

MKA
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Ground Level Tree Assessment

Steyning Grammar School, West Sussex

SRP1121-MKA-XX-XX-T-O-0003

Site	Steyping Grammar School, West Sussex
Project number	251882
Client name / Address	BAM Construction Ltd, CoachWorks, Dover Place, Ashford, Kent, TN23 1HU

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1.0	04 February 2026	Original

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Declaration of compliance

This Ground Level Tree Assessment has been undertaken in accordance with British Standard 42020:2013 "Biodiversity, Code of practice for planning and development". The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.



MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

Validity of data

For sites that require a European Protected Species Licence in respect of bats, the licensing authority in England (Natural England) will expect data from the most recent survey season. Where an absence of roosting bat is indicated, data will be valid for a maximum of 12 months (CIEEM, 2019).

CONTENTS

1. EXECUTIVE SUMMARY.....	4
2. INTRODUCTION	6
2.1. Aims and scope of the report.....	6
2.2. Site description and context	6
2.3. Proposed development.....	6
2.4. Legislation and planning policy.....	7
3. METHODOLOGY	8
3.1. Ground Level Tree Assessment methodology	8
3.2. Equipment and analysis	10
3.3. Dates, times, weather conditions and surveyors	10
3.4. Surveyor, author and reviewer	10
3.5. Constraints.....	10
4. RESULTS.....	11
4.1. Ground Level Tree Assessment results summary	11
5. EVALUATION AND RECOMMENDATIONS	16
5.1. Assessment of impacts.....	16
5.2. Recommendations	16
6. CONCLUSIONS	20
7. REFERENCES	21
8. APPENDICES	22
8.1. Appendix 1: Photographs and figures	22
8.2. Appendix 2: Relevant legislation and planning policy	31
8.3. Appendix 3: Bat box recommendations.....	36

1. EXECUTIVE SUMMARY

In November 2025, MKA Ecology Ltd was commissioned to undertake a Ground Level Tree Assessment at Steyning Grammar School, West Sussex.

The purpose of the survey was to identify bat roosts or trees with bat roost suitability across the Site, evaluate likely ecological impacts, assess requirements for further survey work, and describe likely mitigation and/or habitat enhancement requirements.

The Site consists of school buildings, hardstanding, areas of modified grassland and woodland, as well as numerous trees, a native hedgerow and small sections of ornamental non-native hedgerow. The proposed development is for the redevelopment of the school involving the demolition of five buildings to allow for the construction of six new school buildings, with associated recreational space, sports facilities, and landscaping. It will result in the removal of several habitats including 31 trees, modified grassland and introduced shrub.

A total of 11 trees were assessed as having potential roosting features (PRF's). Potential roosting features that could only support individual bats or very small numbers of bats are classified as PRF-I and potential roosting features which could support multiple bats and may therefore be used by a maternity colony are classified as PRF-M (Collins, 2023). Trees which could not be properly inspected from the ground were either classified as Further Assessment Required (FAR) or as PRF (a tree with at least one PRF present) (Collins, 2023). Three trees were found to have PRF-I features, one tree was found to support PRF-M features, two trees were classified as PRF, and five trees and the boundary trees in woodland 2 were classified as FAR.

A total of 31 trees are to be removed to facilitate the development. Of the trees being removed, trees T30, T35 and T67 were assessed as PRF-I and therefore it is recommended that they are soft felled under a Precautionary Working Method Statement. The remaining 28 trees will also be removed as part of the scheme and were assessed as having no bat roost potential, and therefore require no further survey effort.

The additional eight trees assessed as having potential roosting features and the trees within all three parcels of woodland will be retained within the scheme. However, should the proposed work change to include impacts in these areas such as through felling, limb removal or any physical modification to the trees, as well as artificial lighting, further survey effort will be required. Should any impacts be proposed to woodland 2 or woodland 3, an updated Ground Level Tree Assessment will be needed. Three surveys must be undertaken on trees with PRF-M features which can be comprised of aerial inspections, Bat Emergence Surveys or a combination of the two methods. For trees assessed as FAR,

further surveys can involve undertaking an aerial tree assessment for trees with features that are not visible from the ground and/or an additional Ground Level Tree Assessment.

It is recommended that native planting is incorporated into the development scheme to ensure that the Site remains valuable for foraging and commuting bats. It is also recommended that a sensitive lighting scheme is created to ensure that retained trees remain unlit both during construction and post-development. A bat box scheme must also be created for the Site to provide enhanced opportunities for roosting bats with at least eight bat boxes to be installed; these should include integrated bat boxes within the new school buildings (at least one box on each new building) and tree mounted boxes on retained trees.

2. INTRODUCTION

2.1. Aims and scope of the report

In November 2025, MKA Ecology Ltd was commissioned to undertake a Ground Level Tree Assessment at Steyning Grammar School, West Sussex by BAM Construction Ltd in order to support a planning application for the redevelopment of the school site.

The aims of the Ground Level Tree Assessments were to:

- Undertake a Ground Level Tree Assessment to establish the suitability of the trees at the Site for roosting bats, and record any evidence of bat presence;
- Identify likely ecological impacts relating to the proposed development;
- Assess the need for further survey effort, a European Protected Species Licence or mitigation, if required; and
- Propose any suitable habitat enhancements for bat species, if required.

2.2. Site description and context

The survey area is shown on the map in Figure 1. Within this report this area is referred to as the Site or Steyning Grammar School. It is located within Horsham District Council (central grid reference: TQ 17539 11845) and comprises buildings, hardstanding, areas of modified grassland, other broadleaved woodland and other mixed (mainly broadleaved) woodland, as well as numerous trees, a native hedgerow and ornamental non-native hedgerows.

