhancement of the natural beauty, wildlife and cultural heritage of the area, is a key National Park purpose and in this context, bat species found in and around the site and the within the national park boundary nearby should be given careful consideration. It is noted that previous advice provided by the Sussex Wildlife Trust and Natural England was taken into consideration in our original response. In this context, it was considered that there was a possibility of the development resulting in a detrimental impact on bat species and therefore upon the first purpose of the South Downs National Park.

The key impact arising from the proposed development upon bat species is that of lighting. The site lies close to 'The Mens' Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC), where Barbastelle bats are a qualifying feature of the SAC. Previous comments from the County Ecologist and Natural England advise that further information should be provided:

- To show how lighting will be shielded and cowled; and
- To assess the impact of lighting upon bats (including a lux contour map identifying light spill).

The SDNPA also wishes to draw attention to the adopted South Downs National Park Partnership Management Plan 2014 to 2019, which should also be considered by WSCC as a material consideration. Of particular importance are policies 4 and 5. With regards to National Park setting and conservation of the natural beauty and wildlife of the area located so close to the National Park's boundary, Policy 4 aims to "create more, bigger, better managed and connected areas of habitat in and around the National Park, which deliver multiple benefits for people and wildlife".

South Downs Centre,  
North Street,  
Midhurst,  
West Sussex,  
GU29 9DH

T: 0300 303 1053  
E: [info@southdowns.gov.uk](mailto:info@southdowns.gov.uk)  
[www.southdowns.gov.uk](http://www.southdowns.gov.uk)

Policy 5 aims to “conserve and enhance populations of priority species in and around the National Park, delivering targeted action where required”. We would **maintain our advice** that any potential impact upon bat populations using sites located in the National Park and the surrounding area should be given substantial consideration. Although located outside the former Sussex Downs AONB, the Mens and Ebernoe Common were included in the National Park designation because of the SAC due to the presence of very important bat colonies. These colonies feed over a wide area, both inside and out of the National Park. The locations of both feeding areas and flight paths have been researched for Natural England by Frank Greenaway and therefore if the proposed development were to be recommended for approval, we would seek a precautionary approach and a condition whereby bat populations would be closely monitored, particularly during the operation of the drilling derrek and associated lighting.

We would request that the advice provided by Natural England and the County Ecologist is given careful consideration. The responses from Natural England, the County Ecologist or the Sussex Wildlife Trust are not yet available at the time of writing this response, therefore, provided that Natural England and the County Ecologist are satisfied that the further information, listed above, provided by the ES addendum addresses original concerns relating to light impact upon bat species and their habitat, then the South Downs National Park raises **no objection** to the proposed development. However, should either the County Ecologist or Natural England still not be satisfied that the further information request has been satisfactorily addressed then the South Downs National Park Authority will **reconsider this response**.

Regards,



Tim Slaney  
Director of Planning  
South Downs National Park Authority