



Ground Level Tree Assessment (GLTA)



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Executive Summary

Ecosupport Ltd was instructed by The Incidental Land Company Ltd (TILCo) to undertake a Ground Level Tree Assessment (GLTA) at Hayes Lane, Slinfold. This GLTA was required to identify any potential features for roosting bats within the trees proposed for removal. As part of this assessment, the following surveys were undertaken:

- Ground Level Tree Assessment (March 2026)
- Updated Ground Level Tree Assessment for T64 (September 2026)

Previous survey work in support of planning application DC/25/2006 included a Preliminary Ecological Appraisal conducted by AIDash with the results available in the associated report (AIDash 2025).

Ecosupport will also be conducting a reptile survey on site during April & May 2026, with the results to be reported once the survey work has been completed.

1.0 INTRODUCTION

1.1 Brief

Ecosupport Ltd was commissioned by The Incidental Land Company Ltd (TILCo) to undertake a Ground Level Tree Assessment (GLTA) at Hayes Lane, Slinfold (here after referred to as 'the site'). The purpose of this survey was to assess any trees proposed for removal to identify any features which could offer opportunities for roosting bats. The objectives of the survey were as follows:

- Identify any signs of protected species and potential features that may support them
- Make recommendations for further survey work as necessary;
- Make recommendations for any necessary ecological avoidance and mitigation where possible.

NB: If the works do not take place within 18 months of this report¹ then the findings of this survey will no longer be considered valid and may require updating.

1.2 Site Description & Location

The site comprises of a parcel of grassland located to the east of Hayes Lane, Slinfold, Horsham, RH13 0S1 (OS grid reference TQ 11813 30679) (**Fig 1**). The site is bound by Hayes Lane to the west, residential dwellings to the north with further fields to the south and east. A public footpath runs along the northern and southern boundaries of the site, as well as through the centre of the field. The wider environ is rural, with the site located on the outskirts of Slinfold, a village to the west of Horsham.

¹ <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

Figure 1. Redline boundary of the site (Google Satellite 2026)



1.3 Proposed Development

The proposals are for the erection of 38 dwellings, (including 13 on-site affordable housing units), together with access from Hayes Lane, vehicle and cycle parking, landscaping, open space and play provision, sustainable drainage, and re-alignment of Public Right of Way No.3782.

2.0 RELEVANT LEGISLATION AND POLICY

2.1 Legislation

2.1.1 *The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019*

The Conservation of Habitats and Species Regulations 2017 transposes the EU Habitats Directive (Council Directive 92/43/EEC) into UK domestic law. It provides protection for sites and species deemed to be of conservation importance across Europe. It is an offence to deliberately capture, kill or injure species listed in Schedule 2 or to damage or destroy their breeding sites or shelter. It is also illegal to deliberately disturb these species in such a way that is likely to significantly impact on the local distribution or abundance or affect their ability to survive, breed and rear or nurture their young.

The Conservation of Habitats and Species Regulations 2019 (EU Exit) makes changes to the three existing instruments which transpose the Habitats and Wild Birds Directives so that they continue to work (are operable) upon the UK's exit from the European Union (EU). These include The Conservation of Habitats and Species Regulations 2017 and The Conservation of Offshore Marine Habitats and Species Regulations 2017. This instrument also amends section 27 of the Wildlife and Countryside Act 1981 to ensure existing protections continue. The intention is to ensure habitat and species protection and standards as set out under the Nature Directives are implemented in the same way or an equivalent way when the UK exits the EU.

In order for activities that would be likely to result in a breach of species protection under the regulations to legally take place, a European Protected Species (EPS) licence must first be obtained from Natural England.

2.1.2 *The Wildlife and Countryside Act (1981) (as amended)*

This is the primary piece of legislation by which biodiversity is protected within the UK. Protected fauna and flora are listed under Schedules 1, 5 and 8 of the Act. They include all species of bats, making it an offence to intentionally or recklessly disturb any bat whilst it is occupying a roost or to intentionally or recklessly obstruct access to a bat roost. Similarly, this Act makes it an offence to kill or injure any species of British reptiles and also makes it an offence to intentionally kill, injure or take any wild bird or to take, damage or destroy their eggs and nests (whilst in use or being built).

The Wildlife & Countryside Act (1981) states that it is an offence to 'plant or otherwise cause to grow in the wild' any plant listed in Schedule 9 art II of the Act. This list over 30 plants including Japanese Knotweed (*Fallopia japonica*), Giant Hogweed (*Heracleum mantegazzianum*) and Parrots Feather (*Myriophyllum aquaticum*).

2.1.3 *The Countryside and Rights of Way Act (2000)*

This Act strengthens the Wildlife & Countryside Act by the addition of "reckless" offences in certain circumstances, such as where there is the likelihood of protected species being present. The Act places a duty on Government Ministers and Departments to conserve biological diversity and provides police with stronger powers relating to wildlife crimes.

