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NATURAL PROGRESSION

Mount Avenue, Chaldon, Caterham, Surrey

Preliminary Ecological Appraisal Report

June 2025

Mount Avenue, Chaldon, Caterham, Surrey

Preliminary Ecological Appraisal Report

Client:	Sigma Homes Ltd	
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Abbreviations

CEMP	Construction Environmental Management Plan
CEZ	Construction Exclusion Zone
CHS	Conservation of Habitats and Species Regulations 2017 (as amended)
EclA	Ecological Impact Assessment
ECow	Ecological Clerk of Works
EPS	European Protected Species
GCN	Great crested newt
HPI	Habitat of Principal Importance
HSI	Habitat Suitability Index
NERC	Natural Environment and Rural Communities Act 2006
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
PEA	Preliminary Ecological Appraisal
PRF	Potential (bat) Roost Feature
SBIC	Surrey Biological Information Centre
pSNCI	Potential Site of Nature Conservation Interest
SSSI	Site of Special Scientific Interest
TN	Target Note
WCA	Wildlife & Countryside Act 1981 (as amended)

0 Executive Summary

0.1 Introduction

- 0.1.1 A Preliminary Ecological Appraisal was undertaken for the site of a proposed residential development at Mount Avenue, Chaldon, Caterham, Surrey (Grid Reference: TQ 32112 55025). The report was prepared to establish the site's suitability for development, inform the design process for the proposal, record the ecological baseline and identify key ecological features within and around the Application Site.

0.2 Results

- 0.2.1 There are four nationally important wildlife sites within the desk study search area, this comprises one Area of Outstanding Natural Beauty, one National Nature Reserve, and two Sites of Special Scientific Interest. There are no internationally designated sites and there are no non-statutory sites of local importance, however there are seven potential Sites of Nature Conservation Interest.
- 0.2.2 There are records of a range of protected or notable species in the locality, including amphibians, birds, invertebrates, terrestrial mammals, flowering plants and terrestrial reptiles, together with four Priority Habitats: Lowland Calcareous Grassland, Traditional Orchards, Deciduous Woodland, and Ancient Woodland. Deciduous Woodland is shown as present within the survey area and the closest Ancient Woodland is c.10m south-west.
- 0.2.3 The survey area lies within the village of Chaldon to the west of the town of Caterham in the Tandridge district of Surrey. The survey area comprises c.1.45ha of undeveloped land, currently comprising a large, improved grassland field (horse paddock), with scrub, hedgerows / lines of trees, woodland buildings and hardstanding. The wider landscape is characterised by arable land and pasture with a network of hedgerow and drainage ditches, and numerous woodland blocks. One pond lies within 500m of the survey area.

0.3 Evaluation

- 0.3.1 Table 0.1 presents a summary of ecological constraints and opportunities identified within the survey area.

Table 0.1: Summary of ecological constraints and opportunities

Feature	Detail
<u>Constraints:</u>	
Designated sites	Ancient woodland is located c.10m south-west of the southern boundary of the survey area and is vulnerable to negative effects from the Proposed Development. The Ancient Woodland will be buffered by an undeveloped zone of at least 15m from the

Feature	Detail
	construction footprint (including gardens and residential curtilages; combined with ecological protection measures during construction. None of the statutory or potential non-statutory wildlife sites or areas of Ancient Woodland within the desk-study search zone are likely to be affected by the Proposed Development, considering the size and scale of the proposal and its distance from the designated sites.
Priority Habitats	Lowland Mixed Deciduous Woodland and Hedgerows H1 and H3 within the survey area are Priority Habitats and provide habitats suitable for a range of protected species, including amphibians, nesting birds, invertebrates, bats, hazel dormouse and reptiles. It is currently anticipated that the woodland and majority of hedgerows will be retained and protected during construction. However, a length c.10m of H2 would be removed to make way for the new vehicle access, and two small pedestrian accesses would be made at the eastern and western end of H1. This loss will be offset by replanting hedgerow across the existing access gap at the southern boundary.
Other habitats	The Proposed Development would result in permanent losses of up to c.1.17ha of improved grassland, scrub and hardstanding, depending on the extent and layout of proposals. These areas are of relatively low ecological value and of negligible importance but provide habitats suitable for a number of protected species (e.g. nesting birds, badger, bats, hazel dormouse and reptiles).
Birds (nesting)	Possible permanent loss of nesting habitats (hedgerows, scrub).
Badger	Possible permanent loss of suitable habitats for foraging and sett excavation (grassland, dense scrub, hedgerow). No potential badger setts were identified.
Bats (roosting)	The trees at T1-T4 contain features suitable for roosting bats (e.g. woodpecker holes, lifted bark, dense ivy clad). It is currently anticipated woodland habitats will be retained as part of the proposed development, but trees may require felling due to the extent of decay.
Reptiles	Possible permanent losses of suitable habitats (scrub, hedgerow).
<u>Opportunities:</u>	
Priority Habitats	The hedgerow and woodland Priority Habitats within the survey area are of high intrinsic value and can provide a focus for ecological enhancement measures.
Habitat creation / enhancement	Habitat creation and enhancement opportunities include woodland management, wildflower buffer planting, hedgerow restoration and creation, habitat piles and bird / bat boxes.

0.4 Recommendations

- 0.4.1 No further botanical or protected species surveys are required. Preliminary recommendations are made for the protection of important ecological features to avoid or mitigate ecological impacts, and to enhance the ecology of the survey area post-construction; these are summarised in Table 0.2. It is intended that these preliminary recommendations should be considered during future changes to the design of development proposals so that protection of important ecological features is secured and opportunities for ecological enhancement are realised.

Table 0.2: Summary of recommendations

#	Summary of recommendations
Precautionary measures	
R1	Ancient Woodland, located c.10m south-west of the survey area, will be buffered by an undeveloped zone of at least 15m from the construction footprint (including gardens and residential curtilages) to protect it from noise, light and dust pollution, hydrological changes, impacts to tree root systems, fly-tipping, invasive species and increased public access.
R2	Removal of nesting bird habitats (including vegetation and buildings) will be undertaken outside of the bird nesting season, which runs from 1 March to 31 August. It will therefore be carried out between September and February, but should be planned and implemented in accordance with the findings of the further ecological surveys recommended above.
R3	A repeat badger survey should be undertaken within two months prior to commencement of development works in order to determine if any new badger setts have established.
R4	Vegetation clearance works will be undertaken during the reptile active season (broadly March / April to September / October) and in accordance with a Precautionary Working Method Statement to reduce the risk of killing / injury to reptiles.
Ecological protection measures	
R5	Trees T1-T3 will be retained as part of the Proposed Development. If felling or arboricultural works to these trees are required in the future then aerial inspections for roosting bats within impacted trees will be required, undertaken between May and August.
R6	Deciduous Woodland and Hedgerow priority habitat within the survey area are of high intrinsic ecological value and provide habitats suitable for a range of protected species, including amphibians, nesting birds, invertebrates, badger, bats, hazel dormouse and reptiles. Woodland habitats, and the majority of hedgerows, will be retained and protected during construction and will also provide a focus for ecological enhancement measures (see below).
R7	Hoardings / tree protection fencing will be installed at the construction zone perimeter for the duration of the works to protect the nearby Ancient Woodland. The exact location of hoarding will be led by the root protection zones of surrounding trees.
R8	Areas of deadwood habitat presently within the woodland will be retained as suitable habitat for a range of wildlife.
R9	Standard site procedures to prevent impacts on trees will be adhered to during construction.
R10	Construction works (including demolition, ground works and vegetation clearance) will be carried out in accordance with a Construction Environmental Management Plan.
R11	The use of external lighting will be avoided or minimised to prevent impacts to nocturnal species such as bats. Lighting will not be directed towards the boundary hedgerows or woodland to the west.
R12	Small access gaps will be provisioned at the base of new fence boundaries to enable continued dispersal of small mammals across the site.
R13	At the end of each working day excavations will be covered over and open pipework capped to prevent entrapment of mammals, amphibians and other fauna.
R14	Destruction of fox dens or rabbit warrens will be undertaken in accordance with the Mammals Act 1996 by a registered pest control company.
Ecological enhancement	

#	Summary of recommendations
R15	The retained woodland will be enhanced through active management to improve structure and native species composition.
R16	Buffers of less intensively managed vegetation (e.g. coarse grasses and wildflowers) will be created within soft landscaped areas to maintain / enhance ecological connectivity.
R17	Hedgerow creation and / or restoration will use a range of native fruit, seed, nut and nectar-bearing shrub species.
R18	The landscaping plans for the survey area will utilise plant species which encourage bats by providing additional food sources or roosting opportunities.
R19	Habitat piles for amphibians, invertebrates and reptiles will be created within areas of retained woodland and hedgerow and other newly created habitats.
R20	The value of the survey area for birds will be enhanced by installing a range of artificial nest boxes onto new buildings and retained trees.
R21	The value of the survey area for bats will be enhanced by installing a range of artificial roost boxes onto new buildings and retained trees.

0.5 Conclusions

- 0.5.1 The majority of the survey area is of low ecological value. Significant constraints to the proposed Development were identified including Priority Habitats and the potential presence of nesting birds, roosting bats, and reptiles. However, proportionate and effective mitigation is available to protect against the risk of impacts. No further surveys are required prior to submitting a planning application.

1 Introduction

1.1 Purpose of this Report

- 1.1.1 This report presents a Preliminary Ecological Appraisal (PEA) for the site of a proposed residential development at Mount Avenue, Chaldon, Caterham, Surrey (Grid Reference: TQ 32112 55025). The report has been prepared to establish the site's suitability for development inform the design process for the proposal, record the ecological baseline and identify key ecological features within and around the Application Site.

1.2 Objectives and Approach of the Study

- 1.2.1 The objectives of the PEA were to:
- ▶ Identify features present on or adjacent to the Application Site which are ecologically significant and which may act as constraints or opportunities to the Proposed Development;
 - ▶ Consider the need for further ecological surveys which may be necessary; and
 - ▶ Make preliminary recommendations for the protection of important ecological features, to avoid or mitigate ecological impacts, and to enhance the Application Site for wildlife following construction.
- 1.2.2 The approach to establishing the ecological baseline found within this report has been achieved through:
- ▶ A desk study involving a review of statutory and non-statutory nature conservation sites, and records of habitats and species from the local area;
 - ▶ An extended UK Habitat Classification (UKHab) survey identifying the main habitats on and adjacent to the Application Site, and the presence of, or potential for, protected and/or notable species; and
 - ▶ A PEA of the effects of development proposals with respect to the nature conservation value of the site.

1.3 Survey Area

- 1.3.1 The Application Site boundary is expected to be the same as the survey area boundary.
- 1.3.2 The survey area lies within the village of Chaldon to the west of the town of Caterham in the Tandridge district of Surrey. The survey area comprises c.1.45ha of undeveloped land, currently comprising a large, grassland field (horse paddock), with scrub, hedgerows / lines of trees, woodland, buildings and hardstanding.

1.3.3 The survey area is bounded to the north by Mount Avenue and residential properties, to the east and west by residential properties and to the south by Birchwood Lane. The extent of the survey area is outlined in red Figure 1.1.

1.3.4 The wider landscape is characterised by arable land and pasture with a network of hedgerow and drainage ditches, and numerous woodland blocks. One pond lies within 500m of the survey area.

1.4 Proposed Construction Activities

1.4.1 Outline planning consent is being sought for a residential development. The proposals would include the construction of 30 new dwellings, together with parking, access, landscaping and associated facilities. A feasibility site plan is provided at Figure 1.2.

1.5 Project Background

1.5.1 The initial PEA survey was undertaken in April 2023 and was followed by the recommended protected species surveys for hazel dormouse 2024 (UEEC, 2024). The findings of these surveys have been used to inform this report.

 Survey area

Survey area

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Figure 1.2: Feasibility site plan

2 Survey Methodology

2.1 Desk Study

2.1.1 A desk-based study was undertaken to examine published information and biological records from within the search area (site centroid plus 1km). This was extended to 2km for records of bats and nationally designated sites, and to 5km for internationally designated sites. The desk study established the presence of designated sites of nature conservation interest, or records of protected / notable habitats / species within the Application Site and its surrounding area. This information was collected from the following sources:

- ▶ The 'MAGIC' (Multi-agency Geographic Information for the Countryside) website: www.magic.gov.uk; and
- ▶ Surrey Biological Information Centre (SBIC).

2.2 Preliminary Ecological Appraisal

2.2.1 The PEA (compliant to British Standard BS42020:2013) is based on a survey of the site undertaken on 3 April 2023 by an experienced ecologist. Weather conditions were cool (c.8-11°C), with a gentle breeze (Beaufort Scale 3), 60% cloud cover and no precipitation.

2.2.2 An update survey was undertaken on the 25 March 2025 by an experienced ecologist. Weather conditions during the survey were mild (11°C) with a breeze (Beaufort Scale 2), 60% cloud cover and no precipitation.

