



Ecology Technical Report

Land South of Barrow Green Road, Oxted, Surrey

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LIABILITIES:

Whilst every effort has been made to guarantee the accuracy of this report, it should be noted that living animals and plants are capable of migration/establishing and whilst such species may not have been located during the survey duration, their presence may be found on a site at a later date.

This report provides a snap shot of the species that were present at the time of the survey only and does not consider seasonal variation. Furthermore, where access is limited or the site supports habitats which are densely vegetated only dominant species maybe recorded.

The recommendations contained within this document are based on a reasonable timeframe between the completion of the survey and the commencement of any works. If there is any delay between the commencement of works that may conflict with timeframes laid out within this document or have the potential to allow the ingress of protected species, a suitably qualified ecologist should be consulted.

It is the duty of care of the landowner/developer to act responsibly and comply with current environmental legislation if protected species are suspected or found prior to or during works.

1.0 Introduction

Background

1.1 The Ecology Partnership was commissioned by Croudace Homes to undertake a series of ecology surveys and assessments of land south of Barrow Green Road, Oxted, Surrey, known as Stoneyfields. This was to inform an outline planning application for the site. This has since been refused, with two of the main reasons for refusal relating to ecology, following Surrey Wildlife Trusts (SWT) review of the ecology assessments. In this document we will provide further explanation to address the reasons for refusal and support an appeal for the application.

Site Context and Status

1.2 The site comprises an arable field with small areas of woodland at the northern and southern edges. The site is approximately 9.7ha and located on the north-western edge of Oxted, bound by Barrow Green Road and a railway corridor to the north, a cemetery to the east, residential housing and gardens to the south, ancient woodland to the south-west and a small ephemeral stream to the west (TQ 387 531). The wider surrounding area comprises residential areas to the north, east and south, with extensive woodland and private green space to the west.

1.3 The extent of the site is shown in Figure 1 below in wider context and in Figure 2, a closer view of the site boundary and survey area.

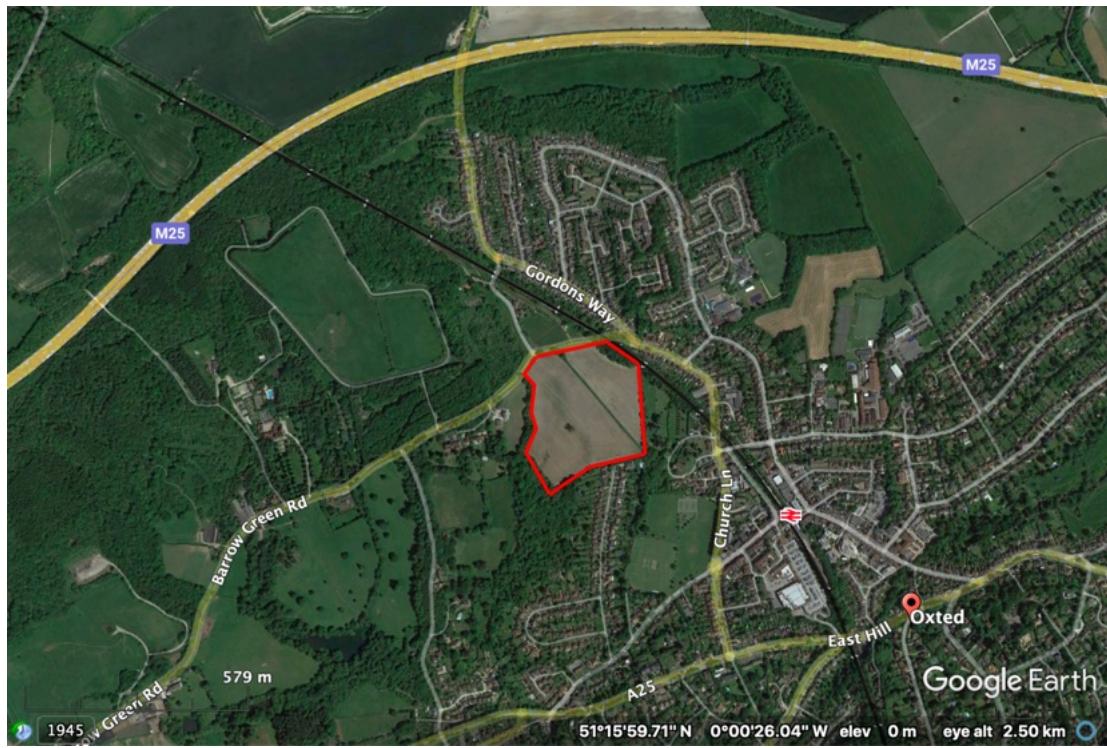


Figure 1: Approximate location of the red line boundary showing the wider landscape
Satellite imagery obtained from Google Earth Pro on 24/03/2022

