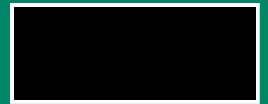


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Proposals at Former Training Camp, Crowborough

Habitat Regulations Assessment

Home Office

July 2026



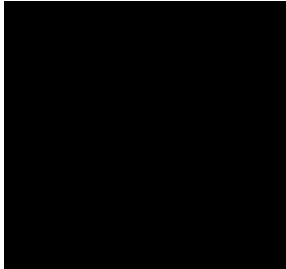
Prepared for:

Home Office

Prepared by:

[REDACTED]

Ecologist



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1. Introduction

- 1.1.1 [REDACTED] has been instructed by the Home Office to undertake Environmental Impact Assessment (EIA) Screening and Habitats Regulations Assessment (HRA) for temporarily accommodating non-detained asylum applicants at the former Crowborough Training Camp site in East Sussex (hereafter referred to as 'the Proposed Development'). The site, covering an area of approximately 18 hectares currently comprises a range of low-rise buildings which have been used in the past for military accommodation, training, welfare facilities and associated utilities and infrastructure. Most recently the site was used as transitional accommodation for the Afghan Resettlement Programme in 2024 before being consented to house asylum applicants for 12 months (until 22nd January 2027). The current proposals would seek to continue the use of the site to three years, until 22nd January 2030, after which it would be handed back to the MOD. The site location and the extent of the landownership by the MOD is shown in Figure 1 in Appendix A.
- 1.1.2 This report constitutes an assessment of the potential for the proposals (the extension in the period of use to three years) to have a Likely Significant Effect on any Special Conservation Areas, Special Protection Areas, or Ramsar sites (referred to hereafter collectively as Habitats sites). If such potential exists, it then presents an Appropriate Assessment of the implications of the proposals for the integrity of those wildlife sites, either alone or in combination with other plans and projects.
- 1.1.3 The National Site Network of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are protected via the Conservation of Habitats and Species Regulations 2017 (as amended, most recently in 2019 to reflect Brexit) (referred to as the 'Habitats Regulations'). These regulations also set out the process for assessing potential adverse effects on such sites, known as Habitats Regulations Assessment (HRA). Paragraph 194 of the National Planning Policy Framework clarifies that, in England, the HRA process is also applied to another category of internationally important wildlife site called Ramsar sites. Plate 1 below sets out the legislative basis for Habitats Regulations Assessment.

1.2 Legislative Context

- 1.2.1 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
- 1.2.2 The HRA process applies the 'Precautionary Principle' to Habitats sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the Habitat (formally "European") site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question. Plate 1 below sets out the legislative basis for Appropriate Assessment.
- 1.2.3 Plans and projects that are associated with potential adverse effects on the integrity of Habitats sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

“Where a land use plan—

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.”

Plate 1 The legislative basis for Appropriate Assessment

- 1.2.4 Over time the phrase ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’.
- 1.2.5 Since the Proposed Development is not directly connected with, or necessary to, the management of any part of the National Site Network, the first step in the process required by the Regulations is to determine whether the project is likely to have a significant effect on any SAC, SPA or Ramsar site. That is the purpose of this document. If a likely significant effect will arise then the local planning authority become involved in consenting the project.

2. Methodology

- 2.1.1 The HRA process applies the 'Precautionary Principle' to Habitats sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the Habitats site(s) in question. Plans and projects with predicted adverse impacts on Habitats sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question.
- 2.1.2 Over time, the phrase 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'.
- 2.1.3 In spring 2018, the 'Sweetman' European Court of Justice ruling clarified that 'mitigation' (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a European site that would otherwise arise) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA has been cognisant of that ruling.
- 2.1.4 The HRA has been carried out with reference to the general guidance on HRA published by government in February 2021 and updated in 2023. [REDACTED] has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.