2.1.4 Natural Environment and Rural Communities Act (2006)

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 requires that public bodies must have due regard to the conservation of biodiversity with a particular regard to species and habitats considered to be of greatest conservation importance. This means that Planning authorities must consider biodiversity and the list of species and habitats of importance when planning or undertaking activities.

Section 41 of the Act lists species and habitats found in England which are considered to be priority species and were identified as requiring action under the UK Biodiversity Action Plan. The latest update to the list of Section 41 habitats of principal importance under the *UK Post – 2010 Biodiversity Framework* includes 56 listed habitats including arable field margins, traditional orchards, hedgerows and several specific habitats within the categories of coastal, grassland, freshwater, inland rock, marine, wetland and woodland. The latest update to the list of Section 41 species of principal importance was in May 2014 and now includes a list of 943 species covering a range of species including vertebrates, terrestrial and marine invertebrates, plants and fungi.

2.1.5 Protection of Badgers Act

The Protection of Badgers Act (1992) relates to the welfare of Badgers (*Meles meles*) as opposed to nature conservation considerations. The Act prevents:

- The wilful killing, injury, ill treatment or taking of Badgers and / or
- Interference with a Badger sett
- Damaging or destroying all or part of a sett
- Causing a dog to enter a set and
- Disturbing a Badger while it is occupying a sett

Provisions are included within the Act to allow for the lawful licensing of certain activities that would otherwise constitute an offence under the Act.

2.1.6 The Environment Act (2021)

The Environment Act 2021 is the UK's new legislation for environmental protection in the UK, which includes protection of water quality, clean air, and biodiversity among other key protections. This Act provides the government power to set targets to reach long-term aims relating to the environment, which will be periodically reviewed and updated. This legislation also establishes a new environmental watchdog organisation, the Office for Environmental Protection (OEP), which will hold the government accountable on environmental issues.

Part 6 of The Environment Act relates to nature and biodiversity. This section makes provision for biodiversity net gain to be a condition of planning permission in England and a requirement for nationally significant infrastructure projects. Biodiversity net gain will require maintenance for a period of at least 30 years after the completion of enhancement works to be achieved.

The legislation also includes updates to existing environmental legislation, such as the NERC Act 2006, to strengthen biodiversity enhancement rather than just conservation and includes a requirement for local, or relevant, authorities to publish biodiversity reports. Further, The

Environment Act places a requirement on responsible authorities to prepare local nature recovery strategies, which will outline nature conservation sites and priorities and opportunities for recovering or enhancing biodiversity within the local area. Within England, the legislation also provides Natural England with the power to publish 'species conservation strategies' and 'protected site strategies' to identify activities that may affect a species or site's status and outline their opinions on measures that would be appropriate to avoid, mitigate or compensate any adverse impacts.

2.2 Policy

2.2.1 National

The National Planning Policy Framework (NPPF) (2026) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

Chapter 19 'Conserving and enhancing the natural environment' states that planning decisions should safeguard and enhance the natural environment, recognising the hierarchy of designated sites and the wider value of natural capital. Development should be directed to land of least environmental value and must avoid, minimise or appropriately mitigate ecological impacts. The Framework emphasises nature recovery, requiring opportunities for habitat creation, restoration and strengthening ecological networks to be identified and delivered, informed by Local Nature Recovery Strategies. Proposals must incorporate high-quality green infrastructure and achieve statutory biodiversity net gain. Development affecting irreplaceable habitats should be refused unless wholly exceptional circumstances apply. For designated sites—including habitats sites, SSSIs and locally important wildlife sites—development is only acceptable where impacts are avoided or clearly justified and mitigated. Overall, Chapter 19 sets a clear expectation that development contributes positively to biodiversity, integrates nature-based solutions, and supports long-term ecological resilience.

Specifically, the NPPF states determining planning applications, local planning authorities should apply the following principles:

1. Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using Local Nature Recovery Strategies, Protected Landscape Management Plans, River Basin Management Plans, National Forest Strategies, Community Forest Plans and other relevant evidence at the most appropriate level to:
 - a. Set out the hierarchy of international, national and locally designated sites and areas of importance for their landscape, geodiversity or biodiversity value in the plan area, and identify other features which require particular consideration in managing development due to their environmental value such as chalk streams;
 - b. Identify opportunities for the conservation, enhancement and recovery of landscapes, sensitive waterbodies, habitats and priority or threatened species, including through habitat restoration, the use of nature-based solutions, and the creation and strengthening of ecological networks that are more resilient to current and future pressures (including opportunities which exist at a catchment or landscape scale across plan boundaries);

- c. Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. This should include limiting the scale and extent of development within Protected Landscapes, avoiding the use of higher quality agricultural land where land of poorer quality is available and avoiding and minimising harm to designated sites of importance for nature. Areas which could become of particular importance for nature identified in Local Nature Recovery Strategies should be taken into account as opportunities to integrate development with environmental restoration, but should not necessarily preclude the allocation of land for development; and
 - d. Set out standards for green infrastructure provision, in a way which complements and/or incorporates those for recreational land (as set out in policy HC1). These should draw upon Natural England's Green Infrastructure Standards for England, tailored as necessary to local circumstances.
2. Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Local standards should not extend to categories of development which are exempt from statutory biodiversity net gain.