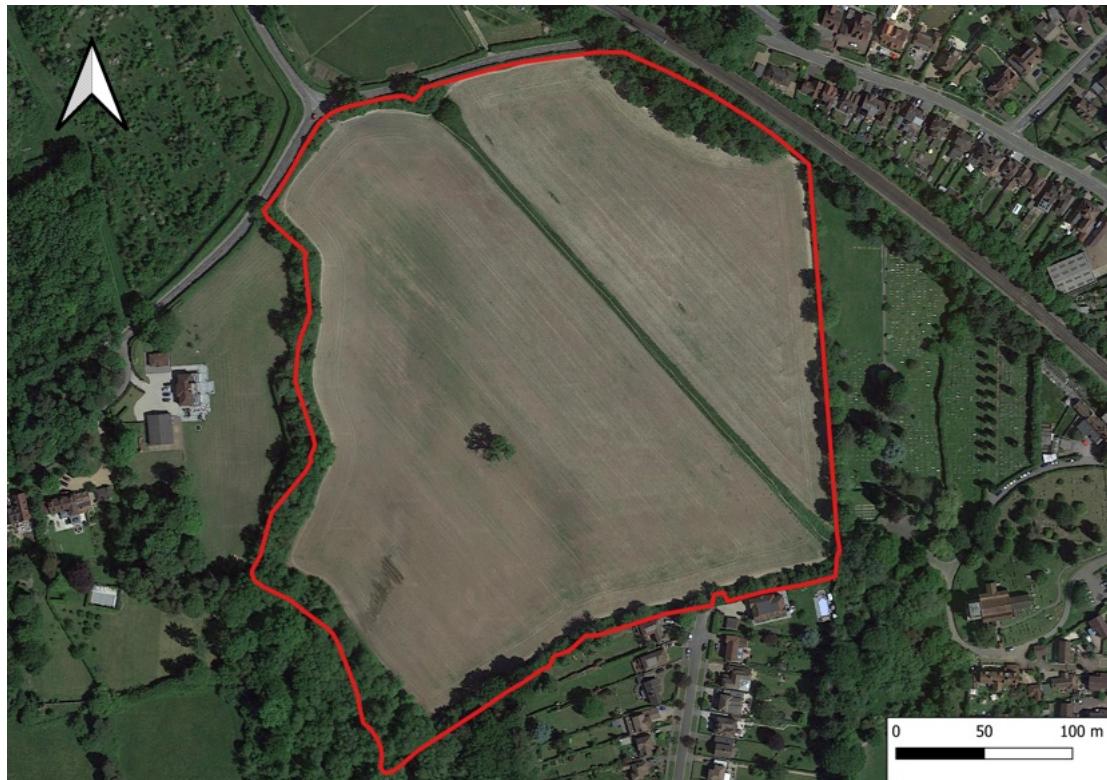


Figure 2: Approximate location of the red line boundary
Satellite imagery obtained from Google Earth Pro on 24/03/2022

Description of the Proposed Development

1.4 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.

Planning Policies

1.5 The outline application was assessed against policy guidance provided by the National Planning Policy Framework, as well as relevant planning policies from the Tandridge Local Plan 2014-2029. A single policy was considered relevant to ecology, biodiversity and nature conservation:

- DP19: Biodiversity, Geological Conservation & Green Infrastructure

2.0 Reasons for Refusal

2.1 Following the Application, Surrey Wildlife Trust, reviewed the information provided in the ecology reports to date and recommended that the application be refused on ecology grounds. The full related reasons for refusal are presented below:

"4) 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."

5) 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.

3.0 Response

Ancient woodland

3.1 Surrey Wildlife Trust (SWT) have asserted that the wet woodland that falls within the site is ancient semi-natural woodland (ASNW) despite it not being on the ancient woodland inventory. This is owing to a map from 1809 showing woodland in this area of the site and the presence of pendulous sedge which is an ancient woodland indicator. SWT state;

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.

3.2 Pendulous sedge is an ancient woodland indicator, however, it can also be a garden escapee (as is often planted in gardens) and therefore its presence should not determine alone the extent of potential ancient woodland habitats. Other species such as bamboo and cherry laurel are present in the woodland, and therefore likely to have been escapees from local gardens, as such, escapees have colonised the woodland habitat. Furthermore, as there is adjacent ancient woodland, the colonisation by pendulous sedge into the woodland on site, which is not ancient, would naturally occur.

3.3 Detailed maps from 1868, 1895 (Figure 3 below), and 1910, all show no woodland within the southern corner of the site, to the east of the stream. Therefore, it is unlikely the woodland has been present continuously for 500 years, and there is no clear evidence of this.

