



Validity of Bat Surveys
152 High Street, Old Woking GU22 9JH

Ref: WEc_GU22

November 2023

Dear Ms. Reynolds

We write in response to the comments received from the Surrey Wildlife Trust, relating to a Preliminary Ecological Assessment at the above site,¹ completed in 2023. The comments state:

It is noted that the application site is laid to low level scrub/brambles/ivy, with no existing significant vegetation apparent, and sited adjacent to maintained private garden areas within the built-up urban area; therefore, the biodiversity implications of the proposal would be minimal. However, the tree mentioned above which is the subject of a s211 notification from 2022 along with an additional Ash Tree towards the south of the site are proposed to be removed as part of this application. It is apparent that these trees remain in place and demonstrate the capacity for potential bat roost features and, therefore, may have bat roosting suitability. Whilst the submitted Ecological Appraisal Report carried out by Wychwood Environmental Ltd dated January 2023 details the results of bat roost potential evaluation on sycamore trees on-site, it does not appear that the ash trees to be affected as a result of the development have been assessed for their suitability to support roosting bats. The proposed development, therefore, would result in works to trees which could result in loss or disturbance to active bat roosts. As such, it is acknowledged that one of the affected trees has a s211 notification but this tree, as noted, remains standing and therefore the owner would still have to comply with the ecological legislation as Bats are still protected. Surrey Wildlife Trust has commented on this application and raise concern over the loss of the aforementioned trees and advise that prior to determination of the planning application the ash trees proposed for removal should be subject to a bat preliminary ground level roost assessment, undertaken by a suitably experienced ecologist in line with best practice guidance.

As such, in the absence of a bat preliminary ground level roost assessment, the LPA cannot be satisfied that the proposed development would not lead to a detrimental impact on trees which are proposed to be removed and their suitability to support roosting bats or that the proposed development would not result in a net loss of biodiversity on the proposal site. The proposed development would, therefore, be contrary to Policy CS7 of the Woking Core

¹ Wychwood Environmental (2023) Preliminary Ecological Assessment: 152 High Street, Old Woking GU22 9JH

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Strategy 2012 and the NPPF as well as Regulation 9(3) of Conservation of Habitats and Species Regulations 2017.

The trees on site were subject to a ground level tree assessment, following BCT protocols. These are considered to offer **negligible** potential to support roosting bats, with the exception of the mature sycamore tree in the south of the plot which has **low** potential for roosting bats in the ivy on an occasional basis. No further emergence/re-entry surveys are required. If this tree is due to be removed, it should be 'soft' felled and left in-situ for 24hrs. Wood should ideally be retained onsite as habitat piles.

The ash trees on site have **negligible** potential for bat roosts, and one sycamore tree on site has **low** potential for bat roosting in the ivy. Under current BCT guidelines this does not require further surveys, as stated in the updated PEA report (attached).

Should you need any further advice on the information provided above please do not hesitate to contact me.

Kind regards,

A black rectangular redaction box covering the signature of Dr. Craig Turner.

Dr. Craig Turner MCIEEM FRGS FL

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