Proof of Evidence in Respect of Ecology and Nature Conservation

On behalf of Tandridge District Council

Land South of Barrow Green Road, Oxted

PINS References: APP/M3645/W/25/3372747

Local Authority References: 2025/245

Author	Robert Hutchinson BSc (Hons) MSc CEcol MCIEEM – Manager of SWT Ecology Planning Advice Service	Date	22/12/2025
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Contents

1 Qualifications and Experience

1.1.1 Surrey Wildlife Trust Ecology Planning Advice Service provides professional, evidence-based consultation responses to planning application proposals submitted to us by local planning authorities in Surrey to help them meet their legal and policy obligations towards wildlife.

1.1.2 I am the Manager of the Surrey Wildlife Trust (SWT) Ecology Planning Advice Service (EPAS). I was appointed as the Manager of EPAS in January 2022. Since 2022 I have managed the delivery of over 9000 planning consultations to ten Local Authorities and the County Council in Surrey. I have experience of working with a wide range of clients including local planning authorities, Surrey County Council, developers, and home owners. This experience has included being project ecologist for significant housing projects and large-scale national infrastructure projects in the UK.

1.1.3 I have acted as an Expert Witness on matters of Ecology and Nature Conservation for Tandridge District Council, Guildford Borough Council. Reigate and Banstead Borough Council, Waverley Borough Council and Mole Valley District Council.

1.1.4 I am a Chartered Ecologist, a member of the Chartered Institute of Ecology and Environmental Management, hold a master's in science in Environmental Sustainability and Green Technology and hold a Bachelor of Science in Geography. I hold protected species survey class licences for great crested newt, bats, smooth snake, sand lizard and a displacement class licence for water vole. I am on the committee of the Surrey Amphibian and Reptile Group.

1.1.5 I confirm that the opinions expressed are my true and professional opinions. I confirm that the evidence to which I have prepared and provided for this Statement is true to the best of my knowledge and given in accordance with the guidelines of the Chartered Institute of Ecology and Environmental Management.

2 Introduction and Scope of Evidence

2.1 Overview

2.1.1 Surrey Wildlife Trust Ecological Planning Advice Service (EPAS) was appointed by Tandridge District Council in November 2025 to advise on ecological matters in connection with a planning appeal for a planning application (2025/245).

2.1.2 Prior to the determination of planning application 2025/245, Surrey Wildlife Trust EPAS provided Tandridge District Council with advice (Our Reference: 387531/001/RH, dated 13th August 2025) (CD3,2L). This is provided in Appendix 1 of this Proof of Evidence.

2.1.3 On the 30th September 2025 the Planning Inspectorate detailed that the appeal for 2025/245 will be dealt with on the basis of an Inquiry (APP/M3645/W/25/3372747).

2.1.4 On the 17th October 2025 I attended the appeal site for a site visit.

2.1.5 Since the submission of our advice letter (387531/001/RH, dated 13th August 2025) and the Decision Notice, further information and rebuttal has been submitted by the Appellant. I attended a Teams meeting on the 14th November 2025 with the Local Authority and the Appellant with regard for Refusal for Refusal No.4 and No. 5

2.2 Background

2.2.1 The Decision Notice (CD3.3) details nine reasons for refusal (RfR). RfR No. 4 and No. 5 are relevant to matters of ecology and nature conservation as outlined below:

2.2.2 RfR No. 4 states:

- *The applicant has not demonstrated that the proposed development, and in particular the outline drainage proposals, will not result in the loss or deterioration of an irreplaceable habitat both on-site and off-site, that is The Bogs ancient woodland, within and adjoining the site boundary. This is contrary to NPPF 2024 paragraph 193 (c) which requires that such development should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*
- *The proposal is also contrary to Tandridge Local Plan Part 2: Detailed Policies (2014) policy DP7 which requires that proposals protect and, where opportunities exist, enhance valuable environmental assets.*
- *The proposal is similarly contrary to Tandridge Local Plan Part 2: Detailed Policies (2014) policy DP19 which provides that where a proposal is likely to result in direct or indirect harm to an irreplaceable environmental asset of the highest designation, such as ancient woodland, the granting of planning permission will be wholly exceptional, and in the case of ancient woodland exceptions will only be made where the need for and benefits of the development in that location clearly outweigh the loss, and that impact or loss should not just be mitigated but overall ecological benefits should be delivered.*

2.2.3 RfR No. 5 states:

- *The information provided with the application is insufficient to show that there will not be adverse impacts on biodiversity as a result of the proposed development contrary to the provisions of paragraphs 187 and 193 of the NPPF and Tandridge Local Plan*

Core Strategy policy CSP17 and Tandridge Local Plan Part 2: Detailed Policies (2014) policy DP19.

2.3 Format of the Proof of Evidence

2.3.1 This Proof of Evidence follows the following format:

- Chapter 1: Qualifications and Experience.
- Chapter 2: Introduction and Scope of Evidence
- Chapter 3: Legislative, Planning Policy and Guidance Framework
- Chapter 4: Reason for Refusal No. 4
- Chapter 5: Reason for Refusal No. 5

2.4 Purpose of the Proof of Evidence

2.4.1 This Proof of Evidence relates to matters of Ecology and Nature Conservation, only.

2.4.2 RfR No. 3 has a clear link to matters of hydrology. I will not provide any technical advice or review of matters of hydrology. This will be carried out by Dr. Harvey Rodda of Hydro-GIS Ltd on behalf of Tandridge District Council. However I will use the evidence of Dr. Harvey Rodda to inform matters of ecology relevant to this appeal site.

2.4.3 RfR No. 4 has a link with highways as a part of the reason relates to the loss of a section of native hedgerow for the access from Barrow Green Road. I will not provide technical advice or review of matters of highways. However I will use the information available on the matter to inform matters of ecology relevant to this appeal site.

2.5 Analysis of Appellant's Ecological Evidence

2.5.1 The determination of the planning application 2025/245 was informed by the following documentation that was submitted to the planning portal in relation to Ecology:

- Preliminary Ecological Appraisal (The Ecology Partnership, December 2024) (CD1.22.AA)
- Environmental Statement Volume 2 – Chapter 10 Ecology (Temple). (CD1.22.J)
- Dormouse Survey (The Ecology Partnership, December 2024) (CD1.22.AC)
- Reptile Survey (The Ecology Partnership, December 2024). (CD1.22.AD)
- Bat Activity Surveys (The Ecology Partnership, December 2024) (CD1.22.AB)
- Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025). (CD1.22.AE)
- Illustrative Landscape Strategy Plan (CSA Environmental, November 2024). (CD2.11)

2.5.2 As part of the appeal, the Appellant has submitted the following ecological documentation and reporting:

- Ecology Technical Report (The Ecology Partnership, October 2025).
- Subject: Ancient Woodland (Note) (The Ecology Partnership, 21st October 2025)

2.5.3 As part of the appeal, the following has relevance to ecology:

- Appeal Technical Note 3: Flood Risk Assessment and Surface Water Drainage Strategy (Motion, October 2025).
- Appellant's Statement of Case (Woolf Bond Planning, September 2025). (CD6.1)
- Proposed Access Location Transport Note (NEO Transport Planning, November 2025)

3 Legislative, Planning Policy and Guidance Framework

3.1 Tandridge District Core Strategy Adopted October 2008

Policy CSP17

- *"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*".

3.2 Tandridge Local Plan Part 2: Detailed Policies 2014-2029 Adopted July 2014

Policy DP19 of the Local Plan Part 2

"*A There will be a presumption in favour of development proposals which seek to:*

1. *Protect, enhance or increase the provision of, and access to the network of multi-functional Green Infrastructure (GI).*
2. *Promote nature conservation and management.*
3. *Restore or create Priority Habitats.*
4. *Maximise opportunities for geological conservation.*

B. In order to conserve and enhance the natural environment, proposals which would result in significant harm to local, national or statutory sites of biological or geological importance or the broader GI network will be refused planning permission unless:

1. *All reasonable alternative locations with less harmful impacts are demonstrated to be unsuitable; and*
2. *The proposal incorporates measures to avoid the harmful impacts arising, sufficiently mitigate their effects, or, as a last resort, compensate for them.*

c. Where a proposal is likely to result in direct or indirect harm to an irreplaceable environmental asset of the highest designation, such as a Site of Special Scientific Interest (SSSI), ancient woodland or veteran trees, the granting of planning permission will be wholly exceptional

1. *With regard to SSSIs, exceptions will only be made where benefits of development at the site clearly outweigh both the impacts on the features of the site and on any broader networks of SSSIs.*
2. *In the case of ancient woodland and veteran trees exceptions will only be made where the need for and benefits of the development in that location clearly outweigh the loss.*
3. *In all cases, any impacts or harm should not just be mitigated, but overall ecological benefits should be delivered*

D. Planning permission for development directly or indirectly affecting protected or Priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place."

Chapter 19 of the Tandridge Local Plan Part 2: 2014 -2029 (Adopted Version July 2014) states of pSNCIs:

- *"The Council will undertake a review of these sites in due course. The policy will be applied to existing SNCIs, pSNCIs and, following a review, to any retained or new sites.*

Potential SNCIs are not protected sites but may have the potential to be so; however because of access or ownership issues they have not been surveyed. Applications affecting a pSNCI will normally allow the potential of the site to be assessed".

3.3 National Planning Policy Framework

National Planning Policy Framework (December 2024)

Chapter 15 - Conserving and Enhancing the Natural Environment:

Paragraph 187 states: "*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a. *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).*
b. *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.*
c. *maintaining the character of the undeveloped coast, while improving public access to it where appropriate.*
d. *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.*
e. *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.*
f. *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate*".

Paragraph 193 states "*When determining planning applications, local planning authorities should apply the following principles:*

a) *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.*
b) *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.*
c) *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*
d) *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."

3.4 Natural Environment and Rural Communities Act (NERC) 2006

- *Section 40 of the NERC Act 2006 states "For the purposes of this section "the general biodiversity objective" is the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England".*

3.5 Government Circular: Biodiversity and Geological Conservation

Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact Within the Planning System (16 August 2025)

Part IV – Conservation of Species Protected by Law - Paragraph 98 states:

- "*The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Local authorities should consult English Nature before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species. They should also advise developers that they must comply with any statutory species' protection provisions affecting the site concerned. For European protected species (i.e. those species protected under the Habitats Regulations) further strict provisions apply, as explained below, to which planning authorities must have regard*".
- *"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted. In appropriate circumstances the permission may also impose a condition preventing the development from proceeding without the prior acquisition of a licence under the procedure set out in section C below"*

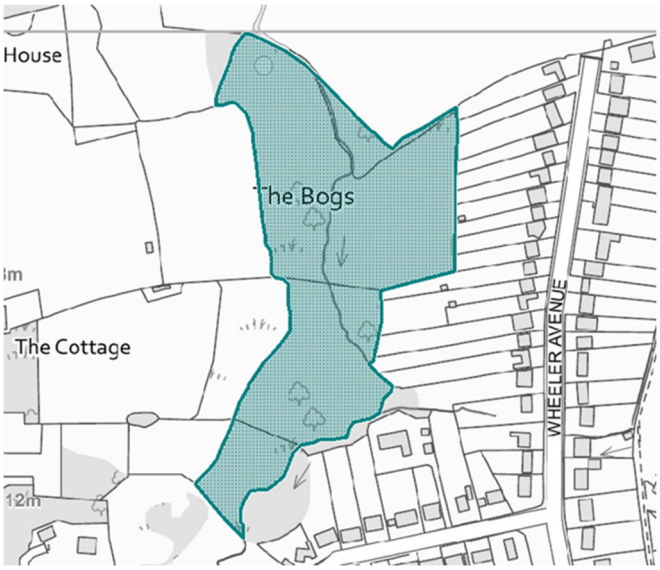
4 Reason for Refusal No. 4

4.1 The Bogs pSNCI and Ancient Semi-Natural (wet) Woodland

Introduction

4.1.1 The allocation of 'The Bogs' as a pSNCI is based upon a survey carried out by Surrey Wildlife Trust on the 3rd May 2007. The status survey report is provided as Appendix 2, and the extent map is shown as Figure 1. The recommendation was made due to the presence of wet woodland and up to fourteen ancient woodland indicator species.

Figure 1 The Bogs pSNCI Extent



4.1.2 The term 'SNCI' is used for Local Wildlife Sites. Surrey Nature Partnership advise that "*SNCIs are non-statutory, however they can be equal in their ecological quality to statutory sites such as Sites of Special Scientific Interest (SSSIs). Their protection is limited to that offered through jurisdictional planning policy*".

4.1.3 Ancient woodland is defined[1] as "*any area that's been wooded continuously since at least 1600 AD. It includes*:

- *ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising from natural regeneration*
- *plantations on ancient woodland sites - replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi"*

4.1.4 Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by[2]:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understorey (all the vegetation under the taller trees)

[1] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK

[2] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK

- damaging or compacting soil
- damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland
- increasing levels of air and light pollution, noise and vibration
- changing the water table or drainage
- damaging archaeological features or heritage assets
- changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss

4.1.5 Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by[3]:

- breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects
- reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species
- reducing the resilience of the woodland or trees and making them more vulnerable to change
- increasing the amount of dust, light, water, air and soil pollution
- increasing disturbance to wildlife, such as noise from additional people and traffic
- increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas
- increasing damaging activities like fly-tipping and the impact of domestic pets
- increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration
- changing the landscape character of the area.

4.1.6 Habitats listed under Section 41 of the Natural Environment and Rural Communities Act (2006) are known as Habitats of Principal Importance or 'Priority Habitats'. The list includes Lowland Mixed Deciduous Woodland[4] and Wet Woodland[5] habitat.

Baseline

4.1.7 The Preliminary Ecological Appraisal (Ecology Partnership, December 2024) details the presence of 'The Bogs' pSNCI."…*located adjacent to the south-west of the site*".

4.1.8 However the Ecology Technical Report (The Ecology Partnership, October 2025) submitted as part of the Appellant's submission confirms that The Bogs pSNCI does extend into the appeal site. Section 3.23 of the Ecology Technical Report (The Ecology Partnership, October 2025) states that "…*approximately 10% of the pSNCI is located within the red line boundary of the appeal site (accounting for 0.21ha of wet woodland and approximately 0.13ha of lowland mixed deciduous woodland…"*

4.1.9 The consultation letter (Our Reference: 387531/001/RH, dated 13th August 2025) provided prior to the determination of the planning application queried the evidence

[3] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK

[4] Lowland mixed deciduous woodland (UK BAP Priority Habitat description)

[5] Wet woodland (UK BAP Priority Habitat description)

used by The Ecology Partnership to discount the woodland north and east of the watercourse as being ancient & semi-natural woodland, whilst it is part of the pSNCI.