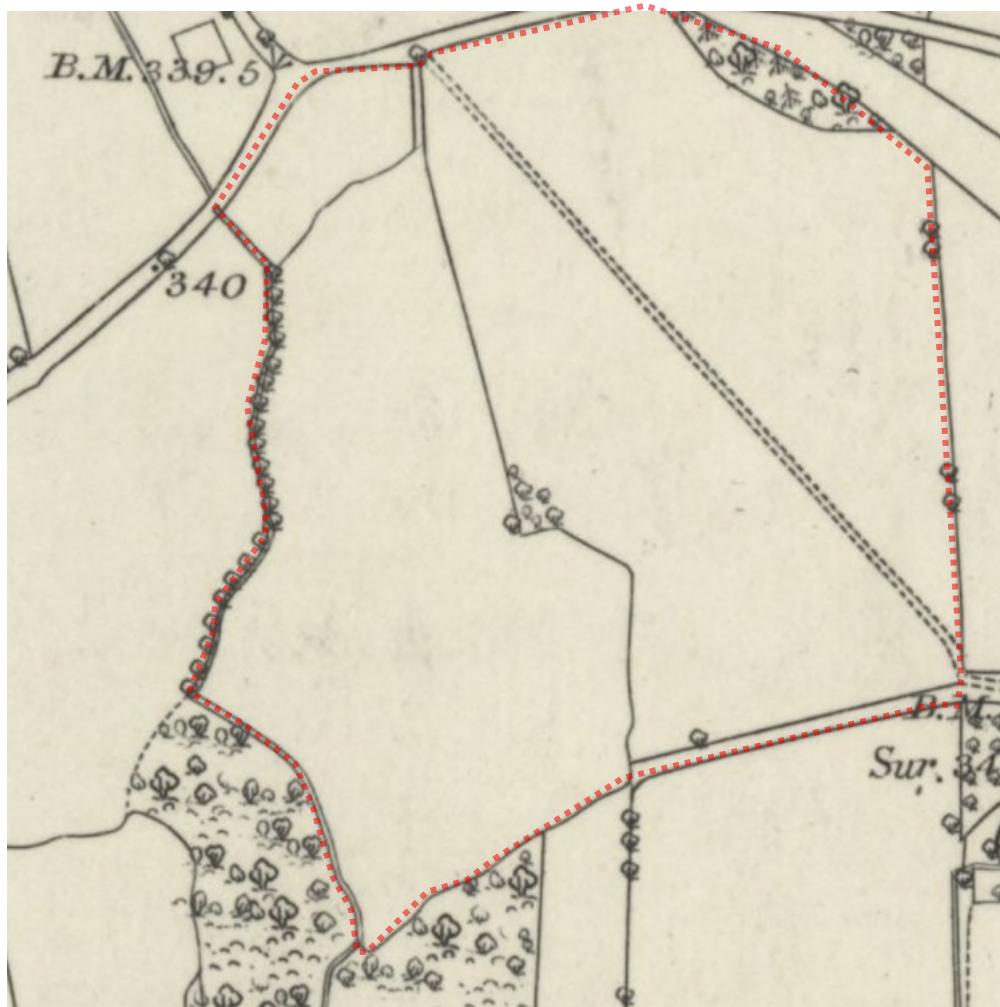
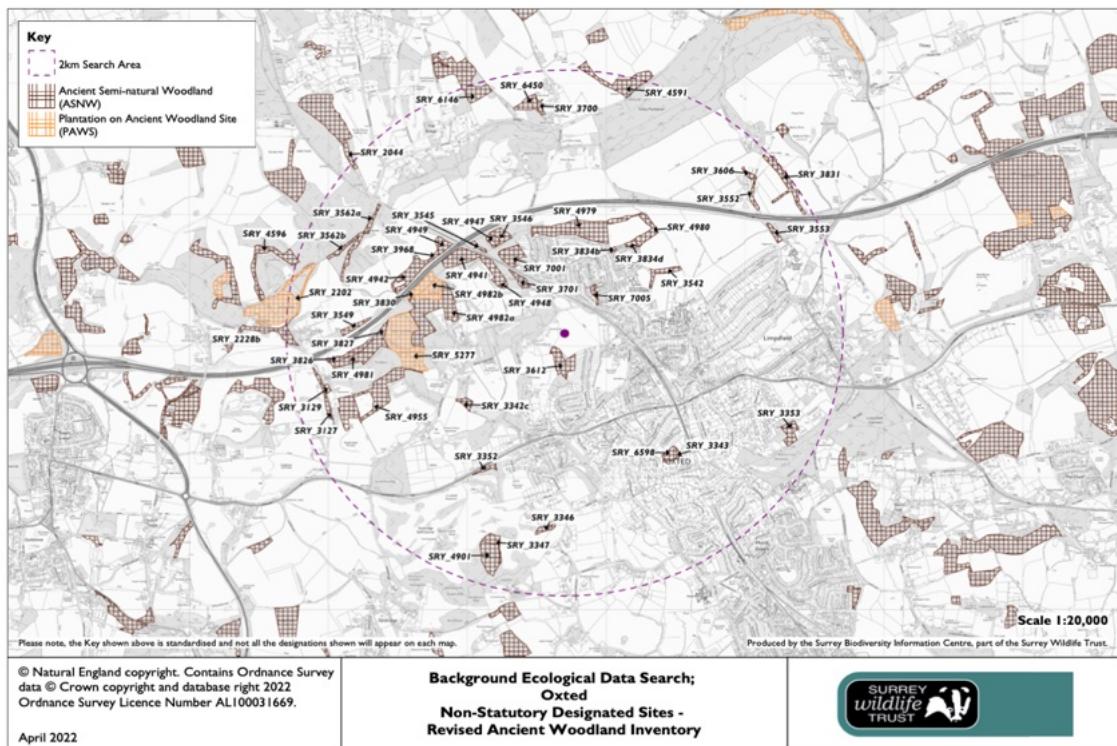
