JOANNA GRAHAM
ECOLOGY LTD

Ground Level Tree Assessment

Iver to Egham

V01

June 2025

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Project: Iver to Egham	Date: 9th June 2025	Project reference: JGE07724
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Quality Assurance

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Revision History

Revision	Date	Amendment
V01	9th June 2025	First version

Contents

Executive Summary

Objective	The purpose of this report is to assess all trees that may be removed within the linear route and working buffer, for the suitability to support roosting bats and provide recommendations to avoid or mitigate, or for further surveys and enhancement measures as required.
Surveys	A Ground Level Tree Assessment was undertaken in April 2025 following the Bat Surveys for Professional Ecologists Good Practice Guidelines.
Findings	A total of 249 trees or groups of trees were highlighted by the tree report as being located within the 30m buffer of the route. A scoping desk assessment was undertaken to identify trees/groups of trees which could be avoided within the works buffer. 44 trees or groups of trees were assessed. 27 trees were assessed as having features only suitable for individual or small numbers of roosting bats (PRF-I) and eight trees were assessed as having features suitable for multiple roosting bats (PRF-M).
Avoidance measures	Where possible it is recommended that the route avoids all PRF-M and PRF-I trees with small movements to the route to avoid trees, especially PRF-M trees highlighted within G075, T087, G220 and G226. Where PRF-I trees have to be removed, these should be sectionally felled. Any sections which include features such as cankers or knot-holes should be left at the base of the tree for 24 hours before removal. A precautionary working method statement should be followed to avoid disturbance or impact to roosts or trees with features.
Further surveys/work	If PRF-M trees cannot be avoided it is recommended that these are subject to tree climbing or emergence surveys. Up to three surveys are required on each tree between May and September, with two surveys between May and August, a minimum of three weeks apart.
Biodiversity enhancement	In agreement with the landowners, bat boxes should be installed on remaining trees within the route and any trees removed, replaced with native species of local provenance.

1. Introduction

1.1 Background

Joanna Graham Ecology Ltd was commissioned by Dalcour Maclaren on behalf of their client to carry out a Ground Level Tree Assessment (GLTA) of trees located between Egham Water Treatment Works (WTW) to the south (grid reference TQ 02256 71730) and Iver Water Treatment Works to the north (grid reference TQ 02275 71754). A Preliminary Ecological Appraisal (Joanna Graham Ecology Ltd, 2024) was conducted in 2024 which recommended that a Ground Level Tree Assessment was carried out. A tree survey was conducted by Nicholsons (Nicholsons, 2025) of all trees within the 30m buffer of the proposed new water main. The tree report assessed 249 trees or groups of trees within the route buffer. A desktop scoping assessment was undertaken to focus the GLTA on trees likely to be impacted and advise where the route could avoid trees negating the need for further survey work.

1.2 Purpose of Report

The report assesses the suitability of all trees proposed to be removed for the potential to support roosting bats. The report outlines recommendations to avoid, mitigate, compensate and enhance the site for bats.

1.3 Site Description

The route started at the Affinity Water site at Egham WTW and ended at Iver WTW. The area was very urban with the route crossing over the M25 and M4 as well as river and railway corridors. Key linear features such as the River Thames, railways and motorways (M4/M25) will be avoided by the use of Horizontal Directional Drilling (HDD). Woodland planting bound many of the linear road, rail and river corridors as well as pockets of new planting around Heathrow Colne Valley Biodiversity Site. Large areas of the route were unmanaged with overgrown scrub, wet woodland and trees present. Other key wooded areas included the tree lined roads around Wraysbury Road and Moor Lane.

1.4 Personnel

The project was led by Joanna Graham BSc (Hons) MCIEEM who has over 13 years' experience in ecological consultancy conducting ecology surveys including habitat and species surveys. Joanna Graham holds a class 2 bat licence (licence reference provided upon request). The surveys were undertaken by Joanna Graham BSc (Hons), Rachel Richards MSc and Beth England BSc (Hons). Rachel and Beth all have over five years' experience completing habitat surveys and hold bat licences (licence references provided upon request).

2. Methodology

2.1 Ground Level Tree Assessment

Ground level tree assessments were undertaken on 1st, 8th, 22nd, 23rd, 28th and 30th April 2025 by experienced ecologists Joanna Graham BSc (Hons), Rachel Richards MSc and Beth England BSc (Hons) following standard survey guidance (Collins, 2023). A GLTA is a detailed inspection of the tree from the ground to look for any features that could potentially be used for roosting (Potential Roost Feature (PRF)).

Binoculars, a camera, an endoscope and a high-powered torch were used to assess the trees for any PRF that may support roosting bats. Potential roost features searched for included:

- woodpecker/squirrel holes;
- knot-holes arising from naturally shed branches, or branches previously pruned back to the branch collar;
- hazard beams;
- other vertical or horizontal cracks and splits (such as frost-cracks or lightning damage) in stems or branches;
- partially detached or raised bark;
- man-made holes (e.g., cavities that have developed from flush cuts) or cavities created by branches tearing out from parent stems;
- cankers (caused by localised bark death) in which cavities have developed;
- other hollows or cavities; including butt-rots;
- double leaders forming compression forks with included bark and potential cavities;
- gaps between overlapping stems or branches;
- partially detached Ivy (*Hedera helix*) with stem diameters in excess of 50mm;
- bat, bird or dormouse boxes.

Where a PRF was identified, where possible, signs of a bat roost, besides the actual presence of bats was recorded such as:

- bat droppings in, around or below the PRF;
- staining below the PRF;
- odour emanating from the PRF;
- audible squeaking (likely at dusk or in warm weather).

Any visible PRFs were categorised following the guidance in the Bat Survey Guidelines (Collins, 2023) which has been reproduced below as Table 1.

Table 1: PRF descriptions

Suitability	Description
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Where the tree is assessed as PRF-I, no further surveys are required. Any trees assessed as PRF-M or it was not possible to categorise the tree due to visibility or size of the tree, a PRF inspection would be recommended. The PRF inspection would further assess the PRF to record the PRF characteristics. Any trees classified as PRF-M may need further surveys such as emergence surveys or climbing inspections.

2.2 Weather

The weather conditions during the surveys were recorded.

Table 2: Weather conditions

Conditions	Detail	Detail	Detail	Detail	Detail	Detail
Date	01/04/2025	08/04/2025	22/04/2025	23/04/2025	28/04/2025	30/04/2025
Rain	No rain	No rain	No rain	No rain	No rain	No rain
Temperature	9^{O}C	9^{O}C	11^{O}C	10^{O}C	16^{OC}	17^{O}C

2.3 Limitations

The GLTA survey was undertaken in April 2025, a suboptimal period where trees are not fully in leaf, however some trees were already in leaf during the survey. Access was limited to G075 and G219 due to dense scrub. The route within sections 1 and 2 has been amended to avoid impact to Staines Moor Site of Special Scientific Interest (SSSI). This report will be subject to an amendment following the updated arboricultural report.