2.2.2 Local – Horsham District Council

As the site falls under the jurisdiction of Horsham District council, the Horsham District Planning Framework (2015) applies. This document outlines the following policies that are relevant to the site.

Policy 25 Strategic Policy: The Natural Environment and Landscape Character

The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development. The Council will support development proposals which:

1. Protects, conserves and enhances the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.
2. Maintain and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District.
3. Maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and ensures no net loss of wider biodiversity and provides net gains in biodiversity where possible.
4. Conserve and where possible enhance the setting of the South Downs National Park

Policy 26 Strategic Policy: Countryside Protection

Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location, and in addition meet one of the following criteria:

1. Support the needs of agriculture or forestry;
2. Enable the extraction of minerals or the disposal of waste;
3. Provide for quiet informal recreational use; or

4. Enable the sustainable development of rural areas.

In addition, proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located, including;

1. The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;
2. The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; and 3. The landform of the area.

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 (SNICIs), 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.

2.2.2.1 Emerging Local Plan 2023 - 2040

A new local plan for Horsham District council is currently undergoing examination by an Inspector appointed by the Secretary of State. There are a number of as yet unresolved objections to the plan. Therefore, at present, the emerging policies of the plan can only be given limited weight.

The new Horsham District Local Plan 2023 - 2040 will set out planning policies and proposals to guide development in the District, excluding the South Downs National Park, up to 2040. This document outlines the following policies that are relevant to the site.

Strategic Policy 14: Countryside Protection

1. Outside built-up area boundaries and secondary settlements, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to, and justify, its countryside location, and must meet one of the following criteria:

- a) Support the needs of agriculture or forestry
- b) Enable the extraction of minerals or the disposal of waste;
- c) Provide for quiet informal recreational use; or
- d) Enable the sustainable development of rural areas.

2. In addition, all proposals must be appropriately integrated within the landscape and be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, conserves, and seeks to enhance, the key features and characteristics of the landscape character area in which it is located, including;

- a) The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;
- b) The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features;
- c) The landform of the area; and
- d) The protection of dark skies, in particular where it may impact on a designated International Dark Sky Reserve (IDSR), Neighbourhood Plan designations and High Weald AONB Management Plan objectives.

Strategic Policy 16: Protected Landscapes

1. Development proposals within and adjacent to the High Weald AONB must demonstrate how their development proposals conserve and enhance the natural beauty of the AONB, having appropriate regard to the setting and views into and out of the AONB, the High Weald AONB Management Plan, any updates and any other relevant documents. Proposals will be

required to set out any proposed mitigation or compensation measures needed to address any harm. 66

2. Small scale development that helps to support the social and economic well-being of the AONB will be supported, provided that the scheme is compatible with the purpose of the designation.

3. Major development within the AONB will only be permitted in exceptional circumstances. Applicants will be required to demonstrate why the proposal is in the public interest and what alternatives to the proposal have been considered.

4. Proposals within land that contributes to the setting of the South Downs National Park should be consistent with National Park purposes and have regard to the South Downs Local Plan, the South Downs Integrated Landscape Character Assessment, the South Downs Partnership Management Plan and any other relevant document and updates. In particular, proposals should not cause harm to the special qualities (including dark skies), local distinctiveness or sense of place, by negatively affecting views into and out of the National Park. Proposals will be required to set out any proposed mitigation or compensation measures needed to address any harm.

Strategic Policy 17: Green Infrastructure and Biodiversity Green Infrastructure

1. Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure and contributes to the delivery of public open space, the Local Nature Recovery Strategy, Nature Recovery Network, natural capital, ecosystem services and / or biodiversity. Green Infrastructure should be integral to the design and layout of development, and new provision, including green linkages, should be provided taking into account Natural England's green infrastructure guidance and the council's green infrastructure strategy. Provision should seek to optimise public access to open space and nature via foot, bicycle, wheeling, and also horse as appropriate.

2. Proposals that would result in any loss, degradation or harmful impacts to green infrastructure, or core areas of the Local Nature Recovery Strategy and Nature Recovery Network will be resisted unless it can be demonstrated that new opportunities will be provided that appropriately mitigates and / or compensates for the respective harm and ensures that the ecosystem services of the area are retained and enhanced. Development proposals will be expected to remove invasive species.

3. Proposals will be expected to retain and enhance existing priority habitats and trees, and accord with the aims and objectives of the Green Infrastructure and Local Nature Recovery Strategies. Habitat enhancement including additional hedgerow and tree planting must take account of the local landscape and habitat context. It should seek to optimise biodiversity, ecological connectivity and function, and climate change resilience.