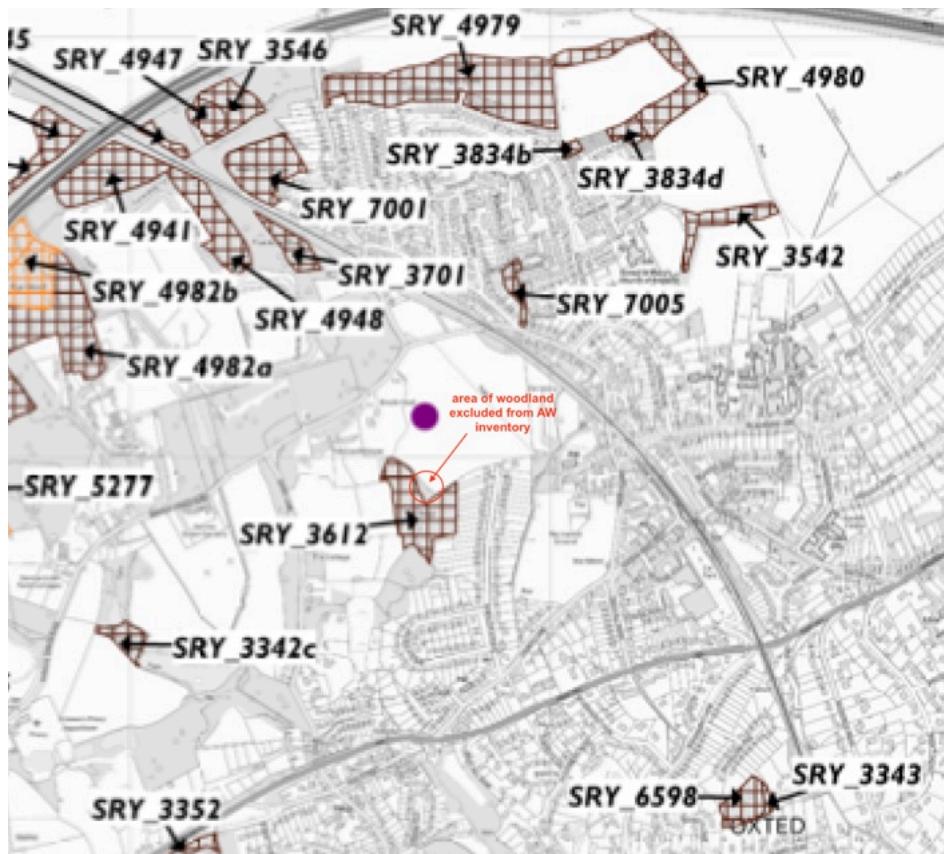