The wider landscape comprises residential development, areas of woodland and arable land. Priority habitats in the wider landscape include deciduous woodland immediately north of the Site, lowland calcareous grassland 0.7km south-west and coastal and floodplain grazing marsh 0.7km east of the Site. The habitats within the Site are generally of lower ecological value with built form and modified grassland occupying most of the area within the boundary. Native trees, hedgerows and the woodland are of elevated value in the context of the Site.

2.3. Proposed development

The proposed development is for redevelopment of the school which entails the demolition of five existing buildings and the erection of six new school buildings with associated recreational space, sports facilities, and landscaping. Proposed habitats include introduced shrub, modified and other neutral grassland, biodiverse green roofs, new trees, species rich hedgerows and an area of traditional orchard. The proposals will result in the removal of several habitats, including 31 trees and areas of modified

grassland and introduced shrub; the three areas of other broadleaved woodland, some areas of existing modified grassland along with the remainder of the trees are to be retained.

2.4. Legislation and planning policy

These surveys have been undertaken with reference to relevant wildlife legislation and planning policy.

Relevant legislation considered within the scope of this document comprised the following:

- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Wildlife and Countryside Act 1981 (as amended); and
- Natural Environment and Rural Communities (NERC) Act 2006.

In addition to obligations under wildlife legislation, the revised National Planning Policy Framework (NPPF) updated on 12 December 2024 requires planning decisions to contribute to conserving and enhancing the local environment. Further details are provided in Appendix 2.

Horsham District Council has produced a Planning Framework (2015) which includes a single policy relating to biodiversity and habitat conservation comprising: Policy 31 Green Infrastructure and Biodiversity.

Where relevant these are discussed in further detail in the Appendix.

3. METHODOLOGY

3.1. Ground Level Tree Assessment methodology

All of the trees within the red line boundary were surveyed at Steyning Grammar School; the tree references and locations are shown in Figure 1, Appendix 1. The assessment was undertaken following guidance set out in *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (4th edition) (Collins, 2023).

The following features were recorded for trees:

- Species; and
- Diameter at breast height.

Surveys were conducted following best-practice guidance set out in *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (4th edition) (Collins, 2023). A trained surveyor assessed each tree, or tree group, for bat roosting features. Trees were assessed for their bat roost suitability according to the scheme presented in Collins (2023). These categories are shown in Table 1 and Table 2. Trees without PRFs were assigned no category and scoped out as having no bat roost suitability. Where PRFs were identified, these were classified, where possible from the ground, as having potential to support either individual roosting bats (PRF-I) or multiple roosting bats (PRF-M). Based on the number, type and accessibility of PRFs present, the tree was overall assigned as either PRF-I or PRF-M. The trees surveyed are shown in Figure 1.

For any trees considered to provide roosting potential, the tree species and descriptions of suitable and actual roost features were recorded (including height above ground level and aspect), as well as descriptions of evidence of bats found. Potential roost features recorded were:

- Woodpecker holes;
- Rot holes;
- Hazard beams;
- Other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
- Partially detached plated bark;
- Knot holes arising from naturally shed branches, or branches previously pruned back to the branch collar;
- Man-made holes (e.g. cavities that have development from flush cuts) or cavities created by branches tearing out from parent stems;
- Cankers (caused by localised bark death) in which cavities have developed;

- Other hollows or cavities, including butt-rots;
- Double-leaders forming compression forks with included bark and potential cavities;
- Gaps between overlapping stems or branches;
- Partially detached ivy with stem diameters in excess of 50mm; and
- Bat, bird or dormouse boxes.

The following types of evidence of use by bats were recorded for trees:

- Presence of bats;
- Bat droppings in, around or below a potential roost feature;
- Odour emanating from a potential roost feature;
- Audible squeaking at dusk or in warm weather; and
- Staining below the potential roost feature.

Trees were assessed for their bat roost suitability according to the scheme presented in Collins (2023). These categories are shown in Table 1 and Table 2 below.

Table 1: Categories to assess roost suitability in trees (adapted from Collins, 2023)

Roost suitability	Description
None	Either no potential roost features in the tree or highly unlikely to be any.
FAR	Further assessment required (FAR) to establish if potential roost features (PRFs) are present in the tree.
PRF	A tree with at least one PRF present.

Where PRFs were identified in trees, these were further categorised as follows.

Table 2: Guidelines for categorising the potential suitability of PRFs in trees (adapted from Collins, 2023)

Roost suitability	Description
PRF-I	PRF is only suitable for individual bats or very small number of bats either due to size or lack of suitable surrounding habitat.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

3.2. Equipment and analysis

The Ground Level Tree Assessment was conducted using binoculars.

3.3. Dates, times, weather conditions and surveyors

The dates, times and weather conditions are given in Table 3.

Table 3: Date, time and weather conditions of survey visit

Date	Time of survey	Weather conditions*
01/12/2025	10:30am	Wind: BF6 Cloud: 8/8 Temp: 11°C Rain: None

3.4. Surveyor, author and reviewer

The Ground Level Tree Assessment was undertaken by Olivia Hine, Ecologist at MKA Ecology Ltd. Olivia has over two years' experience as an ecologist. The report has been drafted by Olivia and reviewed by Megan Stigling-Rose, Senior Ecologist at MKA Ecology Ltd. Megan had over five years' experience and holds a Natural England class 2 bat licence.

3.5. Constraints

An assessment of tree T67 was not undertaken during the survey. Photographs have been provided of this tree, including close-up photographs of old pruning wounds located on the northern aspect of the tree to allow an assessment of bat roost potential to be made. From the photographs of the tree, T67 likely falls into the category of "none" and no suitable roost features were noted. However, as this tree was not inspected during the survey, a precautionary approach has been undertaken, and the tree has been assessed as PRF-I to ensure that it is removed sensitively under a Precautionary Working Method Statement.