2.2 Scope of the HRA

- 2.2.1 There is no guidance that definitively dictates the physical scope of an HRA in all circumstances, since the potential distance at which an impact can arise depends on the proposal, the sensitivity of Habitats sites and the presence of a linking impact pathway for harm (e.g. noise, direct habitat loss etc.).
- 2.2.2 For the purposes of this assessment a 10km zone around the proposal site is considered suitably precautionary based on experience of similar projects i.e. those which involve the delivery of a large number of dwellings on a single site. For example, most core recreational catchments (except for some coastal sites) are under 10km in size and there are few wintering waterfowl and waders that make extensive use of functionally linked habitats located more than 10km from their core areas.
- 2.2.3 In some cases, development impacts can extend beyond 10km, particularly where hydrological pathways are involved, so 10km has not been used as an absolute cut off distance if the source-pathway-receptor concept suggests that a Habitats site located further afield could be significantly affected.

HRA Task 1 – Test of Likely Significant Effects (LSEs)

- 2.2.4 The first stage of any HRA is screening for Likely Significant Effects (LSEs) - essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- "Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?"*
- 2.2.5 The objective is to filter out those plans and projects that, without any detailed appraisal, are unlikely to result in impacts upon Habitats sites, usually because there is no mechanism for an adverse interaction with Habitats sites. This stage is the purpose of this report.
- 2.2.6 A 2018 decision by the European Court of Justice concluded that measures intended to avoid or reduce the harmful effects of a proposed plan or project on a Habitats site may no longer be considered by competent authorities at the LSEs stage of HRA. That ruling has been taken into account in producing this HRA. The HRA has also made reference to an HRA report made for the

original decision to house asylum applicants at the camp, made in 2025, although it is noted that the 2025 HRA did not consider potential recreational pressure on Ashdown Forest SAC/SPA.

- 2.2.7 Also in 2018, the Holohan ruling was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that 'As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area' [emphasis added]. Due account to this decision has been given in this HRA, particularly regarding the potential for mobile species for which an SAC or SPA is designated to be dependent on habitat outside the SAC or SPA.

HRA Task 2 – Appropriate Assessment

- 2.2.8 Where it is determined that a conclusion of 'no Likely Significant Effect' cannot be drawn, the HRA assessment proceeds to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no specific technical analyses, or level of detail, that are classified by law as belonging to Appropriate Assessment rather than the screening for Likely Significant Effects (LSE). The Appropriate Assessment constitutes whatever level of further assessment is required to determine whether an adverse effect on integrity would arise.
- 2.2.9 By virtue of the fact that it follows the screening process, there is an understanding that the analysis will be more detailed than that undertaken at the previous stage. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would address the potential effect, allowing for a conclusion of no adverse effect on integrity. In practice, the Appropriate Assessment takes any element of the Proposed Development that could not be excluded as having Likely Significant Effects following HRA Stage 1 and assesses the potential for an effect in more detail, with a view to concluding whether there would be an adverse effect on site integrity. Adverse effects on site integrity include disruption of the coherent structure and function of the European site(s) and the ability of the site to achieve its conservation objectives.

2.3 Other plans and projects

- 2.3.1 It is a requirement of the Habitats Regulations for any HRA to consider the potential for likely significant effects not only from the plan or project alone, but also (if there will be no significant effects alone) when considered 'in combination' with other plans and projects. For example, a new residential development situated within the core recreational catchment of a particular SAC may be too small to result in significant effects by itself, but when considered in combination with other planned residential developments to be delivered within the same core catchment over a similar timescale a likely significant effect could arise.

3. Test of Likely Significant Effects

- 3.1.1 The Proposed Development is located at the current Crowborough Training Camp site in East Sussex. The site is located approximately 2km to the southwest of Crowborough town centre. The site, covering an area of approximately 18 hectares currently comprises a range of low-rise buildings which have been used in the past for military accommodation, training, welfare facilities and associated utilities and infrastructure. Most recently the site was used as transitional accommodation for the Afghan Resettlement Programme. The current proposals would seek to use the site for a period of up to 12 months, after which it would revert back to the MOD. The site is accessed via the A26. A perimeter fence surrounds the area, delineating the Training Camp site.
- 3.1.2 The site is located in a generally open area of land mostly comprising farmland and wooded areas. Brown Knoll Farm is located to the immediate west of the Training Camp with a Timber Suppliers and industrial units to the immediate south. The nearest residential properties are located approximately 300m to the east of the site.
- 3.1.3 The following Habitats sites lie within 10km of the proposal:
- Ashdown Forest SAC
 - Ashdown Forest SPA
- 3.1.4 Ashdown Forest SAC/SPA is approximately 280m south of the site as shown on Figure 2 in Appendix A. The Conservation Objectives for these Habitats sites are provided in Appendix B.