Figure 3: Image of Map: Surrey Sheet XXVII surveyed between 1868 and 1869 with site boundary overlaid. Map purchased from National Library of Scotland

3.4 The ancient woodland identified on site was identified using the ancient woodland inventory – as stated in the consultation response. However, in addition to this, biological records sought from SWT confirms the extent of ancient woodland located on the site in their own inventory, as shown in the screen shot of the issued records below in Figures 4 and 5.



*Figure 4: Revised Ancient Woodland Inventory produced by Surrey Wildlife Trust
(purchased through their biological records centre)*



*Figure 5: Revised Ancient Woodland Inventory produced by Surrey Wildlife Trust
(purchased through their biological records centre)*

3.5 These records, produced by SWT show the area of ancient woodland to the south of the site being identified, with no additional woodland on the edges of the site as being identified as ancient.

3.6 This is also more clearly shown on Magic maps (see below Figure 6).

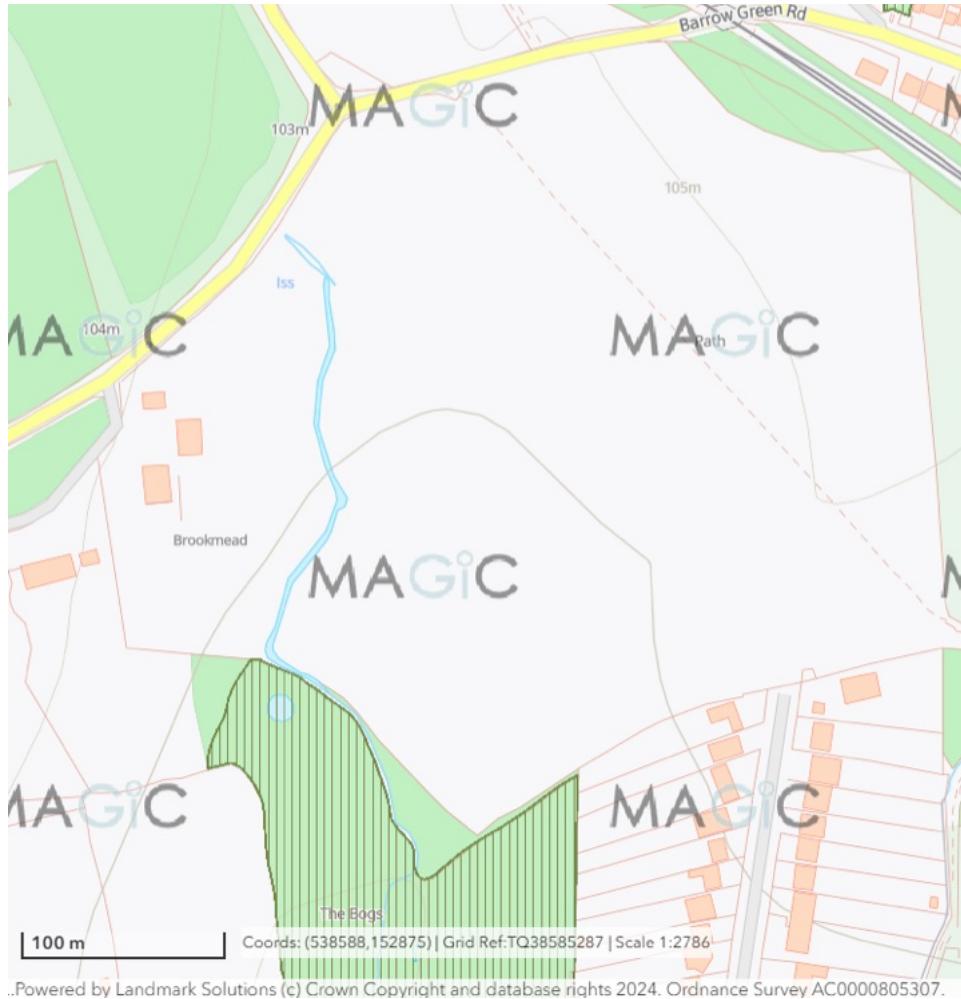


Figure 6: Ancient woodland in hatching shown on Magic Maps

3.7 Considering the old mapping data, the ancient woodland inventory data and SWT own data of ancient woodland, it is considered that an assessment of the ancient woodland has been robust.

3.8 Regardless, this woodland is retained as part of the proposals and buffered from any development. No loss of woodland will occur as a result of the development. Enhancements to some sections of woodland are proposed, and new planting, notably scrub and species rich grassland, will provide valuable habitat around the woodland which is otherwise not present. Fencing and thorny scrub planting will further protect the woodland from recreational pressure.

3.9 The National Planning Policy Framework (NPPF) (2024) is the key government policy document relating to planning decisions affecting ancient woodland. The importance of ancient woodlands as an irreplaceable habitat is set out in paragraph 193 c) of the NPPF, which states: '*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*'.

3.10 On 26 January 2024, the Government introduced a new duty requiring local planning authorities to consult the Secretary of State regarding developments that impact ancient woodland.

3.11 This Direction is made under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No 595). It requires local planning authorities in England to consult the Secretary of State before granting planning permission for certain types of development including planning applications which would "*result in the loss or deterioration of ancient woodland, where the local planning authority considers that potential adverse impacts cannot be mitigated*". This means that from 26 January 2024, no English planning application for development which adversely impacts ancient woodland can be granted without first being referred to the SOS..

3.12 The proposals for the site will not result in any ancient woodland loss. The proposals will not result in the isolation of ancient woodland to additional areas of ancient woodland or semi natural habitat associated with ancient woodland edge. The ancient woodland lies outside the application boundary, is buffered by wet woodland (see below) and a proposed landscape buffer. The landscape buffer removed the agricultural / arable edge and provides new natural planting, creating an ecotone between the woodland on site (not ancient) and the development.

3.13 Indirect impacts, such as increase in recreational use should not occur as the woodland is off site and in private ownership. A recommended fence line will be established along the southern edge of the red line boundary (as described in the ES chapter) and further planting along the edges of the wet woodland (The Bogs within the site) would deter access.

3.14 The ancient woodland is located off site, and therefore the development provides a 15m buffer zone, adhering to Natural England's current guidance. Indeed, it can be seen in Figure 7, that there is a minimum of 15m set back for both The Bogs and ancient woodland boundary.



Figure 7: Ancient woodland 15m buffer zone; The Bogs 15m buffer zone

3.15 The buffer is 15m for both woodlands along the northeastern edge. However, along this edge, additional habitat in the form of a narrow band of woodland is present, providing an established buffer between the development and The Bogs pSNCI and the ancient woodland. Along the remaining edge of the woodland, the buffer is significantly greater, with the SuDs basins, walking route and new planting, proposed between the development and the off site ancient woodland.

3.16 Considering the extent of the buffer zone of the ancient woodland, no impacts from damage to ancient woodland soils, ground flora, tree roots, woodland connections or the loss of semi natural habitats are predicted.

3.17 Other indirect impacts, including changes to light pollution can alter the use of the woodland. A sensitive lighting scheme has been recommended and this can be a

condition of planning. Furthermore, a CEMP will be produced during construction to ensure that the woodland is protected during the construction process.

- 3.18 It is considered that there is no loss of ancient woodland habitat directly, there is no loss of associated semi natural habitats (as the edge habitats are currently arable), there is not loss in terms of fragmentation or isolation of the ancient woodland. Indirect impacts, largely resulting from an increase in the local population, will be managed through fencing, planting and creating attractive walking routes outside the ancient woodland and The Bogs.
- 3.19 It is considered that with the appropriate planting, sensitive lighting and a CEMP for construction, no impact on the integrity of the ancient woodland, is predicted.

The Bogs pSNCI Priority wet woodland

- 3.20 Wet woodlands are water logged for some part of the year. Wet woodland is classified by the tree and understory species. The wet woodland on site is considered to fall within the NVC community W6 *Alnus glutinosa* – *Urtica dioica* woodland. These are defined (NE 2023) 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.
- 3.21 From the data search, the boundary of the bogs was in a small scale on the map and was assumed in error to cover the Ancient Woodland boundary only. The Bogs pSNCI extends into the site boundary and covers the areas of wet woodland on site.

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 Bog's is located within the application site'.

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.

- 3.22 The wet woodland is priority habitat. The wet woodland was mapped as priority woodland within the red line boundary. As such, whilst this section of The Bogs was

not initially identified as being part of the pSNCI, it was still identified as being of high ecological value, i.e priority habitat, within all of the ecological assessments.