A full assessment of woodland 2 and woodland 3 was not undertaken as part of the Ground Level Tree Assessment due to access constraints, where possible the boundary trees were inspected. All three woodland parcels will be retained within the scheme and appropriately buffered from indirect impacts and accidental damage and therefore this is not considered to be a significant constraint. An area to the north of woodland 3 was viewed beyond a fence from the driveway of the main entrance to the school, and an assessment of the trees was made where possible.

4. RESULTS

4.1. Ground Level Tree Assessment results summary

A total of 67 individual trees, woodland 1 and the boundary trees of woodland 2 and 3 were inspected as part of the Ground Level Tree Assessment. A total of 11 trees were found to support PRF's at Steyping Grammar School (Figure 1, Appendix 1). No direct evidence of roosting bats was observed during the survey.

Of the 31 trees to be removed as part of the scheme, T30 and T35 were found to support PRF-I features, meaning that they have opportunities to support individual bats. Tree T67 has also been categorised as PRF-I as mentioned in section 3.5. The remaining 28 trees do not contain suitable roosting features and have been given the category of none, meaning that no PRFs were recorded within the tree.

Of the retained 36 trees and three parcels of woodland, tree T62 was classified as PRF-M, meaning it has the potential to support multiple bats and could be used as a maternity roost. Trees T1, T56, T57, T58, T65 and the boundary trees in woodland 2 were classified as FAR, meaning that further assessment would be required to determine if potential roosting features are present; and two trees, trees T68 (W3) and T69 (W3), were classified as PRF (see Table 2), meaning that they both contain at least one potential roosting feature for bats. These potential roosting features could not be assessed further, as this area was not accessible during the survey. Twenty-eight trees and the trees within woodland 1 were found to have no suitable PRF's and were given the category of none.

Further detailed information regarding the results of the Ground Level Tree Assessment is set out below in Table 4. The locations of the inspected trees are shown in Figure 1.

Table 4: Ground level tree assessment results

Tree number	Species	Descriptions of potential features	Photographs reference	Overall Roost Suitability Classification	Tree being retained or lost (see Figure 2)
T1	Lime	A mature lime tree. The main stem is partially covered by ivy to approximately 6m in height. A small wound was observed on a branch on the northern elevation however, due to the height of this feature, it could not be investigated from the ground.	Photograph 1, Photograph 2	FAR	Retained
T30	Oak	A mature oak tree. A wound is present on a branch on the western aspect. This appears to lead into a small cavity within the branch that could support individual bats.	Photograph 3, Photograph 4	PRF-I	Lost
T35	Beech	A mature beech with a small hole measuring approximately 3cm by 3cm on the western aspect. It appears to lead into a cavity within the branch.	Photograph 3, Photograph 5	PRF-I	Lost
T56	Silver birch	A mature silver birch with two main stems. A knot-hole measuring approximately 8cm by 8cm is present on the eastern aspect at approximately 3-4 m in height, and two further knot-holes are present on the northern aspect. These knot-holes are smaller, measuring approximately 5cm by 5cm. The extent of these features could not be assessed from the ground.	Photograph 6, Photograph 7	FAR	Retained
T57	Lime	A mature lime with three main stems. On the southern aspect of the tree a small cavity measuring approximately	Photograph 8, Photograph 9	FAR	Retained

Tree number	Species	Descriptions of potential features	Photographs reference	Overall Roost Suitability Classification	Tree being retained or lost (see Figure 2)
		8cm in width is present at approximately 3m in height, and a small wound is located at approximately 4 to 5m in height which measures approximately 3cm by 3cm. A small hole was also recorded on the northern aspect at approximately 4 to 5m. The extent of these features could not be assessed from the ground.	Photograph 10		
T58	Lime	A mature lime. A small cavity measuring approximately 6cm by 5cm is present at approximately 3m in height on the northern aspect of the tree which could not be inspected from the ground.	Photograph 8, Photograph 11	FAR	Retained
T62	Maple sp.	A mature tree. On the northern aspect a large cavity, measuring approximately 15cm wide and 15cm in height, with exposed heartwood is present at 3m height on the main stem. This cavity could not be inspected from the ground. On the southern aspect a tear out wound with a woodpecker hole immediately adjacent is present at approximately 10m in height which have the potential to lead into a cavity behind.	Photograph 12, Photograph 13, Photograph 14	PRF-M	Retained
T65	Norway maple	A mature Norway maple. A large wound with exposed heartwood is present on a branch extending to the north away from the main stem. This could potentially lead to	Photograph 15, Photograph 16	FAR	Retained

Tree number	Species	Descriptions of potential features	Photographs reference	Overall Roost Suitability Classification	Tree being retained or lost (see Figure 2)
		cavity which extents up the branch. Due to the height of this feature, it could not be investigated from the ground.			
T67	Mulberry	A small mulberry tree with old pruning wounds on the northern facing aspect. These appear to be sealed with no gaps. It is likely that the tree has no bat roost potential (assessed as none) however, as the tree was not inspected during the survey and has been assessed from photographs, a precautionary approach has been adopted and it has been categorised at PRF-I.	Photograph 19, Photograph 20, Photograph 21, Photograph 22	PRF-I	Lost
T68 (W3)	Beech	A mature beech. A large wound is located on a branch on the northern aspect of the tree at about 8m in height. Exposed heartwood is located within the wound which could create a cavity which extends within the branch. Due to access constraints, this tree could only be observed beyond a fence located on the main driveway entrance to the school.	Photograph 23	PRF	Retained
T69 (W3)	Pine sp.	A pine with several small splits and holes along a branch of the north-western aspect between 6 to 8m in height. Due to access constraints this tree could only be observed beyond a fence located on the main driveway entrance to the school.	Photograph 24	PRF	Retained

Tree number	Species	Descriptions of potential features	Photographs reference	Overall Roost Suitability Classification	Tree being retained or lost (see Figure 2)
W2	Beech, oak, sweet chestnut	Multiple canopy trees within the woodland are covered by ivy. No features were observed on any of the trees from the ground; however, the presence of ivy meant that detailed assessment could not be undertaken, and the trees are of a suitable size and maturity that PRFs may be present.	Photograph 25	FAR	Retained

5. EVALUATION AND RECOMMENDATIONS

The following evaluation and recommendations are based on the Ground Level Tree Assessment undertaken on 01 December 2025.