4. Development likely to affect a watercourse and its associated corridor should seek to conserve and enhance its ecological, landscape and recreational value. This should include providing adequate natural buffer zones to the watercourse. 74 Biodiversity

5. The Council will support appropriate new development which delivers at least 12% biodiversity net gain and:

- a) Retains and enhances significant features of nature conservation value on development sites;
- b) Makes a positive contribution to biodiversity and accords with the aims and objectives of the Green Infrastructure and Local Nature Recovery Strategies, through the creation of appropriate green spaces, that provide linkages between habitats to create local and regional ecological networks that enable the movement of wildlife through development sites; and / or
- c) Following the principle of 'right habitat in the right place', significantly increases woodland or other habitats for the purpose of appropriately enhancing biodiversity, carbon sequestration, pollution control, and / or flood mitigation.

6. Relevant development proposals will be expected to deliver 12% biodiversity net gain and must submit Biodiversity Net Gain information to show how this will be achieved using the mandated Biodiversity Metric or the Small Sites Metric as appropriate and must abide by the metric trading rules. Submissions must make clear what will be provided to meet no net loss and what will deliver net gains. The net gain must be achieved through the delivery of appropriate on-site biodiversity net gain or, where this is not practicable, through off-site net gain within the District especially areas, as suitable to the habitats subject to gain, identified in the District's Green Infrastructure Strategy or the Local Nature Recovery Strategy, or as agreed by the Council. All such schemes, excluding any respective element using statutory biodiversity credits, must submit for approval by the Council a funded maintenance and management plan, including monitoring / reporting and appropriate enforcement processes, that secures the biodiversity net gains for at least 30 years.

7. All other development proposals must seek to demonstrate how measurable biodiversity net gains will be delivered. Protected Sites and Species

8. Proposals must give appropriate consideration to protected and notable species. They will be expected to protect priority species and seek to aid their recovery, and must conserve, restore and enhance priority habitats, and should create and manage appropriate new habitats, taking into account pollination, where practicable. 9. Particular consideration will be given to the hierarchy of sites and habitats, including buffer areas, within the District, or functionally linked to, as follows:

- a) Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites;
- b) Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Veteran Trees, Ancient Woodland and other irreplaceable habitats; 75

c) Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and any areas of priority habitats including traditional orchards, local geodiversity, Core Sites in the emerging NRN and other irreplaceable habitats not already identified in a & b above.

10. An appropriate buffer around woodland will be required, this will be at least 15m around Ancient Woodland or greater in accordance with good practice, and consideration should be given to the potential for protected species, such as bats, and impacts on hydrology. Around ancient and veteran trees a minimum buffer zone of at least 15 times larger than the diameter of the tree, or 5 metres from the edge of the tree's canopy whichever is the larger, will be required.

11. Where the felling of a tree is necessary, for example due to disease, replacement planting with a suitable tree species, age and location to retain and enhance the link with the wider network of habitats and Green Infrastructure, will be required.

12. Where development is anticipated to have a direct or indirect adverse impact on sites or features of importance to nature conservation, development will be refused unless it can be demonstrated that:

- a) The mitigation hierarchy has been applied and the objectives of a site's designation, where applicable, and integrity of the area will not be undermined;
- b) The reason for the development clearly outweighs the likely impact to notified features and / or the need to protect the value of the site; and
- c) Appropriate mitigation and compensation measures will be provided alongside the delivery of measurable biodiversity net gain as relevant.

13. Any development with the potential to impact the Arun Valley SPA / SAC / Ramsar site, The Mens SAC and / or Ebernoe Common SAC will be subject to a Habitats Regulation Assessment 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 Habitat Regulation Assessment of this Plan.

3.0 METHODOLOGY

3.1 GLTA

A Ground Level Tree Assessment (GLTA) of the trees proposed for removal on site was undertaken by Amy Johnston BSc (Hons) ACIEEM (class level 1 survey licence 2025-84003-SCI-CL17, working under class level 2 survey license of Lyndsey Barratt 2024-1193-CL18-BAT) with assistance from Catey Arthars on the 10th March 2026.

An updated GLTA for T64 was completed on 22nd September 2026 working under class level 2 survey license of Lyndsey Barratt 2025-83996-CL18-BAT) with assistance from Imogen Griffiths.

The locations of the trees assessed are shown in **Figure 2** below. This followed BCT (Collins (ed) 2023) best practice survey which includes aiming to identify the following Potential Roost Features (PRFs):

- PRFs formed by disease and decay: woodpecker holes, squirrel holes, knot holes, pruning cuts, tear outs, wounds, cankers, compression, forks, butt rots
- PRFs formed by damage: lightning strikes, hazard beams, subsidence cracks, shearing cracks, transverse snaps, welds, lifting bark, desiccation features, frost cracks; and
- PRFs formed by association: fluting Ivy.