3.23 Considering the above, the scheme has been designed to protect the wet woodland which is located in and forms part of The Bog pSNCI. Whilst a small extent of The Bog pSNCI is confirmed to be present within the red line boundary, the majority of the 3.4ha of pSNCI lies outside the redline, with approximately 10% of the pSNCI located within the red line (accounting for 0.21 ha of wet woodland and approximately 0.13ha of lowland mixed deciduous woodland within the pSNCI which does not account for all southern sections of the woodland noting the red line of the pSNCI has not been georeferenced due to the lack of official red line).

3.24 The presence of this habitat on site, rather than immediately adjacent to the site, does not alter the mitigation measures proposed or the design of the development itself. All impacts on priority habitat or protected sites, and in this case a 'potential' protected site, have to be assessed as part of the impact assessment, alone and in combination with other developments within the zone of influence of the development site. As such, any pSNCI adjacent to the site would be well within the zone of influence and assessed as such (as in the submitted assessment). Indeed, the pSNCI is covered by priority habitat which was assessed as being present on site and adjacent to the site and therefore considered as a whole.

3.25 From discussions with Motion, it was made clear that there would be no significant change in flows of water into 'The Bogs' as during the higher frequency storm events, flows towards The Bogs are predominantly via the ordinary watercourse that is fed by flows from the Southern Water sewer and wider catchment. The overland flow path predicted to form through the site during the higher magnitude, more extreme storm events, will be managed by the development proposals to incorporate ground level reprofiling along the west of the site. Furthermore, we were informed by Motion that the flow of water from the spring will also not be obstructed by the development. It is understood that the SUDS can be carefully designed to achieve the desired outflow needed for the woodland.

3.26 Surrey County Council Flood Risk, Planning and Consenting Team have stated in ref LLFA-TA-25-0769RevA date 04/08/2025 that;

"We are satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed, subject to our advice below."

3.27 The reason for refusal has since been reviewed by Motion (1st October 2025). Motion have reviewed the reason for refusal and have addressed this in four points. These are discussed below.

3.28 Firstly, surface water runoff to ensure the wet woodland habitat (on and off site) would need to be assessed. The water runoff from the impermeable areas of the post development site should be with flows limited to the greenfield Q1, Q30 and Q100 rates for corresponding storm event. This has been modelled and fully assessed and quantified

3.29 Updated hydraulic modelling for the development proposals to incorporate ground level reprofiling along the west of the site to divert a surface water overland flow path assume the discharge rates are the same for pre and post development, and have been run for 1, 2, 5, 10, 30 and 100 and 100 years plus 45% allowance for climate change, including the ground level changes associated with the post development. The surface water runoff maintaining existing conditions have been factored in to the surface water drainage strategy. As such, it is considered that the development would have a negligible impact on flood depths and flows within The Bogs.

3.30 Furthermore, ground water monitoring identified the spring and the wet area around the stream. This area has been buffered from any development. Trial pits identified that ground water levels were below ground when moving away from the saturated ground (around the spring) and identified that the depth of the potential SuDS basin in this area would be in low permeability ground which translates as to low groundwater mobility. The use of a lined basin in these areas would not affect ground water levels or supply.

3.31 The SuDS basins are provided and calculated to attenuate the increase in surface water run off from the development area – i.e the areas of hardstanding (houses and buildings etc) during extreme events. These SuDS therefore do not alter normal surface water drainage, stream or ground water sources.

3.32 The stream to the west of the site is an ordinary watercourse which receives flows from a Southern Water surface water sewer network draining a residential area to the north of the railway line. The development will not impact upon the catchment area north of the railway line, or indeed the wider catchment area. This catchment area will not be impacted by the development and the ordinary water course will not be impacted by the development proposals.

3.33 Hydraulic modelling of the pre-development scenario shows flows within the ordinary watercourse and The Bogs are primarily received from the Southern Water sewer network during high frequency, low magnitude rainfall events. The modelling identified that flows also reach The Bogs via an overland flow path running through the site during higher magnitude storm events greater than and including the 1 in 30-year storm.

3.34 In the post development scenario, during storm events larger than and including the 1 in 30 year event, overland flows are modelled to be diverted around the western area of the site due to the proposed onsite mitigation measures, away from the residential development. The reprofiling is designed to divert these flows to The Bogs, minimising the impact on the existing hydrology

3.35 The hydraulic modelling shows no predicted change in the water peak flows to the ordinary water course from the Southern Water sewer outfall post development scenario during all modelled rainfall events.

3.36 At the Bogs there is no change in the peak flow predicted in the post-development scenario during four of the modelled storm events. During the post-development scenario there is a negligible change in the peak flow at The Bogs of +0.02m³/s in the 1 in 5 year and 1 in 10 year storm events, and -0.01m³/s in the 1 in 100-year storm event. These small changes in flow are not considered significant as there is negligible change in the flows being received by the ordinary watercourse, and the small changes at The Bogs are negligible especially when considered across an area of 3.4ha.