2.2.3 Within the survey area every parcel of land was classified, recorded and mapped using standard colour codes, in accordance with the habitat types specified within the methodology for UKHab survey (UKHab Ltd, 2023). This allows rapid visual assessment of the extent and distribution of different habitat types. The UKHab System comprises a five-level Primary Habitat Hierarchy and a list of Secondary Codes. Each recorded habitat parcel is allocated a single Primary Habitat Code. Secondary Codes are associated with habitat parcels, where it is relevant to the whole parcel. UKHab guidance recommends that secondary codes are added to habitat parcels to:

- ▶ confirm the identity of habitat mosaic and complexes,
- ▶ add information about habitat origin and modifications; and
- ▶ add information on environmental context, management and land use in a consistent manner.

2.2.4 No Minimum Mapping Unit (MMU) has been applied to the survey area and professional judgement has been used to define notable habitat parcels. Target notes were used to provide supplementary information on features which are of particular interest, significant to specific construction proposals, too small to map or to provide additional details, for example relating to species composition and structure.

- 2.2.5 This basic methodology was extended to provide more detail in relation to habitats with potential to support rare or protected fauna, as described by the Chartered Institute of Ecology and Environmental Management's *Guidelines for Preliminary Ecological Appraisal* (CIEEM, 2017b). The assessment of habitat suitability for protected, rare or priority species is based on current good practice guidance such as that presented in the *Herpetofauna Workers' Manual* (Gent and Gibson, 2003) and *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (Collin (ed.), 2023). Where a species/group is not specifically evaluated, this indicates that no habitat of potential value for the species was identified during the survey.

Scope of the survey

- 2.2.6 The buffer zone for the desk study was set at 1km from the centre of the survey area (2km for bats and national sites / 5km for international sites) – a distance within which any notable ecological features likely to be affected by the Proposed Development would be identified.
- 2.2.7 All habitats within the survey area as indicated on Figure 1.1 were included in order to identify any ecological constraints that would be likely to apply to the scheme from within this zone. Adjacent habitats were also surveyed where appropriate in order to identify constraints falling outside of the Application Site and to place the survey area in its ecological context.

Evaluation criteria

- 2.2.8 Important ecological features were evaluated to the extent possible under the survey methods used, and in relation to a geographical frame of reference, i.e. international/European value being most important, then national, regional, metropolitan/county/district/borough, and lastly local (based on CIEEM, 2018).
- 2.2.9 Value judgements are based on various characteristics that contribute to the importance of ecological features. These include site designations (such as Sites of Special Scientific Interest, or for undesignated features, the extent, naturalness, conservation status (local or national importance and so on), and quality of the ecological resource. Quality can refer to habitats (for instance if they are particularly diverse, are a good example of a specific habitat type, or provide for the requirements of important species or assemblages), other features (such as connectivity provided by wildlife corridors or mosaics of habitats) or the richness and abundance of species populations or assemblages.

2.3 Hedgerow Regulations Survey

- 2.3.1 If a hedgerow is classified as important under the Hedgerow Regulations 1997, local planning authorities are able to prevent its removal. To be classified as important, the hedgerow should be over 30 years old and should comprise one of the following:
- ▶ At least 7 woody species / 30m;
 - ▶ At least 6 woody species / 30m and at least 3 features such as; an associated ditch, bank or wall, standard trees, parallel hedge, or connections to woodland or pond;

- ▶ At least 6 woody species / 30m and including any one of black poplar *Populus nigra*, wild service tree *Sorbus torminalis*, small-leaved lime *Tilia cordata*, large-leaved lime *Tilia platyphyllos*;
- ▶ At least 5 woody species and at least 4 associated features; and
- ▶ If adjacent to a bridleway or footpath, at least 4 woody species and at least 2 features.

2.3.2 The Hedgerow Regulations do not apply to hedgerows which form the curtilage of residential properties or gardens. It should also be noted that hedgerows may qualify as important for historic or archaeological reasons and this report only assesses them according to the ecological criteria set out in the Hedgerow Regulations (HMSO, 1997).

2.4 Daytime Bat Walkover

2.4.1 Buildings and trees within / adjacent to the survey area were subject to an external and where possible internal inspection for potential bat roost features (subject to safe access). All observable features potentially suitable for bats were noted and the overall suitability of the structure / tree for roosting bats was classified with reference to Table 2.1 and Table 2.2.

Preliminary Roost Assessment

2.4.2 External building inspections from ground-level focused on access points and potential roosting features (PRF) such as lifted lead flashing, broken, lifted or missing roof or ridge tiles, cracks in the render or gaps between exterior cladding and weatherboards, soffits or fascias. The internal inspection included a search for live animals and other signs that give an indication of past or present occupancy. In the case of bats, typical indicators include droppings (which are characteristic and are often indicative of species), signs of fur oil staining, urine splashing, characteristic odours, and accumulations of discarded prey remains. It also assessed the overall suitability of the structure for roosting bats focusing particularly on the interior roof spaces and cellars (subject to safe access). The objective was to establish whether each feature was of negligible, low, moderate or high roosting bat suitability, or a confirmed roost based on the presence of bats or their droppings.

Table 2.1: Potential suitability of structures for roosting bats (after Collins, J. (ed.), 2023)

Suitability	Roosting habitats
None	No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices / suitable shelter at all ground / underground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool / stable hibernation site, but could be used by individual hibernating bats).

Suitability	Roosting habitats
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity or hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool / stable hibernation site.
Confirmed roost	Bats or unequivocal evidence of bats found, i.e. bat droppings. Suitability categories are irrespective of the presence of a roost. Accordingly, if a roost is confirmed then the categorisation still stands and 'confirmed roost' should be added.

Ground Level Tree Assessment

- 2.4.3 Trees were assessed from ground level for PRFs such as woodpecker holes, cavities, cracks or splits in major limbs (e.g. hazard beams, rot holes, frost cracks, knot holes, occlusions, flush cuts, tear-outs, cankers or butt-rots), loose platey bark, aerial deadwood and dense ivy or epicormic growth.

Table 2.2: Potential suitability of trees for roosting bats (after Collins, J. (ed.), 2023)

Suitability	Roosting habitats
None	No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices / suitable shelter at all ground / underground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
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.

- 2.4.4 The surveys were carried out with the aid of the following equipment: high-powered searchlight fitted with a red filter to search dark areas for signs of bats; close-focusing binoculars to view areas inaccessible on foot; and digital camera with flash to record any evidence of bats or features suitable for use by bats.

2.5 Limitations

- 2.5.1 Biological records gathered during the desk study can provide an indication of the likely presence of a species on or adjacent to a site, however, the absence of records for protected species does not equate to evidence of their absence from the locality. Data search accuracy is variable and records are often georeferenced to the nearest 1km grid square.

- 2.5.2 Time of year when the survey was carried out and other variations will influence the results of the survey. Botanical species vary considerably in their flowering, seeding and fruiting periods, and surveys outside of these periods can confound accurate species identification. Where this is the case plants have been identified to lowest possible taxonomic group, normally genus. The possibility nonetheless exists for other species to be present within the survey area which were not recorded or otherwise indicated by the survey. Both the original and updated surveys reported herein were carried out in early spring, prior to flowering for many botanical species. However, diagnostic vegetative characteristics are often still discernible and the timing of the survey is not considered to be a significant limitation to meeting the report objectives.
- 2.5.3 There were no difficulties in gaining access to habitats within the survey area and assess protected species suitability. However, the adjacent residential gardens to the north, east and west could not be surveyed for signs of species such as badger *Meles meles* due to access restrictions. In addition, the off-site pond could not be assessed for amphibian suitability as it lay on private land.
- 2.5.4 Tree T4 was no longer present during the updated survey in 2025 and it assumed to have fallen or been removed due to its deteriorating condition. T4 is no longer included in this assessment.
- 2.5.5 This report aims to provide general advice on the ecological constraints associated with development proposals for the survey area and includes recommendations for further survey where appropriate. Where impacts are likely or further ecological surveys are recommended, a more detailed Ecological Impact Assessment (EclA) of the effects of the Proposed Development should be carried out based on the results of recommended surveys. The EclA will include detailed advice on ecological avoidance, mitigation, enhancement and/or compensation measures. This is in line with the latest guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017a, 2017b, 2018).
- 2.5.6 The details of this report will remain valid for a period of 18 months from the date of the survey (March 2025), after which the validity of this assessment should be reviewed to determine whether further updates are necessary (CIEEM, 2019). Note that the recommendations within this report should be reviewed (and reassessed if necessary) should there be any changes to the Application Site boundary or the Proposed Development upon which this report was based. See Appendix VII for general Legal and Technical Limitations which apply to this document.

2.6 Personnel

- 2.6.1 Both surveys were carried out by Dan Maude BSc (Hons) MRes ACIEEM, a Senior Ecologist with four-years' professional consultancy experience in ecological field survey for a range of sites and development projects. The report was extensively reviewed by Nick Pincombe BA (Hons) MSc CEnv MIEMA MCIEEM, Director of Urban Edge Environmental Consulting, who has over 20 years' experience in leading survey and impact assessment teams for a wide range of ecology and environmental planning projects. Nick holds Natural England Class Licences to survey for bats (WML-CL18) and great crested newt (WMLCL08).

3 Results

3.1 Desk Study

Statutory and non-statutory site designations

- 3.1.1 There are four nationally important wildlife sites within the desk study search area, one Area of Outstanding Natural Beauty (AONB), one National Nature Reserve (NNR), and two Sites of Special Scientific Interest (SSSI). There are no internationally designated sites and there are no non-statutory sites of local importance within the desk study search area. However, there are seven potential Sites of Nature Conservation Interest (pSNCI); no information was provided on these sites but their location is shown at Figure 3.1. Information regarding the nationally important sites is presented in Table 3.1.
- 3.1.2 The survey area lies within the Impact Risk Zone (IRZ) for Quarry Hangers SSSI and Farthing Downs and Happy Valley SSSI. Any residential development of 100 or more houses outside existing settlements / urban areas should consult Natural England on the likely risks. The number of dwellings associated with Proposed Development is likely to be significantly less 100.

Priority Habitats

- 3.1.3 Priority Habitats include those listed on local Biodiversity Action Plans and Habitats of Principal Importance (HPI) listed under section 41 of the Natural Environment and Rural Communities Act 2006. SBIC and a search of the MAGIC database returned the following data on priority and other habitats within the desk study search area: Lowland Calcareous Grassland, Traditional Orchards, Deciduous Woodland, and Ancient Woodland. Deciduous Woodland is shown as present within the survey area and the closest Ancient Woodland is c.10m south-west of the survey area; see Figure 3.2.

Table 3.1: Nature conservation sites within the desk study search area

Site name	Location*	Description
Nationally designated sites		
Surrey Hills AONB	c.750m south	The AONB spans Surrey from east to west and links together a chain of varied upland landscapes including the North Downs, deciduous woodlands, chalk grassland and unimproved heathland.
Quarry Hangers SSSI	c.1km south	This site encompasses an area of chalk downland on the scarp slope of the North Downs near Caterham. It includes a mixture of species-rich chalk grassland, scrub and woodland, and supports a number of plants which are rare or local in Surrey, as well as local invertebrates.
Farthing Downs and Happy Valley SSSI	c.1.4km north	Farthing Downs and Happy Valley support the most extensive area of semi-natural downland habitats remaining in Greater London. The site is of particular interest for its species-rich chalk and neutral grasslands, and for an area of ancient woodland known as Devilsden

Site name	Location*	Description
		Wood. These habitats hold a large variety of herb species of restricted distribution in the County, including some which are nationally scarce. In addition, the grasslands support the largest British colony of the nationally rare greater yellow-rattle <i>Rhinanthus angustifolius</i> .
South London Downs NNR	c.1.4km north	The South London Downs NNR, comprises the most extensive area chalk downland habitat in Greater London. Other habitats within the NNR include scrub, broadleaved woodland, mixed woodland, yew woodland, and neutral grassland.

