The Ecology Partnership
Thorncroft Manor, Thorncroft Drive
Leatherhead, Surrey KT22 8JB

T +44 (0) 1372 364133
E info@ecologypartnership.com
W ecologypartnership.com

Job Name:	**DC/25/1269 land Nort of Guildford Road, Bucks Green Road. Response to 24th October 2025 Ref 08819 Place Services ecological review**
Date:	**19th November 2025**
Prepared By:	**Alexia Tamblyn**
Subject:	**Technical Response**

This technical response has been produced in response to the and relates to the comments regarding the ecological reports for the

European Protected Species: bats

The site lies approximately 7.8km southwest of The Mens Special Area of Conservation (SAC) and therefore lies within the 12km Wider Conservation Area for the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature for the SAC is Barbastelle bats, the Bat Activity Survey (Ecology Partnership, December 2024) recorded low levels of this species with static bat detectors. We note the document states "Bats were almost exclusively recorded utilising the linear boundary features for commuting, with the central treeline being by far the most frequently used commuting and foraging feature". Our available records from Sussex Biodiversity Records Centre (SxBRC) accessed under licence returned no records of this species within 2 kilometres of the site. MAGIC maps returned one European Protected Species Mitigation Licenses (EPSML) granted within 2km of the site: a) 1.4km to the northwest of the site in 2017 for Common Pipistrelle. There are over 200 records for bats within 2km of the site, including Bechstein's bat, Brown Long-eared bat, Common Pipistrelle, Whiskered/Brandt's bat, Noctule/Serotine, Soprano Pipistrelle and Serotine bat have also been recorded within 2km of the site (SxBRC – accessed under licence). The site lies approximately 10.5km northeast of Ebernoe Common SAC and is therefore within the Wider Conservation Area for the SAC. The sites lies approximately 15.92km north of the Arun Valley SAC, SPA and Ramsar site.

The Ecology Partnership – a project level HRA has been submitted. Barbastelles were recorded in low numbers (peak count of 7 in 2024 across the survey period).

A total of 7616 bat registrations were recorded over the survey period by the Anabat and Songmeter static detectors, and these comprised of at least 13 separate species including common and soprano pipistrelles, myotis species (of which whiskered, Daunebton's, Natterer's and Brandt's were identified), brown long eared bats, noctule, serotine, Nathusius, Leisler's and Barbasetlle. No bechsteins were recorded during the survey period. Records from SxBRC were obtained to support the application

process. Surveys were also conducted in 2021, which highlighted the use of the site by a range of species, of which have been discussed in the reports.

The grassland habitats were well grazed, resulting in a short sward grassland and areas of poaching. The tree lines, with pockets of scrub were considered to be the most valuable habitats. These are largely being retained in situ, and with enhancements, with green routes located around the edges of the site, along the northern aspect. The central tree line is to be enlarged and new habitats planted (including orchard habitat) creating a robust green linear feature. Lighting will be conditioned.

The Preliminary Ecological Appraisal (Ecology Partnership, October 2025) has undertaken a Ground Level Tree Assessment of the onsite trees, identifying several as PRF-I and several as PRF-M. Two of the PRF-M trees are shown on the Arboricultural Impact Assessment (Aspect July 2025) and Landscape Masterplan (Scarp, August 2025) are proposed to be removed or impacted indirectly. These are tree 4 (an Oak tree) and tree 5 (an Ash). However, the ecological reports conflictingly say these trees will be retained. As indicated within the ecological reports any trees identified as PRF-M which will be impacted require further surveys, which can include emergence surveys, to be undertaken prior to determination. The results of these surveys are required prior to determination.

The Ecology Partnership – update surveys conducted on 12th November 2025. Two trees, T44 and T45 were previously recommended for removal. These are shown below in Figure 1.

Figure 1: T44 and T45 trees

Figure 2: Another view of T44 and T45

T44 is the oak tree. This is to be removed to allow for access. A close view is shown in Figure 3.