5.1. Assessment of impacts

Table 5: Summary of results

Roost Suitability Category	Tree Numbers
PRF-I	T30, T35, T67
PRF-M	T62
FAR	T1, T56, T57, T58, T65, boundary trees in woodland W2
PRF	T68 (W3), T69 (W3)

A total of 11 trees and the boundary trees in woodland 2 and woodland 3 were found to have potential to support roosting bats (Table 5). All PRF-M, FAR and PRF trees listed in Table 5 will be retained within the scheme.

The proposed development will involve the removal of 31 trees, comprising trees T4, T10, T11, T24, T25 to T43 (inclusive), T53, T54, T55, T60, T61, T63, T64 and T67 (Figure 2). Of the trees being removed, Trees T30, T35 and Tree T67 were assessed as being PRF-I. The assessment of T67 has been undertaken using photographs (Section 3.5); a number of old pruning wounds are present on the trunk which appear to be sealed and therefore is likely to have no bat roost suitability, however, a precautionary approach has been adopted and it has been classified as PRF-I.

All bat species are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended) (see Appendix 2). Bats are also Species of Principal Importance listed on Section 41 of the NERC Act (2006). It is an offence to deliberately disturb a bat, damage or destroy a bat roost, intentionally or recklessly disturb a bat at a roost, or obstruct access to a roost.

Potential impacts to trees include felling, limb removal, modification to the tree, and disturbance such as by heavy machinery and increases in artificial lighting. All of these actions, in the absence of mitigation, may result in damage or disturbance to roosts, and the killing or injuring of individual bats.

5.2. Recommendations

Trees T30, T35 and T67 (assessed as being PRF-I) will be removed to facilitate the development. As such, it is recommended that these trees are soft felled as a precautionary measure. Further surveys

are not required on trees with PRF-I classification (Collins, 2023). Instead, it is recommended that a Precautionary Working Method Statement (PWMS) is produced to ensure that PRF-I trees are felled in a sensitive manner, following a soft-felling protocol, to mitigate against any adverse impacts in the event that bats are present at the time of the removal.

Soft felling involves the lowering and cushioning of sections of the tree with bat potential features to reduce any potential effects caused by hard impact with the ground. Following this, the felled sections should be left on the ground for a period of at least 24 hours in order to allow any bats, in the unlikely event that they had been present, to escape. An Ecological Clerk of Works (ECoW) should be present to supervise the felling; as such, an updated assessment of Tree T67 should be taken at this point to potentially reduce the classification to none.

Recommendation 1

It is recommended that trees T30, T35 and T67 are soft felled as a precautionary measure and that a Precautionary Working Method Statement (PWMS) is produced to ensure that these trees are felled in a sensitive manner.

It is understood that there will be no direct impact (such as by felling, pruning or increases in artificial lighting) to PRF-M, FAR and PRF trees listed in Table 5 and to woodland 2 and woodland 3 which may support potential roosting features and bat roosts.

Tree T62 was classified as PRF-M. If the proposals are to change, and any tree modification is required, three surveys must be undertaken to determine the presence or absence of roosting bats. These surveys can be comprised of aerial inspections, bat emergence surveys or a combination of the two methods.

If the proposals are to change, and any tree modification is required to: any trees in woodland 2, woodland 3 including trees T68 and T69, trees T1, T56, T57, T58, T65, further survey effort will be required to determine the presence or likely absence of bat roosts. This would involve undertaking an aerial tree assessment for trees with features that are not visible from the ground and/or an additional ground level tree assessment to assess any impacted trees and make further recommendations as to their suitability for roosting bats.

Recommendation 2

If impacts are anticipated, undertake three surveys on trees with PRF-M features. These surveys can be comprised of aerial inspections, bat emergence surveys or a combination of the two methods.

Recommendation 3

Undertake further surveys if any tree modification is required to trees assessed as PRF or FAR. This would involve undertaking an aerial tree assessment for trees with features that are not visible from the ground and/or an additional ground level tree assessment.

All trees assessed to have potential roosting features which are being retained (T62, T1, T56, T57, T58, T65, trees in woodland 2 and woodland 3 including T68 and T69 should be protected with an appropriate buffer during the construction phase. Retained trees close to construction works should be protected as per British Standard (BS) 5837, including the installation of Heras fencing during construction, to prevent any inadvertent damage and disturbance to PRF's caused by tracking vehicles. A Construction and Ecological Management Plan (CEMP) should be produced to outline sensitive working measures.

Recommendation 4

Appropriate buffer zones must be implemented around trees with PRF's during the construction phase of the development. These measures will be detailed within a CEMP.

Bat roosting behaviour, commuting and foraging activity can additionally be dramatically affected by artificial lighting (ILP, 2023). It is strongly recommended that any proposed exterior lighting on the new buildings and around the Site is designed and managed appropriately to ensure that the area remains suitable for foraging bats. A sensitive lighting scheme should be developed to allow suitable roosting and foraging areas for bats. The parcels of woodland, native hedgerow along the western boundary and mature scattered trees along with the proposed hedgerows and orchard area should remain unit.

All lighting should follow the recommendations set out in the Institute of Lighting Professional's best practice guidance for minimising artificial lighting (2023).