The presence or absence of any of the features listed above are then fed into the classification of the tree which is as follows (**Table 1**). When needed, the features were inspected with an endoscope to confirm the classification.

Table 1. Guidelines for assessing the potential suitability of sites for bats (Trees) (adapted from Collins, 2023).

Suitability	Description
	Roosting Features
Negligible	Tree does not support any suitable features that could be potentially utilized by roosting bats.
FAR	Further Assessment Required (FAR) to establish if any PRFs are present in the tree.
PRF - I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF - M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Figure 2. Locations of the trees assessed (Google Satellite 2026)

3.2 Assessment Methodology

3.2.1 Introduction

The methodology for the assessment of the likely ecological effects of the proposed development is based on CIEEM's *Guidelines for Ecological Assessment in the UK* (CIEEM 2018). Although this assessment does not constitute a formal Ecological/ Environmental Impact Assessment, the CIEEM guidelines provide a useful framework for assessing ecological impacts at any level.

3.2.2 Valuation

Features of ecological interest are valued on a geographic scale. Value is assigned on the basis of legal protection, national and local biodiversity policy and cultural and/or social significance.

3.3 Limitations

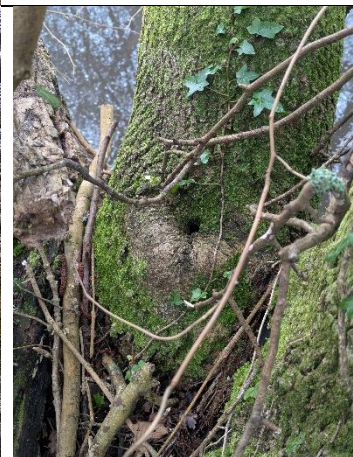
The GLTA was conducted at the appropriate time of year, with all areas of the site accessible. Therefore, there was not considered to be any limitations upon the results.

4.0 RESULTS

4.1 Trees

The results of the GLTA are presented in **Table 2** and **Figure 3** below.

Table 2. Results of the GLTA completed March 2026.

Tree Number	Tree Species	Features	Classification	Photos	
T52	<i>Fraxinus excelsior</i> (Common Ash)	Small amount of ivy present, but not considered to be a feature. No further features noted, potential Ash dieback.	Negligible		
T48	<i>Fraxinus excelsior</i> (Common Ash)	One small knot hole present, considered unlikely to be used by bats due to its lack of depth and exposure. Ivy was present, but not considered substantial enough to be its own feature. Tree previously marked.	Negligible		

G6.1	<i>Quercus robur</i> (Common Oak)	Small areas of peeling bark, however, was not considered substantial enough for use by bats.	Negligible	 	
G6.2	<i>Quercus robur</i> (Common Oak)	No features noted, tree in close proximity to tree G6.1.	Negligible		

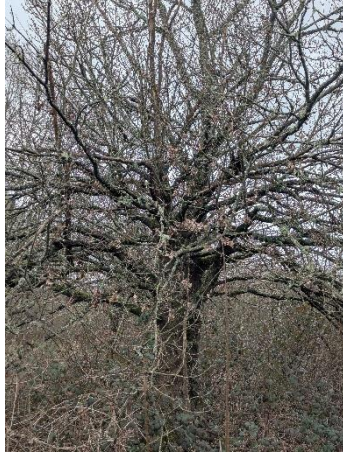
G6.3	<i>Quercus robur</i> (Common Oak)	No significant features noted.	Negligible		
G6.4	<i>Quercus robur</i> (Common Oak)	No significant features noted.	Negligible		

G6.5	<i>Quercus robur</i> (Common Oak)	Lifted bark and dead limbs noted.	PRF-I		
G6.6	<i>Quercus robur</i> (Common Oak)	Lifted bark and dead limbs noted.	PRF-I		

G6.7	<i>Quercus robur</i> (Common Oak)	Lifted bark and dead limbs noted.	PRF-I		
G6.8	<i>Quercus robur</i> (Common Oak)	Cracked main stem.	PRF-I	 	

G6.9	<i>Quercus robur</i> (Common Oak)	Small areas of peeling bark and dead limbs noted.	PRF-I			
G6.10	<i>Quercus robur</i> (Common Oak)	2 small cracked, dead limbs present.	PRF-I			

G6.11	<i>Quercus robur</i> (Common Oak)	No features noted, in very close proximity to G6.10.	Negligible		
G6.12	<i>Quercus robur</i> (Common Oak)	Small areas of lifted bark and dead limbs noted.	PRF-I	 	

G6.13	<i>Quercus robur</i> (Common Oak)	Small areas of lifted bark noted.	PRF-I			
G6.14	<i>Quercus robur</i> (Common Oak)	Small areas of lifted bark and dead limbs noted.	PRF-I			