A desktop scoping assessment was completed to focus the survey effort and highlight individual trees or groups of trees which could be avoided by small movements to the route. See Appendix 2 for the desktop assessment and reasonings.

3. Results

The scoping study recommended avoiding 205 individual trees and groups of trees where feasible. This avoidance could be achieved through minor realignments of the route within the designated buffer or in cases where trees were within the buffer but the works remained confined to the existing carriageway. As a result, these trees were scoped out of the GLTA assessment. During the survey, individual trees within groups were highlighted where they offered potential suitability for roosting bats. Trees with negligible bat roosting potential were not recorded. Identified individual trees within groups were labelled using the group number followed by a sequential suffix (e.g. 1, 2, 3, etc.) to distinguish them within the group.

A total of 44 trees and groups of trees were included within the GLTA. 27 trees were assessed as having features suitable for individual bats (PRF-I). Eight trees were assessed as having features suitable for multiple bats (PRF-M).

The PRF-M features were found on Ash (*Fraxinus excelsior*), poplar species (*Populus* sp.), London Plane (*Platanus* × *hispanica*) and Aspen (*Populus tremula*). There were two unknown trees recorded with PRF-M features; one tree (G220-4) was dead and had no identifying features, the other (G075-3) could only be viewed from a distance due to the presence of dense scrub.

The Bat Tree Habitat Key (BTHK, 2018) was used as a reference to understand what typical disease, decay and damage PRF may support bats, with reference to the type of roosts, bat species and tree species they occur in.

In accordance with BTHK the typical disease and decay PRF that are known to be exploited by roosting bats which are found in Common Lime (*Tilia* × *europaea*) species included butt-rot with welds listed as a damage PRF as well as Ivy forming association PRFs. On T034 was an area of lifted bark at the edge of a pruning scar, assessed as a PRF-I feature as flight access was cluttered by branches.

Typical disease and decay PRF found in Hybrid Black Poplar (*Populus x canadensis*) were woodpecker holes and knot-holes; there were no damage or association PRFs recorded. The features within the poplars along G075 included knot-holes and rot-holes which were only visible from footpath to the south (except eastern and western ends) due to the presence of dense scrub. Furthermore, a tree of unknown species was also within G075 with multiple knot-holes which also could not be fully assessed. These trees have been assessed as PRF-M as the features could not be fully viewed.

Butt-rots were the only typical disease and decay PRF found in London Plane; there were no damage or association PRFs recorded. The knot-holes on T087, although not typically a feature on London Plane which is known to support bat roosts, were assessed as PRF-M. In general knot-holes can provide a suitable feature to support maternity colonies.

All PRF within willow species (*Salix* sp.) were assessed as having suitability to support individual bats (PRF-I) only with no features suitable for multiple bats (PRF-M). The features observed included butt-rot, lifted bark, compression forks, knot holes and transverse snaps. Many features were low and therefore were checked using an endoscope with no signs of bats. According to the BTHK, shearing cracks in Crack Willow (*Salix* × *fragilis*) are known to support bats as well as woodpecker holes and wounds in White Willow (*Salix alba*) and Crack Willow and woodpecker holes, tear outs and wounds in Goat Willow (*Salix caprea*) and Grey Willow (*Grey Willow*).

Typical disease and decay PRFs found in Sycamore (*Acer pseudoplatanus*) that are known to be used by roosting bats include tear-outs, wounds and cankers, there were no damage PRFs in Sycamore used by bats. PRFs were recorded on two trees within G088. Two small rot-holes were recorded at the top of G088-3, both assessed as PRF-I due to their size. The wound on G088-5 was inspected using an endoscope, there was no evidence of bats present and the feature was classed as PRF-I.

Typical disease and decay PRF found in Pedunculate Oak (*Quercus robur*) that are known to be used by roosting bats include woodpecker holes, knot-holes, pruning cuts, tear-outs, and wounds. Typical damage PRFs found in Oak that are known to be used by roosting bats include lightning strikes, hazard beams, subsidence-cracks, shearing cracks, transverse-snaps, lifting bark and desiccation-fissures. An Oak within G088 comprised an upwards facing wound on a limb. The wound was assessed as PRF-I as it was exposed to inclement weather and would fill with rainwater.

Typical disease and decay PRF found in Ash that are known to be used by roosting bats include woodpecker and squirrel (*Sciurus carolinensis*) holes, knot-holes, pruning cuts, tear-outs, wounds and cankers. Typical damage PRFs found in Ash that are known to be used by roosting bats include hazard beams, subsidence-cracks, transverse-snaps and lifting bark. Tree T201 had a knot-hole on the northern side which was assessed as PRF-I. There were two Ash trees with G220. A dead tree (G220-2) had cankers present however the features were heavily cluttered by surrounding vegetation and therefore assessed as PRF-I. G220-3 had two rot-holes both were assessed as PRF-M due to their size and the direction they faced. There was also a small hole on the stem which was assessed as PRF-I.

There were no records of bats using disease, decay or damage PRF in Elder (*Sambucus nigra*). Tree G202-3 was a dead Elder with a knot-hole on the stem. The knot-hole was inspected using an endoscope and found to be connected to a cavity in the rotted trunk. The cavity headed down the tree towards the ground, with no evidence of bats. The feature was assessed as PRF-I.

Two wound features within G220-1, a Field Maple (*Acer campestre*) were assessed as PRF-I. Knot-holes, tear-outs and wounds on Field Maple are known to support roosting bats with no damage or association PRFs recorded.

Typical disease and decay PRFs in Silver Birch (*Betula pendula*) include knot-holes, tear outs and cankers with no damage or association PRFs recorded. A canker was present on G220-5 which was assessed as PRF-I due to the small size of the feature. A dead tree (G220-4) was present within G220, with an active woodpecker hole. This feature was assessed as PRF-M.

Three Aspens were present within G226 with woodpecker holes, wounds and knot-holes. There were no disease and decay, damage or association PRFs recorded within Aspen. However, typically these types of features can support roosts of multiple bats.

Bats can use trees for hibernation, with woodpecker holes, cavities and knot-holes being identified during the GLTA as providing suitable features.

Table 3 below provides details of each tree, the features it supports and an overall summary, the full assessment spreadsheet can be found in Appendix 3.