Recommendation 5

Light pollution from any lighting should be minimised both during and after the construction phase. A sensitive lighting scheme should be developed to allow for suitable roosting and foraging areas for bats within the site with maximum use of appropriate luminaries and directed lighting. The parcels of woodland, native hedgerow and mature scattered trees and the proposed hedgerows and orchard area should remain unit.

Following the issue of the National Planning Policy Framework (NPPF, see Appendix 2), all planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests.

The Site has the potential for use by roosting and foraging bats. With this in mind, enhanced opportunities for roosting bats should be provided at the Site through installation of bat boxes; these should include integrated bat boxes within the new school buildings and tree mounted boxes on retained trees. In addition, it is recommended that native planting is incorporated into the design scheme to provide additional foraging and commuting habitat for bats in the area. This could include planting of native trees and shrubs.

Recommendation 6

It is recommended that a minimum of eight bat boxes are installed throughout the Site. This must include at least one integrated bat box per new building and additional boxes mounted in retained trees. Examples of suitable bat boxes and bat bricks are given in Appendix 3.

Recommendation 7

Native planting should be incorporated into the design scheme, including additional planting of native trees and shrubs.

Summary of recommendations

Table 6 below summarises the requirement for further work at the Site in relation to bats and the stage of development at which the work should be undertaken.

Table 6: Summary of further work required at Steining Grammar School, Steining

Species	Pre-planning action required?	Pre-construction action required?	Construction phase mitigation required?	Enhancements proposed?
Bats	No	Sensitive lighting scheme	Soft fell trees T30, T35 and T67 under PWMS	Bat boxes, sensitive lighting scheme and native planting.

6. CONCLUSIONS

MKA Ecology Ltd undertook a Ground Level Tree Assessment at Steyning Grammar School in December 2025, in order to assess if any of the trees on Site have features which may support roosting bats. A total of 67 individual trees and trees located within three parcels of woodland were inspected. Trees T4, T10, T11, T24, T25 to T43 (inclusive), T53, T54, T55, T60, T61, T63, T64 and T67 are going to be removed to facilitate the proposed development.

A total of 11 individual trees and the trees in woodland 2 and woodland 3 were assessed as having potential to support roosting bats. Of the trees being removed, Trees T30, T35 and T67 were assessed as being PRF-I, and therefore it is recommended that these trees are soft felled as a precautionary measure. An Ecological Clerk of Works (ECoW) will be present for the tree removal, and another inspection of T67 should be undertaken.

It is understood that the remaining trees assessed to have bat roost potential and all of the trees in the woodland parcels are not being impacted by the proposed development. Further survey work will be required if the proposals change and there are to be any impacts by felling, pruning or an increase in artificial lighting levels. All trees assessed to have potential roosting features which are being retained must be protected from accidental damage and indirect impacts during the construction phase. This will be detailed in a CEMP.

A sensitive lighting scheme will be required for the Site to ensure that retained trees remain unlit during both the construction phase and post-development. Furthermore, it is recommended that at least eight bat boxes are installed at the Site including integrated and tree mounted boxes and that native planting is incorporated into the landscaping plans.

7. REFERENCES

British Standards Institution (2013) *British Standard 42020:2013, Biodiversity – Code of practice for planning and development*. British Standards Institution: London.

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8. APPENDICES

8.1. Appendix 1: Photographs and figures

Photograph 1: Tree T1



Photograph 2: Wound located on Tree T1



Photograph 3: TG2 with trees T30 and T35



Photograph 4: Wound located on Tree T30



Photograph 5: Hole in Tree T35



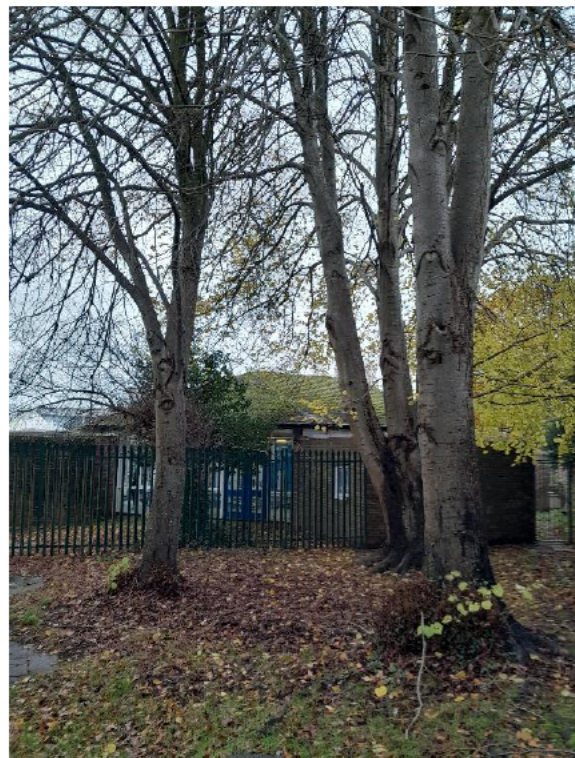
Photograph 6: Eastern aspect of Tree T56