4.1.10 The Ecology Technical Report (The Ecology Partnership, October 2025) provides further assessment on the matter. In addition, I have carried out further research into the topic, to include a search of archive maps and consultation with Surrey Biodiversity Information Centre. However I have not found conclusive evidence of ancient & semi-natural woodland north and east of the watercourse, which would have sufficient weight to overrule the current ancient & semi-natural woodland mapping

4.1.11 However the woodland north and east of the watercourse remains as a material consideration to this planning appeal due to the Priority Habitat status, and the vulnerability of the Wet Woodland Priority Habitat to a significant adverse impact.

4.1.12 Wet woodland occurs on poorly-drained or seasonally-wet soils usually with alder *Alnus glutinosa*, birches *Betula spp*. and willows *Salix spp.*as the predominant tree species, but sometimes including ash Fraxinus *excelsior*, oak *Quercus spp*. and beech *Fagus sylvatica* within drier areas. It can occur anywhere where hydrological conditions are suitable. There are several types of wet woodland reflecting differences in water chemistry, water regime and topography (which influences the soil conditions)[6].

4.1.13 The Woodland Trust states that "*Many wet woodlands have been lost. Current threats to wet woodland include continued clearance and drainage*"[7].

4.1.14 Catchment Based Approach[8] in their Biodiversity Pack Habitat Gude: Wet Woodland outline that "…*pressures on our wet woodland*" includes that woods can be "…*affected by changes in management, but also by changes to natural hydrology and hydrochemistry: an often overlooked issue in our 'terrestrial' wetland habitats*".

4.1.15 Section 3.20 of the Ecology Technical Note (The Ecology Partnership, October 2025) confirms that the wet woodland on-site is considered to fall into the National Vegetation Classification community 'W6 – Alnus glutinosa – Urtica dioica' wet woodland.

4.1.16 The Ecology Partnership state that "*These are defined…as woodlands which may be periodically inundated by the annual rise of the water levels from either brooks / streams. The ground flora is reflective of this, with species such as wild angelica present, which is present in the wet woodland on site*."

4.1.17 The Ecology Partnership do not confirm that this community of wet woodland is present within the adjacent area of The Bogs pSNCI. However the status report (provided in Appendix 2) by Surrey Wildlife Trust details that the wet woodland is dominated by alder (Alnus glutinosa) and that common nettle (Urtica dioica) is also present.

4.1.18 Therefore whilst there may be NVC variation across The Bogs pSNCI, it would appear reasonable that the NVC community W6 is present across The Bogs pSNCI.

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[6] Definition of Favourable Conservation Status for Wet Woodland Defining Favourable Conservation Status Project (Natural England, January 2023).

[7] Wet Woodland - British Habitats - Woodland Trust

[8] Catchment Based Approach: Biodiversity Pack Habitat Guide CaBA-Biodiversity-Pack-Wet-Woodlands.pdf

4.1.19 Natural England[9] outline that "*Many ancient woodlands include patches of wet woodland and are generally biologically richer and more valuable for some groups of species and conservation features than woodland that has developed within the last 300-400 years on previously open ground (Peterken 1977)".*

4.1.20 The Bogs pSNCI includes ancient & semi-natural (wet) woodland and wet woodland Priority Habitat outside of the extent of the ancient and semi-natural woodland.

4.1.21 Therefore it would be reasonable to propose that The Bogs pSNCI has the potential to support a diverse and unique ecology. The value of wet woodland for species to include invertebrates, birds and plants is widely acknowledged. For example:

- Wolton et al (2017)[10] states that *"Wet woodlands are widely recognised among entomologists to possess a rich Diptera fauna".*
- Lewis et al (2007)[11] outlines the importance of 'damp' and 'wet' habitats for willow tit.
- Joint Nature Conservation Committee (JNCC) states that "*Wet woodland combines elements of many other ecosystems and as such is important for many taxa*".
- Natural England (2003) state that: "*Of the birds associated with wet woodland, the willow tit (assessed using IUCN criteria as Endangered) is likely to be one with strongest links to and benefits from the habitat (YWT & RSPB). Wet woodland is also important for woodcock (Vulnerable) and may be important for nightingale (Vulnerable) and marsh warbler (Critically Endangered)".*
- Natural England (2003) state that "*Of the 278 invertebrates associated with wet woodland, Pantheon records the following assessments: • 3% are IUCN red listed as Critically Endangered, Endangered, Vulnerable or Near Threatened. • 37% have other listings, such as RDB status using the pre-1994 criteria, S41 listed, data deficient. • 60% have yet to be assessed."*
- Boyce (2022)[12] states: "*Woodland seepages are clearly an extremely important habitat for a very large number of specialist invertebrates, and given the considerable losses of wet woodland habitats that have occurred in Britain in the last century, this must be considered to be a threatened invertebrate assemblage*"

4.1.22 In the context of 'seepages', Boyce (2022) defines these as "*In essence, seepages are very small, flowing waterbodies. They are characterised by generally slow rates of flow, and by being extremely shallow, sometimes no more than a film of water over the substrate. This means that they are most often associated with the uppermost sections of waterbodies, being transitional to streams and rivers as they gather water lower in the catchment. They are also very often derived from springs*".

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[9] Definition of Favourable Conservation Status for Wet Woodland Defining Favourable Conservation Status Project (Natural England, January 2023).

[10] Wolton, R. J. Chandler, P. J, Drake, C. M & Stubbs, A. E(2017) The relative importance of wet woodland and wet grassland for Diptera conservation: A Case Study from Devon, England, Dipterists Digest, 24, 79-94.

[11] Lewis, J. G, A. Amar, A. Piec, D and Thewlis, R (2007) Factors influencing Willow Tit Poecile montanus site occupancy: A comparison of abandoned and occupied woods. Ibis: 149, Supple 2, 205-213.

[12] Boyce, D (2022) A Review of Seepage Invertebrates in England. English Nature Research Reports, English Nature: ISSN 0967-876X.

4.1.23 Boyce (2022) states of woodland seepages "*It also encompasses a tremendous range of variation, from extensive networks of branching runnels in wet carr woodlands, through to isolated spring-fed seepages in drier woodland types. In combination with other physical and chemical factors, this produces a wide variety of environments that are exploited by an important and exceptionally diverse invertebrate assemblage*".

4.1.24 It is noted that The Bogs pSNCI includes a watercourse and a spring is adjacent. The Flood Risk Assessment and Drainage Strategy (Motion, February 2025) appears to show the southern extent of the spring as being approximately 5m north of the nearest parcel of wet woodland Priority Habitat, as mapped by The Ecology Partnership.

4.1.25 As part of the status survey report by Surrey Wildlife Trust I have seen email correspondence on the potential for The Bogs to support birds. The correspondence is included in Appendix 2 of this Proof of Evidence. It outlines a list of 32 species of bird recorded, with the potential for more to be present, to include wintering species. The correspondence outlines the potential for woodcock to be present, which is a bird on The Birds of Conservation Concern Red List

4.1.26 In addition to the biodiversity value of wet woodland, the habitat type also provides a number of ecosystem services. Ecosystem services are the direct and indirect contributions that living and non-living components of ecosystems provide for human wellbeing and quality of life[13]. Natural England[14] outline that Wet woodland (or associated features) have a role in the provision of ecosystem services including:

- Reducing the effects of climate change (to include flood risk management).
- Carbon storage and sequestration.
- Nitrogen fixing.
- Erosion management.
- Water Quality.

4.1.27 Lowland mixed deciduous woodland and wet woodland are different Priority Habitats.

4.1.28 However in the Priority Habitats Inventory (Natural England Open Data Publication) wet woodland as a Priority Habitat is mapped with low confidence. This is due to reasons such as the habitat can be considered as being an additional feature to Lowland Mixed Deciduous Woodland and due to the difficulty in mapping the habitat.

4.1.29 Natural England[15] state that "*The NFI (Forest Research 2020) estimates there is around 78,000 ha of wet woodland in England. Again, caution must be applied to this figure because it is based on a sample survey. Therefore, the figure is likely to be the right order of magnitude, but not precise*".

[13] Anderson, P, Lascelles, B, Nason, M and Witter, L (undated) Integrating Ecosystem Services into Ecological Restoration Chartered Institute for Ecology and Environmental Management (CIEEM)

[14] Definition of Favourable Conservation Status for Wet Woodland Defining Favourable Conservation Status Project (Natural England, January 2023

[15] Definition of Favourable Conservation Status for Wet Woodland Defining Favourable Conservation Status Project (Natural England, January 2023

4.1.30 This can be compared to the estimates available for Lowland Mixed Deciduous Woodland. The National Forest Inventory (NFI; Forest Research 2020) estimates there is around 748,000 ha of lowland mixed deciduous woodland in England[16].

4.1.31 Both wet woodland and lowland mixed deciduous woodland are relevant to this appeal site on and adjacent to the site. However the estimated coverage of both habitats by The National Forest Inventory shows that wet woodland Priority Habitat is more restricted in distribution and a rarer habitat in a national and Surrey county context.

4.1.32 To illustrate this, Appendix 4 shows the distribution of lowland mixed deciduous woodland and the distribution of wet woodland in England as side by side comparisons. In Appendix 4 this comparison has been shown in a Surrey county context.

4.1.33 The limitation associated with mapping estimates for wet woodland is acknowledged.

4.1.34 However I present this evidence as it outlines the rarity of wet woodland in a national and county context. This coupled with the biodiversity value of a wet woodland, and the ecosystem services suppled gives the Local Authority weight in seeking evidence that there will not be an adverse effect on the wet woodland and The Bogs pSNCI. Also noting that the ancient & semi-natural woodland is an irreplaceable habitat.

Available Hydrological Information and Assessment

4.1.35 The consultation letter (Our Reference: 387531/001/RH, dated 13th August 2025) provided a summary of the advice provided to The Oxted and Limpsfield Residents Group by Hydro-GIS Ltd. Hydro-GIS Ltd[17] state a conclusion that:

- *"There is a brief discussion in the Hydraulic Modelling Report of how the proposed changes will impact the areas surrounding the site, including The Bogs. However, the result shows a reduction in flood levels to the south of the site, which would also mean a reduction in flow to The Bogs".*
- *"Given the area of ancient woodland with a wet woodland dominated landscape, a reduction in flow may not be a desirable outcome, and could have adverse impacts on the biodiversity of the area. The hydraulic modelling studies should go further to demonstrate what would happen on a higher frequency lower magnitude basis, and look at a typical annual water balance to identify the full impact to The Bogs Given the limited information which has been provided, the FRA should be rejected by Tandridge District Council. A separate report should be requested to specifically consider the impact of the development on The Bogs, which would cover all aspects of the hydrology, not just the flood risk".*

4.1.36 The Appellant has submitted an 'Appeal Technical Note Flood Risk Assessment and Surface Water Drainage Strategy (Motion, October 2025). The Ecology Technical Note (The Ecology Partnership, October 2025) includes reference to the assessment by Motion. It appears that the overall objective of this is to show that sufficient hydrological assessment has been carried out by the Applicant / Appellant and therefore that there can be confidence in a conclusion that there will not be an adverse impact.

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[16] Definition of Favourable Conservation Status for Lowland Mixed Deciduous Woodland Defining Favourable Conservation Status Project (Natural England, January 2023

[17] Hydro-GIS Ltd (May 2025) Stoney Field Barrow Green Road, Oxted, RH8 0NN Review of Flood Risk V2 Final Report. For: Oxted and Limpsfield Residents Group.

4.1.37 In Section 3.26 of the Ecology Technical Note (The Ecology Partnership, October 2025) it cites the advice of Surrey County Council Flood Risk, Planning and Consenting Team. However the Flood and Climate Resilience Specialist at Surrey County Council has confirmed that their consultation does not include potential ecological or hydrological impacts on habitats or species. This is provided in Appendix 5.

4.1.38 Dr. Harvey Rodda has submitted a Proof of Evidence which continues to provide the expert advice that the Appellant has not provided adequate additional information on how the development site may impact on the hydrology of The Bogs pSNCI.

4.1.39 Dr. Harvey Rodda outlines the baseline hydrological information and assessment that is required to undertake an impact assessment in terms of overall hydrology.

Assessment and Evaluation

4.1.40 The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 confirms that ancient and semi-natural woodland is an Irreplaceable Habitat.

4.1.41 Paragraph 186 of the NPPF states "*When determining planning applications, local planning authorities should apply the following principles:*

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".

4.1.42 Chapter 3 of this Proof of Evidence outlines the protection afforded to an Irreplaceable Habitat in the Tandridge Local Plan Part 2: Detailed Policies 2014-2029.

4.1.43 The NPPF (footnote 70) defines wholly exceptional reasons as being "*For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat."* No case that the proposed development is wholly exceptional has been submitted by the Applicant / Appellant.

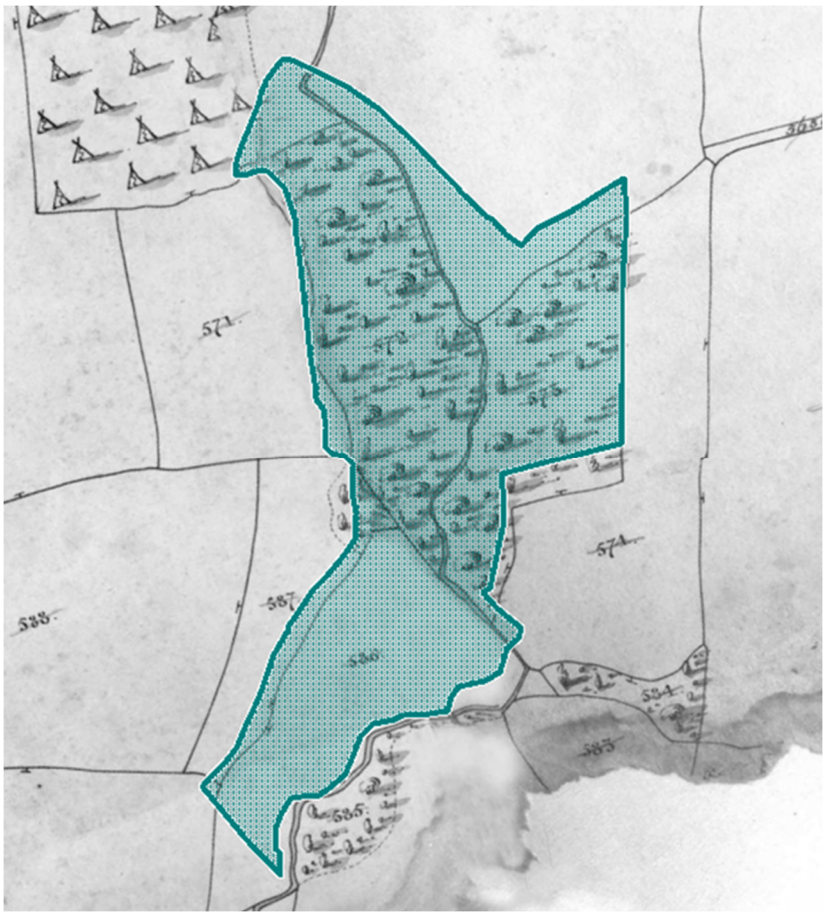
4.1.44 The Bogs pSNCI is an ancient and semi-natural (wet) woodland south of the existing watercourse. It is unproven if the wet woodland north of the watercourse is ancient & semi-natural (wet) woodland, however it is a wet woodland Priority Habitat and a lowland mixed deciduous woodland north of the existing watercourse.