Table 3: Summary of GLTA for each tree assessed as PRF-I or PRF-M

Route section (according to tree report)	Tree number	Species	Feature number	PRF type	PRF classification	Overall suitability
1	T034	Common Lime	1	Lifted bark	PRF-I	PRF-I
1	G075-1	Poplar sp.	1	Knot-hole	PRF - M	PRF-M
1	G075-2	Poplar sp.	1	Rot-hole	PRF - M	PRF-M
1	G075-3	Unknown	1	Knot-hole	PRF - M	PRF-M
1	T087	London Plane	1	Knot-hole	PRF - M	PRF-M
1	G0088-1	Willow sp.	1	Butt-rot	PRF - I	PRF-I
1	G0088-2	Willow sp.	1	Lifting bark	PRF-I	PRF-I
1	G0088-3	Sycamore	1	Rot-hole	PRF-I	PRF-I
1	G0088-5	Sycamore	1	Wound	PRF-I	PRF-I
1	G0088-10	Willow sp.	1	Compression fork	PRF-I	PRF-I
1	G0088-11	Pedunculate Oak	1	Wound	PRF-I	PRF-I
6	G199-18	Willow sp.	1	Lifting bark	PRF-I	PRF-I
6	T201	Ash	1	Knot-hole	PRF-I	PRF-I
6	G202-9	Elder	1	Knot-hole	PRF-I	PRF-I
6	G216-3	Crack Willow	1	Lifting bark	PRF-I	PRF-I
6	G216-4	Crack Willow	1	Knot-hole	PRF-I	PRF-I
6	G216-5	Crack Willow	1	Transverse snap	PRF-I	PRF-I
6	G216-6	Crack Willow	1	Transverse snap	PRF-I	PRF-I
6	G216-7	Crack Willow	1	Transverse snap	PRF-I	PRF-I
7	G219-1	Crack Willow	1	Lifted bark	PRF-I	PRF-I
7	G220-1	Field Maple	1	Wound	PRF-I	PRF-I
			2	Wound	PRF-I	

7	G220-2	Ash	1	Canker	PRF-I	PRF-I
			2	Canker	PRF - I	
7	G220-3	Ash	1	Hole	PRF-I	PRF-M
			2	Rot-hole	PRF-M	
			3	Rot-hole	PRF-M	
7	G220-4	Unknown	1	Woodpecker hole	PRF-M	PRF-M
7	G220-5	Silver Birch	1	Canker	PRF-I	PRF-I
8	G226-1	Aspen	2	Woodpecker hole	PRF-M	PRF-M
8	G226-2	Aspen	1	Wound	PRF-M	PRF-M
			2	Knot-hole	PRF-M	PRF-M

As part of the PEA biological records were sought. The records showed that there were 44 records of bats within 1km of the site. The records included unknown bat species, pipistrelle species (*Pipistrellus* sp.), Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle, Nathusius' Pipistrelle (*Pipistrellus nathusii*), Serotine (*Eptesicus serotinus*), Noctule (*Nyctalus noctula*), Brown Long-eared Bat (*Plecotus auritus*), Brandt's Bat (*Myotis brandtii*), Daubenton's Bat (*Myotis daubentonii*), myotis species (*Myotis* sp.), Leisler's Bat (*Nyctalus leisleri*), Natterer's Bat (*Myotis nattereri*) and Whiskered Bat (*Myotis mystacinus*).

Although the route was in an urban location, the route still offered a variety of commuting and foraging opportunities, such as along wooded road corridors, railway corridors, woodland edges, field boundaries, hedgerows as well as over Staines Moor lowland meadow and along river corridors. There were also mature trees and residential properties along the route which could provide roosting opportunities.

4. Recommendations

Where possible the route should avoid all trees and follow unvegetated areas such as footpaths and carriageways maintaining a buffer from existing boundary trees. Existing gaps within hedgerows and scrub should be utilised.

Small movements to the route as summarised in Table 4 below would avoid all trees with PRF-M features.

Table 4: Summary of recommendations for PRF-M trees

Route section (according to tree report)	Tree number	Species	Recommendation
1	G075-1	Poplar sp.	Avoid by keeping south within field
1	G075-2	Poplar sp.	Avoid by keeping south within field
1	G075-3	Unknown	Avoid by keeping south within field
1	T087	London Plane	Avoid by keeping west staying within carriageway
7	G220-3	Ash	Keep north or use existing gap in hedge to the south
7	G220-4	Unknown - dead	Keep north or use existing gap in hedge to the south
8	G226-1	Aspen	Keep west using existing gap in trees
8	G226-2	Aspen	Keep west using existing gap in trees

Where it is not possible to move the route, the minimum number of trees should be removed along the route. All trees which had suitability for individual bats (PRF-I) should be sectionally felled. Any sections which contain a feature i.e. canker or wound, or upon removal a feature is identified under Ivy, should be stored at the base of the tree for 24 hours before being removed from site. If PRF-M trees cannot remain or will be subject to high levels of disturbance, further surveys are required. It is recommended that the trees are surveyed via tree climbing and the use of an endoscope to further examine the feature. If the feature is downgraded to PRF-I no further surveys are required. If the feature provides suitable roosting opportunities for multiple bats, a further two surveys are required. The three surveys should be carried out between May and September, with two surveys between May and August, a minimum of three weeks apart.

G220-4 and G226-1 were recorded as not climbable due to the presence of dead wood and damage from woodpeckers, if these trees require removal further emergence surveys will be required.

Bats can roost in trees all year round and therefore, a precautionary working method statement (PWMS) should be followed to avoid disturbance to any potential roosts. The PWMS should include details on how to avoid direct or indirect impact to any trees within the working buffer with PRF-I or PRF-M features. This will include reduced/no night working to prevent illuminating key trees and features as well as preventative measures to avoid noise disturbance.

In agreement with the landowners, to enhance the local area, bat boxes should be installed on remaining trees within the route and any trees removed and replaced with native species of local provenance.