* Approximate distance and bearing from the survey area

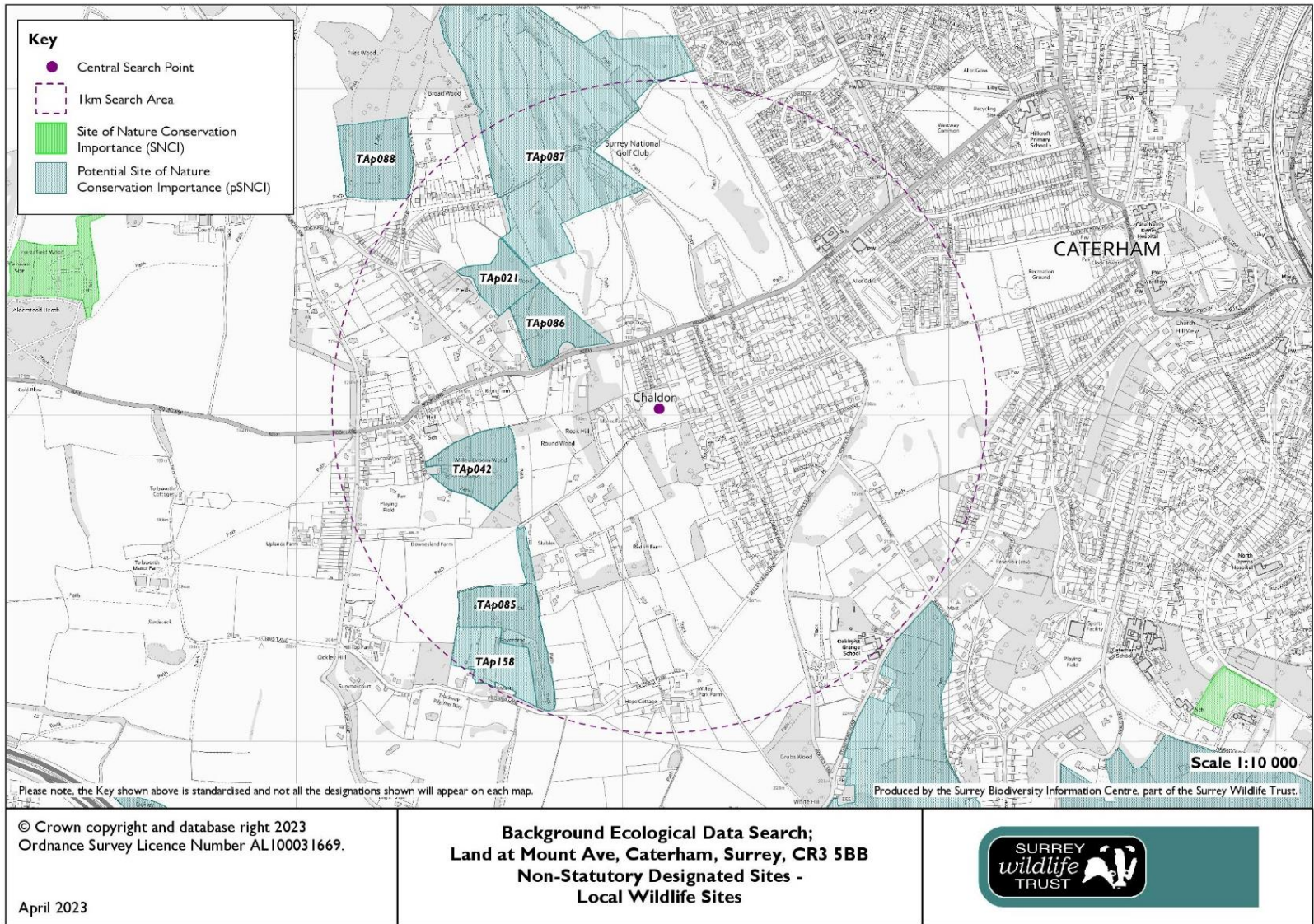


Figure 3.1: Non-statutory sites within the desk study search area (including pSNIC)

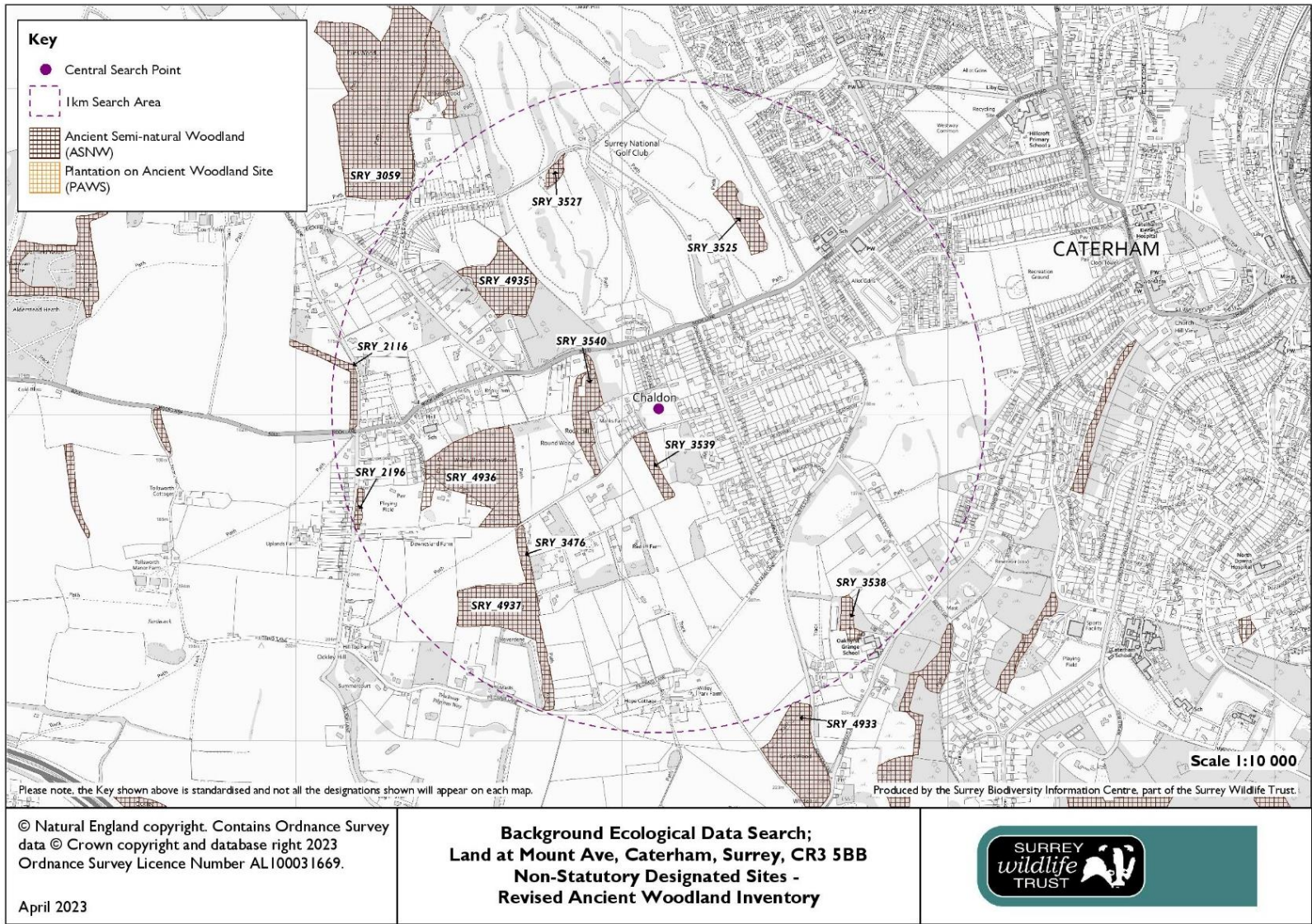


Figure 3.2: Ancient Woodland within the desk study search area

Records of protected, rare and notable species

3.1.4 Biological records were obtained from SBIC for the desk study search area and are summarised in Table 3.2.

Table 3.2: Records of protected, rare & notable species within the desk study search area

Group	Species	Designation
Amphibians	Common Toad <i>Bufo bufo</i>	WCA Sch.5 part, NERC s41
	Smooth Newt <i>Lissotriton vulgaris</i> , Common Frog <i>Rana temporaria</i>	WCA Sch.5 part
Birds (note: species may appear more than once)	Red Kite <i>Milvus milvus</i>	Birds Dir.1
	Red Kite, Redwing <i>Turdus iliacus</i> , Fieldfare <i>Turdus pilaris</i>	WCA Sch.1
	Yellowhammer <i>Emberiza citrinella</i> , Dunnock <i>Prunella modularis</i> , Linnet <i>Linaria cannabina</i> , House Sparrow <i>Passer domesticus</i> , Bullfinch <i>Pyrrhula pyrrhula</i> , Starling <i>Sturnus vulgaris</i> , Song Thrush <i>Turdus philomelos</i>	NERC s41
	Yellowhammer, Linnet, House Sparrow, Woodcock <i>Scolopax rusticola</i> , Starling, Redwing, Fieldfare, Mistle Thrush <i>Turdus viscivorus</i> , Song Thrush, House Martin <i>Delichon urbicum</i>	RL
	Mallard <i>Anas platyrhynchos</i> , Lesser Black-backed Gull <i>Larus fuscus</i> , Dunnock, Bullfinch, Tawny Owl <i>Strix aluco</i> , Wood pigeon <i>Columba palumbus</i> , Moorhen <i>Gallinula chloropus</i> , Wren <i>Troglodytes troglodytes</i>	AL
Invertebrates	Purple Emperor <i>Apatura iris</i> , Roman Snail <i>Gryllus campestris</i> , White-letter Hairstreak <i>satyrium w-album</i>	WCA Sch.5 part
	Small Heath <i>Coenonympha pamphilus</i> , Dingy Skipper <i>Erynnis tages</i> , Grizzled Skipper <i>Pyrgus malvae</i> , White-letter Hairstreak	NERC s41
Mammals (terrestrial)	Lesser Horseshoe <i>Rhinolophus hipposideros</i>	Habs.Dir.2&4, CHS Sch.2, WCA Sch.5 full, NERC s41
	Noctule <i>Nyctalus noctula</i> , Hazel Dormouse <i>Muscardinus avellanarius</i> , Soprano Pipistrelle <i>Pipistrellus pygmaeus</i> , Brown Long-eared Bat <i>Plecotus auritus</i>	Habs.Dir.4, CHS Sch.2, WCA Sch.5 full, NERC s41
	Daubenton's Bat <i>Myotis daubentonii</i> , Natterer's Bat <i>Myotis nattereri</i> , Common Pipistrelle <i>Pipistrellus pipistrellus</i>	Habs.Dir.4, CHS Sch.2, WCA Sch.5 full
	West European Hedgehog <i>Erinaceus europaeus</i>	NERC s41
Plants	Bluebell <i>Hyacinthoides non-scripta</i>	WCA Sch.8
Reptiles (terrestrial)	Slow Worm <i>Anguis fragilis</i> , Grass Snake <i>Natrix helvetica</i>	WCA Sch.5 part, NERC s41

Birds.Dir.1 Wild Birds Directive 2009/147/EC Annex 1

Habs.Dir.2/4 Habitats Directive 92/43/EEC Annex 2 or 4

CHS Sch.X Conservation of Habitats & Species Regulations 2017 Schedules 2 (EPS animals) or 5 (EPS plants)

WCA s1/Sch.X Wildlife and Countryside Act 1981 Section 1 / Schedules 1, 5 (fully or partially protected), 6 or 8

NERC s41 Natural Environment & Rural Communities Act 2006 Section 41 Species of Principal Importance
 RL / AL Red/Amber Listed (IUCN or Birds of Conservation Concern 5 (Stanbury *et al.*, 2021))

3.2 Habitats

3.2.1 The following UKHab habitats were identified within or adjacent to the survey area and are shown on the UKHab habitats plan at Appendix I. The habitats are described below broadly in the order of their extent, and Table 3.3 provides the area / length of each habitat type recorded within the survey area.

Table 3.3: Area / Lengths of habitat types recorded within the survey area

Habitat type*	Measurement
Area habitats	
Modified grassland	1.03ha
Lowland Mixed Deciduous Woodland	0.22ha
Bramble scrub	0.07ha
Other mixed woodland	0.06ha
Blackthorn scrub	0.05ha
Developed land; sealed surface	0.02ha
Linear habitats	
Hedgerows	208m
Line of trees	76m

Modified grassland

3.2.2 A large, modified grassland field lay at the centre of the survey and was in use as a horse paddock. The field was shortly cropped from intensive grazing and bare ground patches were frequent, especially at the field edges which had become heavily poached. Species composition was generally low with some increased richness toward the boundaries, though this was generally from species indicative of nutrient enrichment such as common nettle *Urtica dioica* and cleavers *Galium aparine*. The grassland was abundant with perennial rye-grass *Lolium perenne* and false oat-grass *Arrhenatherum elatius*, with frequent meadow buttercup *Ranunculus acris* and occasional creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, and mosses. Ribwort plantain *Plantago lanceolata*, docks *Rumex spp.*, ragwort *Senecio jacobea* and daisy *Bellis perennis* occurred rarely.

Lowland Mixed Deciduous Woodland

3.2.3 Lowland Mixed Deciduous Woodland was located at the north-western corner of the survey area and joined a narrow linear patch of mixed semi-natural woodland that ran along the southern half of the western boundary. The woodland was partially fenced and had an open structure with a limited understorey. Species composition was diverse and varied with mature pedunculate oak

Quercus robur, semi-mature beech *Fagus sylvatica*, alder *Alnus* spp., wild cherry *Prunus avium* and willow *Salix* spp., with occasional saplings of holly *Ilex aquifolium* and elder *Sambucus nigra*.