4.1.45 Dr. Rodda has set out in Proof of Evidence that adequate information on how the development site may impact on the hydrology of The Bogs pSNCI has not been submitted. There is no formal evidence of ecological surveys and assessments for The Bogs pSNCI, other than the initial status report.

4.1.46 Therefore the baseline hydrological and ecological vulnerability of The Bogs pSNCI to the proposed development has limited understanding and evidence. As inadequate hydrological assessment has been submitted, the potential impact of the scheme upon The Bogs pSNCI is not clear.

4.1.47 The map shown in Figure 2 is a 'Tithe Map' from 1839. This the oldest archive map I have found / sourced which gives a relatively accurate representation of The Bogs.

Figure 2 Tithe Map, dated 1839



4.1.48 The existing watercourse can be clearly seen in the Tithe Map in Figure 2. The parcel code '573' was known as 'The Willows'. The parcel code '586' in the south of the now known area of The Bogs is 'Willows Bog'. Therefore it can be seen with relatively accurately that the wet woodland component is a fundamental aspect of this particular ancient and semi-natural woodland. A 'willow' is a tree species with an association to wetland habitats or damp woodland soils.

4.1.49 An impact to the wet woodland component of the ancient and semi-natural woodland through one or a combination of hydrological processes which would or could lead to even the partial loss of, or change to, the habitat would be a significant adverse impact and contrary to the protection afforded to an Irreplaceable Habitat.

4.1.50 I would also conclude that the potential loss of or change to the wet woodland Priority Habitat north of the watercourse (within The Bogs pSNCI), for example, through succession to a dry or drier woodland would be significant. Paragraph 186 of the NPPF states "*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".*

4.1.51 The Chartered Institute for Ecology and Environmental Management define a 'Significant Effect' as being "*Significance is a concept related to the weight that should be attached to effects when decisions are made. … 'significant effect' is an effect that*

either supports or undermines biodiversity conservation objectives for 'important ecological features' …or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/local nature conservation policy) or more wide-ranging (enhancement of biodiversity). Effects can be considered significant at a wide range of scales from international to local"

4.1.52 The impact of on the hydrology of The Bogs pSNCI could lead to the following impacts

- The net loss of wet woodland Priority Habitat in Surrey.
- The likely loss of wet woodland associated species.
- The loss of the ecosystem service(s) provided by the wet woodland Priority Habitat.
- An adverse impact upon this ancient & semi-natural (wet) woodland.

4.2 Conclusion

4.2.1 In Section 4.2.1 to 4.2.34 of this Proof of Evidence I have:

- Introduced The Bog pSNCI (and associated habitats)
- Outlined that wet woodland supports a diverse and potentially specialised ecology, and especially when the wet woodland is within ancient and semi-natural woodland.
- Outlined the ecosystem services provided by wet woodland.
- Shown that wet woodland has a rarer distribution across Surrey and England when compared using the National Forest Inventory.
- Shown that wet woodland is vulnerable to changes in hydrology or hydrochemistry.

4.2.2 In Section 4.2.35 to 4.2.39 of this Proof of Evidence I have:

- Shown that Surrey County Council did not review the surface water drainage and SuDS against matters of habitat and/or species.
- Used Dr. Harvey Rodda's Proof of Evidence to understand that adequate information on the hydrology of The Bogs pSNCI has not been submitted.

4.2.3 In Section 4.2.40 to 4.2.51 of this Proof of Evidence I have:

- Confirmed that ancient and semi-natural woodland is an Irreplaceable Habitat.
- Outlined that the Appellant has not stated that the scheme would be 'wholly exceptional'
- Outlined that an adverse impact to the wet woodland component of the ancient & semi-natural woodland would be a significant effect on The Bogs pSNCI.
- Outlined my opinion that the loss of the wet woodland Priority Habitat north of the watercourse in The Bogs pSNCI would be significant.

4.2.4 Therefore I would conclude that given the significance of any adverse impact upon The Bogs pSNCI, it would be essential that the Local Authority has sufficient evidence that the hydrology of The Bogs pSNCI is fully understood, fully assessed, and if required, any potentially impact is fully mitigated. This is because any adverse impact upon the ancient and semi-natural (wet) woodland would be unacceptable.

4.2.5 Given that Dr. Harvey Rodda has shown that inadequate hydrology information and assessment has been submitted, I cannot advise the Local Authority that sufficient information and evidence has been submitted on ecological grounds. Therefore I would support the Local Authority in their issue of Rf4 No. 4.

5 Reason for Refusal No. 5

5.1 Overview

5.1.1 RfR No. 5 states:

- *The information provided with the application is insufficient to show that there will not be adverse impacts on biodiversity as a result of the proposed development contrary to the provisions of paragraphs 187 and 193 of the NPPF and Tandridge Local Plan Core Strategy policy CSP17 and Tandridge Local Plan Part 2: Detailed Policies (2014) policy DP19.*

5.1.2 The matter of The Bogs pSNCI (to include Ancient & Semi-Natural (Wet) Woodland and Habitat of Principal Importance) is reviewed in Chapter 4. However it is also relevant to Chapter 5 (and RfR No. 5). I consider that The Bogs pSNCI (to include Ancient & Semi-Natural (Wet) Woodland and Habitat of Principal Importance) is dealt with in Chapter 4. Therefore Chapter 5, includes the following matters:

- The potential impact of the proposed development upon birds and invertebrates (not including with The Bogs pSNCI), please refer to Chapter 4).
- Whether there is sufficient evidence that the sequential steps of the mitigation hierarchy have been implemented in the design of the access off Barrow Green Road.
- Key Issue 7 – Biodiversity Net Gain in the Officer's Report for 2025/245.

5.2 Potential Impact of the proposal upon Birds and Invertebrates.

5.2.1 The consultation letter (Our Reference: 387531/001/RH, dated 13th August 2025) provided for the planning application advised the Local Authority that:

- There is insufficient consideration for ground nesting birds, such as skylark in the application submission.
- There is no evidence submitted that the bird assemblage would be of low environmental value/sensitivity, as the baseline bird assemblage of the application site is unknown.
- In the absence of any assessment for invertebrates, we have insufficient information on the species group to review the application.

5.2.2 The Ecology Technical Note (The Ecology Partnership, October 2025) provides analysis on the potential for ground nesting birds such as skylark. Further it is assessed by The Ecology Partnership that the arable field does not support valuable habitats for invertebrates. I am satisfied on the matter of potential skylark presence and accept the assessment for the likely value of the arable habitat for invertebrates.

5.2.3 Section 3.55 of the Ecology Technical Note (The Ecology Partnership, October 2025) states that "*It is our understanding that the drainage strategy for the site will ensure no significant reduction in waterflows into the wet woodland and as such any invertebrates which utilise this habitat are unlikely to be significantly affected by the application…".*

5.2.4 However as outlined in Chapter 4, it has not been demonstrated that sufficient hydrological assessment and modelling has been carried out to evidence that the proposed development will not have an adverse effect upon The Bogs pSNCI.

5.2.5 Therefore the matter of invertebrates and birds in the context of The Bogs pSNCI remains an issue.

5.2.6 There is no evidence submitted on the assemblage of invertebrates and birds within The Bogs pSNCI. Therefore the value of the baseline assemblages of invertebrates and birds is unknown. As outlined in Section 4.1.21 and 4.1.25 of this Proof of Evidence given the presence of the ancient & semi-natural woodland it is reasonable to assert that birds and/or invertebrates which qualify as being a Species of Principal Importance, or a Species of Conservation Concern[18], will be present.

5.2.7 The Tandridge Local Plan Part 2: 2014 -2029 (Adopted Version July 2014) states "*Planning permission for development directly or indirectly affecting protected or Priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place".*

5.2.8 If there is a change to the hydrology of The Bogs pSNCI and this has a negative impact upon the habitat(s) present, then this will likely impact upon invertebrates and birds.

5.2.9 Therefore the information provided with the application is insufficient to show that there will not be an adverse impact on biodiversity.

5.3 Native Hedgerow Habitat of Principal Importance

5.3.1 The Preliminary Ecological Appraisal (The Ecology Partnership, December 2024) details that there is a "…*single native hedgerows within the site, located along the northern site boundary adjacent to Barrow Green Road*".

5.3.2 The native hedgerow is dominated by hawthorn with field maple, dog rose, wayfaring tree, ash and sycamore present.

5.3.3 Section 4.4 of the Preliminary Ecological Appraisal (The Ecology Partnership, December 2024) confirms that the hedgerow is a Priority Habitat. Ecology Partnership recommend that the hedgerow is "…*retained within the masterplan, protected throughout construction and enhanced. Any unavoidable lost should be compensated for through creation of new like for like habitat to be managed to the higher condition*".

5.3.4 Table 2 of the Biodiversity Net Gain Feasibility Assessment (The Ecology Partnership, February 2025) details that 0.05km of the native hedgerow will be lost.

5.3.5 Section 10.6.1 of the Environment Statement Volume 2 – Chapter 10 (Ecology) details that there will be a permanent loss of a section of hedgerow in the north-east for site access. In review of the planning application, I was not satisfied that sufficient evidence of the sequential steps of the mitigation hierarchy had been submitted by the Applicant.

5.3.6 For example, in Figure 4.1 of the ES Volume 2: Main Text, Chapter 4: Alternatives Considered and Design Evolution the native hedgerow is not shown as a constraint.

5.3.7 Planning Practice Guidance1 defines sequential set of steps or sequential approach of avoidance, mitigation and compensation as:

- *"Avoidance – Can significant harm to wildlife species and habitats be avoided; for example by locating on an alternative site with less harmful impacts?*
- *Mitigation - Where significant harm cannot be wholly or partially avoided, can it be minimised by design or by the use of effective mitigation measures that can be secured by, for example, conditions or planning obligations*

[18] Such as Birds of Conservation Concern 5 Birds of Conservation Concern | BTO Birds of Conservation Concern | BTO

- *Compensation - Where, despite mitigation, there would still be significant residual harm, as a last resort, can this be properly compensated for by measures to provide for an equivalent or greater value of biodiversity*

5.3.8 On 'avoidance and mitigation'. The Chartered Institute of Ecology and Environmental Management (CIEEM)[19] state:

- *"Negative impacts should always be avoided where possible, for example by deciding not to locate a project in a particular area or making a change to scheme layout to ensure no negative impacts. Avoidance can also be part of mitigation. Mitigation includes measures to avoid or reduce the negative impacts of a project, for example careful timing of an activity to prevent an impact occurring".*
- *Avoiding and/or minimising negative impacts is best achieved through consideration of potential impacts of a project from the earliest stages of scheme design and throughout its development. Many impacts can be avoided or reduced by consideration of alternatives.*
- *Mitigation measures incorporated into the scheme design are often described as 'embedded mitigation' or 'mitigation by design'. This can include the re-design of the layout of the scheme, or adjusting the location of certain activities. Mitigation by design is particularly beneficial as there is greater certainty that it will be delivered".*

5.3.9 Planning Practice Guidance[20] states that "*Where a development cannot satisfy the requirements of the 'mitigation hierarchy', planning permission should be refused as indicated in paragraph 186 of the National Planning Policy Framework".*

5.3.10 The Ecology Partnership has not submitted any further information or evidence on this matter as part of the appeal. However the Appellant has submitted a 'Transport Note' by NEO Transport Planning (November 2025). The scope of the Transport Note is to "…*consider and clarify the position of the proposed access arrangements at the proposed development at Land South of Barrow Green Road, Oxted*".

5.3.11 The Transport Note concludes that the proposed access location Barrow Green Road is considered to represent the optimum location to serve the site, and has been agreed as being fit for purpose by SCC highways and an independent road safety auditor.

5.3.12 I have sought advice from a highways specialist who has confirmed that from the highways perspective the location of the proposed access off Barrow Green Road is valid. It is also noted that there is no reason for refusal due to the highways design.

5.3.13 Overall I can see evidence that from a highways perspective that there has been an evolution of the scheme. However, across all of the documentation, I remain of the opinion that there is no evidence that the native hedgerow was identified as an important characteristic of the appeal site. Noting that the information in the Transport Note by NEO Transport Planning is retrospective to an extent. Therefore I assess that it is reasonable to take a position that there is a lack of evidence that the Appellant sought to avoid and impact to the native hedgerow as a first step in the hierarchy.

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[19] CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.3. Chartered Institute of Ecology and Environmental Management, Winchester

[20] Planning Practice Guidance – Paragraph 019 Reference ID: 8-019-20240214

5.3.14 However it is then important to assess whether this lack of evidence for avoidance is sufficient to be a 'significant impact', even after mitigation measures are proposed.

5.3.15 The Biodiversity Net Gain Feasibility Assessment (The Ecology Partnership, February 2025) outlines that the scheme has the feasibility to plant approximately 1.35km of hedgerow. Given that from a highways perspective the location of the access is acceptable and NEO Transport Planning has shown further justification for the location I would advise that if the appeal is granted, then sufficient mitigation and compensation for the loss of native hedgerow is secured. This could be secured through the final Biodiversity Net Gain Assessment and Landscape and Ecological Management Plan.