5. References

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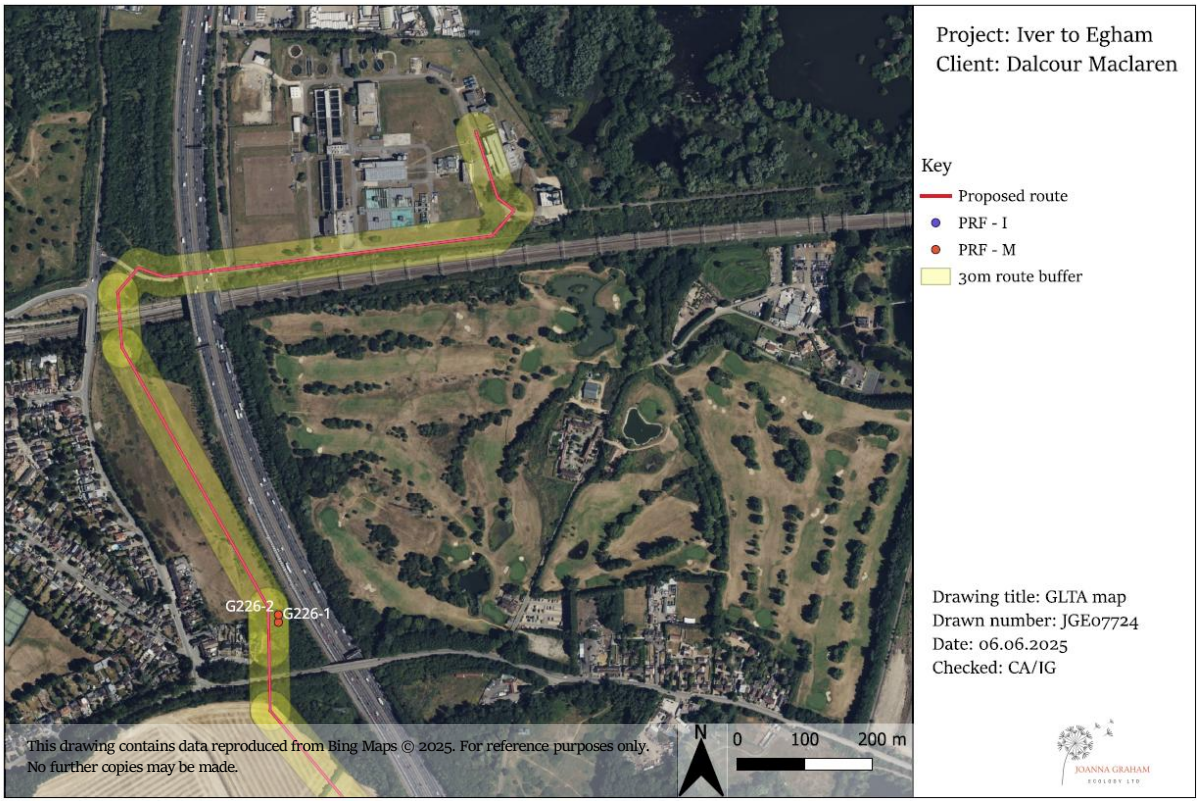
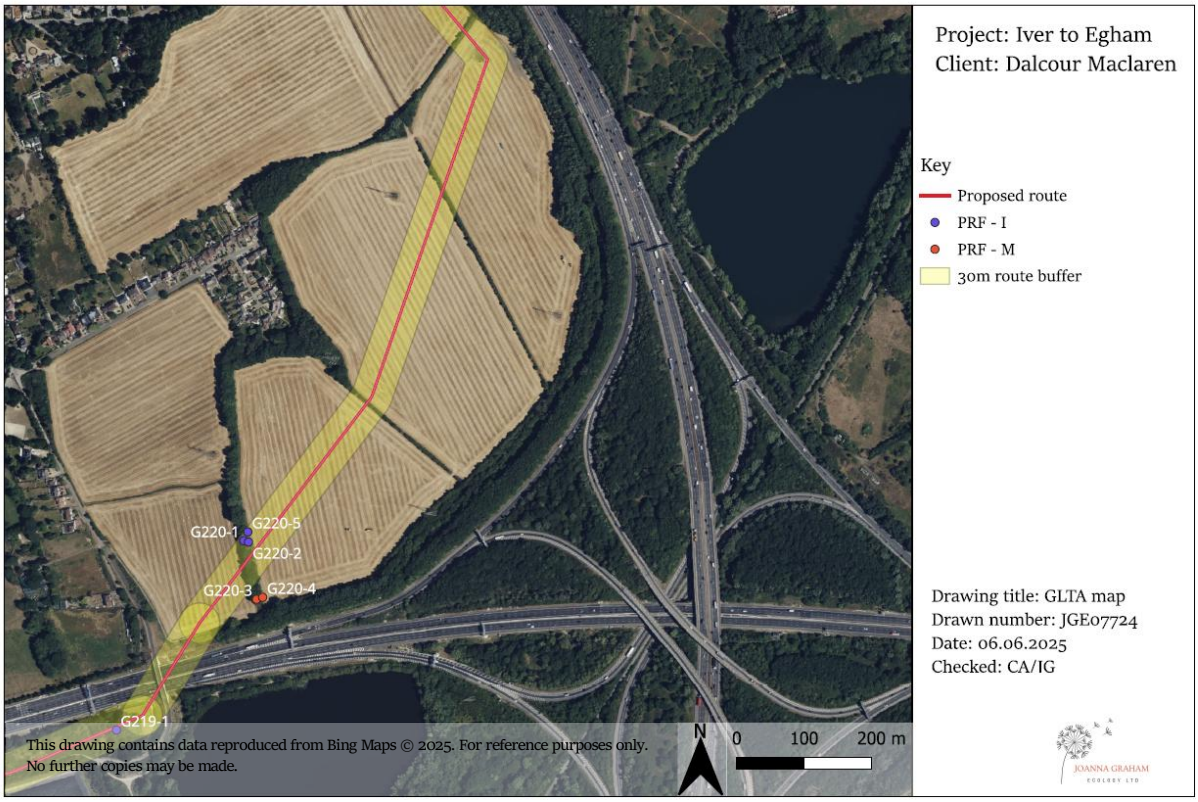
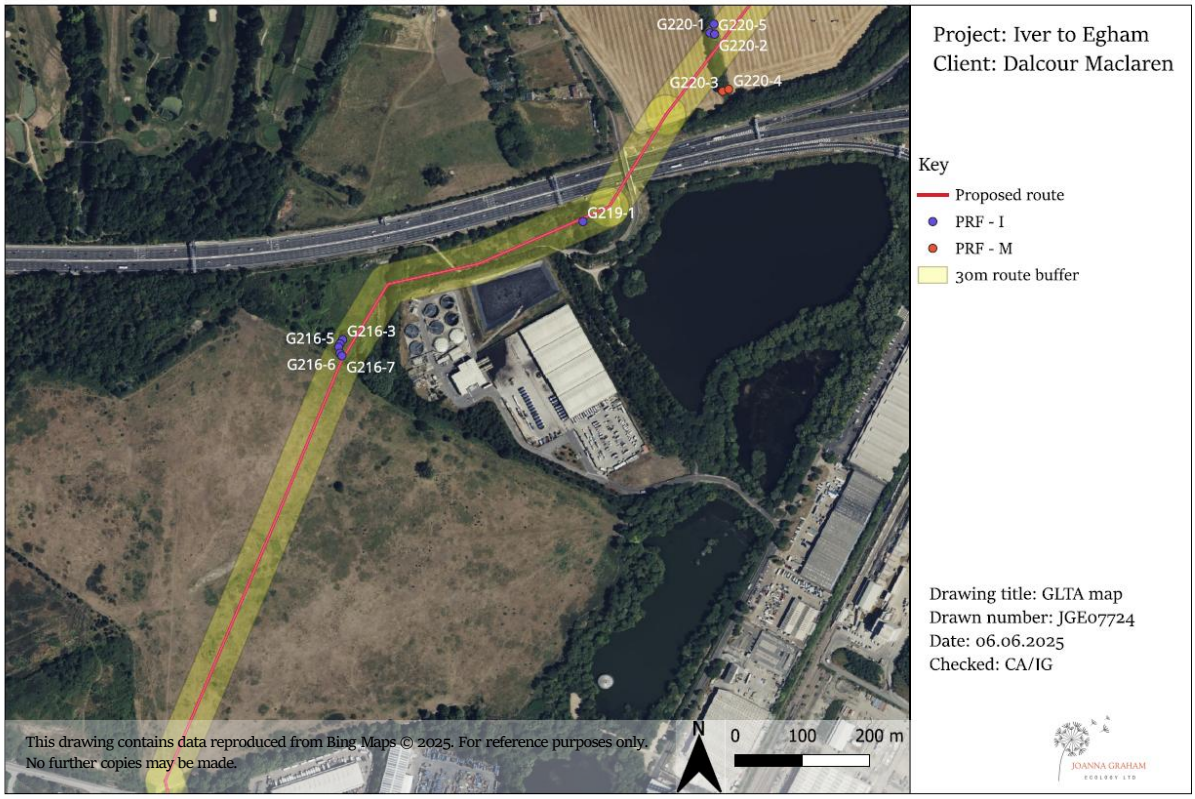
South Bucks District Council (2011). *Core Strategy Development Plan Document* (at South Bucks Core Strategy – Adopted February 2011)