- 3.2.4 Fenced areas of the woodland had a patchy ground flora that resembled the adjacent grassland, albeit ungrazed, and unfenced areas comprised heavily poached bare ground. A small patch of bluebell was recorded at TN1. The woodland contained a large area of decaying timber (TN2), large rubble pile (TN3), felled tree piles (TN4), tree stumps (TN6) and litter which was scattered throughout. Several of the mature trees showed extensive decay. Two small, corrugated iron buildings and a shipping container were also present.

Bramble scrub

- 3.2.5 Sections of scrub were present at the northern and eastern boundary. Dense bramble *Rubus fruticosus* scrub formed a fenced off area at the western end of the northern boundary and continued eastward in a narrow, linear band below a line of semi-mature trees. There was also a relatively large patch of dense blackthorn *Prunus spinosa* scrub that extended out from the centre of the eastern boundary hedgerow. Several mammal paths (TN5) were identified leading into the scrub.

Other mixed woodland

- 3.2.6 This woodland section ran linearly along the western boundary and joined the southern end of the broadleaved semi-natural woodland. It was mostly composed of young trees including wild cherry, holly and beech with some semi-mature silver birch *Betula pendula* specimens. Many of the trees had been heavily browsed by the horses and much of the bark had been stripped as indicated by TN7. There was minimal ground flora from heavy poaching. Where ground flora was present it was indicative of nutrient enrichment.

Blackthorn scrub

- 3.2.7 Scattered blackthorn scrub had developed in small, low growing patches along the western end of the southern boundary, and southern end of the eastern boundary.

Developed land; sealed surface

- 3.2.8 Two small, ramshackle, open-fronted horse shelters / storage areas were constructed with corrugated metal panels and located within the fenced off area of the broadleaved woodland. A blue painted metal shipping container was also present within the woodland.
- 3.2.9 A small patch of asphalt that was in poor condition formed the entrance to survey area. The hardstanding had been encroached by plant species such as perennial rye-grass, ribwort plantain, meadow buttercup and docks. There was a large mound of rubble and timber at the eastern side of the hardstanding.

Hedgerows

- 3.2.10 There were two hedgerows and one line of trees that formed the survey area boundaries.

- 3.2.11 Hedgerow H1 was a species rich native hedgerow and trees that formed the southern boundary. There was a vehicle entrance gap that measured c.6m at roughly the centre of the hedge. To the east of the entrance H1 had a continuous canopy but patchy understorey with narrow gaps common. To the west of the entrance the hedge was denser and wider, with blackthorn beginning to extend from it. Species within the hedge included ash, elder, hawthorn *Crataegus monogyna*, hazel *Corylus avellana*, holly, and sycamore *Acer pseudoplatanus*. H1 was on average c.2m wide and 4-5m tall.
- 3.2.12 H3 was a species rich native hedgerow and trees that formed the eastern boundary. The hedge was scrubby and overgrown at the northern end but was neatly managed at the southern end. Species within H3 included blackthorn, hawthorn, wild cherry, holly, hazel, alder, honeysuckle *Lonicera periclymenum* and sycamore. Bramble was common throughout the hedge and a large patch of blackthorn scrub extended from the centre.

Line of trees

- 3.2.13 H2 was a line of trees that formed the eastern part of the northern boundary. Trees within the hedge included young to semi-mature specimens of holly, wild cherry, hazel, blackthorn, alder and sycamore. The line of trees had an understorey of dense bramble scrub that extended out from the trees to the north and south. H2 was c.2m wide and 5-6m tall.



Modified grassland – view looking north



Modified grassland – example of heavily poached area



Lowland Mixed Deciduous Woodland – view looking west



Lowland Mixed Deciduous Woodland – centre



Other mixed woodland



Other mixed woodland – centre



Bramble scrub – northern boundary



Blackthorn scrub – eastern boundary



Building B1



Building B2



Building B3



H1 eastern end



H1 western end



H2 – view looking west



H3 – view looking south



Developed land entrance track

3.3 Preliminary Roost Assessment

3.3.1 The buildings within the survey area were classified as being of negligible suitability for roosting bats due to the construction material and absence of suitable features.

3.3.2 Suitable trees for roosting bats are detailed below in Table 3.4.

Table 3.4: Preliminary Roost Assessment of trees within the survey area

Preliminary Roost Assessment of trees *	
T1: Decaying ash	
<i>Description</i>	Decaying ash tree that consisted of a main stem that forked at c.5m above ground. All major limbs had been lost or felled and only small amount of young growth remained.
<i>Evidence of bats</i>	None
<i>Potential roost features (PRF)</i>	Numerous woodpecker holes surrounding the upper reaches of the tree. Platey sections of bark across the tree.
<i>Overall suitability for roosting bats</i>	PRF-M
T2: Decaying sycamore	
<i>Description</i>	Decaying semi-mature sycamore that was formed of a main stem that split into two smaller stems at c.6m above ground. There were no major limbs and small branches only. Much of the bark had been shed and the wood beneath had started to rot.
<i>Evidence of bats</i>	None
<i>Potential roost features (PRF)</i>	Numerous woodpecker holes across the trees. Extensive areas of lifted bark across the tree.
<i>Overall suitability for roosting bats</i>	PRF-M
T3: Pedunculate oak	
<i>Description</i>	Large, mature pedunculate oak located within the broadleaved woodland. The tree has three major limbs, two fork from the main trunk at the same point c.3.5m above ground, with the southern leaning limb forking again c.4.5m above ground. The tree appears to be in good condition.
<i>Evidence of bats</i>	None
<i>Potential roost features (PRF)</i>	Single woodpecker hole on the eastern aspect of the larger limb that leans to the south c.7m above ground. Some loose bark around the ends of broken limbs but these features are generally tight.
<i>Overall suitability for roosting bats</i>	PRF-M

* Any other trees within the survey area were not of sufficient size/age to present PRFs



T1



T1 – woodpecker holes



T2 - right



T2 – woodpecker holes and lifted bark



T3



T3 – woodpecker hole

4 Evaluation

4.1 Introduction

- 4.1.1 This section evaluates the survey area in terms of the habitats and species present or potentially present on site or its immediate vicinity, in the context of relevant legislation and planning policy. See Appendix VI for a review of the legislation and planning context.

4.2 Designated Sites

- 4.2.1 Ancient woodland is located c.10m south-west of the southern boundary of the survey area and is vulnerable to negative effects from the Proposed Development, such as noise, light and dust pollution, hydrological changes, impacts to tree root systems, fly-tipping, invasive species and increased public access. The Ancient Woodland will be buffered by an undeveloped zone of at least 15m from the construction footprint (including gardens and residential curtilages; see section 5.3), combined with ecological protection measures during construction (see section 5.4). Given the size and scale of the proposals and current absence of direct access into the Ancient Woodland, these measures are likely to be effective in maintaining the condition of the woodland.
- 4.2.2 None of the statutory or potential non-statutory wildlife sites or areas of Ancient Woodland within the desk-study search zone are likely to be affected by the Proposed Development, considering the size and scale of the proposal and its distance from the designated sites; the closest statutory designation is 750m south (Surrey Hills AONB) and the closest pSNCI is c.190m north.

4.3 Habitats

Evaluation

- 4.3.1 Table 4.1 presents a preliminary evaluation of the habitats recorded within or adjacent to the survey area, with reference to the criteria defined at section 2.2.8. It is important to note that these preliminary evaluations may be updated following completion of more detailed botanical or protected species surveys.

Table 4.1: Preliminary evaluation of habitats within the survey area

Habitat	Evaluation	Rationale
Hedgerows HPI	Local	Whilst these habitats qualify as HPI, similar habitat of this quality is not uncommon in the Tandridge District, which restricts their importance.
Lowland Mixed Deciduous Woodland HPI	Negligible	This habitat qualifies as HPI but is in poor condition and not considered to be a good quality example.

Habitat	Evaluation	Rationale
		Habitat of similar or better quality is widely available in the surrounding area.
All other habitats	Negligible	These habitats are common and widespread or poor-quality examples, none of which are HPI.

Priority Habitats

4.3.2 Priority Habitats present within the survey area or at its boundaries include:

- ▶ Lowland Mixed Deciduous Woodland
- ▶ Hedgerows

Lowland Mixed Deciduous Woodland

4.3.3 Lowland Mixed Deciduous Woodland includes “woodland growing on the full range of soil conditions, from very acidic to base-rich, and takes in most semi-natural woodland in southern and eastern England... It occurs largely within enclosed landscapes, usually on sites with well-defined boundaries, at relatively low altitudes... The woods tend to be small, less than 20ha. Often there is evidence of past coppicing, particularly on moderately acid to base-rich soils; on very acid sands the type may be represented by former wood-pastures of oak and birch. There is great variety in the species composition of the canopy layer and the ground flora... *Quercus robur* is generally the commoner oak (although *Quercus petraea* may be abundant locally) and may occur with virtually all combinations of other locally native tree species” (Maddock, 2008).

4.3.4 Deciduous Woodland Priority Habitat is present within the survey area. This feature is of high intrinsic ecological value despite its condition and provide habitats suitable for a range of protected species, including nesting birds, badger (foraging and sett creation), foraging, commuting and roosting bats, and hazel dormouse. Dead wood within these habitats also provides valuable habitat for fungi and saproxylic invertebrates (e.g. stag beetle *Lucanus cervus*) and refuge / hibernation habitats for widespread amphibians, GCN and reptile species. This Priority Habitat is due to be retained as part of the Proposed Development and will be protected during construction.

Hedgerow

4.3.5 Hedgerows H1 and H3 were classified as species-rich. Hedgerow Priority Habitats are defined “as any boundary line of trees or shrubs over 20m long and less than 5m wide, and where any gaps between the trees or shrub species are less than 20m wide..., consisting predominantly (i.e. 80% cover or more) of at least one woody UK native species” (any bank, wall, ditch or tree within 2m of the centre of the hedgerow is considered to be part of the hedgerow habitat, as is the herbaceous vegetation within 2m of the centre of the hedgerow) (Maddock, 2008). The hedgerows within the survey area fall into this classification.

4.3.6 Hedgerow Priority Habitats are of high intrinsic ecological value and provide habitats suitable for a range of protected species, including amphibians and reptiles (shelter and dispersal), nesting birds, invertebrates, foraging / commuting bats, and hazel dormouse.

- 4.3.7 It is currently anticipated that the majority of hedgerows will be retained and protected during construction, however, a length c.10m of H2 would be removed to make way for the new site access. Small pedestrian accesses are expected to be created at eastern and western ends of H1. Loss to H1 will be offset by planting a new section of hedgerow across the existing entrance at the centre of the hedge.
- 4.3.8 All the hedgerows within the survey area were assessed according to criteria set out in the Hedgerow Regulations 1997; see Table 4.2. A table showing full survey results is presented in Appendix IV. If a hedgerow is classified as important under the Regulations, local planning authorities are able to prevent its removal.

Table 4.2: Hedgerow assessment

Hedgerow #	Importance under Hedgerow Regulations 1997	Priority Habitat?
H1	Important	Yes
H2	Not important (partial residential boundary)	Yes
H3	Not important (partial residential boundary)	Yes

Other habitats

- 4.3.9 The Proposed Development would result in permanent losses of up to c.1.17ha of improved grassland, scrub and hardstanding, depending on the extent and layout of proposals. These areas are of relatively low ecological value and of negligible importance, but provide habitats suitable for a number of protected species (e.g. nesting birds, badger, bats, hazel dormouse and reptiles).

4.4 Species

Amphibians (excluding great crested newt)

- 4.4.1 The shortly grazed improved grassland habitat that dominates the survey area is of low ecological value for common and widespread amphibian species due to its uniform structure and short sward height. The areas of scrub, woodland and hedgerow provide potentially suitable terrestrial habitats for common amphibian species, but most of these will be retained and habitats of similar suitability are widely available in the surrounding area.

Great crested newt

- 4.4.2 SBIC returned no records of GCN from within the desk-study search zone.
- 4.4.3 The survey area contains predominantly sub-optimal terrestrial habitat for GCN, comprised mainly of intensively grazed improved grassland (horse paddocks) with a short sward height and no structural variation. Grasslands of this nature are occasionally used by foraging or dispersing GCN but contain few shelter habitats and are unlikely to support high numbers, although if this habitat is left unmanaged it could quickly become suitable for GCN. However, there are patches of better habitat for this species, including the woodland, scrub and hedgerows, which together

provide sections of potential foraging, shelter and hibernation habitats. Decaying timber, rubble, tree piles and stumps (TN1-TN4 and TN6) provide additional shelter and hibernation habitats.