3.37 The objections with regards to the changes in water levels and rates are therefore considered unfounded. The SuDS has been designed to prevent excess run off from the new areas of hardstanding within the development, ensuring that green field run off rates are achieved. The Spring is buffered and the areas associated with the spring

are also retained, ensuring that any development, including SuDS will not impact upon the ground water mobility rates. Finally, the stream to the west of the site, is also buffered from the development and the peak flow rates have been modelled pre and post development. The development will not impact the stream of the drainage which feeds into the stream to the west, with the stream having a much wider catchment than the site itself.

3.38 Wet woodlands are changeable in terms of the water present, dictated to by climate conditions as well as other potential impacts in the catchment. On 30th March 2022, during the PEA, areas of the wet woodland were wet, and the stream supported some water, albeit the flow was limited. On the 26th September 2024 during the river corridor condition assessment the stream site was fast flowing, and new water channels were forming through the woodland. The latest survey 23rd September 2025, identified that both the stream on the western side of the site and the spring at the centre of the site, as dry. The woodland itself did not support standing water, but the soil was damp underfoot. As such, wet woodland can be reasonably dynamic, with channels being formed under peak flows / storm events and being dry during dry summer conditions.

3.39 With regards to The Bogs habitat value, the dominance of common nettle suggests that the site is currently nutrient enriched. Nutrient pollution from enrichment / fertilization, which can run off and change the natural community of plants. In this woodland, common nettle and bramble are abundant, suggesting that there is some nutrient enrichment flowing from the arable field into the woodland itself. Whilst there are some indicator species present – wild angelica is a notable species – the dominance of common nettle is clear.

3.40 Invasive species within the woodland, such as cherry laurel and bamboo, will change the soil chemistry and the resilience of the ecosystem.

3.41 Cherry laurel has large rooting systems which can drain moisture from the soil and disrupt natural processes. Furthermore, the leaves / plant cast shadow, preventing species from growing beneath. The rotting leaves also have cyanide within, changing the soil chemistry. Bamboo presence also causes impacts due to the rhizome networks and high levels of leaf litter, out competing native and wet woodland specialist plants. These species can alter the water availability and soil chemistry and the removal and

management of these would aid the wet woodland in terms of its resilience. As such, as part of the long term management of the site, management of the wet woodland would include;

- Removal of non-native and invasive species.
- Creation of opportunities, such as gaps or bare ground, to allow natural regeneration to take place.
- Implement management, such as coppicing or layering, to encourage the development of a shrub layer/secondary canopy.

3.42 With regards to The Bogs habitat and protected species value, surveys of bats, dormice and reptiles, alongside the PEA were conducted to assess the value of the site for these species. Recommendations for The Bogs pSNCI / ancient woodland / wet woodland were provided after the surveys were completed. This included provision of a dark corridor and the implementation of a buffer zone (min 15m) between the woodland and any development.

3.43 The fence line mentioned will be located between the woodland edge and the site and therefore prevent recreational access into any of the wet woodland, including areas not listed as ancient on the ancient woodland inventory.

Protected species- Breeding birds and invertebrates

3.44 Surrey Wildlife Trust (SWT) have asserted that the development does not demonstrate that it will have no significant impact on priority bird species such as skylark within the arable fields and willow tit within the wet woodland.

3.45 Breeding bird surveys were not conducted across the field as the site was considered largely unsuitable for arable bird species, such as skylark, due to the management of the field itself, and the high levels of use through the site and around the edges of the site by local residents. Indeed, the local residents have made an application for a claimed public footpath around the perimeter of 'Stoney Field' to be added to the Definitive Map & Statement (Ref CP612)

3.46 Indeed, responses from the local residents confirm the use of the site for recreation, for example taken from web comment 7066425 -06/08/2025 which states;
'the proposal would result in the loss of a well used and much valued open and recreational space. The field is used by recreational walkers, hikers, horse riders, children playing, dog

walkers and those just looking for a tranquil beautiful place to relax or recover. As well as the bridleway, there are informal footpaths around the edge of the field. Three of these paths are currently the subject to a rights of way application submitted to Surrey County Council in December 2022 with usage evidence forms from more than 100 residents."

3.47 Additional responses from local residents, include web comment 7066431, 7066433 ('well trodden path'), 7066441, 7066448, 7066450, 7066451, 7066459, as well as comments from individuals including comments;

- *'it is used constantly by local people to walk on, to exercise their dogs, to horse ride, to be in nature and amongst the wildlife. I walk our dogs there every day - I regularly see deer and red kites and numerous other birds and a multitude of diverse plants including grasses and local ancient herbs. I am rarely alone in the field as it is used by some many of us.'* (Kate Grimes)
- *'I firmly believe Stoney Field should be retained in its current form; a well-loved and much-used green space for the local community to enjoy with beautiful views of the Surrey Hills National Landscape year round.'* (Mark Adcock)
- *"It is used so frequently by so many locals, you are almost never alone in the field, as people are walking alone or with dogs"* (David Stevenson),
- *"- it is used constantly by local people to walk on, to exercise their dogs, to horse ride, to be in nature and amongst the wildlife. I walk our dogs there every day - I regularly see deer and red kites and numerous other birds and a multitude of diverse plants including grasses and local ancient herbs. I am rarely alone in the field as it is used by some many of us."* (Kate Grimes)
- *"the field is used constantly by local people to walk on, to exercise their dogs, to horse ride, to be in nature amongst local wildlife • I walk my dogs there every day"* (Angela Stevenson)

3.48 From Oxted and Limpsfield Residents Group;

"24. Paths around and across the field have been used for many years by residents and visitors walking locally or to access the National Landscape. Three of the paths around the field are currently the subject of a rights of way application submitted to Surrey County Council for consideration in December 2022 with usage evidence forms from more than 100 residents."