Photograph 7: Northern aspect of Tree T56



Photograph 8: TG8 with Trees T57 and T58



Photograph 9: Wound on Tree T57



Photograph 10: Cavity on Tree T57



**Photograph 11: Small cavity present on Tree
T58**



Photograph 12: Tree T62



Photograph 13: Large cavity in Tree T62



Photograph 14: Woodpecker hole and tear out wound on Tree T62



Photograph 15: TG10 with tree T65



Photograph 16: Wound with exposed heartwood on Tree T65



Photograph 17: Tree T67



Photograph 18: Main stem of Tree T67



Photograph 19: Pruning wound on Tree T67



Photograph 20: Pruning wound on Tree T67



Photograph 21: Pruning wound on Tree T67



Photograph 22: Pruning wound on Tree T67



Photograph 23: Mature beech with wound located in woodland W3



Photograph 24: Pine tree with series of splits and small holes in woodland W3



Photograph 25: Ivy covered trees in woodland W2



Figure 1: Site location and ground level tree assessment results

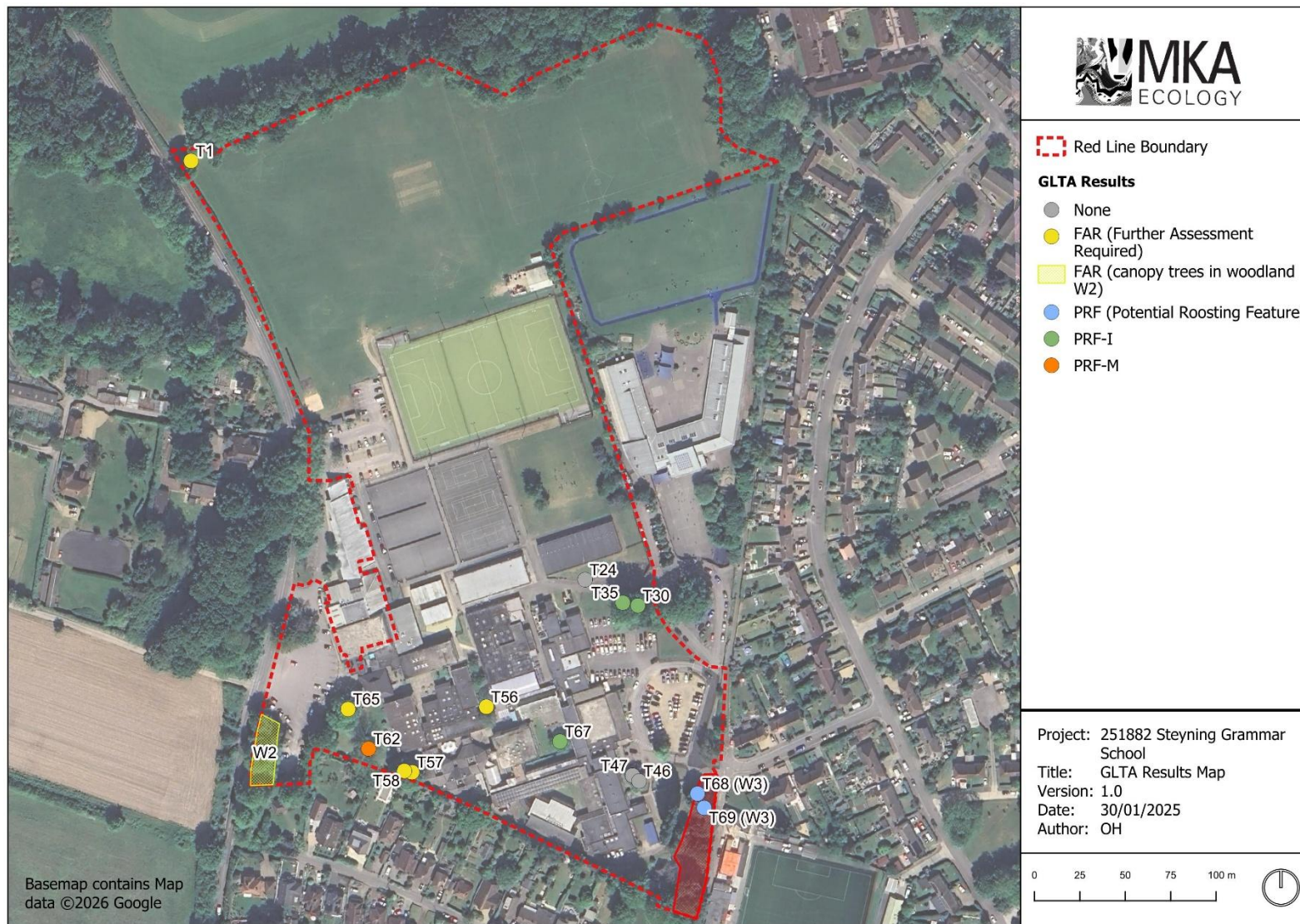
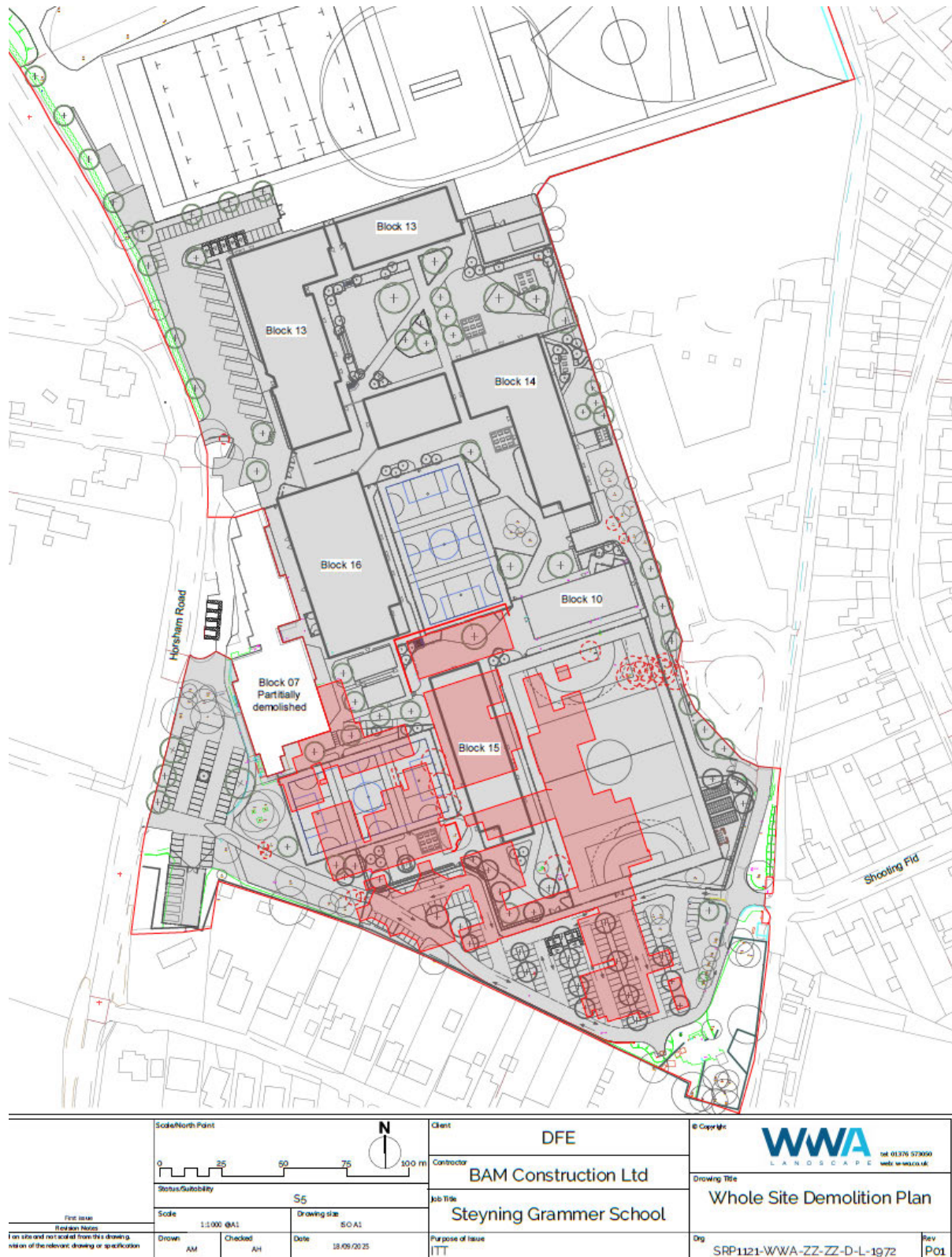