3.2 Habitat loss and fragmentation

- 3.2.1 The Proposed Development is not located within the Ashdown Forest SAC or the Ashdown Forest SPA. As such there is no direct habitat loss or fragmentation impacts on these sites. Since the Proposed Development lies within 280m of the SPA/SAC, great crested newt (*Triturus cristatus*) may utilise terrestrial habitat within the site. However, there are no construction works associated with the Proposed Development and there will be no removal of vegetation or works directly to any ponds. As such it can be concluded that there are no likely significant effects as a result of this impact pathway.

3.3 Species disturbance (visual, noise, vibration)

- 3.3.1 Regarding the interest features of Ashdown Forest SAC/SPA, noise, visual and vibrational disturbance will not impact the designated habitats. There will be no works associated with the Proposed Development as temporary fencing, ablution blocks, and generators have already been installed as necessary and there is no change in existing use. Any associated with operational use of the camp will not differ from the existing consented uses, given the site is a former training camp. Given this, coupled with the distance to potential Dartford warbler and European nightjar habitat, and the presence of intervening woodland creating separation from the SPA interest features, disturbance is considered negligible.
- 3.3.2 During operation of the site, there will be no change to lighting from the existing consented use and the 280m separate of the camp from the SAC/SPA and intervening 55-132m belt of dense woodland will minimise light spill onto the SAC/SPA. This will avoid potential impacts as a result of visual and nighttime disturbance and therefore no likely significant effect will arise.

3.4 Changes to water quality

- 3.4.1 The Proposed Development will be entirely contained within the existing site boundary and the existing associated drainage infrastructure. This will ensure no likely significant effects occur during operation.
- 3.4.2 During construction, water will be supplied [REDACTED]
[REDACTED]
[REDACTED] While there is potential risk of pollution through spillage, leakage or contamination during construction activities, the waterbody bordering the site, Brownknoll Gill, is located downstream of Ashdown Forest SAC/SPA and therefore, any contamination or pollution incidents will not spread into the designated sites.

- ### 3.5 Changes to air quality

- ### 3.6 Changes to surface and groundwater hydrology

- ### 3.7 Introduction of Invasive Non-Native Species (INNS)

- ### 3.8 Recreational pressure

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- 3.8.4 Given the above, it is concluded there are no likely significant effects as a result of this impact pathway.

4. Conclusion

- 4.1.1 Assessing the potential for the works to lead to negative impacts on Ashdown Forest SAC and Ashdown Forest SPA, the following impact pathways were considered:
- Habitat loss and fragmentation;
 - Species disturbance (Visual, noise, vibration and light pollution);
 - Changes to water quality;
 - Changes to air quality;
 - Changes to surface water and groundwater hydrology; and
 - Introduction of invasive non-native species.
- 4.1.2 It is concluded that likely significant effects can be excluded for all the above identified impact pathways and therefore, it can be concluded with a high degree of confidence that will not be no adverse effects on the integrity of any Habitats sites due to the proposals, either alone or in combination with other projects and plans.
- 4.1.3 Since there is no mechanism for likely significant effects on Ashdown Forest SAC/SPA from this proposal, either because there is no construction work or because the levels of occupancy are within the parameters of the existing MOD camp, there is no mechanism for in combination recreational pressure or traffic-related air quality impacts in combination with growth in the Wealden Local Plan or elsewhere within 7km of the SAC/SPA.

Appendix A Figures

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LEGEND

-  Site Boundary
-  Land Registry Ownership Boundary

NOTES

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, Intermap, NASA, NGA, USGS, Contains OS data © Crown copyright 2025