5.4 Key Issue 7 – Biodiversity Net Gain

5.4.1 The Officer's Report outlines Key Issue 7 – Biodiversity Net Gain. It states:

- *"NPPF paragraph 187 seeks that planning decisions should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity. Policy CSP17 of the Core Strategy requires development proposals to 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. Policy DP19 of the Local Plan Part 2: Detailed Policies 2014 advises that planning permission for development directly or indirectly affecting protected or priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place.*
- *The principles of Biodiversity Net Gain (BNG) are enshrined within the Environment Act 2021 in England. This legislation mandates that most developments must achieve a minimum 10% increase in biodiversity value compared to pre-development levels. This increase can be achieved on-site, off-site, or through the purchase of statutory biodiversity credits. A Biodiversity Net Gain Metric Calculation is submitted with the application, alongside a Biodiversity Net Gain Feasibility Assessment report. The calculations show that the proposed development has the potential to deliver a +15.30% net gain in habitat units and a +271.39% net gain in hedgerow units, and +21.31% net gain in watercourse units, and all trading rules can be satisfied. The applicants Planning and Affordable Housing Statement refers to the assessment being reviewed and updated at reserved matters stage once there is a developed layout and landscaping strategy. Surrey Wildlife Trust also identify that the BNG assessment may need to be rerun when more information is available about the biodiversity value of the site.*
- *BNG is a requirement of national legislation and, while any net gains to biodiversity are to be encouraged, this is not a consideration that should attract more than limited weight in favour of the application in the overall planning balance".*

5.4.2 This Key Issue forms part of the opinion of the Local Authority. However, matters raised in the consultation letter (Our Reference: 387531/001/RH, dated 13th August 2025) provided for the planning application will be relevant to this key issue.

5.4.3 Note that I have still not seen the formal Statutory Biodiversity Metric Calculation Tool that was used by The Ecology Partnership. However as outlined on the 13th August 2025 the clarity of the information in the Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025) has reduced this limitation.

5.4.4 In the consultation letter (Our Reference: 387531/001/RH, dated 13th August 2025) provided for the planning application, the boundary and extent of the ancient and semi-natural (wet) woodland was not agreed. If I had found sufficient evidence that this habitat extends north of the watercourse in The Bogs pSNCI then this would have influenced the biodiversity net gain assessment and strategy.

5.4.5 The Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025) provides a baseline which aligns with the Preliminary Ecological Appraisal (Ecology Partnership, December 2024). The feasibility shows that the proposal has the potential to achieve the minimum +10% for each of the relevant habitat modules.

5.4.6 It is maintained that inadequate hydrological assessment has been submitted.

5.4.7 Therefore there is insufficient evidence that the condition of the wet woodland Priority Habitat will be maintained in the current condition. If the condition of the wet woodland could be reduced or the wet woodland lost, then this may influence the proposal that an on-site biodiversity net gain is feasible for all habitat modules. Therefore this matter is linked to Chapter 4 of this Proof of Evidence (such as 4.2.35 to 4.2.39).

5.4.8 However it is important to be transparent that this is an outline planning application, and therefore this is feasibility modelling only. If one of the habitat modules was to drop below the minimum +10% then the concept of biodiversity net gain does allow for off-site biodiversity units to be purchase. However this would only be an acceptable solution of the biodiversity gain hierarchy has been evidenced and followed.

5.4.9 Therefore in conclusion, Key Issue 7 – Biodiversity Net Gain remains relevant with respect to the hydrological context and debate associated with this planning appeal.

5.4.10 If the planning appeal is granted, then this application will be subject to the General Biodiversity Gain Condition and will therefore be required to provide a Biodiversity Gain Plan. Development should not begin unless: A biodiversity gain plan has been submitted to the planning authority; and The planning authority has approved the plan.

5.4.11 On-site significant enhancements for the appeal site would need to be secured through a Habitat Management and Monitoring Plan.

5.4.12 Paragraph: 015 Reference ID: 74-015-20240214 of the Planning Practice Guidance published by the Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (1 May 2024) states:

- *“For the purposes of biodiversity net gain, planning obligations are one of the mechanisms under paragraph 9 of Schedule 7A necessary to secure the maintenance of significant onsite habitat enhancements for at least 30 years” .*

5.4.13 Paragraph: 015 Reference ID: 74-021-20240214 of the Planning Practice Guidance published by the Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (1 May 2024) states

- *“Paragraph 9 of Schedule &A of the Town and Country Planning Act 1990 requires that where an applicant relies upon a significant increase in on-site habitat biodiversity value, the habitat enhancement (significant on-site habitat enhancement) must be subject to a planning condition, section 106 agreement, or conservation covenant requiring the habitat enhancement to be maintained for at least 30 years after the development is completed”.*

6 Appendix 1 SWT EPAS Consultation History

Date: 13/08/2025

Our reference: 387531-001-RH

By email: statutory@tandridge.gov.uk

Surrey Wildlife Trust

School Lane, Pirbright,
Woking, Surrey, GU24 0JN
01483 795449
planning@surreywt.org.uk
surreywildlifetrust.org/epas

Dear Cliff

Planning reference: 2025/245

Proposals: Outline application for a residential development of up to 190 dwellings (including affordable homes) (Use Class C3), an extra care facility with up to up 80 beds (Use Class C2), together with the formation of vehicular access, landscaping, parking, open space, green and blue infrastructure, and all other associated development works. All matters reserved except access

Site Address: Land South Of Barrow Green Road Oxted,

Thank you for consulting with Surrey Wildlife Trust with regards to the above planning application. Our advice is restricted to ecological issues and does not prejudice further representation Surrey Wildlife Trust may make as a non-statutory organisation on related, or other, issues. We do not comment on whether a planning application should be granted or refused, but rather provide a technical review of the ecological information that has been submitted to ensure that all ecological aspects have been appropriately considered prior to determination or discharging of conditions.

The Local Planning Authority (LPA) has a duty to conserve biodiversity in line with the planning and legislative context. Relevant legislation and planning policies are detailed in Appendix 1. We have reviewed the relevant application documents submitted on the planning portal, and other relevant publicly available information, and assessed these against published best practice guidance to determine whether the submitted information was sufficient for the LPA to assess the planning application. Following this, we assessed the proposals against relevant legislation and planning policy and recommended an appropriate course of action to ensure that the LPA is fulfilling its duty to conserve biodiversity.

Our advice and recommendations are detailed below. This consultation response is valid for one year. Should further project information or amended designs be provided or submitted to the planning portal we may need to update our response accordingly.

General

The LPA may wish to consult with Natural England on the matter of Statutory Designated Sites. To include Woldingham & Oxted Downs Site of Special Scientific Interest, which is approximately 1km north of the application site.

The Bogs pSNCI and Ancient Woodland

Context

The Preliminary Ecological Appraisal (Ecology Partnership, December 2024) details the presence of 'The Bogs' potential Site of Nature Conservation Importance (pSNCI). The Ecology Partnership state that this is "…*located adjacent to the south-west of the site*".

Section 3.4 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) states that there are numerous ancient woodland parcels surrounding the application site to include "…*a c2.2ha area adjacent to the southern boundary*".

Section 3.4 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) details the presence of priority deciduous woodland parcels "…*an area which overlaps the southern site boundary*". Ecology Partnership has recorded priority wet woodland in the south of the application site. The location of these habitats is shown in Appendix 2 Habitat Map.

Chapter 19 of the Tandridge Local Plan Part 2: 2014 -2029 (Adopted Version July 2014) states of pSNCIs that "*The Council will undertake a review of these sites in due course. The policy will be applied to existing SNCIs, pSNCIs and, following a review, to any retained or new sites. Potential SNCIs are not protected sites but may have the potential to be so; however because of access or ownership issues they have not been surveyed. Applications affecting a pSNCI will normally allow the potential of the site to be assessed*".

Policy DP19: Biodiversity, Geological Conservation & Green Infrastructure is relevant for the pSNCI, the ancient woodland, the wet woodland and the lowland mixed deciduous woodland.

The allocation of 'The Bogs' as a pSNCI is based upon a status survey carried out by Surrey Wildlife Trust on the 3rd May 2007. The recommended boundaries and extent of the pSNCI is provided in a map within the status survey report. This recommended boundary does match the mapping shown on the Tandridge District Council Planning Policies Map[1].

The recommendation was made in 2007 due to the presence of wet woodland and up to fourteen ancient woodland indicator species. An online search of the Natura England Ancient Woodland Inventory shows that approximately 2.2ha of 'The Bogs' is identified as being ancient and semi-natural woodland. The Natural England Ancient Woodland Inventory mapping does match the information supplied in Section 3.5 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024). Therefore the online mapping evidence is that the ancient and semi-natural woodland does not cover the whole area of 'The Bogs SNCI'.

pSNCI Extent

The Environmental Statement Volume 2 – Chapter 10: Ecology states in Table 10.4 that 'The Bogs' pSNCI is adjacent to the south-west boundary and that it is assumed to be proposed for selection as an SNCI due to the ancient / wet woodland habitat.

The red line boundary of the proposed development along the southern boundary mirrors the route of a watercourse. There are pockets of habitat, which has been identified by the Ecology Partnership has being priority wet woodland and priority deciduous woodland, north and east of this watercourse 'Other rivers and streams' in Appendix 2: Habitat Map'. This area of wet woodland and the strip of deciduous woodland on the southern boundary of the application site are within the boundaries and extent of the proposed pSNCI. **Therefore based upon the boundaries and extent of the pSNCI, 'The Bogs' is located within the application site.**

[1] Tandridge District Council Planning Policies'

The Preliminary Ecological Appraisal (Ecology Partnership, December 2024), the Environmental Statement Volume 2 – Chapter 10: Ecology and the overall proposal submission is therefore not based upon the proposed boundary of 'The Bogs' pSNCI.

Therefore the Preliminary Ecological Appraisal (Ecology Partnership, December 2024), the Environmental Statement Volume 2 – Chapter 10: Ecology (and the arboricultural submission) has not assessed the proposal against the full extent of the pSNCI.

Impact upon the Bogs pSNCI and the Priority Wet Woodland

In this section, where we refer to 'wet woodland' it is in reference to the wet woodland within 'The Bogs' pSNCI south of the watercourse and the priority wet woodland identified north of the watercourse (which is located within the red line boundary but still within the pSNCI).

The priority wet woodland within the 'The Bogs' pSNCI south of the watercourse is part of the ancient & semi-natural woodland shown on the Natural England Ancient Woodland Inventory.

However the priority wet woodland north of the watercourse is not within the Natural England Ancient Woodland Inventory and has not been assessed by the Ecology Partnership or Temple as being ancient & semi-natural woodland. Further review of this matter is provided under the sub-section 'Biodiversity Net Gain – Irreplaceable Habitats' of this consultation.

The presence of the priority wet woodland north of the watercourse, within the red line boundary and within the pSNCI, remains a material consideration in the determination of the planning application. Habitats listed under Section 41 of the Natural Environment and Rural Communities Act (2006) are known as Habitats of Principal Importance 'or Priority Habitats'

The Oxted and Limpsfield Residents Group has engaged Hydro-GIS Ltd[2] to advise them on a review of the flood risk. Given that the author of this consultation is not a qualified hydrologist, we have also sought the advice of Hydro-GIS Ltd in the preparation of this consultation.

Hydro-GIS Ltd[3] state a conclusion that:

- *"There is a brief discussion in the Hydraulic Modelling Report of how the proposed changes will impact the areas surrounding the site, including The Bogs. However, the result shows a reduction in flood levels to the south of the site, which would also mean a reduction in flow to The Bogs. Given the area of ancient woodland with a wet woodland dominated landscape, a reduction in flow may not be a desirable outcome, and cold have adverse impacts on the biodiversity of the area. The hydraulic modelling studies should go further to demonstrate what would happen on a higher frequency lower magnitude basis, and look at a typical annual water balance to identify the full impact to The Bogs".*
- "*Given the limited information which has been provided, the FRA should be rejected by Tandridge District Council. A separate report should be requested to specifically consider the impact of the development on The Bogs, which would cover all aspects of the hydrology, not just the flood risk*".

Section 10.7.11, 10.7.12 and 10.7.15 of the Environmental Statement Volume 2 – Chapter 10: Ecology provides the 'anticipated effects' of the proposal upon the pSNCI, the ancient

[2] Hydro-GIS Ltd (May 2025) Stoney Field Barrow Green Road, Oxted, RH8 0NN Review of Flood Risk V2 Final Report. For: Oxted and Limpsfield Residents Group.

[3] Hydro-GIS Ltd (May 2025) Stoney Field Barrow Green Road, Oxted, RH8 0NN Review of Flood Risk V2 Final Report. For: Oxted and Limpsfield Residents Group.

woodland and the wet woodland. This primarily covers the potential for a physical and direct impact upon the habitat(s), and therefore outlines the implementation of a minimum 15m buffer zone from the ancient woodland and a Construction and Environmental Management Plan.

Section 10.7.15 of the Environmental Statement Volume 2 – Chapter 10: Ecology has consideration for hydrology. **However the Environmental Statement Volume 2 – Chapter 10: Ecology, and Preliminary Ecological Appraisal (Ecology Partnership, December 2024) do not demonstrate a full assessment of the potential impacts upon 'The Bogs' pSNCI (to include the ancient wet woodland) and the priority wet woodland.**

This is primarily because there is insufficient information provided on the baseline hydrological regime of 'The Bogs' pSNCI, and the evidence submitted that there will not be an adverse impact upon the pSNCI and the wet woodland. There appears to be no monitoring of 'The Bogs' pSNCI throughout the seasons in a year to understand the hydrological interaction between the site and the pSNCI. There is no evidence of a technical review and assessment of the proposed location of the detection basins/SuDs in the south-west of the application site and the location of development and how this may change the movement of water (surface and groundwater) and the amount of water that 'The Bogs' pSNCI will (or may) receive.

Temple[4] outline that the unnamed stream along the western site boundary will be retained and protected through a buffer, however, we understand that this is not the only source of potential hydrological interaction between the application site and 'The Bogs' pSNCI. Figure 21 in the report by Hydro-GIS Ltd[5] shows flow paths towards 'The Bogs' pSNCI from the application site. Temple[6] state that "*A small spring is also present within the site and also feeds into the stream, however, the development will not restrict the flow of water from this spring into the stream*". The relationship between the spring (to include groundwater) and 'The Bogs' pSNCI does not appear to be detailed or assessed. The location of the spring is not completely clear to us in review of Appendix H of the Drainage Strategy (as outlined by Section 4.15 of the Flood Risk Assessment and Drainage Strategy (Motion, February 2025).

Planning Practice Guidelines from Natural England and the Forestry Commission (14th January 2022) states that

- "*Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by*
  - *changing the water table or drainage*"

Wet woodland, especially, ancient, has the potential to support a unique woodland ecosystem of species to include birds, plants and invertebrates. Historical mapping available from 1839 shows evidence of (likely) wet woodland in the location of the pSNCI. We understand that a citation of the pSNCI is wet alder woodland below escarpment. In terms of the ecology of the wet woodland within The Bogs' pSNCI, we have found no assessment or consideration by Ecology Partnership or Temple, on the vulnerability of the habitat, as a habitat for species, to a potential change. The potential for a change to the woodland, could extend to hydrological aspects and potential pollution pathways but also the proximity of the large development.