Figure 3: T44

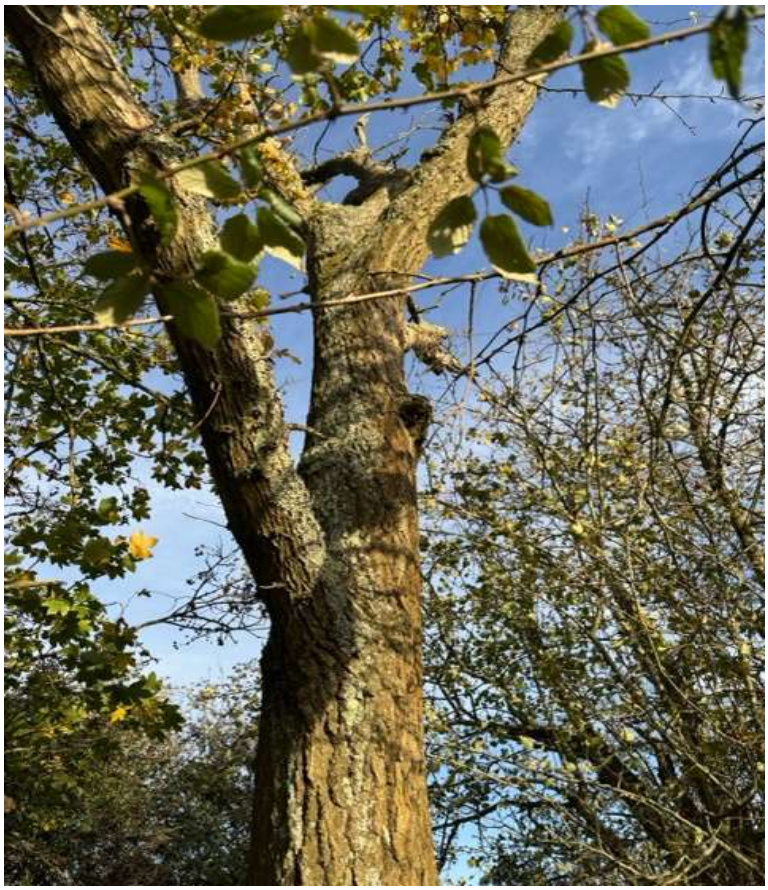


Figure 4: T44

Figure 5: T44

T44 supports extensive dead wood. There are no woodpecker holes or rot holes present across the tree. No obvious features which bats could exploit were recorded. The areas of dead wood do not provide any valuable habitat which could be used by bats. This tree can be removed without further surveys. However, it is recommended that update surveys are conducted prior to removal to review whether the tree remains are per current condition.

T45 is an ash tree. This tree has three main limbs, with one intact and the other two limbs have had the crown blown out and have left the limbs open and exposed at the top. The crown is located on the ground and set within the scrub.

Figure 6: T45 – two limbs with the crown blown off and the third limb with the crown intact

The third limb with the crown does not have any features which bats could exploit. This limb can be removed to ensure the future management of the tree as standing dead wood monolith. There are a number of woodpecker holes in the top of the central limb. However, as the crown has blown out, these

are open and exposed, with daylight seen coming through. These were investigated and all of these top features were open and exposed to the elements due to the crown loss. This provided water ingress. Figure 7 below.

Figure 7: Open features

There was a single hole in the central limb which did not extend deep into the limb. This is shown in Figure 8. It can be seen that the endoscope goes into the hole and the light shows the rear of the hole. The endoscope survey identified that this was a shallow hole and would not allow numerous bats to roost within. However, it may provide some shelter of a single bat.

Figure 8: Superficial hole in central limb

There is a hole located at the base of the tree which was partially covered by bramble at the time of the survey. This was removed and the hole investigated. This hole extended both upwards into the main trunk. This feature was fully investigated with the endoscope. No evidence of bats was recorded at the time of the assessment. However, it was considered that this feature would be able to support multiple bats within.

This feature has been classified as PRF-M, i.e. that it could support multiple bats. There are limitations to this feature which may devalue it. Largely the cover of bramble and hawthorn around the edges of the tree / pockets of scrub, which may deter bats from finding and utilising the feature.

Regardless, this tree is to be retained as a monolith. The third limb removed to stabilise the tree and the tops taken down a little, retaining the key feature within the central limb. The height of the two limbs is reasonably low due to the crown being previously removed. It is considered that this tree, with planting around can be managed within the scheme. If this tree degrades then further surveys can be conducted and removals undertaken in the future if required.