ISSUE PURPOSE

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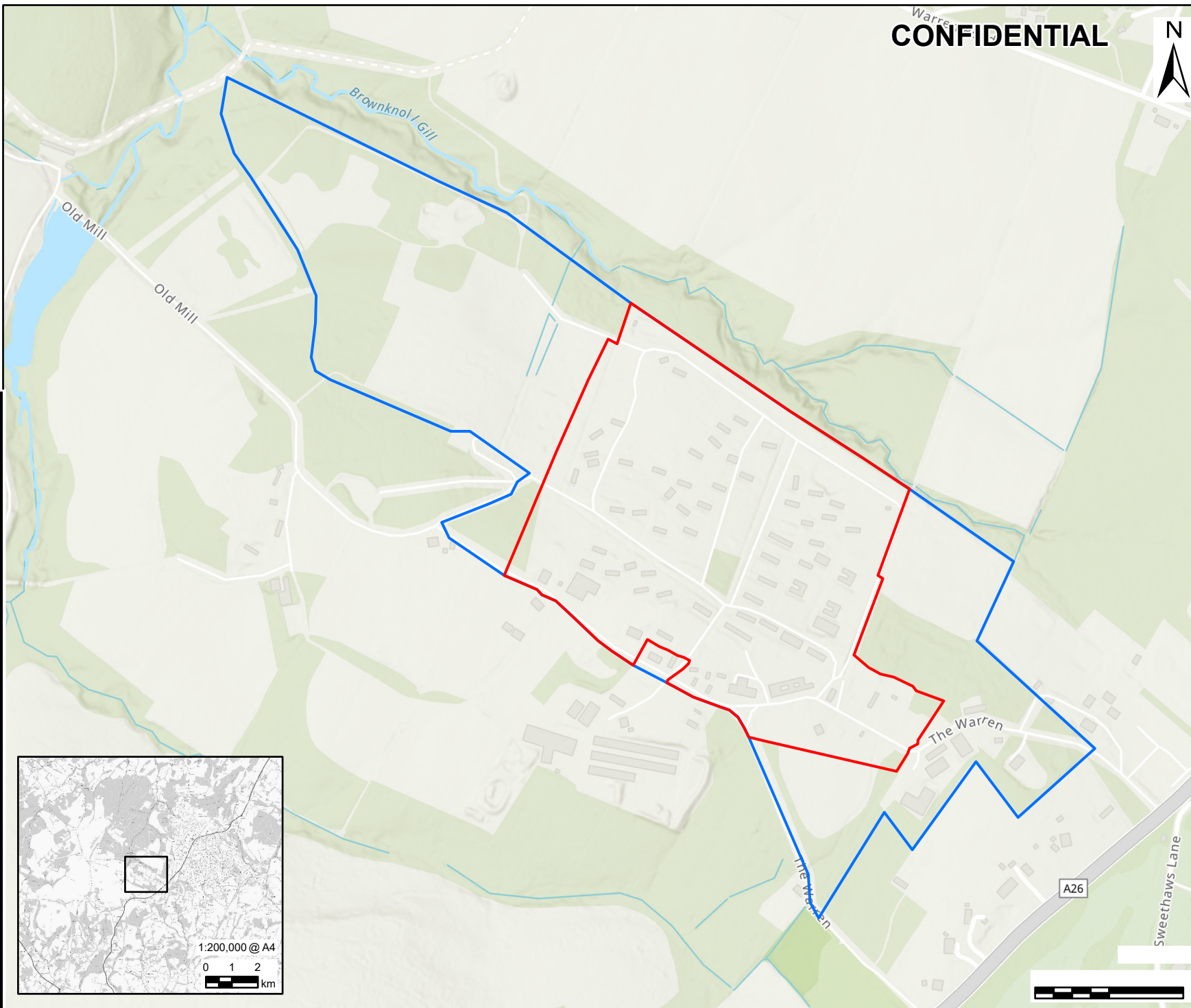