[4] Environmental Statement Volume 2 – Chapter 10: Ecology

[5] Hydro-GIS Ltd (May 2025) Stoney Field Barrow Green Road, Oxted, RH8 0NN Review of Flood Risk V2 Final Report. For: Oxted and Limpsfield Residents Group

[6] Environmental Statement Volume 2 – Chapter 10: Ecology

We would conclude that there is insufficient evidence for us to confirm that the proposed development will not have an adverse effect upon 'The Bogs' pSNCI, the ancient & semi natural (wet) woodland and the priority wet woodland.

Section 10.7.30 of the Environmental Statement Volume 2 – Chapter 10: Ecology outlines the assessment that The Bogs pSNCI is private, and that there is limited access. A fence will be installed to deter entry into the woodland. Temple assess therefore that "*recreational impacts on this woodland associated with the development are unlikely to be significant*". As outlined above in the consultation however, The Bogs pSNCI is within the application site.

Therefore there will be access 'into' The Bogs pSNCI. This means that there will be the potential for an impact upon pSNCI through recreational pathways. Although the amount of pSNCI within the application site is minor compared to the extent to the south/south-west.

Further review on ancient & semi-natural woodland is provided under the sub-section 'Biodiversity Net Gain – Irreplaceable Habitats' of this consultation and should be noted.

However if the application is deemed to be granted, then full detail of a strategy to protect The Bogs pSNCI through the construction and operational phases should be secured and submitted to the Local Authority.

Protected Species – Amphibians

Section 3.5 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) outlines the presence of one pond within 14m of the application site. This is stated to be within a private garden to the west of the site. The location of the pond appears to be within the boundary of 'The Bogs' pSNCI. In Section 3.20 to 3.21 of the Preliminary Ecological Appraisal, the Ecology Partnership scope out the potential for the application site to support great crested newt. Based on the review of the material, this appears to be a valid conclusion.

However given the wet woodland on and adjacent to the application site, there will be the potential for amphibians to be present on-site. For example common toad. If the application is granted, then a Construction and Environmental Management Plan should be secured, and habitat creation and enhancement should be secured for amphibians.

Protected Species – Bats

Section 4.7 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) details the presence of a single large mature oak tree in the west of the site. The tree is assessed to have high suitability to support roosting bats. We recommend that the tree is protected throughout the construction and operational phases of the proposed development.

This should extend to the protection of the tree from lighting. Full detail of the lighting scheme should be secured through a Sensitive Lighting Management Plan if the application is granted.

If the application is granted, then the proposed development should proceed in line with all of the recommendations within the Bat Activity Surveys (Ecology Partnership, December 2024).

This includes Section 4.0 on the commuting and foraging habitat, lighting recommendations, and enhancements, which includes strengthening commuting features. If the planning application is granted, then the following should be secured:

- Construction Environmental Management Plan.
- Sensitive Lighting Management Plan.
- Landscape and Ecological Management Plan.

Protected Species – Birds

Section 3.24 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) outlines the presence of suitable habitat for birds within the woodland and scrub. The Preliminary Ecological Appraisal and the Environmental Statement Volume 2 – Chapter 10: Ecology provide a standard recommendation of the timing of any clearance works.

The proposed development site is dominated in area by arable habitat. The ecological submission have no regard or consideration for birds associated with farmland or arable habitat, such as skylarks. The photographs in the Preliminary Ecological Appraisal (such as 8 and 9) show an arable habitat that is unlikely to be used by species like skylark.

However, Photograph 6 in the Preliminary Ecological Appraisal shows shorter grass in the background to the bare ground. Plate 1, Plate 2 and Plate 4 in the Archaeological Desk Based Assessment shows a habitat on-site as been short sward grassland/arable. In the Heritage Report, Plate 4 appears to show short sward grassland / crop. Therefore the photograph 8 and 9 in the Preliminary Ecological Appraisal does not appear to be consistent condition of the habitat height. **We would therefore conclude that there is insufficient consideration for ground nesting birds, such as skylark in the application submission.**

Section 10.5.23 of the Environmental Statement Volume 2 – Chapter 10: Ecology states "*During all survey work significant numbers of dog walkers were observed around the edges and along the footpath which runs through the centre of the field. As such, the arable habitat on Site was considered unlikely to support significant numbers of ground nesting and farmland birds, owing to the high levels of disturbance on site from dogs and people*".

However we have not found any evidence of this assessment and evaluation in the Preliminary Ecological Appraisal or in the Environmental Statement Volume 2 – Chapter 10: Ecology. We have not found any evidence that Temple has visited the site (for example a date of a site visit in a methodology), therefore it is unclear how this conclusion has been made.

Even if there was a baseline level of recreational disturbance which limits the likelihood of a 'significant numbers' of ground nesting birds, a low number of territories would still be material to the determination of the planning application. For example, Skylark is a Species of Principal Importance. The evidence base and justification for Section 10.5.23 remains unclear.

The Preliminary Ecological Appraisal does not include an impact assessment and mitigation strategy for birds. It outlines the nesting bird season. Section 10.5.23 of the Environmental Statement Volume 2 – Chapter 10: Ecology states "*Overall, it is considered that the likely bird assemblage utilising the Site would be of low environmental value/sensitivity*".

There is no evidence submitted that the bird assemblage would be of low environmental value/sensitivity, as the baseline bird assemblage of the application site is unknown.

Policy DP19 states that "*Planning permission for development directly or indirectly affecting protected or Priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place*".

Section 10.7.49 of the Environmental Statement Volume 2 – Chapter 10: Ecology states "*An increase in local residents is likely to result in the increase of pets, including cats, which are known to predate on birds. Cat predation may result in loss of population of Priority BoCC species which may be using the habitats on the boundary of the Site*". There is no evidence submitted on the bird assemblage of the application site, and the extent to which it supports birds listed as being a Species of Principal Importance (or as a Bird of Conservation Concern).

Therefore the impact that cat predation (and any other impact) would have upon priority species of bird is unknown and is not evidenced in any of the ecological submissions.

In our opinion, the assessment for birds should extend to the 'The Bogs' pSNCI, if there is the potential for a change in the hydrology[7] of the wet woodland on-site and adjacent to the site (more in the 'Impact upon the Bogs pSNCI and the Priority Wet Woodland'). Wet woodland for example can support bird species such as willow tit and lesser spotted woodpecker. Both species are listed as being Species of Principal Importance, and they are on the red list[8].

However, if the planning application is granted, a Construction and Environmental Management Plan should be secured, and habitat creation and enhancement should be secured for birds as part of the proposed development.

Protected Species – Hazel Dormouse

Section 3.18 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) outlines the presence of potential hazel dormouse habitat on-site. However, based upon the presence/ absence surveys carried out, the species is assessed by The Ecology Partnership as being likely absent. The presence of the species in the local landscape and the lack of any detailed survey within the adjacent ancient & semi-natural woodland is however noted.

If the application is granted, then a Construction and Environmental Management Plan should be secured, and habitat creation and enhancement should be secured for hazel dormouse and other small mammals. This should be in line with the recommendations provided in Section 5.3 of the Hazel Dormouse (Ecology Partnership, December 2024) report.

Protected Species – Invertebrates

The habitats within the site includes deciduous & wet woodland, priority hedgerows, field margins and a watercourse. Therefore the site has the potential to support terrestrial and aquatic invertebrates. The Arboricultural Impact Assessment (Barton Hyett Associates, July 2025, Revision B) details a number of trees which are 'notable', such as Tree T16.

The proposed development will impact upon other neutral grassland, native hedgerow and a line of trees. It appears likely that field margins will also be impacted and a drainage pipe will be installed in the woodland in the south of the site. The development will result in an increase in lighting in proximity to the woodlands, mature tree and hedgerows.

Natural England Standing Advice states that developers should submit information with their planning application on how their development proposal avoids or mitigates harm to invertebrates. In our opinion, this should extend to the adjacent 'The Bogs' pSNCI, if there is the potential for a change in the hydrology of the wet woodland on and adjacent.

The Environmental Statement Volume 2 – Chapter 10: Ecology, and Preliminary Ecological Appraisal (Ecology Partnership, December 2024) have no appraisal, assessment or consideration for invertebrates. **In the absence of any assessment for invertebrates, we have insufficient information on the species group to review the application.**

Protected Species – Reptiles

[7] And the risk of increased cat predation.

[8] Birds of Conservation Concern 5 (Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. 2021. The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 723-747". bocc-5-a5-4pp-single-pages.pdf

Section 3.23 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) outlines the presence of potential reptile habitat on-site. The presence/likely absence surveys on-site recorded the presence of slow worm, and the population is assessed to be 'Good'.

The presence of grass snake has not been ruled out, and we would agree with this.

An outline reptile strategy is submitted within the Reptile Survey (Ecology Partnership, December 2024). If the application is granted, then a Reptile Mitigation Strategy should be secured through a planning condition. This will need to have assessment and strategy for the construction and operational phases of the proposed development.

Protected Species – Badger

Section 4.15 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) states "*However, badgers are a mobile species and could establish new setts within the suitable woodland and scrub habitat within the site. Therefore, it is recommended that an update badger survey is carried out prior to development to ensure no new evidence of badgers is found onsite*". **We agree with this recommendation. The recommendation should be secured through a planning condition, if the application is granted.**

Protected Habitats – Hedgerow

Section 4.4 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) details the presence of native hedgerows on-site. The Preliminary Ecological Appraisal states "*It is recommended that these habitats be retained within the masterplan, protected throughout construction and enhanced. Any unavoidable lost should be compensated for through creation of new like for like habitat to be managed to the higher condition*".

Section 3.13 of the Preliminary Ecological Appraisal (Ecology Partnership, December 2024) states that the hedgerow on-site contains hawthorn, field maple, dog rose, wayfaring tree, ash, sycamore, traveller's joy, and ivy. This is assessed to be a Habitat of Principal Importance.

The Environmental Statement Volume 2 – Chapter 10: Ecology refers to this as a 'species-poor hedgerow' however it is an Important Hedgerow. In the Biodiversity Net Gain Assessment, the hedgerow is classified as being a 'Native Hedgerow', and therefore it has a low distinctiveness. However the classification of species-poor hedgerow is not clearly evidenced. The outline species list of the hedgerow contains at least five woody species.

It is unclear where the assessment of 'woody' species has been provided to show evidence that it is species-poor, as opposed to species-rich. If species-rich, for example, then the biodiversity net gain assessment would need to be updated accordingly. It is unclear where the Important Hedgerow assessment has been reported.

Section 10.6.1 of the Environmental Statement Volume 2 – Chapter 10: Ecology details that the construction phase will result in the permanent loss of a section of hedgerow in the north-east for a site access. **However the overall submission, to include ecological, does not include any reference to the implementation of the mitigation hierarchy**. The hedgerow has been confirmed as being a Habitat of Principal Importance, and there is no evidence of the Applicant having consideration for an alternative access location, which would not result in the loss of any hedgerow. It is acknowledged that an alternative design may require the loss of bramble scrub, however bramble scrub is not a Habitat of Principal Importance.

A ES Volume 2: Main Text Chapter 4: Alternatives Considered and Design Evolution has been submitted. This does not raise the Habitat of Principal Importance as a constraint on-site.

Figure 4.8 shows an 'Initial Masterplan Concept' which does not show an access through the location of the hedgerow. However 4.9 the Illustrative Masterplan is apparently amended to include the severance of the hedgerow. There is no evidence that the hedgerow was considered as an important matter / constraint, or that effort to avoid the impact was attempted.

Biodiversity Net Gain – Irreplaceable Habitats

We have carried out research, to include mapping archives, of the woodland associated with 'The Bogs' pSNCI. The extent of the ancient woodland inventory mapping, and the mapping of the ancient woodland by the Applicant's ecologist, has been discussed above.

However we are particularly interested in why the woodland north and east of the watercourse has been discounted as being ancient & semi-natural woodland, whilst it is part of the pSNCI.

The importance of this matter is material to this application. For example, if present within the application site, then the 15m buffer of the proposed development would be inaccurate and the scheme would need to be re-assessed in terms of ancient and semi-natural woodland.

The Environmental Statement Volume 2 – Chapter 10: Ecology, and Preliminary Ecological Appraisal (Ecology Partnership, December 2024) do not provide an evidence-based scope out of the woodland habitat north and east of the watercourse as being ancient.

It would appear that there is a reliance upon the Natural England dataset. The issue of mapping small areas of ancient woodland, especially through archives, is a known limitation.

Therefore in our opinion, there should be caution in excluding small areas of woodland from being ancient, purely on mapping data alone. On the 25th July 2025, Woolf Bond Planning prepared a letter to Tandridge District Council (REF; SB/9060). This includes a section of 'Ancient and Semi-Natural Woodland Matters ASNW'. In the letter (Ref: SB/9060) it states:

- *"The ecologist's conclusion on the extent of ASNW is based upon the Ancient Woodland Inventory (AWI) which was created through review of old maps to determine areas that had been continuously wooded for over 500 years. The woodland within the Site itself is not included in the inventory and did not feature the ancient woodland indicators typical of ancient woodland, instead comprising alder, with very sparse understorey and a ground layer dominated by nettles and other species associated with nutrient enrichment."*

The Environmental Statement Volume 2 – Chapter 10: Ecology, and Preliminary Ecological Appraisal (Ecology Partnership, December 2024) provide no evidence of assessing 'old maps' or mapping archives. We disagree that the woodland on-site does not feature ancient woodland indicator species. Or there is no evidence that this is the case. Section 3.11 of the Preliminary Ecological Appraisal states "*The woodland in the south of the site was similar in the drier areas in its western and eastern extents*". This is a comparison with woodland in the north. Ecology Partnership advise that the species present includes British bluebell, wood meadow grass, ramsons and wood anemone. These are examples of indicator species.

In review of the Environmental Statement Volume 2 – Chapter 10: Ecology, and Preliminary Ecological Appraisal (Ecology Partnership, December 2024), we have not found analysis of these indicator species. It is unclear whether this overview in Section 3.11 for at least two woodland parcels on-site, provides a complete list of species present.