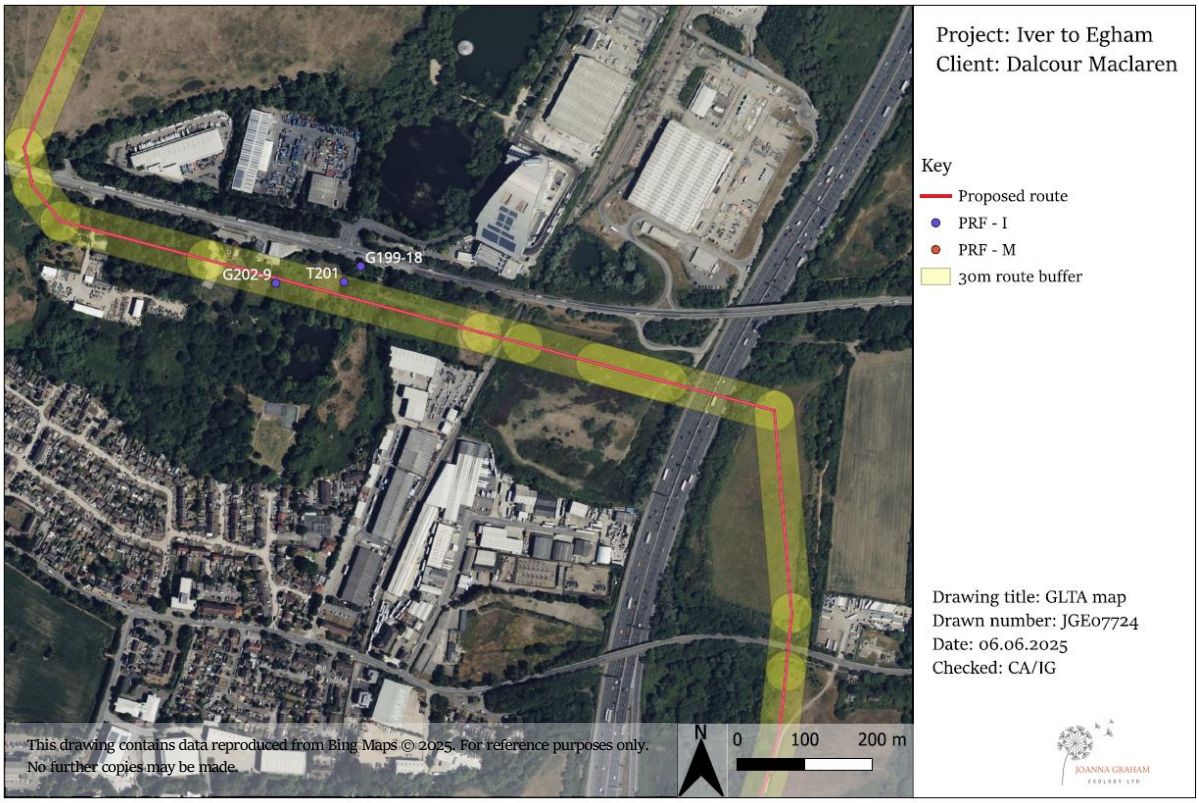
6. Figures

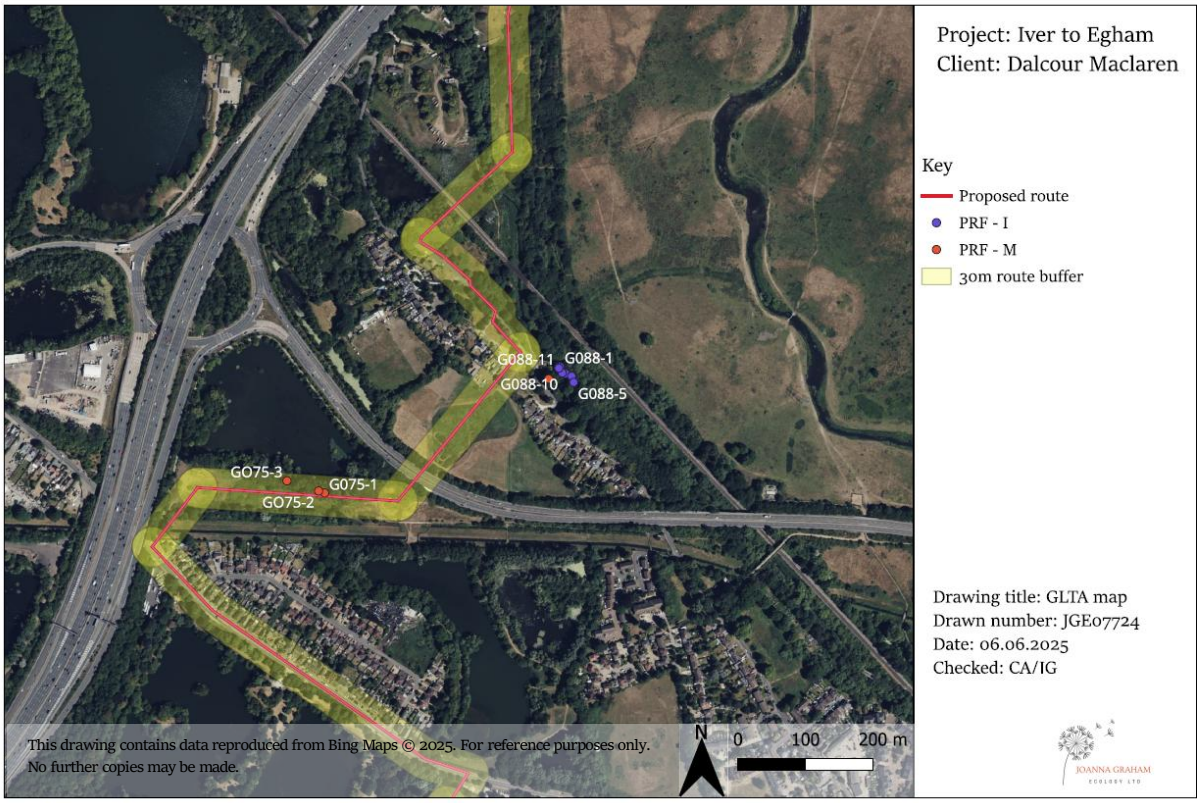
Figure 1 Tree Location Map











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Appendices

Appendix 1 Planning Policy and Legislation

National Planning Policy Framework

In England, the National Planning Policy Framework (NPPF), section 15, paragraphs 187 to 201 emphasises the importance of conserving nature and achieving net gains for biodiversity, for full details please see National Planning Policy Framework (publishing.service.gov.uk).

Conserving and Enhancing the Natural Environment:	
Planning policies and decisions should contribute to and enhance the natural and local environment by:	• Protecting and enhancing valued landscapes, sites of biodiversity or geological value, and soils. • Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. • Maintaining the character of the undeveloped coast, while improving public access to it where appropriate. • Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs. • Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans. • Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate
Planning Approaches:	• Plans should distinguish between the hierarchy of international, national, and locally designated sites. • They should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. • Take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. • Plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
Protected Areas:	• Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads, and National Landscapes which have the highest status of protection in relation to these issues. • The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within

	their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. • When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development 67 other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: (a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; (b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and (c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
Habitats and Biodiversity:	
To protect and enhance biodiversity and geodiversity, plans should:	• Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. • Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
Planning determination:	• If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. • Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. • Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons 70 and a suitable compensation strategy exists. • 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.

Protected sites:	• The following should be given the same protection as habitats sites:
	  ○ Potential Special Protection Areas and possible Special Areas of Conservation.
	  ○ Listed or proposed Ramsar sites.
	  ○ Sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.
	• The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Local Planning Policy

South Bucks District Core Strategy includes biodiversity within Core Policy 9: Natural Environment. Runnymede 2030 Local Plan includes Policy EE9: Biodiversity, Geodiversity and Nature Conservation, EE11 on Green Infrastructure and EE12 on blue infrastructure. Slough Borough Council includes: Core Policy 9: Natural and Built Environment.

Policy	Description