G6.15	<i>Quercus robur</i> (Common Oak)	Small areas of lifted bark, wounds and dead limbs. Features considered too small to be utilized by several bats.	PRF-I		
G6.16	<i>Quercus robur</i> (Common Oak)	No features noted.	Negligible		

G6.17	<i>Quercus robur</i> (Common Oak)	Cracked and dead lower limbs noted.	PRF-I		
G6.18	<i>Quercus robur</i> (Common Oak)	No features noted.	Negligible		

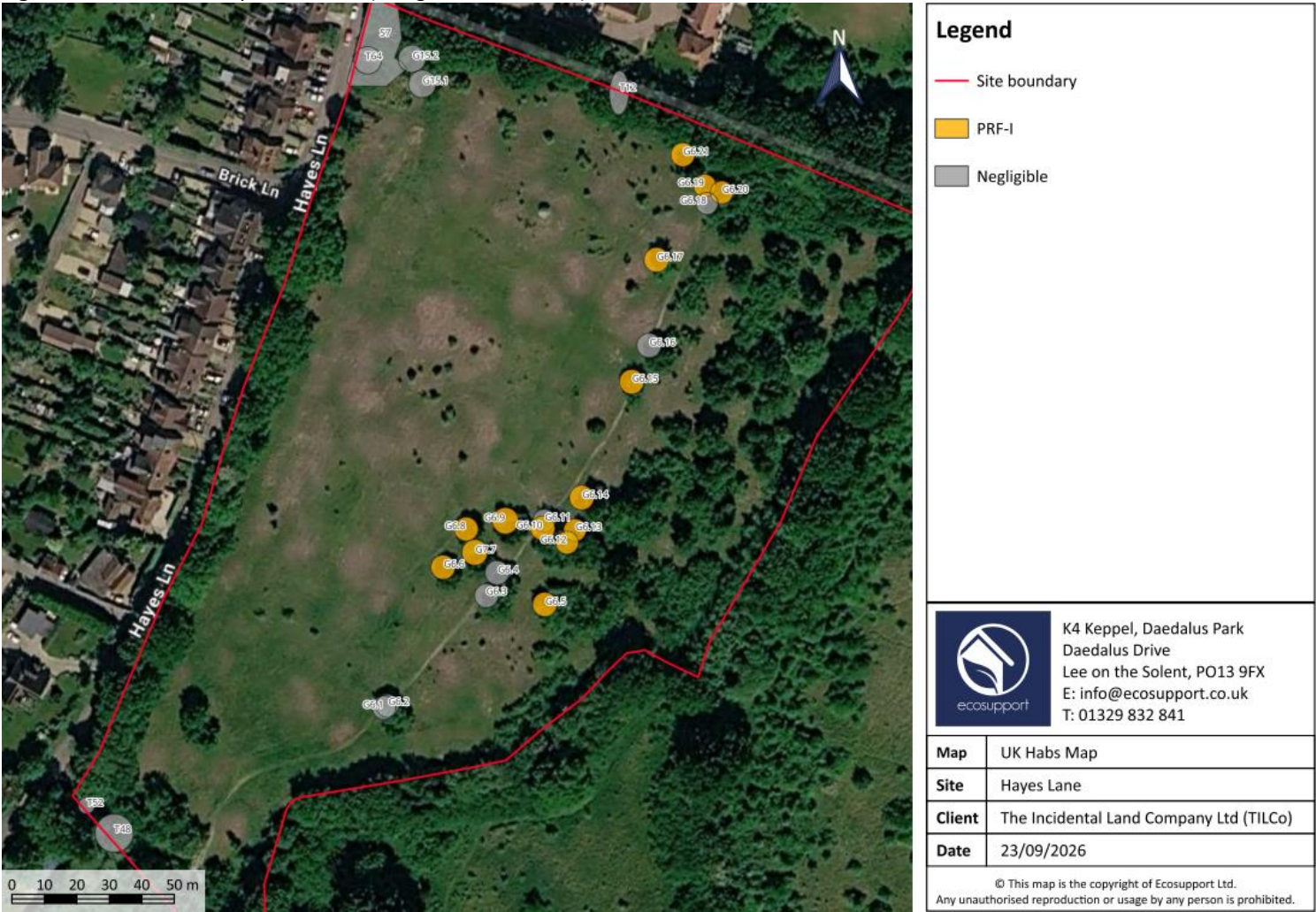
G6.19	<i>Quercus robur</i> (Common Oak)	Small areas of lifted bark and dead limbs noted. Features present where a limb has broken off. Features considered too small to be utilized by several bats.	PRF-I	 	
G6.20	<i>Quercus robur</i> (Common Oak)	Small areas of lifted bark, cracked dead limbs and previous wounds noted. Features considered too small to be utilized by several bats.	PRF-I	 	

G6.21	<i>Quercus robur</i> (Common Oak)	Small areas of lifted bark, dead limbs and previous wound noted.	PRF-I			
T12	<i>Quercus robur</i> (Common Oak)	Small areas of Ivy, but not extensive enough to be classed as a feature. No further features noted. Birds nest present, appeared inactive.	Negligible			