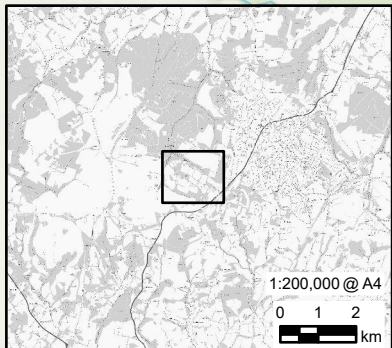
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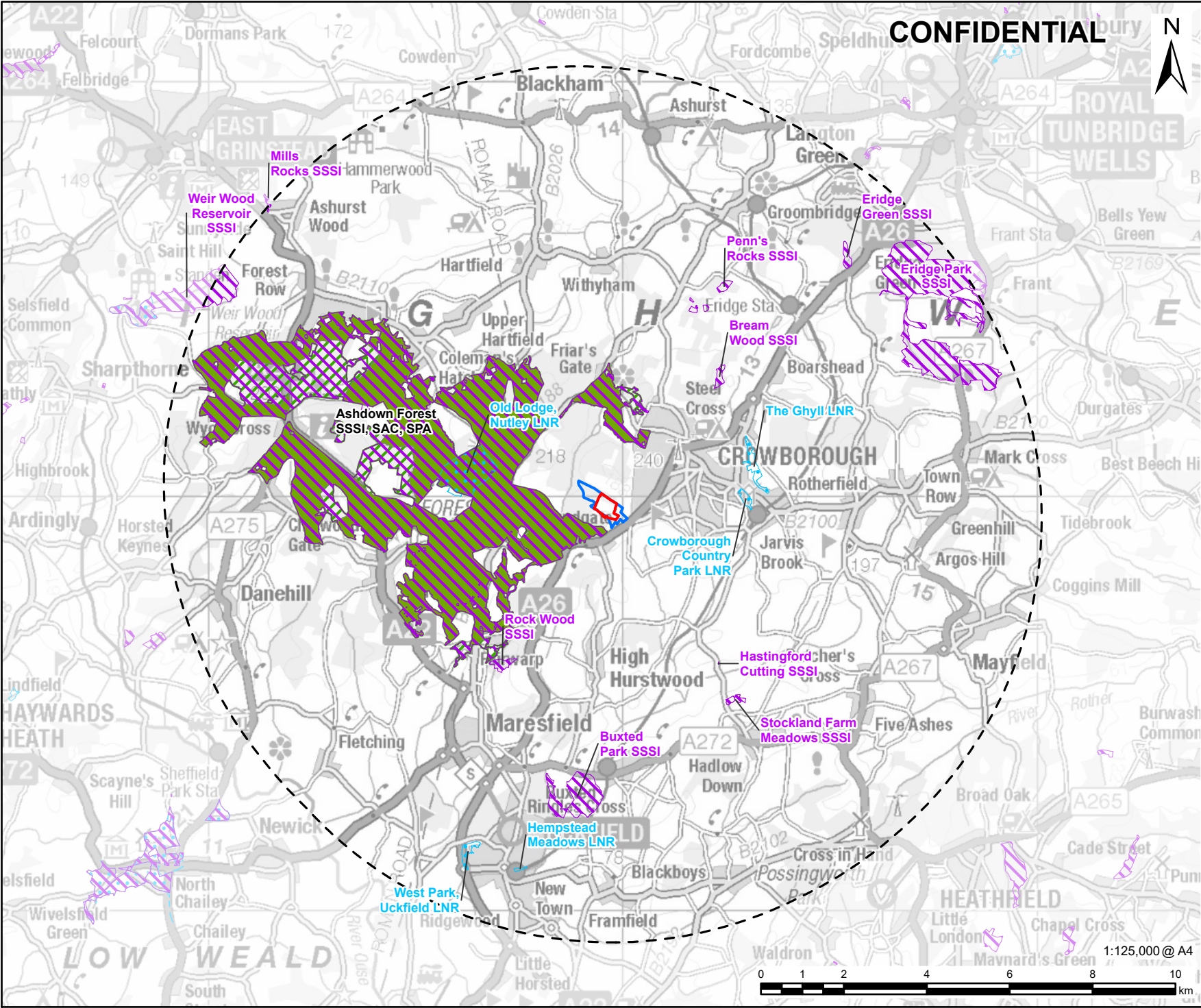
FIGURE TITLE