South Bucks: Core Policy 9: Natural Environment	The highest priority will be given to the conservation and enhancement of the natural beauty of the Chilterns Area of Outstanding Natural Beauty, and the integrity of Burnham Beeches Special Area of Conservation. The conservation and enhancement of the Chilterns AONB and its setting will be achieved by ensuring that all development complies with the purposes of the AONB and its Management Plan. The conservation and enhancement of Burnham Beeches SAC, and its surrounding supporting biodiversity resources, will be achieved through restricting the amount of development in close proximity to the site, and ensuring that development causes no adverse effect on the integrity of the SAC. Further details on mechanisms for achieving this will be given in the Development Management DPD. More generally, the landscape characteristics and biodiversity resources within South Bucks will be conserved and enhanced by: • Not permitting new development that would harm landscape character or nature conservation interests, unless the importance of the development outweighs the harm caused, the Council is satisfied that the development cannot reasonably be located on an alternative site that would result in less or no harm and appropriate mitigation or compensation is provided, resulting in a net gain in Biodiversity.

	• Seeking the conservation, enhancement and net gain in local biodiversity resources within the Biodiversity Opportunity Areas, on other non-designated land, on rivers and their associated habitats, and as part of development proposals. • Maintaining existing ecological corridors and avoiding habitat fragmentation. • Conserving and enhancing landscapes, informed by Green Infrastructure Plans and the District Council's Landscape Character Assessment. • Improving the rural/urban fringe by supporting and implementing initiatives in the Colne Valley Park Action Plan. • Seeking biodiversity, recreational, leisure and amenity improvements for the River Thames setting where opportunities arise, for example at Mill Lane (see Core Policy 15). Further guidance on the protection and enhancement of landscape and biodiversity resources will be given in the Development Management DPD.
Runnymede: Policy EE9: Biodiversity, Geodiversity and Nature Conservation	Development on or adjacent to the following hierarchy of important sites in the Borough will need to pay particular attention to the requirements of this policy. 1) Ramsar sites (international). 2) Special Protection Areas and Special Areas of Conservation (European). 3) Sites of Special Scientific Interest and National Nature Reserves (National). 4) Ancient Woodland, ancient or veteran trees; and/or trees and hedgerows protected by a Tree Preservation Order. 5) Sites of Nature Conservation Importance, Local Nature Reserves. 6) Other priority habitats and priority species not identified in 1, 2, 3, 4 or 5 above (Local); designated Local Green Space where richness of wildlife has been identified as a contributing factor in its designation; and any area in Runnymede that may be in future identified as a Nature Improvement Area; trees considered to make a significant contribution to their surroundings, individually or as a group. The Council will seek net gains in biodiversity, through creation/expansion, restoration, enhancement and management of habitats and features to improve the status of priority habitats and species. Development proposals should demonstrate how this will be achieved and should be in accordance with any Supplementary Planning Document the Council prepares. Development proposals not directly related to the management of Ramsar, SPA, SAC as well as SSSI units forming part of these designations will not be permitted unless it can be demonstrated that the impact of proposals, either alone or in combination, will not result in likely significant adverse effects. If significant adverse effects remain even with the implementation of suitable avoidance and/or mitigation, development proposals will need to demonstrate that alternatives to the proposal have been fully explored and that Imperative Reasons of Overriding Public Interest (IROPI) exist. In these exceptional circumstances the Council will only permit development where suitable compensatory measures can be implemented.