3.49 From the responses, it can be seen that the site is well used (over 100 residents identify the site's use). From our own observations during surveys on site, there was always dogwalkers and other users walking both the PROW and the informal footpath around the edge. The field is therefore not considered likely to support ground nesting birds due to disturbance from dogs and dog walkers and other recreation. The field is

considered to be on the edge of the urban environment, and therefore influenced by this. The PEA highlights the extent of the paths in the photographs.

3.50 It must be noted that the SWT records did not identify the presence of skylarks within the data set purchased for this site.

3.51 In addition, the Oxted and Limpsfield Residents Group provide a photo from June 2025 shown below. This photo shows the barley crop during the peak summer months. The nature of crop fields such as shown below, managed intensively, reduce potential for skylark to persist. Indeed, such a field does not provide the short vegetation for ground nesting, and where short vegetation is present, that being around the edges of the site, these areas are well used by local residents and dog walkers.

21. Loss of agricultural land: Paragraph 187(b) of the NPPF requires a recognition of the economic and other benefits of the best and most versatile agricultural land (BMV). This large field has been in agricultural arable use for centuries and the whole of it is Grade 3a BMV, as shown in the applicant's Agricultural Land Classification and Considerations document which was submitted in July 2025 in response to a specific request by the council. This is in contrast to the Planning and Affordable Housing Statement which accompanied the original application which stated: *"The loss of agricultural land also attracts only limited weight, given the Site is moderate/poor quality agricultural land is not classified as 'best and most versatile agricultural land."* The field is high quality where crops such as wheat do well as evidenced by this year's flourishing barley crop seen here in June 2025 against the backdrop of the National Landscape.



22. Loss of a well used and much valued open and recreational space: The

3.52 The original PEA site visit was conducted in May 2022 which shows the crop as already established, at a height that would not be suitable for skylark. As such, the window in which skylark would be able to nest on site would be quite short. In our experience, typically skylark are found in significant numbers in more rural locations away from settlement and recreational areas, and where farm crop management facilitates the suitable conditions for them (for example skylark plots). As such it is unlikely that a significant ground nesting bird population is on site.

3.53 Whilst the surrounding hedgerows and woodland may be important for breeding birds, these will all be protected from the development, and no gardens will be positioned in close proximity to these features. Furthermore, the use of fences and thorny shrub and hedgerow planting, will further deter cats and dogs from entering these areas.

Invertebrates

3.54 Surrey Wildlife Trust (SWT) have asserted that the development does not demonstrate that it will have no significant impact on potentially important invertebrate assemblages within the wet woodland, or other woody habitats on site.

3.55 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 once this area is fenced off from the public.

3.56 The entire habitat of The Bogs pSNCI and the woodland habitat on the southern aspect of the site is to be retained in entirety. Dark corridors, buffer zone and habitat creation of additional grassland habitats, have been provided. Indeed, an ecotone between The Bogs pSNCI and the areas of lowland deciduous woodland, will be created. Areas of scrub, wet grassland and species rich grassland, are to be created on the southern aspect and the western aspect (along the unnamed stream). These habitats are not currently present along this southern edge, with the existing arable field abutting the woodland with minimal margins, certainly with limited naturalise edge habitats. The arable field does not support valuable habitats for invertebrates.

3.57 The creation of an ecotone of high value habitat would be considered a benefit to species such as invertebrates and bats, providing higher value habitats (see the BNG report) than currently existing.

3.58 Similarly T 16 will also be fenced off and has been left with a 20m buffer to ensure no long term harm to this tree and will be protected from excessive artificial lighting through a sensitive lighting strategy.

4.0 Conclusions

4.1 The site was made up of a large arable field bounded by belts of scrub, a hedgerow, a parcel of woodland to the north, and the edge of a large wet woodland to the south of the site. The ecological value of the site is well understood, and the ecological surveys are robust.

4.2 A detailed review of the drainage reports show that The Bogs will retain existing ground water and above water, through both the ordinary water course and over land flows, post development. The Bogs therefore will remain as wet woodland.

4.3 The Bogs can be enhanced to ensure its resilience to climate change, through the removal of invasive species which alter the soil chemistry and water availability. The SuDs will ensure there are no pollution pressures resulting from the development.

4.4 It is considered that the design of the development is such that a net gain can be achieved on the habitat units, hedgerow units and watercourse units. Other ecological enhancement will provide new opportunities for wildlife within the development zone.

Appendix 1: Photos

<p>Photograph 1: Small ephemeral stream adjacent to the western site boundary. (May 2022)</p>	
<p>Photograph 2: Wet woodland in the south of the site. (May 2022)</p>	
<p>Photograph 3: 23rd September 2025</p>	

Appendix 2: Habitat Map



The Ecology Partnership Ltd
Thorncroft Manor
Thorncroft Drive
Leatherhead
KT22 8JB

Tel: 01372 364 133

www.ecologypartnership.com

Approved: Alexia Tamblyn MA (Oxon) MSc CEcol CEnv MCIEEM FRGS

Date: 13/10/2025