- 4.4.4 There are no ponds within the survey area, however an analysis of Ordnance Survey maps and aerial photography indicated that one pond is present within 500m of the survey area; see Appendix III for a pond plan. Pond P1 is located c.270m south. P1 could not be accessed to assess its breeding habitat suitability as it lay on private land. Images from aerial photography indicate the pond is surrounded by terrestrial habitats (coarse grassland and nearby woodland) of better suitability for GCN than those within the survey area. Any GCN present within this pond are more likely to use adjacent terrestrial habitats than migrate towards the sub-optimal habitat that dominates the survey area.
- 4.4.5 In conclusion, small patches of terrestrial habitat suitable for GCN are present within the survey area, although these are limited in extent, with the majority of grassland habitat being sub-optimal due to its short sward height, uniform structure and intensive grazing. Combined with the lack of potentially suitable breeding ponds connected to the site, the scope for potential impacts to GCN is negligible. GCN is not considered to present a constraint to the Proposed Development and no further surveys for this species are required.

Birds (nesting)

- 4.4.6 SBIC returned records of 18 notable bird species from within the desk-study search zone during a date range of 2001 to 2018.
- 4.4.7 The boundary hedgerow, woodland and scrub within the survey area are suitable for nesting birds such as wren, dunnoek (an Amber-listed bird of conservation concern (BoCC5); Stanbury *et al.*, 2021), robin *Erithacus rubecula* and chaffinch *Fringilla coelebs*, while the buildings provide some limited suitability for species such as house sparrow (BoCC5 Red-listed). The improved grassland is unlikely to support ground-nesting species such as skylark *Alauda arvensis* (BoCC5 Red-listed) under its currently grazing regime due to the short sward height and poor structural form.
- 4.4.8 Woodland habitats are of particular importance for species such as blackcap *Sylvia atricapilla*, great spotted woodpecker *Dendrocopos major*, green woodpecker *Picus viridis*, treecreeper *Certhia familiaris*, lesser spotted woodpecker *Dendrocopos minor* (NERC s41 and Red-listed (BoCC5)), cuckoo *Cuculus canorus* (NERC s41 and Red-listed (BoCC5)) and nightingale *Luscinia megarhynchos* (Red-listed (BoCC5)). Woodland habitats within the survey area are due to be retained as part of the Proposed Development. Precautionary measures for nesting birds are recommended at section 5.3.

Invertebrates

- 4.4.9 SBIC returned records of six species of protected invertebrate from within the desk-study search zone, during a date range of 1997 to 2016, principally of Lepidoptera (moths and butterflies) but also including Roman snail.
- 4.4.10 The improved grassland that dominates the survey area is largely unsuitable for invertebrates and are unlikely to support a diverse or abundant invertebrate fauna in general. The patches of scrub, woodland and hedgerows provide some limited opportunities for a range of common and

widespread invertebrates. These better habitats are expected to be mostly retained and are also abundant within the wider landscape. The limited losses within the site resulting from development are not considered likely to significantly affect invertebrate communities. Invertebrates are not considered to present a constraint to the Proposed Development and no further surveys for this group are required.

Mammals (terrestrial)

Badger

- 4.4.11 SBIC did not return any badger records.
- 4.4.12 The survey area provides suitable foraging habitat for badger with sett creation potential limited to the woodland, scrub and boundary hedgerows. A search for badger setts and signs of their presence was undertaken within a 30m radius of the survey area boundary but did not include the adjacent private properties to the north, east and west.
- 4.4.13 There some minor mammal paths heading into the blackthorn scrub, broadleaved woodland, and hedgerow H1, but there was no observable evidence of badger activity within or around the survey area, such as footprints, latrines, dung pits, or badger hairs caught at fence lines. However, badger's use of the landscape is dynamic and can change rapidly. A repeat badger survey should be undertaken within two months prior to commencement of Proposed Development as recommended at section 5.3.

Bats

- 4.4.14 SxBRC returned 27 records of at least seven species of bat from within 2km of the survey area, during a date range of 1994 to 2019, including Daubenton's bat, Natterer's bat, noctule, common pipistrelle, soprano pipistrelle, brown long-eared and lesser horseshoe bats. All of these records were of bats in flight.
- 4.4.15 All of the buildings within the survey area were considered to have negligible suitability to support roosting bats, based on external and internal inspections.
- 4.4.16 The PRA concluded that trees T1, T2 and T3 were of PRF-M suitability for roosting bats due to the range of PRFs exhibited and its proximity to good foraging and commuting habitat. These trees will be retained as part of the Proposed Development. However, felling or arboricultural works to these trees, if required in the future, could result in destruction of a bat roost or present a risk of killing, injury or disturbance if bats are present during the works. If future works are required then further surveys for bats roosting in trees will be required, as recommended at section 5.4
- 4.4.17 The intensively grazed grassland habitat which dominates the survey area provides a patch of low suitability foraging habitat for bats. The woodland and scrub offer better opportunities for foraging and the boundary hedgerows may serve as a navigation route or foraging feature for bats. It is anticipated that the majority of these better habitats will be retained and protected during the works. Significant impacts to foraging / commuting bats are unlikely and further bat

activity surveys are not required but external lighting should be mitigated as recommend at section 5.4.

Hazel dormouse

- 4.4.18 SBIC returned two records of hazel dormouse within the desk study search area, during a date range of 2016 to 2018, the nearest record being located c.700m north-west in 2018.
- 4.4.19 The hedgerows within the survey area are relatively dense and largely intact, providing potential habitat for dormouse. Food plants are present (including pedunculate oak, ash, birch, hazel, honeysuckle, sycamore, hawthorn and bramble), but hazel is infrequent. The hedges are species rich and likely to provide a year-round source of food. The dense scrub provides further suitability for dormouse, but the woodland is less suitable as it lacks a dense understorey. These habitats are relatively well connected via mature hedgerows to larger woodland blocks, including Ancient Woodland within the wider landscape. The woodland habitats are due to be retained and protected during construction, however, dense scrub habitats within the survey area would be removed and new access gaps are proposed within hedgerows H1 and H2.
- 4.4.20 Hazel dormouse surveys were carried out in 2024. The nest tube survey recorded no hazel dormouse nests during the survey period however six other mouse species nests were recorded. Five nests were found along the eastern boundary and one at the northern boundary. Based on the results of these surveys, hazel dormouse are considered to be absent from the survey area and no further surveys are required.

Water vole and otter

- 4.4.21 SBIC returned no records of European water vole *Arvicola amphibius* or otter *Lutra lutra*.
- 4.4.22 There are no riparian habitats running through or adjacent to the survey area, nor in the wider landscape, making it unlikely that either species would be present. Neither species is considered to present a constraint to Proposed Development and further surveys are not required.

Plants, native

- 4.4.23 SBIC returned records of bluebell from within the desk-study search zone during a date range of 1993 to 2016.
- 4.4.24 Native bluebell was recorded in low numbers in the woodland at the west of the survey area; the species is listed on schedule 8 of the Wildlife and Countryside Act 1981 (as amended; WCA) which affords it protection against possession, transport and trade. No other rare or protected species of flora were recorded within the survey area, but the time of year may have resulted in botanical species being under recorded due to an absence of inflorescences. The woodland is due to be retained and no further botanical surveys are considered necessary. Nevertheless, care should be taken to maintain bluebells within the woodland during construction.

Plants – invasive non-native species and injurious weeds

- 4.4.25 No invasive plant species (i.e. species listed on Schedule 9 of the WCA) were located during this survey. No significant stands of injurious weed species were noted (ragwort *Senecio jacobea*, spear thistle *Cirsium vulgare*, creeping thistle *Cirsium arvense*, curled dock *Rumex crispus*, and broad-leaved dock *Rumex obtusifolius*). Invasive plant species and injurious weeds are not considered to present a constraint to the Proposed Development and no further action for this group is required.

Reptiles (terrestrial)

- 4.4.26 SBIC returned two records of terrestrial reptile species from within the desk-study search area, during a date range of 2016 to 2017. Two of the four widespread species have been recorded in the vicinity; slow worm, grass snake. Both were located c.630 south-east of the survey area.
- 4.4.27 The survey area contains predominantly sub-optimal habitat for reptiles, comprised mainly of intensively grazed improved grassland (horse paddocks) with a short sward height and no structural variation. Grasslands of this nature contain few shelter habitats and are unlikely to support high numbers, although if this habitat is left unmanaged it could quickly become suitable for reptiles. However, areas of suitable habitat are present, including woodland, scrub and hedgerow. Decaying timber, rubble, tree piles and stumps (TN2-TN4 and TN6) provide additional shelter and hibernation habitat. The majority of these habitats would be retained but the scrub at the eastern boundary is likely to be lost. In addition, new access gaps would be made at the northern and southern boundary. Works to the scrub and hedgerow should be undertaken in accordance with a Precautionary Working Method Statement to reduce the risk of killing / injury to reptiles, as recommended at section 5.3

Other protected, rare or notable species

- 4.4.28 SBIC returned three records of hedgehog from within the desk-study search zone during a date range of 2008 to 2015. The closest to the site was located c.330m north-west in 2015. The survey area contains habitats suitable for this species, including grassland, hedgerow, woodland and scrub. Hedgehog is listed as a species of principal importance under the NERC Act 2006 and is undergoing a significant population decline. Measures should be taken to continue accommodating this species within the survey area post-development (see section 5.4).

5 Recommendations and Conclusions

5.1 Introduction

- 5.1.1 With regard to the objectives of this PEA, recommendations are made below for the protection of important ecological features, and/or to avoid or mitigate ecological impacts, and to enhance the survey area for wildlife following construction. It is intended that these recommendations should be considered during future changes to the design of development proposals so that protection of important ecological features is secured and opportunities for ecological enhancement are realised.

5.2 Protected Species Surveys

- 5.2.1 There is no requirement to undertake further botanical or protected species surveys prior to submitting a planning application

5.3 Precautionary Measures

- 5.3.1 The following species/groups (Table 5.1) require specific precautionary measures to be adhered to prior to and during construction to ensure that an offence under the relevant legislation is avoided.

Table 5.1: Recommended precautionary measures

#	Recommended precautionary measures
R1	Ancient Woodland, located c.10m south-west of the survey area, will be buffered by an undeveloped zone of at least 15m from the construction footprint (including gardens and residential curtilages) to protect it from noise, light and dust pollution, hydrological changes, impacts to tree root systems, fly-tipping, invasive species and increased public access.
R2	Removal of nesting bird habitats (including vegetation and buildings) will be undertaken outside of the bird nesting season, which runs from 1 March to 31 August. It will therefore be carried out between September and February, but should be planned and implemented in accordance with the findings of the further ecological surveys recommended above, as other protected species may still be present outside of the bird breeding season. Any construction works undertaken within the bird breeding season where suitable bird breeding habitat exists will require a site check for nesting birds by a suitably qualified ecologist. This will take place no more than two days prior to works commencing. This is to ensure that no disturbance to active bird nests occurs. If a nest is found it must be cordoned off and works adjacent to the nest must be delayed until such time that the chicks have fledged from the nest. This will be supervised by a suitably qualified ecologist.
R3	Badger's use of the landscape is dynamic and can change rapidly. A repeat badger survey should be undertaken within two months prior to commencement of development works in order to determine if any new badger setts have established within the survey area. The survey

#	Recommended precautionary measures
	area should include the construction zone plus a 30m buffer to ensure that disturbance to badgers occupying a sett does not occur during the works.
R4	Vegetation clearance works in the hedgerows and dense scrub, and removal of timber, rubble, tree piles and stumps (TN2-TN4 and TN6) will be undertaken in accordance with a Precautionary Working Method Statement to reduce the risk of killing / injury to reptiles. The Method Statement will specify reasonable avoidance measures including timing restrictions (works to be carried out during the reptile active season, broadly March / April to September / October), progressive reduction of vegetation height to displace any reptiles present and will be carried out under the supervision of a suitably qualified ecologist. Once vegetation removal is complete, the survey area will be maintained in unsuitable condition to prevent recolonisation.

5.4 Ecological Protection Measures

- 5.4.1 The following protection measures (Table 5.2) will be carried out as part of the proposed scheme alongside any specific measures that are described above.