	For development proposals that affect national, regional or locally protected sites not forming part of a Ramsar, SPA or SAC, permission will only be granted where it can be demonstrated that the benefits of the development proposal clearly outweigh the harm to the site and has followed the hierarchy of mitigation so that biodiversity/geodiversity damage from development should first be avoided, then mitigated on-site and finally, as a last resort and where acceptable, offset.
Policy EE11: Green Infrastructure	The Council will seek to avoid further habitat fragmentation of Green Infrastructure by encouraging development proposals which restore, maintain and enhance habitat connectivity, in particular in Biodiversity Opportunity Areas as shown on the policies map. The Council will seek development to contribute towards the delivery of a high quality multi-functional Green Infrastructure network by requiring proposals to provide and make enhancements to onsite Green Infrastructure assets. In exceptional circumstances, if it is not possible to provide on-site Green Infrastructure as it is neither feasible nor viable, a financial contribution towards provision and enhancement of Green Infrastructure and services may be sought. The Council will ensure the effective use of Tree Preservation Orders to protect significant trees and will encourage the proper care and maintenance of trees by requiring owners to submit applications to work on protected trees and ensure that protected trees are replaced if they have to be felled.
Policy EE12: Blue Infrastructure	The local planning authority will require applicants to contribute towards the delivery of a high quality multi-functional Blue Infrastructure network by expecting Blue Infrastructure assets to be provided, protected, maintained and enhanced to deliver multiple benefits and services for biodiversity, recreation and landscape. Therefore, the Council will resist proposals that lead to a decrease in the provision and quality of, and fails to enhance, the status of blue infrastructure, in accordance with the Water Framework Directive. Proposals will be supported that: • Demonstrate how they will support improving the status of failing water bodies, in particular in relation to the requirements of the Thames River Basin Management Plan; • Do not involve the culverting of watercourses; • Do not involve the loss of natural banks; • Make appropriate provision to protect, enhance, improve and maintain accessible networks of Blue Infrastructure, including through de-culverting and re-naturalisation of hard banks if appropriate; • Where appropriate, enable public access to Blue Infrastructure, including through providing undeveloped buffer zones (8m minimum for main rivers and 5m minimum for ordinary water courses). In certain circumstances, these standards could be negotiated to suit the particular ecological and requirements of a site. Any scheme to provide a buffer zone will need to include a working method statement detailing how the buffer zone will be protected during construction and long-term ecological plan. • Include measures to allow for the natural movement of fish within the watercourse where barriers to fish movement (e.g. weirs) are present. Development where inclusion of Sustainable

	Drainage Systems is necessary should have a management plan in place to demonstrate how wildlife has been taken account of
Slough: Core Policy 9: natural and built environment	Development will not be permitted unless it: • Enhances and protects the historic environment; • Respects the character and distinctiveness of existing buildings, townscapes and landscapes and their local designations; • Protects and enhances the water environment and its margins; • Enhances and preserves natural habitats and the biodiversity of the Borough, including corridors between biodiversity rich features.

Legislation

National Legislation

The following legislation is relevant to development within England:

The Conservation of Habitats and Species Regulations 2019 (as amended)

The Conservation of Habitats and Species Regulations 2019 (as amended) is a set of regulations in the UK that address the protection and conservation of natural habitats and species.

These regulations provide provisions for the selection, designation, registration, and notification of sites to be protected under the Council Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora. The regulations cover the conservation of natural habitats and habitats of species in European sites. These sites include Special Areas of Conservation and Special Protection Areas designated under the EU Directive. The regulations outline procedures for site selection, classification, and management agreements for these sites.

The regulations address the protection of both animals and plants. They define offences related to capturing or killing wild animals and certain wild plants. European protected species of animals and plants are specifically covered.

The regulations also consider nature conservation policy in planning contexts.

The Wildlife and Countryside Act 1981

This legislation makes it an offence to deliberately take, kill or injure a protected wild animal, or to intentionally, or recklessly, disturb such an animal in its place of shelter, or to damage, destroy or obstruct access to its place of shelter. It is also an offence to be in possession of a protected animal, live or dead.

The act contains four parts and 17 schedules, which cover:

Part 1: Wildlife (includes protection of birds, animals and plants; and measures to prevent the establishment of non-native species which may be detrimental to native wildlife).

Part 2: Nature conservation, the countryside and National Parks (including the designation of protected areas).

Part 3: Public rights of way.

Part 4: Miscellaneous provisions of the act.

Other legislative Acts affording protection to wildlife and their habitats include:

- Deer Act 1991;
- Natural Environment & Rural Communities (NERC) Act 2006;
- Protection of Badgers Act 1992;
- Wild Mammals (Protection) Act 1996.

Species Specific Legislation

Bats

Bats and their roosts are protected by UK legislation.

The Wildlife and Countryside Act (1981) (as amended) makes it an offence to:

- intentionally kill, injure or take a bat;
- possess or control any live or dead specimen or anything derived from a bat;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a bat; and
- intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for that purpose.

Additionally, The Conservation of Habitats and Species Regulations 2017 (as amended) make it an offence to:

- deliberately capture or kill a bat;
- deliberately disturb a bat;
- damage or destroy a breeding site or a resting place of a bat; and
- keep, transport, sell or exchange or offer for sale or exchange a live or dead bat or any part of a bat.

Appendix 2 Desktop scoping survey

	Iver to Egham GLTA					1st April 2025
	Tree ref	Species	Survey	Avoid	Info	Comments
Page 1	T001			yes		avoid by route in road
	T002			yes		avoid by route in road
	T003			yes		avoid by route in road
	G004			yes		offsite
	G005			yes		offsite
	T006			yes		hdd
	T008			yes		hdd
	G007			yes		hdd
	G009			yes		hdd
	T010			yes		hdd
	T/G11-23			yes		hdd
	T024			yes		Keep east
	G025			yes		Keep east
	T026	Ash	yes			
	T027	Hornbeam	yes			
	T028			yes		on pavement
	H029			yes		
	T030			yes		on pavement
	T031	Lime	yes			
	T032	Lime	yes			
	T033	Lime	yes			
	T034	Lime	yes			
	T035-G068			yes		avoided by route in carriageway
	G069	Ash	yes		+30 stems	impacted by hdd area
	G070-g074			yes		avoided by hdd
	G075		yes		unknown number	
	G076-G079			yes		avoided by hdd
	G080	mixed species	yes		unknown number	
	T081			yes		hawthorn
	T082	horse chestnut	yes			
	T083	oak	yes			
	T084	horse chestnut	yes			

	T085	horse chestnut	yes			
	G086	mixed species	yes		unknown number	
	T087	london plane	yes			
	T088	mixed species	yes		unknown number	
	T090			yes		keep south
Page 2	T091-G116			yes		avoided by hdd
	T117	goat willow	yes			
	T118-G122			yes		keep west
page 3	G123			yes		keep east
	G124-G125			yes		OLD ROUTE
	G126			yes		keep west
	T128	sycamore	yes			
	G129	field maple	yes		5 trees	
	G130			yes		keep east
	G131-G147			yes		Avoid by hdd
page 4	G148		yes		unknown number '+50 stems	
	G149-G153			yes		OLD ROUTE
	G154	field maple ar	yes		unknown number '+100 stems	
	G155-G159			yes		OLD ROUTE
	G160		yes		unknown number '+100 stems	
	G161		yes		unknown number '+30 stems	
	G162-170			yes		Avoid by HDD or OLD ROUTE
	G171	crack willow	yes		6+ stems	
	G172			yes		
	g173		yes		unknown 5+ stems	
	G174			yes		Keep west
	t175			yes		Keep east
	G176			yes		Keep east