Site Location Plan

FIGURE NUMBER

Figure 1





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LEGEND

- Site Boundary
- Land Registry Ownership Boundary
- 10km Buffer of the Site Boundary and Land Registry Ownership Boundary
- Local Nature Reserve (LNR)
- Site of Special Scientific Interest (SSSI)
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)

NOTES

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Only sites within the 10km Buffer are
labelled.

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FIGURE TITLE

Designated Sites

FIGURE NUMBER

Figure 2

Appendix B Conservation Objectives

B.1 Ashdown Forest SAC

Introduction

The Ashdown Forest SAC is an extensive area of common land located between East Grinstead and Crowborough. The underlying geology of the Ashdown Sands, in combination with the wetter and cooler local climate, gives rise to sandy soils, which are characteristically acid, clay and nutrient-poor. In turn, this soil type has promoted the development of heathland, valley mire and damp woodland communities.

Despite a recent acceleration in the development of woodland, Ashdown Forest remains one of the largest single continuous blocks of lowland heath in south-east England. A range of typical heathland flora is supported, including heather (*Calluna vulgaris*), bell heather (*Erica cinerea*), cross-leaved heath (*Erica tetralix*), gorse (*Ulex europaeus*) and dwarf gorse (*Ulex minor*). A rich invertebrate fauna (e.g. beetles, dragonflies, damselflies and butterflies) and unique assemblage of heath and woodland birds critically depend on the SAC habitat (see section on the overlapping Ashdown Forest SPA below).

The damp heath woodland may be varied, including birch (*Betula sp.*, acting as primary colonisers), oak (*Quercus robur*), willow (*Salix sp.*) and pine (*Pinus sp.*). In areas where grazing management has been limited, woodland often encroaches on former heath, forming dense and shaded areas with sparse ground flora. In many instances, where Natural England's site condition assessment identifies sub-components as 'unfavourable declining', a lack of grazing management has been identified as a main contributing factor to negative site condition.

Qualifying Features¹

Annex I habitats:

- Northern Atlantic wet heathland with *Erica tetralix*
- European dry heaths

Annex II species present as a qualifying feature, but not a primary reason for site selection:

- Great-crested newt *Triturus cristatus*

Conservation Objectives²

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Threats / Pressures to Site Integrity³

The following threats / pressures to the integrity of the Ashdown Forest SAC have been identified in Natural England's Site Improvement Plan and Supplementary Advice on Conservation Objectives:

- Change in land management;
- Air pollution: Impact of atmospheric nitrogen deposition;

¹ Available at: <https://sac.jncc.gov.uk/site/UK0030080> [Accessed on the 17/04/2026]

² Available at: <http://publications.naturalengland.org.uk/publication/6183967367626752> [Accessed on the 30/07/2026]

³ Available at: <http://publications.naturalengland.org.uk/publication/5793096570765312> [Accessed on the 30/07/2026]

- Public access / damage; and
- Hydrological changes.

B.2 Ashdown Forest SPA

Introduction

The mosaic of habitats, and specifically the heath and woodland, in Ashdown Forest harbours a high species richness of birds. These include woodland specialists (e.g. woodcock, tree pipits, siskins, lesser redpoll) as well as various birds of prey (e.g. buzzards, sparrowhawk, hobby). However, most notably, Ashdown Forest harbours specialist species that critically depend on the heath for survival, including the nightjar and Dartford warbler. The Dartford warbler depends on mature, dry heath habitats (especially gorse) in good condition for surviving the winter. It is a ground-nesting bird that builds a grassy, cup-shaped nest under the protective cover of dense heather or gorse. Similarly, nightjar usually build their nests in small gaps in dry heather, which provides shelter and protection from potential predators. Both species depend on the rich invertebrate fauna that is supported by the heath.

Qualifying Species⁴

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species:

Annex I breeding species:

- European nightjar (*Caprimulgus europaeus*) – 35 pairs (1% of the breeding population in GB)
- Dartford warbler (*Sylvia undata*) – 29 pairs (1.8% of the breeding population in GB)

Conservation Objectives⁵

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and,
- The distribution of the qualifying features within the site.

Threats / Pressures to Site Integrity⁶

The following threats / pressures to the integrity of the Ashdown Forest SPA have been identified in Natural England's Site Improvement Plan and Supplementary Advice on Conservation Objectives:

- Change in land management;
- Air pollution: Impact of atmospheric nitrogen deposition;
- Public access / disturbance; and
- Hydrological changes.

⁴ Available at: <http://publications.naturalengland.org.uk/publication/6399918323269632> [Accessed on the 30/07/2026]

⁵ Available at: <http://publications.naturalengland.org.uk/publication/6399918323269632> [Accessed on the 30/07/2026]

⁶ Available at: <http://publications.naturalengland.org.uk/publication/5793096570765312> [Accessed on the 30/07/2026]