Figure 2: Plan showing tree removal at Steining Grammar School (plan courtesy of WWA Landscape, 2025)



8.2. Appendix 2: Relevant legislation and planning policy

Please note that the following is not an exhaustive list and is solely intended to cover the most relevant legislation pertaining to species commonly associated with development sites.

Subject	Legislation (England)	Relevant criminal offences
Bats (all species)	The Conservation of Habitats and Species Regulations 2017 (as amended) All bat species are listed on Schedule 2, which designates them as European Protected Species. European Protected Species are subject to the provisions of Part 3, Regulation 41 (Protection of certain wild animals).	- Deliberate capture, injury or killing of a bat; - Deliberate disturbance of a bat; - Damage or destruction of a bat roost; - To possess, control, transport, sell or exchange, or to offer for sale or exchange, any live or dead bat or part of a bat, or anything derived from a bat or any part of a bat. Notes In this interpretation, a bat roost is “a <i>breeding site or resting place of a bat</i>”. Because bats tend to reuse the same roosts, bat roosts are considered to be protected whether or not the bats are present at the time. In this interpretation, disturbance of animals includes <i>in particular</i> any disturbance which is likely – (a) to impair their ability: - to survive, to breed or reproduce, or to rear or nurture their young, or - in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

Subject	Legislation (England)	Relevant criminal offences
		• (b) to affect significantly the local distribution or abundance of the species to which they belong.
	Wildlife and Countryside Act 1981 (as amended) All bat species are listed on Schedule 5 and are therefore subject to parts of the provisions of Section 9 (Sections 9(4)(b) and (c) and Section 9(5)).	• Intentional or reckless disturbance of a bat while it is occupying a roost; • Intentional or reckless obstruction of access to a roost; • To sell, expose for sale, possess or transport for the purpose of sale, any live or dead bat or any part of, or anything derived from a bat; or • Publishing or causing to be published any advertisement likely to be understood as conveying that an individual buys or sells, or has an intention to buy or sell bats. In this interpretation, a bat roost is "any structure or place which any wild [bat]...uses for shelter or protection". Because bats tend to reuse the same roosts, bat roosts are considered to be protected whether or not the bats are present at the time.

The Wildlife & Countryside Act 1981 (as amended)

Full legislation text available at: <http://www.legislation.gov.uk/ukpga/1981/69>

Conservation of Habitats and Species Regulations 2017 (as amended)

Full legislation text available at: <https://www.legislation.gov.uk/ukxi/2017/1012/contents/made>

Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006

Full legislation text available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents>

Several bat species are listed as species of principal importance for the purpose of conserving biodiversity under Section 41 of the NERC Act 2006.

The NERC Act 2006 places a legal obligation on public bodies, including those considering planning applications, to maintain, and where possible enhance, the conservation status of any Section 41 species found on a site. Species included on Section 41 were also included on the UK Biodiversity Action Plan (BAP) and remain an integral part of the Post-2010 Biodiversity Framework.

These species are:

- Barbastelle *Barbastella barbastellus*;
- Bechstein's bat *Myotis bechsteinii*;
- Brown long-eared bat *Plecotus auritus*;
- Greater horseshoe bat *Rhinolophus ferrumequinum*;
- Lesser horseshoe bat *Rhinolophus hipposideros*;
- Noctule *Nyctalus noctula*; and
- Soprano pipistrelle *Pipistrellus pygmaeus*.

National Planning Policy Framework (NPPF)

Full text is available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

The revised NPPF was updated on 12 December 2024 setting out the Government's planning policies for England and the process by which these should be applied. The policies within the NPPF are a material consideration in the planning process. The key principle of the NPPF is a presumption in favour of sustainable development, with sustainable development defined as a balance between economic, social and environmental needs.