The review of historical mapping that we have carried out includes 1895 and the 1960s. In 1895 the woodland is mapped south of the watercourse. However by the 1960s woodland habitat appears north and east of the watercourse. These are the locations of the priority wet

woodland and priority deciduous woodland on-site as mapped by Ecology Partnership in the south of the application site. The Oxted Tithe Map (1839) has correlation with the 1895 map.

However we have also reviewed the Archaeological Desk Based Assessment (RPS Group, February 2025) which contains a number of archive / historical maps. We particularly note Figure 7 of the Archaeological Desk Based Assessment, which is taken from '1809 Plan of Oxted Court Farm'. Figure 7 clearly shows the woodland adjacent to the south of the application site which is mapped by Natural England as being ancient. However, Figure 7 shows a piece of the woodland extending north, and past the red line boundary of the proposed development site, that has been overlaid on the map image. This would appear to overlap with an area of lowland mixed deciduous woodland mapped by Ecology Partnership.

The map that we have found of 1895 is different to the map from 1809. However this may reflect different mapping techniques or requirements. It is appreciated that the map is from 1809, and we note the importance of 1600AD. However we have not found any clear or accurate maps from 1700. Based upon the description of lowland mixed deciduous woodland in the Preliminary Ecological Appraisal, there are ancient woodland indicators in this location (i.e, where the woodland extends over the red line boundary in the Figure 7: 1809).

Therefore in overall review we are not satisfied with the overall evidence submitted that discounts the presence of ancient & semi-natural woodland within the red line boundary. It does not appear to be covered in the Preliminary Ecological Appraisal, and it is not covered in the Environmental Statement Volume 2 Chapter 10: Ecology.

The letter (Ref: SB/9060) states "*The woodland within the Site itself is not included in the inventory and did not feature the ancient woodland indicators typical of ancient woodland, instead comprising alder, with very sparse understorey and a ground layer dominated by nettles and other species associated with nutrient enrichment".*

However this appears to omit the deciduous woodland parcel east of the priority wet woodland on-site. There is also opinion that pendulous sedge (as found in the priority wet woodland on-site) can be an indicator of ancient woodland[9], when found in proximity to other indicators[10].

Biodiversity Net Gain - Approach

We have carried out a review of the biodiversity net gain assessment as submitted – Ecology Partnership do not assess that an irreplaceable habitat is located on-site, within the red line.

However our review above is important, as the presence of ancient & semi-natural woodland within the application site would require an update to the Biodiversity Net Gain strategy.

The LPA may therefore wish to require sufficient evidence on the approach taken to dismiss the presence of ancient & semi-natural woodland within the application site before the Biodiversity Gain Condition is discharged, if the application is granted.

Biodiversity Net Gain – General

The biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development. However, Biodiversity net gain is not just

[9] The Wild Flower Key (March 2006, Dr. Francis Rose).

[10] Acknowledged that pendulous sedge can also be associated as not being an indicator of ancient woodland and can occur across a range of different habitats.

a post-permission matter. To ensure the biodiversity gain objective is met, it is important that biodiversity net gain is considered throughout the planning process.

Paragraph: 019 Reference ID: 74-019-20240214 of the Planning Practice Guidance published by the Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (1 May 2024) states that:

- The statutory framework for biodiversity net gain involves the discharge of the biodiversity gain condition following the grant of planning permission to ensure the objective of at least 10% net gain will be met for a development.
- Given this, it would generally be inappropriate for decision makers, when determining a planning application for a development subject to biodiversity net gain, to refuse an application on the grounds that the biodiversity gain objective will not be met.
- However, decision makers may need to consider more broadly whether the biodiversity gain condition is capable of being successfully discharged. Matters for consideration may include the following (but this is not an exhaustive list):
    - The appropriate balance expected between onsite gains, off-site gains and the use of statutory biodiversity credits for the development, taking account of the Biodiversity Gain Hierarchy.
    - Whether the type and location of any significant onsite habitat enhancements proposed for onsite gains are appropriate, taking into account other policies to support biodiversity (including local nature recovery strategies) and other wider objectives (for example policies for design, open space and recreation, and retention of trees); and
    - Any planning conditions which need to be imposed to secure any significant onsite habitat enhancements, including any conditions requiring the maintenance of the enhancement for at least 30 years after the completion of the development.
    - Prior to the determination of the planning application, decision makers will also want to discuss with the applicant whether any section 106 planning obligations are required to secure either significant onsite habitat enhancements or offsite gains for the development.

This application will be subject to the General Biodiversity Gain Condition and will therefore be required to provide a Biodiversity Gain Plan. Development should not begin unless:

- **A biodiversity gain plan has been submitted to the planning authority; and**
- **The planning authority has approved the plan**.

Please note that Paragraph: 024 Reference ID: 74-024-20240214 of the Planning Practice Guidance published by the Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (1 May 2024) states that:

- "*To ensure applicants are clear about this distinction, the local planning authority are strongly encouraged to not include the biodiversity gain condition, or the reasons for applying this, in the list of conditions imposed in the written notice when granting planning permission.*
- *There is a separate requirement to provide information about the biodiversity gain condition. This information must be separate to the list of conditions on the decision notice*".

Biodiversity Net Gain – Review

Please note that we have not seen the Statutory Biodiversity Metric Calculation Tool used to inform the Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025). This is a limitation, however the clarity of the information in the Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025) has reduced this limitation.

The Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025) provides a habitat baseline which aligns with the Preliminary Ecological Appraisal (Ecology Partnership, December 2024). The feasibility analysis shows that the proposed development has the potential to achieve the minimum +10% for each of the relevant habitat modules.

In review of the Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025) it appears to be the plan that the wet woodland will be retained in a moderate condition.

However as outlined above it this consultation, it has not yet been evidenced that the hydrological interaction of the wet woodland with the application site will be maintained. A change in the hydrological interaction, which results in a loss of the wet woodland, or a deterioration of the condition to low, would influence the biodiversity net gain strategy.

However the extent to which this would impact the feasibility of the scheme to achieve a minimum +10% for modules is not clear. It is feasible that the minimum +10% in biodiversity units could still be achieved for relevant modules. However a significant impact upon the wet woodland priority habitat would not be in line with policy for a Habitat of Principal Importance.

Please note our above review for the hedgerow on-site – 'Protected Habitat – Hedgerow'. If the hedgerow is a Species Rich Hedgerow, then an update will be required. As with the wet woodland, however, the extent to which this would impact the feasibility of the scheme to achieve a minimum +10% for the hedgerow module is not clear.

Section 2.12 of the Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025) states that:

- *"It should be noted that the application is Outline only, and detailed landscaping will be developed at the reserved matters stage. As such, this assessment would need to be revised once landscaping has been finalised".*
- *"A detailed Habitat Management & Maintenance Plan will be developed at the detailed design stage to detail the long-term management of the proposed habitats to achieve the targeted habitat conditions, over a 30 year timespan".*

The Biodiversity Net Gain Feasibility Assessment (Ecology Partnership, February 2025) does not directly reference 'Significant on-site Enhancement'. However the feasibility assessment for the habitat modules and even if the scheme is amended, if granted, then it is very likely that significant on-site enhancement will be required.

Paragraph: 015 Reference ID: 74-015-20240214 of the Planning Practice Guidance published by the Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (1 May 2024) states: "*For the purposes of biodiversity net gain, planning obligations are one of the mechanisms under paragraph 9 of Schedule 7A necessary to secure the maintenance of significant onsite habitat enhancements for at least 30 years*".

Paragraph 021: Reference ID74-021-20240214 of the Planning Practice Guidance published by the Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (1 May 2024) states "*Paragraph 9 of Schedule &A of the Town and Country Planning Act 1990 requires that where an applicant relies upon a significant increase in on-site habitat biodiversity value, the habitat enhancement (significant on-site*

habitat enhancement') must be subject to a planning condition, section 106 agreement, or conservation covenant requiring the habitat enhancement to be maintained for at least 30 years after the development is completed".

Significant enhancements are areas of habitat enhancement which contribute significantly to the proposed development's BNG, relative to the biodiversity value before development.

Significant enhancements must be secured for 30 years in the same way as off-site gains.

What counts as a significant enhancement will vary depending on the scale of development and existing habitat, but these would normally be:

- Habitats of medium or higher distinctiveness in the biodiversity metric.
- Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development.
- Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development.
- Areas of habitat creation or enhancement which are significant in area relative to the size of the development.
- Enhancements to habitat condition, for example from poor or moderate to good.

Paragraph: 015 Reference ID: 74-015-20240214 of the Planning Practice Guidance published by the Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (1 May 2024) advises that:

- *"If planning obligations are going to be used for biodiversity net gain, it is good practice to submit information about any potential planning obligations which may need to be entered into should the proposal be granted planning permission.* For example, if there is a need for:
    - "*Significant increase of onsite biodiversity enhancements, then applicants are encouraged to provide a draft Habitat Management and Monitoring Plan as part of the application which sets out the proposals for long term maintenance of habitats to be secured through planning condition or planning obligation*".

We will highlight that the Applicant has failed to provide a draft Habitat Management and Monitoring Plan. The rationale for this is not clear.

However, if the application is granted, then the applicant will be required to submit a Habitat Management and Monitoring Plan, in line with a Biodiversity Gain Plan.

I hope this information is helpful in assisting your consideration of the application. Please contact planning@surreywt.org.uk if you require any further clarifications with regards to the above.

Kind regards,

Author Robert Hutchinson BSc (Hons) MSc CEcol MCIEEM – Manager of SWT Ecology Planning Advice Service

Carex remota	Remote Sedge *	f
Centaurea nigra	Common Knapweed	lf
Cerastium fontanum	Common Mouse-ear	o
Cirsium arvense	Creeping Thistle	lf
Cirsium palustre	Marsh Thistle	o
Cirsium vulgare	Spear Thistle	r
Cornus sanguineus	Dogwood	o
Corylus avellana	Hazel	o
Chrysosplenium oppositifolium	Opposite-leaved Golden-saxifrage*	f
Dactylis glomerata	Cock's-foot	lf
Dactylorhiza sp.	Orchid sp	r
Dryopteris dilatata	Broad Buckler Fern	o
Dryopteris filix mas	Male Fern	o
Epilobium hirsutum	Great Hairy Willowherb	o
Filipendula ulmaria	Meadowsweet	o
Fraxinus excelsior	Ash	o
Galium aparine	Goosegrass/Cleavers	f
Geranium robertianum	Herb Robert	f
Geum urbanum	Herb Bennet/Wood Avens	f
Glechoma hederacea	Ground Ivy	o
Gunnera tinctoria	Giant Rhubarb	o
Hedera helix	Ivy	f
Heracleum sphondylium	Hogweed	o
Holcus lanatus	Yorkshire Fog	lf
Humulus lupulus	Hop	o
Hyacinthoides non scripta	Bluebell *	o
Ilex aquifolium	Holly *	o
Impatiens parviflora	Small Balsam	la
Iris pseudacorus	Yellow Flag	o
Juncus articulatus	Jointed Rush	o
Juncus effusus	Soft Rush	o
Lam.gal. v. argentea	Introduced Yellow Archangel	la
Lamiastrum galeobdolon	Yellow Archangel *	f
Lolium perenne	Perennial Rye grass	lf
Lotus corniculatus	Bird's-foot Trefoil	lf
Lotus ulignosus	Greater Birds-foot Trefoil	r
Luzula campestris	Field Wood-rush	lf
Lysichiton sp	Skunk Cabbage sp	o
Melica uniflora	Wood Melick *	o
Mercuralis perennis	Dogs Mercury	o
Myosotis sylvatica	Wood Forget-me-not	o
Oenanthe crocata	Hemlock Water Dropwort	o
Osmunda regalis	Royal Fern	r
Oxalis acetosella	Wood Sorrel *	o
Phelum pratense	Timothy	lf
Phyllitis scolopendrium	Harts-tongue Fern	r
Plantago lanceolata	Ribwort Plantain	lf

7 Appendix 2 The Bogs pSNCI Status Survey Report

Botanical Survey for The Bogs, Oxted

Written by Isobel Girvan & Gwyneth Fookes

June 2007

Surrey Wildlife Trust, School Lane, Pirbright, Woking, Surrey GU24 0JN

Contents

Introduction

Surrey Wildlife Trust have been approached by local residents in Wheeler Avenue with regard to a woodland in Oxted known as 'The Bogs' (central grid reference TQ386528). They expressed concern over its future as there is potential pressure from development close by and changes to drainage leading to potential drying out. Therefore they commissioned Surrey Wildlife Trust to carry out a botanical survey, with permission from the landowners, to ascertain its ecological interest, draw up a vascular plant species list and write a report on the findings. The site visit was carried out on the 3rd May 2007 with Surrey Wildlife Trust local volunteer botanist Gwyneth Fookes and Isobel Girvan Consultancy Manager at Surrey Wildlife Trust.

Its current local status is known as a 'potential Site of Nature Conservation Importance' (pSNCI). This is because it was highlighted as a potential area of interest when the SNCI project was being carried out in Tandridge, however ownership either was not established or refused at the time of the project, therefore it was never surveyed.

The pSNCI as highlighted on the Trusts maps covers just over 3 hectares. Of which the majority is wooded with some garden intrusions along the eastern side off Wheeler Avenue.

The site was approached via a dry neutral semi improved species rich meadow which dipped gently eastwards towards the wet woodland. The central section of the woodland was then given a walkover survey, as this was the only area with ownership permission.

A total of 91 vascular plant species were recorded during this site visit by Gwyneth Fookes local Surrey Wildlife Trust botanist and Isobel Girvan Consultancy Manager at Surrey Wildlife Trust. Of which 15 are known as Ancient Woodland Indicators. These are species which are strongly associated with ancient woodlands which have been continuously wooded or managed as woodland for over 400 years. Ancient woodlands have been highlighted on the Ancient Woodland Inventory of Surrey (1987). However, The Bogs is not highlighted and nor does it appear as wooded on the suite of historical maps held at the Trust. The conclusion being that it is an area that has been wet for hundreds of years and whilst not continuously wooded has had minimal human interference and hence why there are a good proportion of ancient woodland indicators.

Only a small part of The Bogs was surveyed on this occasion (approximately 0.8ha), but under investigation of aerial photographs and local knowledge it would appear that the rest of the woodland is in similar condition. Such woodlands are relatively rare and are a priority habitat as described in the Surrey Woodlands Habitat Action Plan.

Further investigation of the rest of the woodland would prove interesting and no doubt would increase the number of vascular plant species recorded. In some areas cultivated species have been planted in the past and some have spread,

bamboo in particular. The cultivated species have not been listed as they have obviously all been deliberately introduced. Ideally these should be cleared from the site which would increase the ecological interest of the site.