Figure 9: Lower rot hole previously partially covered with bramble

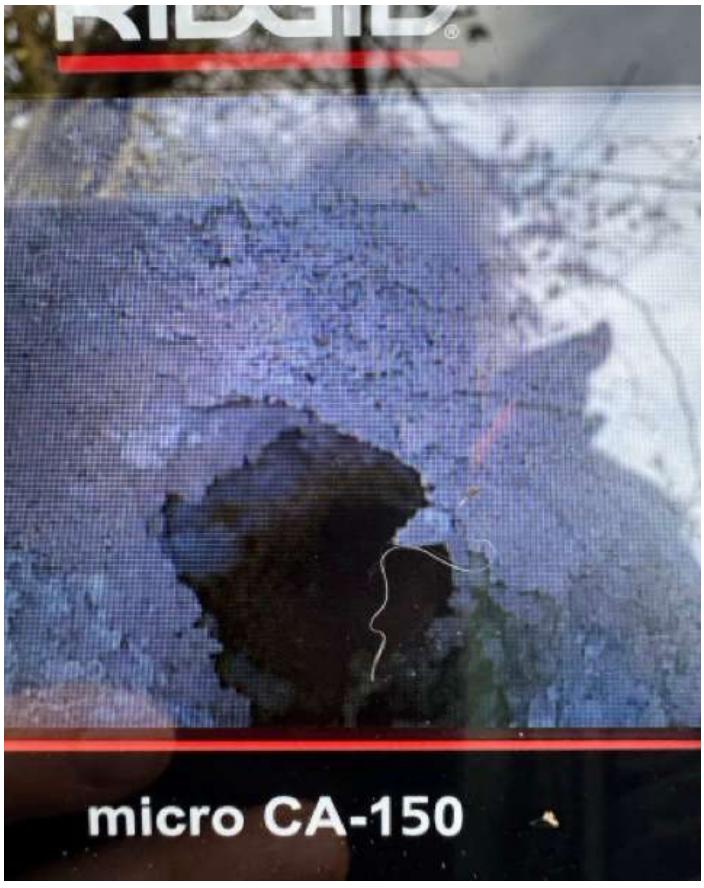


Figure 10: View of the hole from endoscope

Considering the investigations T44 can be removed after a final check in line with a CEMP. T45 can be retained and monitored. If the tree degrades further, then surveys will be conducted to asses the value for bats. This can be in line with a consented LEMP.

Additionally, we are not satisfied sufficient certainty of the impacts upon the integrity of the Mens SAC and its qualifying species (Barbastelle) has been provided to support the LPA with their project level HRA. The proposals include the removal of a section of mature tree line located centrally within the site, which the activity surveys identified as a the most used feature by commuting and foraging bats. Aerial imagery shows this linear feature connecting to woodland habitat in the wider area. We recommend the need for information to support Habitats Regulations Assessment, which fully considers the impacts of the proposals, particularly from increased lighting and severance of flight lines and mitigation to avoid. The Information to support HRA should consider in combination impacts as well as impacts from the development alone. This information is required prior to determination to aid the LPA with their project level HRA.

The Ecology Partnership – a project level HRA has been submitted.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should "Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby".

The Ecology Partnership – this has been detailed above.

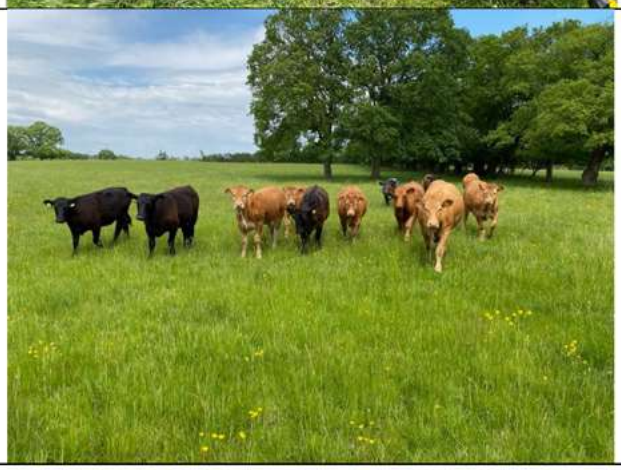
Protected Species: reptiles

The site is a large area of arable pasture, which is stated to be regularly grazed. The site is intersected by a mature tree line and patches of dense scrub. The ecological report has ruled out the need for further reptile surveys, stating the available records for Grass Snake are separated from the site by road and the site is unsuitable for use by reptiles due to grazing. A desktop search of records on NBN Atlas included records for Common Lizard and Grass Snake within the site to the east of this site. Additionally, grazing is not considered a deterrent for site use by reptiles. The site habitats offer a range of niches from the scrub and grassland edges which would provide suitable habitat for use by reptile species and are proposed to be removed.