G15.1	<i>Quercus robur</i> (Common Oak)	Very minor peeling bark, however gaps were not substantial enough to be classed as a feature. No further features noted.	Negligible		
G15.2	<i>Quercus robur</i> (Common Oak)	No features noted.	Negligible		

T64	<i>Quercus robur</i> (Common Oak)	Very minor peeling bark approximately 7m high on a northern facing limb. Gaps were not substantial enough to be classed as a feature. Also, small areas of ivy were present, but not extensive enough to be classed as a feature. No further features were noted.	Negligible		
S7	<i>Prunus spinosa</i> (Blackthorn), <i>Crataegus monogyna</i> (Hawthorn)	Thick area of scrub with ivy present. No features were noted on the visible stems. Stems were considered unlikely to contain features due to their small size.	Negligible		

Figure 3. Results of the updated GLTA (Google Satellite 2026).



5.0 LIKELY ECOLOGICAL IMPACTS IN ABSENCE OF MITIGATION

5.1 Introduction

The CIEEM guidelines (CIEEM 2018) require that the potential impacts of the proposals should be considered in the absence of mitigation. In order for a significant adverse effect to occur, the feature being affected must be at least of local value. However, in some cases, features of less than local value may be protected by legislation and/or policy and these are also considered within the assessment. Although significant effects may be identified at this stage of the assessment, it is often possible to provide appropriate mitigation.

5.2 Site Preparation and Construction

5.2.1 Impacts to Wildlife

5.2.1.1 Bats

A number of the trees proposed for removal on site have been identified to contain features with suitability for individual roosting bats. Therefore, in the absence of mitigation, the removal of those trees could result in disturbance, harm and even death of individual bats if present. Therefore, the removal of those trees could result in an **adverse impact** at the **local** level of significance.

5.2.1.2 Breeding and Nesting Birds

The trees on site have been identified as having potential for breeding and nesting birds. The removal of the trees, if carried out during the nesting bird season, could result in the disturbance, harm and even death of nesting birds, therefore, in the absence of mitigation, an **adverse impact** is possible at the **local level**.

6.0 RECOMMENDATIONS

6.1 Introduction

The below sections outline a number of recommendations for further survey work required to fully assess the potential ecological impacts of the development and ensure the proposed mitigation and compensation are appropriate and proportionate. In addition to this, measures are outlined to protect the existing features of value and provide enhancements post development.

6.2 Bats

6.2.1 Further Survey Work

T64 is located within an area of dense scrub and therefore had limited visibility. It is therefore recommended that this tree is subject to an updated GLTA once the scrub has been cleared in order to determine if any features are present.

6.2.2 Precautionary Tree Removal

Several trees were identified as containing PRF-I's and as such, in accordance with the Bat Mitigation Guidelines (2025), any works or remedial works to these trees will follow a precautionary working method statement (PWMS). The following PWMS will be undertaken to ensure no bats are harmed in the unlikely case that individuals are present on site.

Bats are most vulnerable during the maternity season and the hibernation period. Therefore, it is recommended that trees works avoid the maternity season (May - August) and hibernation period (November – February). Optimal time for works is generally considered to be in spring and autumn when bats are least vulnerable to disturbance (Reason & Wray, 2025). Works will take place in suitable weather conditions (i.e. it is dry/calm and temperatures are no lower than 8°C for at least an hour or two from dusk on 3-4 consecutive nights prior to works) (Reason & Wray, 2023).

The following methods will be applied to each tree / group respectively. All works will be done under supervision of a suitably qualified ecologist holding a Class Level 2 (CL18) Bat Licence. All PWMS must be undertaken immediately prior to the removal or works to each tree:

- Immediately prior to felling, any PRF's will be subject to an endoscope survey by an ecologist.
- Any Ivy present will be cautiously pulled back from the tree, with any new features found underneath to also be subject to an endoscope survey prior to felling.
- Once bats are determined to be absent, the tree will be removed.
- If features are present which cannot be subject to an endoscope survey due to their height/ H&S concerns, then the tree will be soft felled.

In the unlikely instance that a bat or evidence of bats is found during any works, all works must immediately stop and the project ecologist must be informed. Natural England will then need to be contacted in order to obtain a European Protected Species development licence before any further works proceed. It is essential that these processes are immediately

followed to ensure that no offence is committed under The Conservation of Habitats and Species Regulations 2017.

6.2.3 Compensation

In order to compensate for the loss of PRF-I's on site, five 'Schwegler 2F with double front panel' or similar approved, will be placed onto mature retained trees at a height of 3.5m from ground level (**Fig 4**).

Figure 4. Schwegler 2F with double front panel to be implemented.