Botanical Survey

[Use in conjunction with Figure 1]

A species list is listed below with vascular plant species that were recorded on the site visit in May 2007 using the scientific and common names, along with the abundance using the DAFOR system. This is a way of describing the abundance of a plant using the following key and is used in site descriptions in the Target Note section.

(Locally) **D**ominant, **A**bundant, **F**requent, **O**ccasional, **R**are

[Please note that plants ranked as 'rare' means that they were not found often over this site and does not necessarily indicate that they are a Surrey Notable Species]:

Target note 1 – Semi improved species rich sheep grazed grassland.

This sward seems to have had minimal fertilizers (if any) over the years. It is currently grazed and seems to have been managed in such a way for many years.

The grassland comprises abundant to frequent grasses such as Sweet Vernal grass (*Anthoxanthum odoratum*), Meadow Foxtail (*Alopecurus pratensis*). Yorkshire Fog (*Holcus lanatus*), Rough Meadow grass (*Poa pratense*) and Timothy (*Phelum pratense*). Also present, albeit in smaller quantities, is Perennial Rye grass (*Lolium perenne*). Herb content and diversity is high in what is a relatively small area. Herbs include frequent Common Knapweed (*Centaurea nigra*), Creeping Buttercup (*Ranunculus repens*), Field Wood-rush (*Luzula campestris*), occasional Creeping Thistle (*Cirsium arvense*), Hairy Sedge (*Carex hirsuta*), Common Sorrel (*Rumex acetosa*), Bugle (*Ajuga reptans*), Creeping Cinquefoil (*Potentilla reptans*), Ribwort Plantain (*Plantago lanceolata*) and Common Mouse-ear (*Cerastium fontanum*). In addition towards the edge of the woodland where it was significantly damper other wet loving species are present such as Soft Rush (*Juncus effusus*), Meadowsweet (*Filipendula ulmaria*), Wavy Bittercress (*Cardamine flexuosa*), Cuckooflower (*Cardamine pratensis*) and Marsh Thistle (*Cirsium palustre*).

Target note 2 – Wet woodland

Wet woodland dominated by an Alder (*Alnus glutinosa*) canopy with frequent Crack Willow (*Salix fragilis*). Other species in the canopy layer, generally along the edges where it is slightly drier, include occasional Sycamore (*Acer pseudoplatanus*), Norway Maple (*Acer platanoides*) and Ash (*Fraxinus excelsior*). The shrub layer is intermittent with Rowan (*Sorbus aucuparia*) appearing in small woodland gaps, Hazel (*Corylus avellana*) is present in locally frequent patches as well as Elder (*Sambucus nigra*), Holly (*Ilex aquifolium*), Dogwood (*Cornus sanguineus*) and Guelder Rose (*Viburnum opulus*) all rare. There are some dominant patches of non

native Bamboo (*Sasa sp*), which is spreading. Other non-native shrubs included a planted Raspberry (*Rubus ideus*) species, as well as Skunk Cabbage (*Lysichiton sp*) and Giant Rhubarb (*Gunnera tinctoria*) as well as a whole host of other planted garden cultivars. Presumably past owners have tried to 'gardenise' the woodland before realising that the damp and shady conditions would make this very hard. However some of the non native species do appear to be gradually spreading and are having a detrimental effect on the native interest of the site and of the overall ecological value of the woodland site.

The ground flora tended to be dominated in large swathes by Ramsons (*Allium ursinum*), an ancient woodland indicator, which is frequently found in damp woods and shady places and is at its best near steams on the heavy solids of the Weald Clay (Lousely) and therefore mostly found in the east of the county. Other frequent to occasional associates in the damper areas included Opposite-leaved Golden-saxifrage (*Chrysosplenium oppositifolium*) (also ancient woodland indicator) as well as Yellow Flag (*Iris pseudacorus*) and Marsh Marigold (*Caltha palustris*). The drier areas are generally covered in Common Nettle (*Urtica dioica*), which is often locally dominant along the edges and in open gaps along with occasional Cleavers (*Galium aparine*). Where it tends to be more shaded other ancient woodland indicators include Bluebell (*Hyacinthoides non scripta*), Moscatel, (*Adoxa moschatellina*) Great Hairy Wood Brome (*Bromus ramosa*), Wood Melick (*Melica uniflora*), Yellow Archangel (*Lamiastrum galeobdolonm*), Remote Sedge (*Carex remota*) which are locally frequent. Other occasional associates in this community include Dogs Mercury (*Mercuralis perennis*), Greater Stitchwort (*Stellaria graminea*) and Lesser Celendine (*Ranunculus ficaria*).

Species list

Scientific Name	Common Name (AWI*)	Abundance
Acer platanoides	Norway Maple	lf
Acer pseudoplatanus	Sycamore	r
Adoxa moschatellina	Town Hall Clock/Moscatel *	lf
Aesculus hippocastanum	Horse Chestnut	o
Ajuga reptans	Bugle	f
Allium ursinum	Ramsons *	f/ld
Alnus glutinosa	Alder	a
Alopecurus pratensis	Meadow Foxtail	lf
Angelica sylvestris	Wild Angelica	o
Anthoxanthum odoratum	Sweet Vernal grass	la
Anthriscus sylvestris	Cow Parsley	lf
Arum maculatum	Lords & Ladies	r
Bromus ramosa	Great Hairy Wood Brome *	r
Caltha palustris	Marsh Marigold/Kingcup	lf
Cardamine flexuosa	Wavy Bittercress	o
Cardamine pratensis	Ladysmock/Cuckooflower	o
Carex hirsuta	Hairy Sedge	lf
Carex pendula	Pendulous Sedge *	o

Carex remota	Remote Sedge *	f
Centaurea nigra	Common Knapweed	lf
Cerastium fontanum	Common Mouse-ear	o
Cirsium arvense	Creeping Thistle	lf
Cirsium palustre	Marsh Thistle	o
Cirsium vulgare	Spear Thistle	r
Cornus sanguineus	Dogwood	o
Corylus avellana	Hazel	o
Chrysosplenium oppositifolium	Opposite-leaved Golden-saxifrage*	f
Dactylis glomerata	Cock's-foot	lf
Dactylorhiza sp.	Orchid sp	r
Dryopteris dilatata	Broad Buckler Fern	o
Dryopteris filix mas	Male Fern	o
Epilobium hirsutum	Great Hairy Willowherb	o
Filipendula ulmaria	Meadowsweet	o
Fraxinus excelsior	Ash	o
Galium aparine	Goosegrass/Cleavers	f
Geranium robertianum	Herb Robert	f
Geum urbanum	Herb Bennet/Wood Avens	f
Glechoma hederacea	Ground Ivy	o
Gunnera tinctoria	Giant Rhubarb	o
Hedera helix	Ivy	f
Heracleum sphondylium	Hogweed	o
Holcus lanatus	Yorkshire Fog	lf
Humulus lupulus	Hop	o
Hyacinthoides non scripta	Bluebell *	o
Ilex aquifolium	Holly *	o
Impatiens parviflora	Small Balsam	la
Iris pseudacorus	Yellow Flag	o
Juncus articulatus	Jointed Rush	o
Juncus effusus	Soft Rush	o
Lam.gal. v. argentea	Introduced Yellow Archangel	la
Lamiastrum galeobdolon	Yellow Archangel *	f
Lolium perenne	Perennial Rye grass	lf
Lotus corniculatus	Bird's-foot Trefoil	lf
Lotus ulignosus	Greater Birds-foot Trefoil	r
Luzula campestris	Field Wood-rush	lf
Lysichiton sp	Skunk Cabbage sp	o
Melica uniflora	Wood Melick *	o
Mercuralis perennis	Dogs Mercury	o
Myosotis sylvatica	Wood Forget-me-not	o
Oenanthe crocata	Hemlock Water Dropwort	o
Osmunda regalis	Royal Fern	r
Oxalis acetosella	Wood Sorrel *	o
Phelum pratense	Timothy	lf
Phyllitis scolopendrium	Harts-tongue Fern	r
Plantago lanceolata	Ribwort Plantain	lf

Poa nemoralis	Wood Meadow grass *	o
Poa trivialis	Rough Meadow grass	lf
Potentilla erecta	Tormentil	r
Potentilla reptans	Creeping Cinquefoil	o
Potentilla sterilis	Barren Strawberry *	r
Ranunculus ficaria	Lesser Celandine	f
Ranunculus repens	Creeping Buttercup	lf
Rubus ideus	Raspberry (planted)	o
Rumex acetosa	Common Sorrel	o
Rumex obtusifolius	Broad-leaved Dock	o
Rumex sanguineum	Wood Dock	r
Salix fragilis	Crack Willow	f
Sambucus nigra	Elder	o
Sasa sp	Bamboo	ld
Silene dioica	Red Campion	o
Sorbus aucuparia	Rowan	o
Stachys sylvatica	Hedge Woundwort	o
Stellaria graminea	Lesser Stitchwort	r
Stellaria holostea	Greater Stitchwort	o
Taraxacum officinale	Dandelion	lf
Tellima grandiflora	Fringe Cups	r
Urtica dioica	Common Nettle	f
Veronica chamaedrys	Germander Speedwell	o
Viburnum opulus	Guelder Rose *	r
Vicia sepium	Bush Vetch *	o

*** AWI – Ancient Woodland Indicator**

Snails

Arianta arbustorum	Copse snail
Cepaea nemoralis	Dark lipped hedge snail
Succinea putris	Marsh snail
Trichia stiolata	Strawberry snail

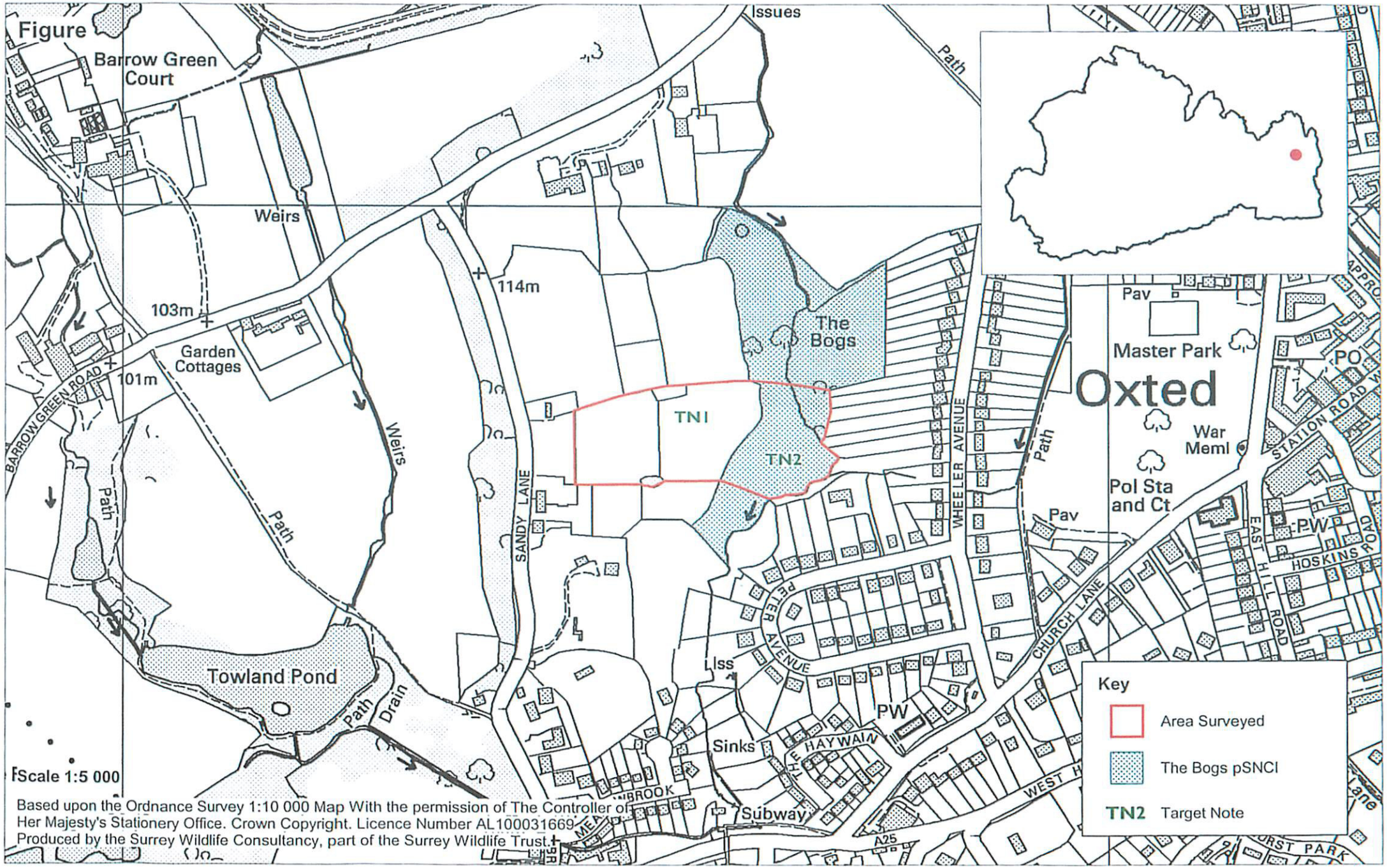
Shield bugs

? *Palomena prasina*	Green shield bug
? *Pentatoma rufipes*	Forest shield bug

Mammals

Caprelous capreolus	Roe Deer
Talpa europaea	Mole

Figure



Based upon the Ordnance Survey 1:10 000 Map With the permission of The Controller of Her Majesty's Stationery Office. Crown Copyright. Licence Number AL100031669. Produced by the Surrey Wildlife Consultancy, part of the Surrey Wildlife Trust.

From: Brian Thomas pj.thomas@tiscali.co uk
Sent: 17 May 2007 10:35
To: RSPB WETLAND OXTED
Subject: Re: The Bogs Oxted

I am sorry for not replying sooner, but I have been away in Extremadura Spain birdwatching of course!! I woke very early this morning and thought I would pay the site a visit, which I did between 6.00 am and 7.15. Not the best of weather overcast and intermittent drizzle but still a good amount to see and hear. I cut through the hole in the hedge at the end of your road and immediately turned west and walked down the edge of the wheat field. This is a good area with overgrown blackberry scrub and stinging nettle—perfect habitat for common whitethroat-sure enough I heard one singing briefly-don't know if it is nesting or just feeding here. I had a good walk all around and in the woodland and saw or heard the following additional species: goldcrest (several singing), treecreeper, blackcap, chiffchaff ,greenfinch, goldfinch, chaffinch (2 in song), robin, wren (several in song), dunnock, house sparrow, starling, great tit, coal tit, blue tit, long-tailed tit, blackbird, song thrush, mistle thrush, magpie, jay, carrion crow, jackdaw, wood pigeon, collared dove, and great spotted woodpecker. I can add from my first visit sparrowhawk, nuthatch, bullfinch, green woodpecker, and pheasant

This gives a species total so far of 32. I believe I heard a distant cuckoo as well. With better weather and a further visit this Spring I would expect to add some if not all of the following species : swift, swallow, house martin, rose-ringed parakeets yellowhammer, reed bunting ,linnet, lesser whitethroat ,willow warbler, tawny owl, little owl, marsh tit lesser-spotted woodpecker, and of course cuckoo

In the Winter I would definitely expect to pick up : fieldfare, redwing, redpoll, and siskin and possibly woodcock, snipe, and brambling., if lucky!