Table 5.2: Recommended ecological protection measures

#	Recommended ecological protection measures
R5	Trees T1-T3 will be retained as part of the Proposed Development. If felling or arboricultural works to these trees are required in the future they could result in destruction of a bat roost or killing, injury or disturbance to roosting bats, and more detailed inspection of these features will be required in line with current guidelines (Collins, J. (ed.), 2023). Aerial inspections aim to closely investigate potential bat roost features, using an endoscope to search for evidence of bats and investigate the depth, extent and quality of PRFs. Aerial inspections must be undertaken/supervised by surveyors licensed to use endoscopes, and are either completed by qualified tree climbers or from a cherry picker. In some cases, aerial inspection will show that a PRF does not extend into a cavity and therefore is not of roosting potential. In such cases the tree may be removed without further constraints. An initial aerial inspection can be undertaken at any time of year and in some cases can rule out the need for further survey. Three aerial inspections, with at least two in the period May to August, are required for PRF-M trees.
R6	Deciduous Woodland and Hedgerow priority habitat within the survey area are of high intrinsic ecological value and provide habitats suitable for a range of protected species, including amphibians, nesting birds, invertebrates, badger, bats, hazel dormouse and reptiles. Woodland habitats, and the majority of hedgerows, will be retained and protected during construction and will also provide a focus for ecological enhancement measures (see below).
R7	Hoardings / tree protection fencing will be installed at the construction zone perimeter for the duration of the works to protect the nearby Ancient Woodland from temporary impacts including noise, light and dust pollution. The exact location of hoarding will be led by the root protection zones of surrounding trees, to be confirmed by the arboricultural report for the survey area.
R8	Areas of deadwood habitat presently within the woodland will be retained as suitable habitat for a range of wildlife. This includes several felled tree piles (TN4) and tree stumps (TN6). Deadwood habitats provide an important source of food and shelter for a variety of bats, birds,

#	Recommended ecological protection measures
	invertebrates, plants and fungi as well as shelter and hibernation habitats for a range of amphibians, reptiles and small mammals.
R9	British Standard BS 5837:2012 will be followed at all times during construction when working in close proximity to trees or shrubs which are to be retained. According to BS 5837:2012 the root protection area is 12x diameter of the trunk (diameter is measured around the trunk at a height of 1.5m above ground level), which will constitute the construction exclusion zone (CEZ). The distance is measured from the centre of the trunk to the nearest part of any excavation or other work. If a separate tree survey is carried out for the proposed development, works will be undertaken in accordance with the approved arboricultural method statement.
R10	Construction works (including demolition, ground works and vegetation clearance) will be carried out in accordance with a Construction Environmental Management Plan (CEMP: Biodiversity). The CEMP will specify: potentially damaging construction activities; "biodiversity protection zones"; measures to avoid or reduce impacts during construction (including protective fences, exclusion barriers, pollution control and methodological or seasonal restrictions); location and timing of sensitive works; periods during which ecological supervision is required; and the role & responsibilities of an Ecological Clerk of Works (ECoW).
R11	The use of external lighting will be avoided or reduced to the minimum required for its intended purpose, during both construction and operation. This will be of benefit to nocturnal species e.g. bats. Where external lighting is to be provided, it will be low-level, directional lighting with minimal spill and glare, and consideration will be given to reduced hours of operation and / or a movement responsive system of control. Use narrow-spectrum bulbs and light sources that emit minimal UV light, avoiding white and blue wavelengths of the spectrum. Use glass lantern covers instead of plastic to filter UV light. Lighting will not be directed towards the boundary hedgerows or woodland to the west.
R12	To enable continued dispersal of hedgehogs (which require large territory sizes) and other small mammals across the site and within the local area following the Proposed Development, small access gaps to measure c.13x13cm are recommended to be provisioned at the base of all new fence boundaries. These will allow easy passage for small mammals to continue foraging in the area while still being small enough to contain pets.
R13	All excavations left overnight will either be covered over, or provided with a ramp to enable easy escape of badgers, hedgehogs, small mammals, amphibians and other fauna, and inspected each morning prior to recommencement. Open pipework greater than 150mm outside diameter will be blanked off at the end of each working day.
R14	Where fox dens or rabbit warrens are to be damaged or destroyed as part of the proposed works, this will be undertaken in accordance with the Mammals Act 1996 by a registered pest control company.

5.5 Recommendations for Ecological Enhancement

- 5.5.1 The following ecological enhancements (Table 5.3) should be considered to improve the value of the survey area for biodiversity after construction but should be reviewed and specified further following the completion of recommended protected species surveys.

Table 5.3: Preliminary recommendations for ecological enhancement

#	Preliminary recommendations for ecological enhancement
R15	The retained woodland will be enhanced through additional understorey planting of a range of native fruiting shrubs of local provenance and selective tree thinning to increase light penetration.
R16	Buffers of less intensively managed vegetation (e.g. coarse grasses and wildflowers, including the use of tussock-forming grass species such as cock's foot <i>Dactylis glomerata</i> , Yorkshire fog <i>Holcus lanatus</i> , tufted hair-grass <i>Deschampsia cespitosa</i> and false oat-grass) will be created within soft landscaped areas within the Proposed Development, towards the survey area boundaries and alongside hedgerows, scrub (if retained) and woodland. This will help to maintain / enhance ecological connectivity through the survey area for reptiles, amphibians and small mammals, and provide forage for invertebrates.
R17	Hedgerow creation and / or restoration as part of the landscaping plan for the survey area will use a range of native shrub species. Fruit, seed, nut and nectar-bearing species will be used preferentially when selecting species for landscape planting, so that food sources are available throughout the year (e.g. hazel, hawthorn, blackthorn, rowan <i>Sorbus aucuparia</i> and honeysuckle). If an evergreen hedge is required for landscape screening, suitable native species include holly, yew <i>Taxus baccata</i> , although both can be rather slow growing, ivy <i>Hedera helix</i> and privet <i>Ligustrum vulgare</i> .
R18	The landscaping plans for the survey area will utilise plant species which encourage bats. The table at Appendix V lists species of plants that can provide benefit for bats either by providing a food source for insects on which bats feed, or providing additional roosting opportunities (Gunnell <i>et al.</i> , 2012). The plant species are predominantly native to Britain, but not all species will be suitable in all situations. The aim is to encourage a diverse range of invertebrate food sources and increased bat roost potential.
R19	Habitat piles will be created within areas of retained woodland and hedgerow or within areas of newly created habitat. These will provide additional hibernation and shelter resources for amphibians, invertebrates, reptiles, and a range of other wildlife, and egg-laying substrate for grass snakes. Hibernacula can be created by partially burying logs and stones in sheltered areas away from flood risk, and covering over with earth or turf. Breeding habitats can be created by collecting grass clippings and other prunings arising from landscape management of the site, and composting them in a secluded corner of the site. Deadwood piles can be created using arisings from site clearance to provide shelter and breeding opportunities for invertebrates, particularly saproxylic species which are dependent on deadwood.
R20	The value of the survey area for birds will be enhanced by installing a range of artificial nest boxes. These will be placed on retained mature trees within the development or at the site boundaries, or incorporated within building facades. For instance: ▪ New buildings: nest boxes can be installed under the eaves for birds that utilise buildings for nesting, e.g. house martin, house sparrow, swallow <i>Hirundo rustica</i> and swift <i>Apus apus</i>. These species are of principal importance, of conservation concern. ▪ Trees: nest boxes with entrance holes suitable for tit species, woodpeckers and nuthatches, and open-fronted boxes suitable for spotted flycatcher <i>Muscicapa striata</i> or song thrush, and treecreeper <i>Certhia familiaris</i> boxes.
R21	The value of the survey area for bats will be enhanced by installing a range of artificial roost boxes. These will be placed on retained mature trees within the development or at the site

#	Preliminary recommendations for ecological enhancement
	boundaries or incorporated within building facades. Boxes suitable for a range of species should be used, for instance: ▪ New buildings: integral bat tubes can be installed within buildings which face vegetated areas, particularly towards west of the development. Bat tubes can be incorporated into the design of the building so that only the access holes are visible from the exterior of the building. The Schwegler 1FR or 2FR Bat Tube is designed to meet the characteristic requirements of the types of bats that inhabit buildings such as pipistrelles or serotines <i>Eptesicus serotinus</i>. It is designed to be installed on the external walls of buildings, either flush or beneath a rendered surface. ▪ Pipistrelles: bat boxes suitable to install on mature trees either within or at the edges of the development include the Schwegler 1FF Flat Bat Box, or other manufacturer's equivalent. ▪ Noctules <i>Nyctalus spp.</i> and brown long eared bats: bat boxes suitable to install on mature trees either within or at the edges of the development include the Schwegler 2F General Purpose Bat Box or the 2FN Woodland Bat Box, or other manufacturer's equivalent. Bat boxes on buildings should ideally be located south-facing (between south-east and south-west) and above 4m from ground level. On trees, bat boxes should ideally be located on three aspects of each tree (facing north, south-east and south-west) and at ≥5m from ground level. In both cases they should be installed facing vegetation features such as mature hedgerows or trees, but with a clear line of flight for bats exiting the roost, and away from sources of artificial light.

5.6 Conclusions

- 5.6.1 The majority of the survey area is of low ecological value. Significant constraints to the proposed Development were identified including Priority Habitats and the potential presence of nesting birds, roosting bats, and reptiles. However, proportionate and effective mitigation is available to protect against the risk of impacts. No further surveys are required prior to submitting a planning application.

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Appendix I: UKHab Habitats Plan

Please see insert.

Mount Avenue, Caterham, Surrey

-  Survey area
-  Modified grassland
-  Blackthorn scrub
-  Bramble scrub
-  Developed land, sealed surface
-  Developed land, sealed surface; building
-  Lowland mixed deciduous woodland
-  Other woodland; mixed
-  Native Species Rich Hedgerow with trees
-  Line of Trees
-  Fence
-  Tree with PRF-M suitability to support roosting bats
-  Target note



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Ordnance Survey AC0000808122

Scale (at A4): 1:900 Created by: EM
Date: Apr 2025 Reviewed by: NP
Drawing number:
UE0540ECO-MountAvenue_Habitats_250327



Appendix II: Target Notes

Target Note	Photo
1. Bluebell	
2. Decaying wood pile	
3. Rubble pile	

Target Note	Photo
4. Tree piles	 A photograph showing a pile of cut logs and branches on the ground. The logs are of various sizes and are surrounded by some green vegetation and smaller branches.
5. Mammal path	 A photograph of a grassy area with a dense thicket of trees and bushes in the background. A faint rainbow is visible in the sky above the trees.
6. Tree stumps	 A photograph showing a pile of tree stumps and logs. The stumps are cut at different heights and are surrounded by some green vegetation and smaller branches.

Target Note	Photo
7. Horse browsing	
8. Manure piles	

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Appendix III: Pond Plan

Please see insert.

Mount Avenue, Caterham, Surrey

-  Survey area
-  250m buffer
-  500m buffer
-  Pond

0 150 300
Metres



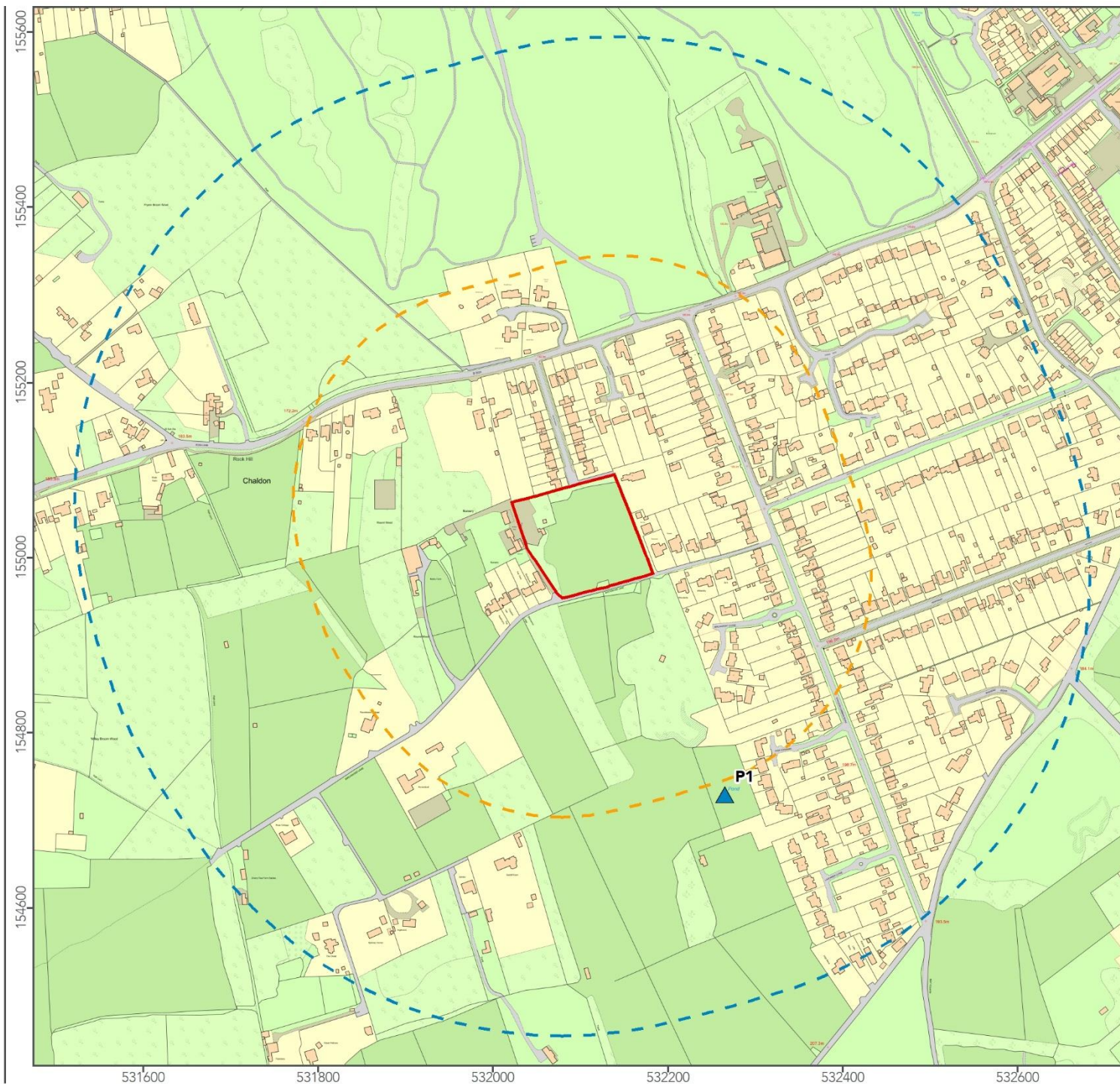
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Ordnance Survey 0100031673