Policies 170 to 183 of the NPPF address conserving and enhancing the natural environment, stating that the planning system should:

- Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes;

- Recognise the wider benefits of ecosystem services; and
- Minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity.

Furthermore, there is a focus on re-use of existing brownfield sites or sites of low environmental value as a priority, and discouraging development in National Parks, Sites of Specific Scientific Interest, the Broads or Areas of Outstanding Natural Beauty other than in exceptional circumstances.

Where possible, planning policies should also

“Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.

Local plan

Horsham District Council has produced a Planning Framework (2015) which includes a single policy relating to biodiversity and habitat conservation:

- Policy 31 Green Infrastructure and Biodiversity.
 1. Development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained.
 2. Development proposals will be required to contribute to the enhancement of existing biodiversity, and should create and manage new habitats where appropriate. The Council will support new development which retains and /or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks.
 3. Where felling of protected trees is necessary, replacement planting with a suitable species will be required.

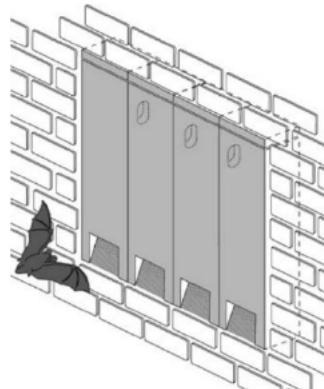
4.
 - a. Particular consideration will be given to the hierarchy of sites and habitats in the district as follows:
 - i. Special Protection Area (SPA) and Special Areas of Conservation (SAC)
 - ii. Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs)
 - iii. Sites of Nature Conservation Importance (SNCIs), Local Nature Reserves (LNRs) and any areas of Ancient woodland, local geodiversity or other irreplaceable habitats not already identified in i & ii above.
 - b. Where development is anticipated to have a direct or indirect adverse impact on sites or features for biodiversity, development will be refused unless it can be demonstrated that:
 - i. The reason for the development clearly outweighs the need to protect the value of the site; and,
 - ii. That appropriate mitigation and compensation measures are provided.
5. Any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to a HRA to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the HRA of this plan.

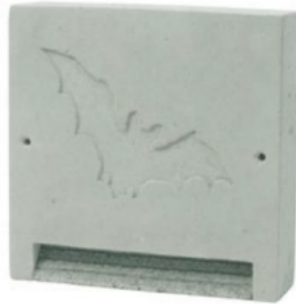
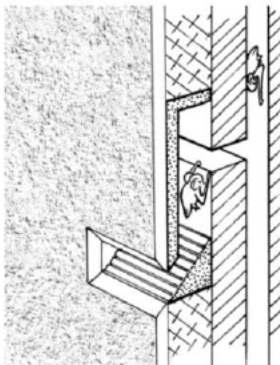
8.3. Appendix 3: Bat box recommendations

A wide range of bat boxes are available to suit a variety of species and design requirements. Bat boxes can be mounted externally on buildings, built directly into the wall structure or mounted on trees (dependent on box design).

Boxes are more likely to be inhabited if they are located where bats feed and it may help to place the box close to features such as tree lines or hedgerows, which bats are known to use for navigation and can provide immediate cover for bats leaving the roost. Boxes should be placed in areas sheltered from strong winds and are exposed to the sun for part of the day. Access to any bat roosting features should not be lit and should also be at a reasonable height to avoid predation (at least 2m if possible, preferably 4-5m).

Example	Description	Picture
Schwegler General Purpose Bat Box 2F	www.schwegler-nature.com Height: 33 cm Weight: approx. 3.8 kg External diameter: 16 cm Installation: Hanging A general purpose box, suitable for all species.	
Schwegler General Purpose Bat Box 2F with Double Front Panel	www.schwegler-nature.com Height 33 cm Weight: approx. 4.1 kg External diameter: 16 cm Installation: Hanging This box is suitable for crevice dwellers, such as Nathusius' pipistrelle, Daubenton's bat and common pipistrelle.	

Example	Description	Picture
Schwegler 1FF	www.schwegler-nature.com Dimensions: 14(d) x 27(w) x 43(h) cm Weight: 9.9 kg Installation: Hanging This box is suitable for crevice dwellers, such as Nathusius' pipistrelle, Daubenton's bat and common pipistrelle. This box minimises temperature fluctuations in spring and autumn and is self-cleaning.	
Schwegler 1FQ	www.schwegler-nature.com Dimensions: 60(h) x 35(w) x 9(d) cm Weight: 15.8kg Installation: Attached to most external brick, timber or concrete walls at least 3m high. Can also be placed inside roof space This box is ideal for all types of bats that inhabit buildings. The box is weather-resistant and is also temperature controlled and self-cleaning. The front panel of the box can also be painted during manufacture, to match an existing colour.	
2FR Schwegler Bat Tube	www.schwegler-nature.com Dimensions: 47(h) x 20(w) x 12.5(d) Weight: 9.8kg Installation: Can be installed on external walls – either flush or beneath a rendered surface in concrete and, during renovation work, under wooden panelling or in building cavities. Several tubes should be installed together (recommended three).	

Example	Description	Picture
	This box is ideal for all types of bats that inhabit buildings. By installing boxes side by side a colony roosts can be created with any size requirement. This box has three different environmental partitions inside, attracting different species. The box is self-cleaning.	
1FE Schwegler Bat Access Panel	www.schwegler-nature.com Dimensions: 30(h) x 30(w) x 8(d) cm. Weight: approx. 5.1 kg. Installation: Installation of multiple units is recommended. The box can be integrated into insulation or masonry. It can also be attached to the underlying structure to cover existing cavities, allowing bats to still use them. Install at least 3m above the ground. This is a general purpose box, suitable for all species. There is a maintenance-free access panel for installing on or in the surface of exterior walls. The open rear enables bats to continue to use existing nesting sites in walls.	 



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