6.2.4 Sensitive Lighting

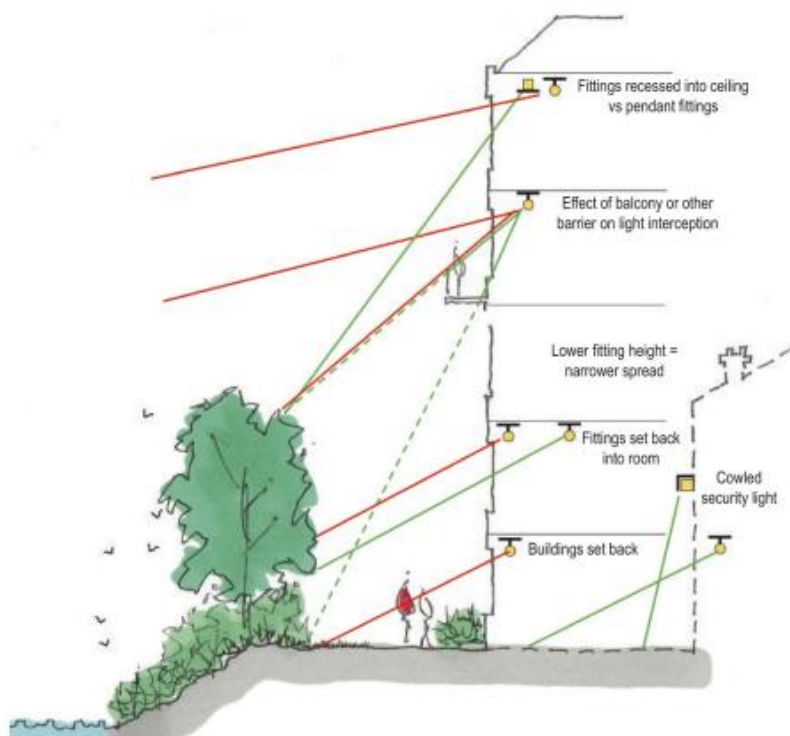
It is recommended that any lighting complies with the newly published *Guidance Note 08/23 Bats and Artificial Lighting at night* (ILP / BCT, 2023) produced via a collaboration between the Institute of Lighting Professionals (ILP) and the Bat Conservation Trust (BCT), which outlines the latest recommendations to minimise the impacts of increased artificial lighting on bats. The key recommendations within this document have been outlined below and will be implemented as far as is practicable:

'Light sources, lamps, LEDs and their fittings come in a myriad of different specifications which a lighting professional can help to select. However, the following should be considered when choosing luminaires and their potential impact on Key Habitats and features:

- *All luminaires will lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used*
- *LED luminaires will be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability*

- *A warm white light source (2700Kelvin or lower) will be adopted to reduce blue light component*
- *Light sources will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012)*
- *Internal luminaires can be recessed (as opposed to using a pendant fitting - See **Fig 5**) where installed in proximity to windows to reduce glare and light spill*
- *Waymarking inground markers (low output with cowls or similar to minimise upward light spill) to delineate path edges (see Case Study 1)*
- *Column heights will be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards*
- *Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered - See ILP GN01*
- *Luminaires will always be mounted horizontally, with no light output above 90° and/or no upward tilt*
- *Where appropriate, external security lighting will be set on motion sensors and set to as short a possible a timer as the risk assessment will allow. For most general residential purposes, a 1 or 2 minute timer is likely to be appropriate*
- *Use of a Central Management System (CMS) with additional web-enabled devices to light on demand Use of motion sensors for local authority street lighting may not be feasible unless the authority has the potential for smart metering through a CMS*
- *The use of bollard or low-level downward-directional luminaires is strongly discouraged. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, increased upward light scatter from surfaces and poor facial recognition which makes them unsuitable for most sites. Therefore, they should only be considered in specific cases where the lighting professional and project manager are able to resolve these issues. See Case Study 6*
- *Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely'*

Figure 5. Internal lighting mitigation options (ILP 2023).



6.3 Breeding and Nesting Birds

To avoid disturbance of nesting birds or damage to their nests, clearance of any trees, hedgerows and lines of trees that are suitable for nesting birds will be undertaken outside of the bird-nesting season (typically March – August, dependant on weather). If this is not possible, areas proposed for clearance should be thoroughly checked by an ecologist immediately prior to clearance. If any active nests are found, they should be left undisturbed with a 5m buffer erected (barrier tape or similar) and monitored until the chicks have fledged.

7.0 CONCLUSION

A GLTA was undertaken of the site known as Hayes Lane, Slinfold in relation to the proposed residential development. Several trees were found to contain PRF-I's. These will be subject to a precautionary tree removal methodology to ensure no impacts to bats occur. A number of bat boxes will be installed onto retained trees in order to compensate for the loss of roosting features. Sensitive lighting is also recommended for the proposals, to reduce any impacts upon bats locally. Finally precautionary methods have been recommended for the tree removal, to ensure no impacts to breeding or nesting birds occur.

8.0 REFERENCES

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