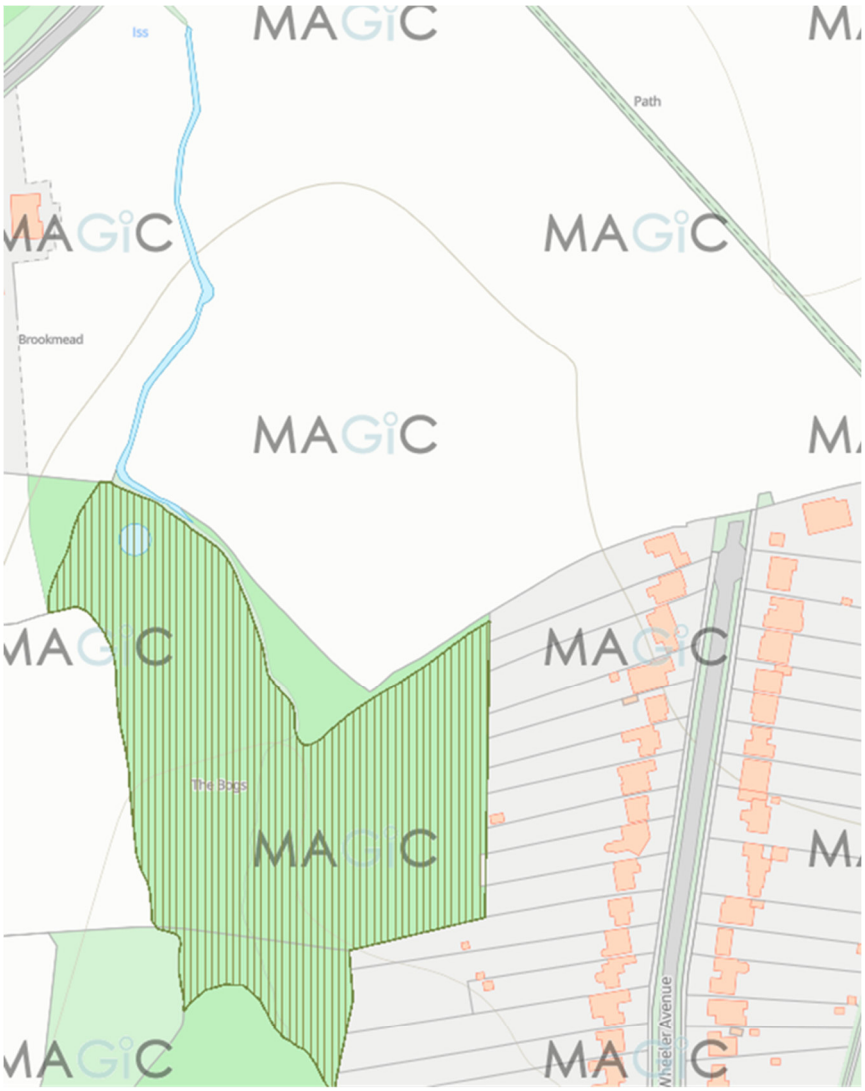
In summary I would hope to get a minimum total of 40 species this Spring and get up to at least 44 with the certain Winter visitors. I shalt keep you posted.

Despite the weather it was a real treat walking around the Bogs this morning-the ransoms looked beautiful, I'm not so keen on their smell however!!

Kind regards Brian Thomas.-----

Original Message —---

8 Appendix 3 Ancient and Semi-Natural Woodland and Priority Habitat Mapping



Woodland

Ancient Woodland (England)

Ancient and Semi-Natural Woodland

Ancient Replanted Woodland

Baseline habitats

- Other neutral grassland
- Cropland
- Bare ground
- Bramble scrub
- Mixed scrub
- Lowland mixed deciduous woodland
- Wet woodland
- Ancient woodland (Offsite)
- Rural Tree

Linear habitats

- Native hedgerow
- Line of Trees
- Other rivers and streams

Title: Baseline habitat map
Site: Stoneyfields, Oxted
Sureveyor: MP DH
Surevey date: 26/09/2024

The Ecology Partnership
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Thorncroft Drive
Leatherhead
KT22 8JB
t: 01372 364133
e: info@ecologypartnership.com
w: www.ecologypartnership.com

9 Appendix 4 National Forest Inventory Mapping

Figure 3 National Forest Inventory Mapping: Wet Woodland

A map showing the distibution of NFI sample squares where the priority habitat 'Wet Woodland' has been identified. A total of 352 hectads in England contain records of Wet Woodland.

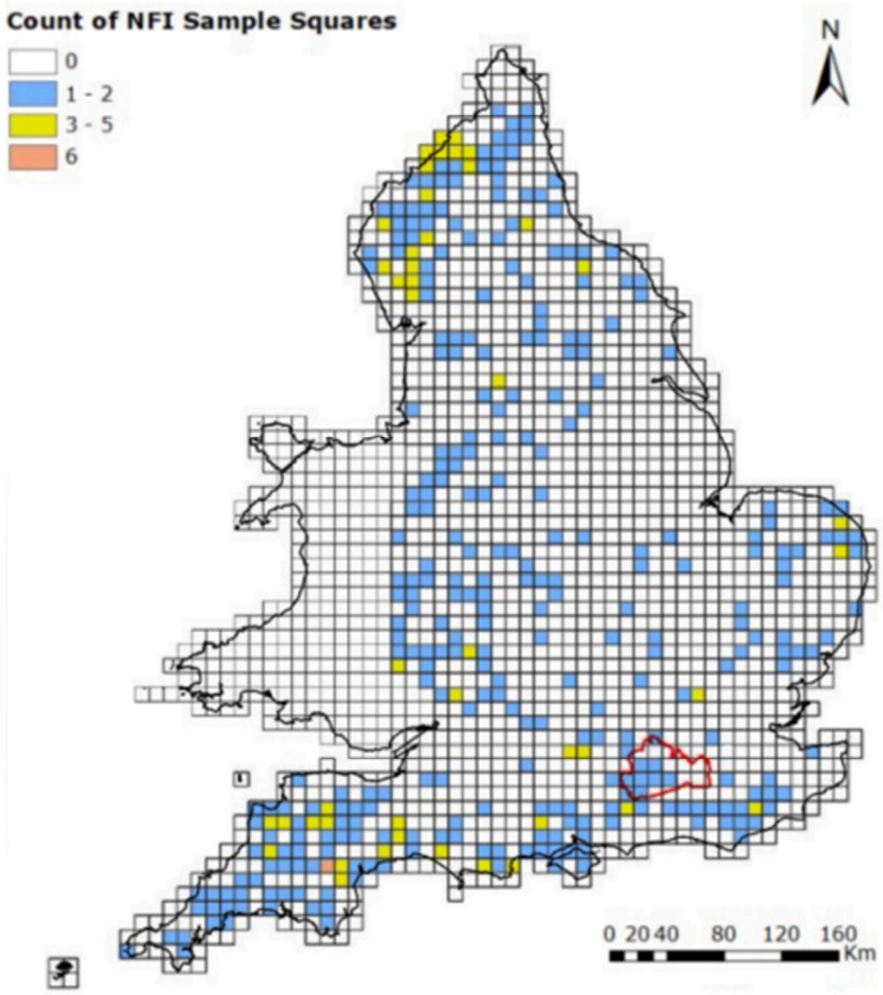
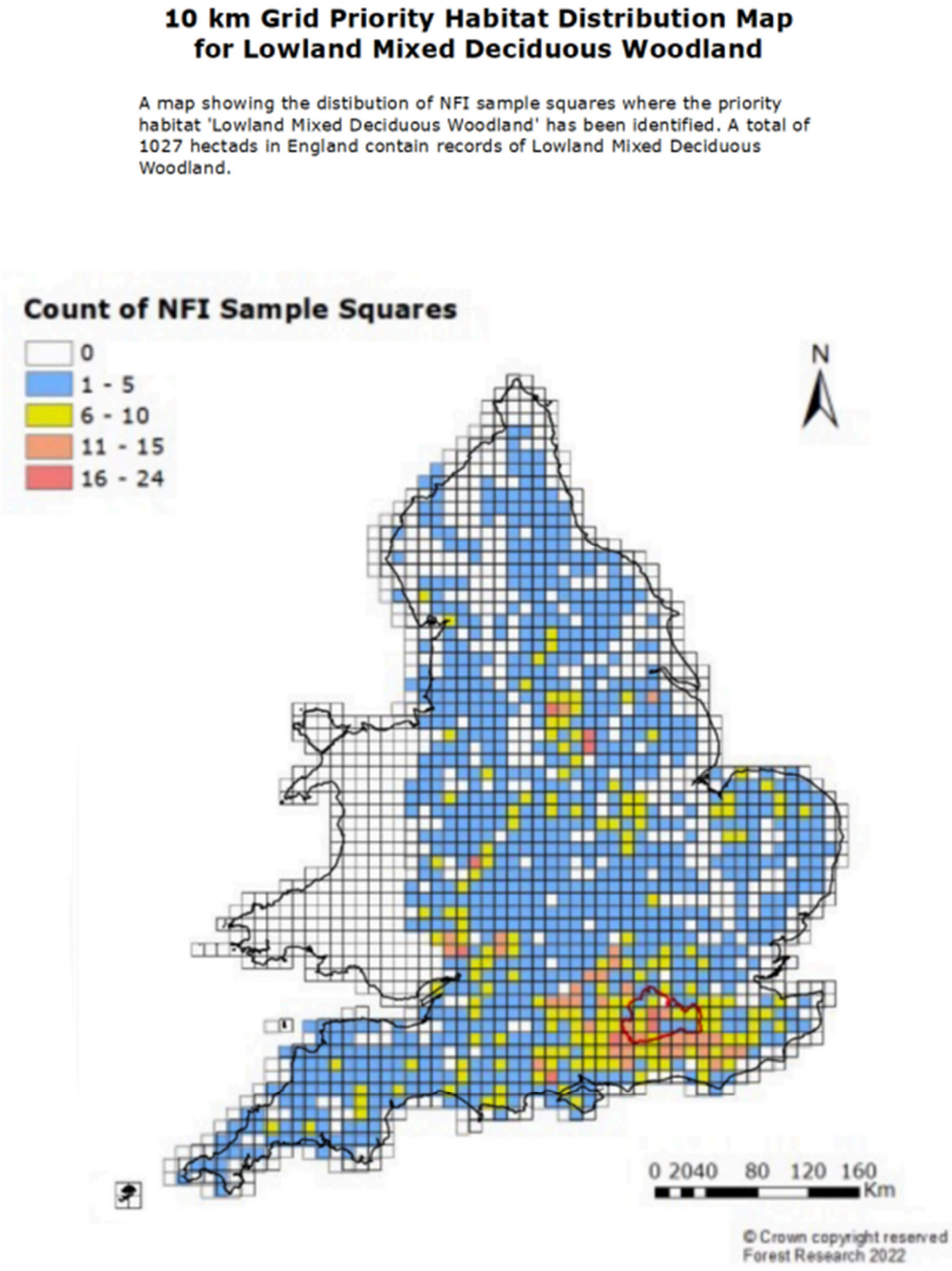


Figure 4 National Forest Inventory Mapping: Lowland Mixed Deciduous Woodland



10 Appendix 5: Email correspondence with Surrey County Council

From: Robert Hutchinson <Robert.Hutchinson@surreywt.org.uk>
Sent: 12 December 2025 12:31
To: Laura Moyano <Laura.Moyano@surreycc.gov.uk>
Cc: Cliff Thurlow <cthurlow@tandridge.gov.uk>
Subject: 2025/245 - Tandridge

Caution: This email originated from outside Surrey County Council.
Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Laura

I hope you are well?

The application 2025/245 is subject to a planning appeal.

One of the reasons for refusal is linked to hydrology and wet woodland habitat. In consultation provided by Surrey County Council, no objection, subject to conditions, has been submitted on matters of surface water flood risk and surface water drainage. However, my understanding is that matters of flood risk and drainage are not assessed in terms of potential ecological impact or hydrological impact upon habitats or species.

I would be grateful if you could confirm whether this is a correct conclusion?

Best regards

Rob

Rob Hutchinson BSc (Hons) MSc CEcol MCIEEM
Manager - Ecology Planning Advice Services Surrey Wildlife Trust
e: robert.hutchinson@surreywt.org.uk · w: surreywildlifetrust.org
a: Surrey Wildlife Trust · School Lane · Pirbright · Surrey · GU24 0JN
Building with Nature: Approved Assessor – National www.buildingwithnature.org.uk

LM Laura Moyano <Laura.Moyano@surreycc.gov.uk>
To: Robert Hutchinson
Cc: Cliff Thurlow <cthurlow@tandridge.gov.uk>

Reply Reply all Forward
Mon 2025-12-15 10:57

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Dear Robert and Cliff,
Thank you for your email.
The LLFA's statutory role is to provide expert advice on surface water drainage and Sustainable Drainage Systems (SuDS) for major development proposals. This relates solely to surface water flood risk and does not include fluvial flood risk or groundwater.
Your conclusion is correct, the LLFA was satisfied with the proposal, subject to our pre-commencement condition. Our remit is limited to assessing surface water flood risk and surface water drainage, including SuDS. Matters concerning potential ecological or hydrological impacts on habitats or species fall outside our expertise and statutory remit. While the proposed scheme appears acceptable in terms of surface water management, subject to detailed design information, there may be other matters that are not. Any concerns regarding biodiversity impacts shall the addressed and drainage strategy amended to satisfy all the parties, if applicable, as there is not a single sustainable drainage solution, but we cannot comment beyond our statutory role/expertise. I hope this clarifies your query. Should you require further assistance, please do not hesitate to contact me.

Laura Moyano
Flood and Climate Resilience Specialist
Environment & Planning
Place Directorate
SuDS

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