Scale (at A4): 1:6,500 Created by: MT

Date: Apr 2023 Reviewed by: NP

Drawing number:

UE0540ECO-MountAvenue_SiteLocation_230405



Appendix IV: Hedgerow Regulations Survey

Feature	Hedgerow Number		
	H1	H2	H3
Adjacent to bridleway/path	Yes	No	No
<i>Populus nigra</i> , <i>Sorbus torminalis</i> , <i>Tilia cordata</i> , <i>Tilia platyphyllos</i> present	No	No	No
Average number of woody species within 30m sections	5	5	5
Associated bank or wall	No	No	No
Intact hedgerow	No	Yes	Yes
Trees present within hedge	Yes	Yes	Yes
Ditch	No	No	No
Connection points	6	3	4
Parallel hedge	Yes	No	No
Residential curtilage	No	Partial	Partial
IMPORTANT	Yes	No	No

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Appendix V: Plant Species which encourage Bats

Please see following pages which are drawn from Gunnell *et al.* (2012).

Plant Species	Common name	Native	Type	Benefit	Soil	Light	Extensive green roofs	Living walls	Rain Gardens	Hedges/ trees	Beds/ borders
<i>Acer campestre</i>	Field maple	N	T/S	C	Any	Sun / shade				Y	
<i>Acer platanoides</i>	Norway maple		T	S	Well drained / alkaline	Sun / shade				Y	
<i>Acer saccharum</i>	Sugar maple		T	S	Any	Sun / shade				Y	
<i>Achillea millefolium</i>	Yarrow	N	HP	C,F	Well drained	Sun	Y				
<i>Ajuga reptans</i>	Bugle	N	HP	C,F	Any	Sun / shade	Y				
<i>Anthyllis vulneraria</i>	Kidney vetch	N	HP	F	Well drained	Sun	Y				
<i>Aubrieta deltoidea</i>	Aubrieta		H	F	Well drained	Sun / shade		Y			
<i>Betula pendula</i>	Silver birch	N	T	C	Sandy / Acid	Sun				Y	
<i>Cardamine pratensis</i>	Cuckoo-flower	N	HP	F	Moist	Sun / shade					Y
<i>Carpinus betulus</i>	Hornbeam	N	T	C	Clay	Sun				Y	
<i>Centaurea nigra</i>	Common knapweed	N	HP	C,F	Dry, not acid	Sun	Y				Y
<i>Centranthus ruber</i>	Red valerian		HP	F	Well drained / alkaline	Sun	Y				Y
<i>Clematis vitalba</i>	Old man's beard	N	C	F	Well drained / alkaline	Sun				Y	
<i>Corylus avellana</i>	Hazel	N	S	C	Any dry	Sun / shade		Y		Y	
<i>Crataegus monogyna</i>	Hawthorn	N	S	S,C	Any	Sun / shade				Y	
<i>Daucus carota</i>	Wild carrot	N	Bi	S,C,F	Any	Sun	Y				Y
<i>Dianthus spp.</i>	Pinks	N	A-Bi	F	Well drained	Sun	Y	Y			Y
<i>Digitalis purpurea</i>	Foxglove	N	Bi	C	Well drained	Shade / partial shade				Y	Y
<i>Erica cinerea</i>	Bell heather	N	S	F	Sandy	Full sun					Y
<i>Erysimum cheiri</i>	Wallflower		Bi-P	F	Well drained	Sun		Y			
<i>Eupatorium cannabinum</i>	Hemp agrimony	N	H	F	Moist	Sun / shade					Y
<i>Fagus sylvatica</i>	Beech	N	T	C,R	Well drained / alkaline	Sun / shade				Y	
<i>Foeniculum vulgare</i>	Fennel		H	F	Well drained	Sun					Y
<i>Fraxinus excelsior</i>	Common ash	N	T	C,R	Any	Sun / shade				Y	
<i>Hebe spp.</i>	Hebe species		S	F	Well drained	Sun / shade				Y	Y
<i>Hedera helix</i>	Ivy	N	C	F,C	Any	Sun / shade		Y		Y	Y
<i>Hesperis matronalis</i>	Sweet rocket		H	F	Well drained / dry	Sun / shade					Y
<i>Hyacinthoides non-scripta</i>	Bluebell	N	B	F	Loam	Shade / partial shade		Y		Y	Y

Plant Species	Common name	Native	Type	Benefit	Soil	Light	Extensive green roofs	Living walls	Rain Gardens	Hedges/ trees	Beds/ borders
<i>Ilex aquifolium</i>	Holly	N	T	C	Any	Sun / shade				Y	
<i>Jasminum officinale</i>	Common jasmine		C	F	Well drained	Sun		Y			Y
<i>Lavandula</i> spp.	Lavender species		S	F	Well drained / sandy	Sun		Y			Y
<i>Linaria vulgaris</i>	Toadflax	N	HP	C	Well drained / alkaline	Sun	Y				Y
<i>Lonicera periclymenum</i>	Honeysuckle	N	C	F	Well drained	Sun		Y		Y	
<i>Lotus corniculatus</i>	Bird's foot trefoil	N	HP	F	Well drained / dry	Sun	Y				Y
<i>Lunaria annua</i>	Honesty		Bi	F	Any	Sun / partial shade	Y				
<i>Malus</i> spp.	Apple		T	C	Any	Sun				Y	
<i>Matthiola longipetala</i>	Night-scented stock		A	F	Well drained/ moist	Sun			Y		
<i>Myosotis</i> spp.	forget-me-not	N	A	F	Any	Sun	Y	Y			
<i>Nicotiana glauca</i>	Ornamental tobacco		A	F	Well drained/ moist	Sun / partial shade			Y		
<i>Oenothera</i> spp.	Evening primrose species		Bi	F	Well drained/ dry	Sun	Y				
<i>Origanum vulgare</i>	Marjoram	N	HP	F	Well drained/ dry	Sun	Y	Y			
<i>Populus alba</i>	White poplar	N	T	C	Clay loam	Sun				Y	
<i>Primula veris</i>	Cowslip	N	HP	F	Well drained/moist	Sun / partial shade	Y				
<i>Primula vulgaris</i>	Primrose	N	HP	F	Moist	Partial shade	Y	Y		Y	
<i>Prunus avium</i>	Wild cherry	N	T	C	Any	Sun				Y	
<i>Prunus domestica</i>	Plum		T	C	Well drained/ moist	Sun				Y	
<i>Prunus spinosa</i>	Blackthorn	N	S	C	Any	Sun / partial shade				Y	
<i>Quercus petraea</i>	Sessile oak	N	T	C,R	Sandy loam	Sun / shade				Y	
<i>Quercus robur</i>	Common oak	N	T	C,R	Clay loam	Sun / shade				Y	
<i>Rosa canina</i>	Dog rose	N	S	C	Any	Sun			Y	Y	
<i>Salix</i> spp.	Willow species	N	S	S,C	Moist	Sun / shade			Y	Y	
<i>Sambucus nigra</i>	Elder	N	T	C	Clay loam	Sun				Y	
<i>Saponaria officinalis</i>	Soapwort	N	HP	F	Any	Sun					
<i>Saxifraga oppositifolia</i>	Saxifrage	N	HP	C	Well drained	Sun	Y	Y			
<i>Scabiosa columbaria</i>	Small scabious	N	HP	F	Well drained/ alkaline	Sun	Y				
<i>Sedum spectabile</i>	Ice plant		HP	F	Well drained/ dry	Sun	Y				
<i>Silene dioica</i>	Red campion	N	HP	F	Any	Shade / partial shade		Y	Y	Y	

Plant Species	Common name	Native	Type	Benefit	Soil	Light	Extensive green roofs	Living walls	Rain Gardens	Hedges/ trees	Beds/ borders
<i>Sorbus aucuparia</i>	Rowan	N	T	C	Well drained	Sun				Y	
<i>Stachys lanata</i>	Lamb's ears		HP	F	Well drained/dry	Sun	Y				
<i>Symphotrichum</i> spp.	Michaelmas daisies		HP	F	Any	Sun					
<i>Tegetes patula</i>	French marigold		A	F	Well drained/moist	Sun					
<i>Thymus serpyllum</i>	Creeping thyme	N	HP/S	F	Well drained/dry	Sun	Y	Y			
<i>Tilia x europaea</i>	Common lime		Type	C	Any	Sun / shade				Y	
<i>Trifolium</i> spp.	Clover species	N	HP	F	Any	Sun	Y				
<i>Valeriana</i> spp.	Valerian species	N	HP	F	Moist	Sun / partial shade			Y		
<i>Verbascum</i> spp	Mulleins	N	Bi,HP	C	Well drained	Sun	Y				
<i>Verbena bonariensis</i>	Verbena		HP	F	Well drained/moist	Sun					
<i>Viburnum lantana</i>	Wayfaring tree	N	S	C	Any	Sun / shade				Y	
<i>Viburnum opulus</i>	Guelder rose	N	S	C	Moist	Sun / shade			Y	Y	
<i>Viola tricolor</i>	Pansy	N	A	F	Well drained/moist		Y	Y			

The table above is derived from the BCT publication Landscape and Urban Design for Bats and Biodiversity (Gunnell et al., 2012) and lists suggested plant species that can provide benefit for bats either by providing a food source for insects or roost potential. The plants listed are predominately native to Britain. The small group of non-native plants is included for their documented value for wildlife. This list has been checked against Natural England's list of invasive non-native plants.

HP: Herbaceous perennial

T: Tree

A: Annual

Benefit:

Bi: Biennial

S: Shrub

B: Bulb

C: Moth caterpillar food plant

F: Flowers attract adult moths

BiP: Biennial perennial

H: Herb

C: Creeper/climber

S: Sap sucking insects (e.g. whiteflies)

R: Good roost potential

Appendix VI: Legislation and Planning Context

Legislation

General

The main legislative instruments for ecological protection in England and Wales are: the Wildlife and Countryside Act 1981 (WCA; as amended); Countryside and Rights of Way Act 2000 (CRoW; as amended); Natural Environment and Rural Communities Act 2006 (NERC; as amended); the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations; as amended); and the Environment Act 2021.

WCA 1981 consolidated and amended pre-existing national wildlife legislation in order to implement the Bern Convention and the European Union Wild Birds Directive (Council Directive 2009/147/EC). It complements the Habitats Regulations, offering protection to a wider range of species than the latter. The Act also provided for the designation and protection of nationally important conservation sites of value for their floral, faunal or geological features, termed Sites of Special Scientific Interest (SSSI). Schedules of the act list protected species of flora and fauna, as well as invasive species, and detail the possible offences that apply to these species.

The CROW Act 2000 amended and strengthened existing wildlife legislation detailed in the WCA. It placed a duty on government departments & the National Assembly for Wales to have regard for biodiversity, provided increased powers for the protection and maintenance of SSSI, and created a right of access to parts of the countryside. The Act contained lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

The NERC Act 2006 consolidated and replaced aspects of earlier legislation. Section 40 of the Act places a duty upon all local authorities and public bodies in England and Wales to have regard to the purpose of conserving biodiversity in exercising all of their functions, including by restoring or enhancing habitats and species populations. Sections 41 (England) and 42 (Wales) list habitats and species of principal importance to the conservation of biodiversity (otherwise known as Priority Habitats/species as listed in the now superseded UK Biodiversity Action Plan). These lists supersede Section 74 of the CRoW Act 2000. These species and habitats are a material consideration in the planning process.

The Habitats Regulations 2017 are the principal means by the European Union Habitats Directive (Council Directive 92/43/EEC) was transposed into English and Welsh law, and place a duty upon the relevant authority of government to identify sites which are of importance to the habitats and species listed in Annexes I and II of the Habitats Directive. Those sites which meet the criteria in Europe are designated as Sites of Community Importance by the European Commission, and subsequently identified as Special Areas of Conservation (SAC) by the European Union member states. Since the UK's departure from the European Union the European Commission no longer has a role in designating SACs in the UK. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 establish a single stage designation process, where the appropriate authority is the decision maker. The selection and designation of SACs is based on the criteria set out in Annex III of the Habitats Directive insofar as it applies to the UK, and having regard to the advice of the appropriate nature conservation body.