The Ecology Partnership – biological records from SxBRC were purchased both for the 2021 PEA and the update. Records for reptiles are present within the local area. However, the records are separated by roads and housing.

Both in 2021 and 2024 survey the grass was grazed. Photos taken in 2019, show the grassland is low level, with grassland grazed to the very edges of the site, including the hedgerows. The photos are shown below. Reptile surveys were not recommended in 2021. Recommendations for sensitive clearance and maintaining management of the grassland (to keep sward height short).

Photograph 1: An overview of field 1. *(Dated May 2019)*		
Photograph 2: An overview of field 1. *(Dated May 2019)*		
Photograph 3: Hedgerow 1 on site. *(Dated May 2019)*		

Photograph 10: Field 1 – looking south-east across the site towards Hedge 2 *(Dated June 2021)*	
Photograph 11: Field 1 Quadrat 1 *(Dated June 2021)*	
Photograph 12: Field 1 – active cattle grazing *(Dated June 2021)*	

Photos taken in 2024 show that the grassland is still heavily grazed across the site, with areas of poached habitat along the edges of the site, close up to the hedgerows.

Photo 1: Taken 2024 grazed grassland up to the edges of the site	
Photo 2: Taken 2024 grazed grassland up to the edges of the site	
Photo 3: Taken 2024 grazed grassland overview of the field.	

Photo 4: Taken 2024 grazed grassland up to the edges of the site	

It must be noted that the grazing regime is has not altered since our first survey in 2019. With the grassland grazed to a short sward height, areas devoid of vegetation due to grazing, and limited edge habitat, as this has been impacted by cow use of the field.

Furthermore, the surveys would not be possible as this is an actively used site by cows. Cows can move and trample mats, even eat these, which is therefore a risk to cows in terms of their health and wellbeing.

During all our surveys, the grassland was well grazed and provided limited cover. The requirement for the surveys was not recommended during the course of the survey period. This is professional judgement based on the use of the site by grazing and the impact grazing has on the on site habitats.

Duering the November 2025 survey it can be seen that the grassland is grazed under the central tree belt. This is shown in Figure 11. Whilst there are pockets of bramble and hawthorn and dog rose which are also present along the tree line, these are shown in Figure 12.

The habitat present is limited and further surveys would still not be considered necessary.

Figure 11: Central tree line and grazing underneath trees recorded

Figure 12: Central tree line and grazing underneath trees recorded and areas of bramble / mixed scrub

As such we are satisfied with the justification to not undertake reptile surveys to inform the impact assessment and mitigation strategy. As per Government Advice surveys should be undertaken if:

- ***"distribution and historical records suggest reptiles may be present - you can search the National Biodiversity Network Atlas by species and location***
- ***the development proposal is likely to lead to harm to individual reptiles or their habitats***

• suitable habitat is present at the development site that could support reptiles"

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for reptiles, Protected Species.

The results of these surveys are required prior to determination because paragraph 99 of the ODPM Circular 06/2005 highlights that: "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision."

The Ecology Partnership – a construction environmental management plan (CEMP) for biodiversity should be conditioned. This can include, but not limited to, sensitive clearance measures for reptiles. This would also include up to date walkover survey to ensure that the grassland habitats on site are retained to a short sward height ad therefore unsuitable for reptile species. However, if the baseline changes, due to the removal of the grazing regime, then additional surveys may be required.

The site is not considered suitable to support rare reptiles, i.e. smooth snake or sand lizard, which would require an EPS license as the habitats are not suitable on site or in the local landscape.

Additional comments

We are satisfied sufficient information relating to Dormouse, breeding birds and other protected and Priority species has been provided.

The Ecology Partnership – agreed.