The 2019 Amendment Regulations have created a new national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes existing SACs, existing Special

Protection Areas (SPA) originally designated as a result of Council Directive 2009/147/EC on the Conservation of Wild Birds, and any new SACs and SPAs designated under the 2019 Regulations. SACs and SPAs in the UK therefore no longer form part of the EU's Natura 2000 ecological network.

The Habitats Regulations also provide for the protection of individual species of fauna and flora of European conservation concern listed in Schedules 2 and 5 respectively (European Protected Species (EPS)). Schedule 2 includes species such as otter and great crested newt for which the UK population represents a significant proportion of the total European population. It is an offence to deliberately kill, injure, disturb or trade in these species. Schedule 5 plant species are protected from unlawful destruction, uprooting or trade under the regulations. Under the Habitats Regulations disturbance includes any activity which is likely to: impair the ability of a EPS to survive, breed, reproduce, or rear/nurture its young; impair the ability of a EPS to migrate or hibernate; or significantly affect the local distribution or abundance of the species.

The Environment Act 2021, among other things: established an Office for Environmental Protection; introduced a mandatory requirement for all new development requiring planning permission to achieve a net gain for biodiversity of at least 10% (although implementation of this is transitional); amended the NERC Act duty to conserve biodiversity by explicitly adding a duty to enhance; and requires local authorities to produce local nature recovery strategies.

Great crested newt (*Triturus cristatus*; GCN) (and natterjack toad *Bufo calamita*)

GCN is fully protected by the WCA and the Habitats Regulations. The legislation makes it an offence, *inter alia*, to:

- ▶ Intentionally kill, injure or take a GCN (including its eggs).
- ▶ Possess or control a live or dead GCN, any part of, or anything derived from a GCN.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a GCN uses for shelter or protection.
- ▶ Intentionally or recklessly disturb a GCN while it is occupying a structure or place that it uses for shelter or protection.

Wild birds

Wild birds are protected by the Wildlife and Countryside Act, 1981 (as amended). This legislation makes it an offence to intentionally kill, injure or take away any wild bird. It is also an offence to take, damage or destroy the nest of any wild bird while it is in use or being built or to take or destroy the egg of any wild bird. In addition, certain species are listed on Schedule 1 of the WCA (such as kingfisher *Alcedo atthis*). This makes it an additional offence to intentionally or recklessly disturb the adults while they are in and around their nest or intentionally or recklessly disturb their dependent young. Such species are considered to be in greater need of legal protection or of high nature conservation priority.

Birds of Conservation Concern (BoCC5) are included on Red and Amber lists (Stanbury *et al.*, 2021). Birds on the Red list are those of highest conservation priority due significant and sustained population decreases and/or range contractions (e.g. house sparrow *Passer domesticus* and starling *Sturnus vulgaris*). Birds on the Amber list are the next most critical group and include species whose population/range have shown moderate declines, or which have recovered to some extent from historical decline, such as dunnock *Prunella modularis*.

Badger (*Meles meles*)

Badgers are listed under Schedule 6 of the Wildlife and Countryside Act which grants them partial protection. This protection is extended by the Protection of Badgers Act 1992 (Badger Act) which makes it an offence to take, injure or kill a badger, interfere with a sett, sell or possess a live badger, or mark or ring a badger without a licence. Under the Act disturbance is illegal without a licence. Natural England has published guidelines to be adopted when determining whether an activity is 'disturbing' i.e. a licence is required when, for example, using heavy machinery (generally tracked vehicles) within 30m of any entrance to an active sett. Licences are not normally issued during the badger breeding season (December – June inclusive).

Bats (*Chiroptera*)

Bats and their roosts are fully protected by protected by the WCA and the Habitats Regulations, and seven species of bats are species of principal importance. The legislation makes it an offence, *inter alia*, to:

- ▶ Intentionally kill, injure or take a bat.
- ▶ Possess or control a live or dead bat, any part of a bat, or anything derived from a bat.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a bat uses for shelter or protection. This is taken to mean all bat roosts whether bats are present or not.
- ▶ Intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection.
- ▶ Make a false statement in order to obtain a licence for bat work.

Under the Habitats Regulations disturbance includes any activity which is likely to:

- ▶ Impair the ability of a bat to survive, breed, reproduce, or rear/nurture its young.
- ▶ Impair the ability of a bat to migrate or hibernate.
- ▶ Significantly affect the local distribution or abundance of the species.

Eurasian beaver (*Castor fiber*)

From October 2022 Eurasian beavers are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Under this legislation it is an offence to:

- ▶ Deliberately disturb a beaver – this includes any action likely to impair their ability to survive, breed or rear their young.
- ▶ Deliberately injure, capture or kill a beaver.
- ▶ Damage or destroy the breeding site or resting place of a beaver.

It is also an offence to:

- ▶ Possess, control or transport a beaver.
- ▶ Sell or exchange a beaver.
- ▶ Offer a beaver for sale or exchange.

This applies whether the beaver is alive or dead and includes beaver parts and derivatives.

The Wildlife and Countryside Act 1981 (as amended) prohibits the release of beavers into the wild except with a licence. It also makes it an offence to use any trap or snare for the purpose of killing, taking or restraining beavers. It is also an offence to set a trap or snare in place to cause injury to a beaver.

Some management activities near or in a site of special scientific interest may need permission from Natural England under this legislation.

Beavers are protected from unnecessary suffering and cruel treatment under the Animal Welfare Act 2006 and the Wild Mammals (Protection) Act 1996.

Hazel dormouse (*Muscardinus avellanarius*)

Dormouse is fully protected by the WCA and the Habitats Regulations. The legislation makes it an offence, *inter alia*:

- ▶ Intentionally kill, injure or take a dormouse.
- ▶ Possess or control a live or dead dormouse, any part of, or anything derived from a dormouse.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a dormouse uses for shelter or protection.
- ▶ Intentionally or recklessly disturb a dormouse while it is occupying a structure or place that it uses for shelter or protection.

Otter (*Lutra lutra*)

Otter is fully protected by the WCA and the Habitats Regulations. The legislation makes it an offence, *inter alia*, to:

- ▶ Intentionally kill, injure or take an otter.
- ▶ Possess or control a live or dead otter, any part of, or anything derived from an otter.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that an otter uses for shelter or protection.
- ▶ Intentionally or recklessly disturb an otter while it is occupying a structure or place that it uses for shelter or protection.

Water vole (*Arvicola amphibious*)

Water vole is fully protected by the WCA. The legislation makes it an offence, *inter alia*, to:

- ▶ Intentionally kill, injure or take a water vole.
- ▶ Possess or control a live or dead water vole, any part of, or anything derived from a water vole.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a water vole uses for shelter or protection.
- ▶ Intentionally or recklessly disturb a water vole while it is occupying a structure or place that it uses for shelter or protection.

Reptiles

The four common species (slow-worm *Anguis fragilis*, common lizard *Zootoca vivipara*, adder *Vipera berus* and grass snake *Natrix natrix*) are partially protected under the WCA. They are protected, *inter alia*, against intentional killing and injuring. The handling and translocation of these reptiles does not require a licence.

Smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis* are fully protected by the WCA and the Habitats Regulations. The legislation makes it an offence, *inter alia*, to:

- ▶ Intentionally kill, injure or take a smooth snake or sand lizard.
- ▶ Possess or control a live or dead smooth snake or sand lizard, any part of, or anything derived from a smooth snake or sand lizard.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a smooth snake or sand lizard uses for shelter or protection.
- ▶ Intentionally or recklessly disturb a smooth snake or sand lizard while it is occupying a structure or place that it uses for shelter or protection.

Weeds Act 1959 / Ragwort Control Act 2003

This legislation provides for orders to be made for control where notifiable weed species such as ragwort are said to be a problem. The act does not make it illegal to have ragwort (or other weed species) on your land, make it illegal to allow ragwort to spread, or force landowners automatically to control it. However, if DEFRA is satisfied that there are injurious weeds to which this Act applies growing upon any land it may serve upon the occupier of the land a notice in writing requiring them, within the time specified in the notice, to take such action as may be necessary to prevent the weeds from spreading.

Planning context

National Planning Policy Framework (Section 15: Conserving and enhancing the natural environment)

The National Planning Policy Framework (NPPF), published in December 2024, outlines the Government's commitment to the conservation of wildlife and natural features. It is concerned with:

- ▶ Protecting and enhancing valued landscapes, sites of biodiversity or geological conservation value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- ▶ Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- ▶ Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- ▶ Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current & future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- ▶ Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- ▶ Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

The NPPF requires that local plans should “distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value...; take a strategic approach to

maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries”.

To protect and enhance biodiversity and geodiversity, the NPPF states that planning policies should:

- ▶ Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- ▶ 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.

When determining planning applications, local planning authorities should aim to protect and enhance biodiversity by applying the following principles:

- ▶ if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- ▶ development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- ▶ development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- ▶ development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

The following wildlife sites should be given the same protection as habitats sites:

- ▶ potential Special Protection Areas and possible Special Areas of Conservation;
- ▶ listed or proposed Ramsar sites; and
- ▶ sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. The policies within the NPPF (and additional guidance contained within Circular 06/2005) are a material planning consideration.

UK/Local Biodiversity Action Plan Designations and Birds of Conservation Concern and Red Data Book Listings

Note that BAP designations and status as RSPB Birds of Conservation Concern or Red Data Book species does not offer any further legal protection, but planning authorities are required to prevent these species from being adversely affected by development in accordance with National Planning Policy and the CROW and NERC Acts. The United Kingdom Biodiversity Action Plan (UKBAP), first published in 1994 and updated in 2007, was a government initiative designed to implement the requirements of the Convention of Biological Diversity to conserve and enhance species and habitats. The UKBAP contained a list of Priority Habitats and species of conservation concern in the UK, and outlined biodiversity initiatives designed to enhance their conservation status.

However, as a result of devolution, and new country-level and international drivers and requirements, much of the work previously carried out by the UK BAP is now focussed at a country-level rather than a UK-level, and the UK BAP was succeeded by the 'UK Post-2010 Biodiversity Framework' in July 2012. The UK lists of Priority Habitats and species nonetheless remain an important reference source and were used to draw up statutory lists of Priority Habitats and species in England, Northern Ireland, Scotland and Wales. The Priority Habitats and species correlate with those listed on Section 41 and 42 of the NERC Act.

The UKBAP required that conservation of biodiversity be addressed at a County level through the production of Local BAPs. These are targeted towards species of conservation concern characteristic of each area. In addition, a number of local authorities and large organisations have produced their own BAPs. Where they exist, Local BAP targets with regard to species and habitats are a material consideration in the planning process.

Local Planning Policy

The following policies relating to wildlife and biodiversity are contained within the adopted Tandridge District Core Strategy (Tandridge District Council, 2008):

Policy CSP 17: Biodiversity

Development proposals should protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible, expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks to sustain wildlife in accordance with the aims of the Surrey Biodiversity Action Plan.

The Council will seek to enhance biodiversity by supporting the work of the Downlands Countryside Management Project and by supporting Local Nature Reserves and Community Wildlife Areas.

Appendix VII: Legal and Technical Limitations

- This report has been prepared by Urban Edge Environmental Consulting Ltd (UEEC Ltd) with all reasonable skill, care and diligence within the terms of the contract made with the Client to undertake this work, and taking into account the information made available by the Client. No other warranty, expressed or implied, is made as to the professional advice included in this report or any other services provided by us.
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- Where this report presents or relies upon the findings of ecological field surveys (including habitat, botanical or protected/notable species surveys), its conclusions should not be relied upon for longer than a maximum period of two years from the date of the original field surveys. Ecological change (e.g. colonisation of a site by a protected species) can occur rapidly and this limitation is not intended to imply that a likely absence of, for instance, a protected species will persist for any period of time;
- This report has been prepared using factual information contained in maps and documents prepared by others. No responsibility can be accepted by UEEC Ltd for the accuracy of such information;
- Every effort has been made to accurately represent the location of mapped features, however, the precise locations of features should not be relied upon;
- Populations of animals and plants are often transient in nature and a single survey visit can only provide a general indication of species present on site. Time of year when the survey was carried out, weather conditions and other variables will influence the results of an ecological survey (e.g. it is possible that some flowering plant species which flower at other times of the year were not observed). Every effort has been made to accurately note indicators of presence of protected, rare and notable species within and adjacent to the site but the possibility nonetheless exists for other species to be present which were not recorded or otherwise indicated by the survey;
- Any works undertaken as a consequence of the recommendations provided within this report should be subjected to the necessary health & safety checks and full risk assessments.

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