Page 5	G177			yes		Keep east
	G178	ash/willow	yes		unknown 10 stems	
	G179	ash/willow	yes		unknown 25+ stems	
	H180			yes		
	G181-G185			yes		Avoid by HDD
	G186			yes		Keep west
	T187			yes		Keep west
	G188			yes		Keep west
	G189			yes		Keep south
	G190			yes		Avoid by HDD
	G191			yes		Avoid by HDD
	G192			yes		Avoid by HDD
	G193	hawthorn/eld	yes		unknown 25+ stems	
	G194			yes		Offsite
	G195			yes		Keep south
	T196	goat willow	yes			
	T197	goat willow	yes			
	G198		yes		unknown approx 10+ stems	
Page 6	G199		yes		unknown approx 30 stems	
	T200			yes		Keep south
	T201	ash	yes			
	G202		yes		unknown approx 40 stems	
	G203	ash	yes		unknown approx 10 stems	
	G204			yes		Keep south
	T205-T210			yes		Avoid by HDD
	G211	hawthorn/eld	yes		unknown approx 20+ stems	
	G212			yes		Offsite
	t213-t215			yes		Avoid by HDD

	G216	crack willow	yes		unknown approx 20 stems	
	G217	crack willow	yes		unknown approx 20 stems	
	G218			yes		Keep north of track
	G219	crack willow	yes		unknown approx 20 stems	
Page 7	G220		yes		unknown approx 20 stems	
	H221		yes		hedge with trees	
	H222		yes		hedge with trees	
	H223		yes		hedge with trees	
Page 8	G224			yes		Avoid by HDD
	G225			yes		Avoid by HDD
	G226	aspen	yes		unknown number approx 20 stems	
	G227			yes		Keep west
	G228			yes		Keep west
	G229			yes		keep to road
	G230-T249			yes		keep to road

Appendix 3 GLTA results

See following page.

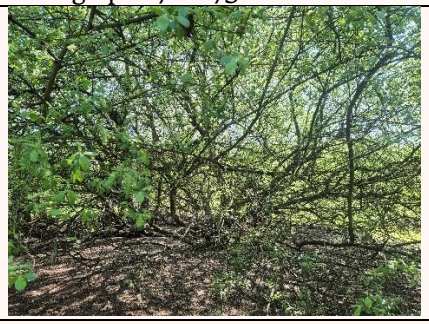
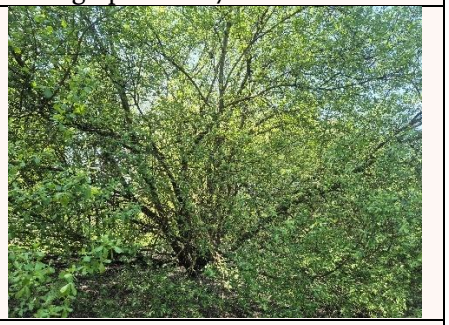
Sector	GROUP/TREE ID	TREE NUMBER	OS GRID REFERENCE	SPECIES	ALIVE/DEAD	DBH	MULTI STEM	HEIGHT	Feature number	STEM/LIMB	PRF TYPE	DIRECTION	PRF HEIGHT	DPH	NOTES	Climbable?	SUITABILITY	PRF - I / PRF - M
1	T034		TQ 02688 72016	Lime	Alive	600	No	6	1	Stem	Other	E	6		edge of a pruning scar. Right next to busy road, and could be blocked by branches and leaves when the tree is fully in leaf.	Yes	Low	PRF - I
1	G075	1	TQ 02490 72425	Poplar	Alive		Yes x4	14	1	Stem	Knot-hole	S	10		This tree line only visible from footpath (except eastern and westen ends) due to the presence of dense scrub. Possible knot hole visible.	Yes	Mod	PRF - M
1	GO75	2	TQ 02481 72428	Poplar	Alive		Yes x4	14	1	Stem	Rot-hole	S	10		This tree line only visible from footpath (except eastern and westen ends) due to the presence of dense scrub. Possible rot hole visible.	Yes	Mod	PRF - M
1	GO75	3	TQ 02434 72443	Unknown	Alive		Yes x3	14	1	Stem	Knot-hole	S	10		This tree line only visible from footpath (except eastern and westen ends) due to the presence of dense scrub. Possible knot hole visible.	Yes	Mod	PRF - M
1	T087		TQ 02822 72594	Plane	Alive	1000+	No	16	1	Limb	Knot-hole	MULTIPLE	12		2 x potential knot holes facing north and 1 x potential knot hole facing south. The tree is covered by dense ivy.	Yes	Mod	PRF - M
1	G088	1	TQ 02839 72612	Willow	Alive	50	Yes x2	8	1	Stem	Butt-rot	NE	160		Mature tree with rot throughout the trunk. The cavity in the stem was checked with an endoscope (15cm). No evidence of bat found, cobwebs found in cavity	No	Low	PRF - I
1	G088	2	TQ 02847 72602	willow	Dead	80	No	10	1	Stem	Lifting-bark	S	50		Mature tree, with one feature. This was checked with an endoscope, cavity was approximately 15cm deep, no evidence of bats found	No	Low	PRF - I
1	G088	3	TQ 02856 72598	sycamore	Alive	100	Yes x2	12	1	Limb	Rot-hole	E	6		Mature tree with two small rot holes near the top of the tree, as well as several rotten branches.	No	Low	PRF - I
1	G088	5	TQ 02859 72589	sycamore	Alive	80	Yes x5+	12	1	Limb	Wound	N	150		A mature tree with one feature, which was checked with an endoscope. The cavity was 2 inches in depth and filled with woodlice. No evidance of Bats	No	Neg	PRF - I
1	G088	10	Tq 02842 72603	willow	Alive	80	No	9	1	Stem	Compression-f	MULTIPLE	200		A split was forming at the fork of the tree where the two halves are pulling apart.	Yes	Low	PRF - I
1	G088	11	TQ 02837 72610	oak	Alive	100	No	10	1	Limb	Wound	S	850		A Mature tree with a wound (50cm long) on one limb. The wound was facing up, so it couldn't be properly viewed from the ground.	No	Low	PRF - I
6	G199	18	TQ 03623 77212	willow	Alive	120	Yes x3	12	1	Limb	Lifting-bark	N	6m		Mature tree with a small section of lifted bark and the base of a fork of two branches. Located adjacent to the bypass	Yes	Low	PRF - I
6	T201	1	Tq 03598 77189	Ash	Alive	150	No	12	1	Stem	Knot-hole	N	8m		During the survey, we had limited access to the tree due to the scrub at the base. Due to foliage and scrub, we were unable to get a good view of the knothole	No	Low	PRF - I
6	G202	9	TQ 03497 77187	elder	Dead	20	No	5	1	Stem	Knot-hole	E	45cm		connected to a cavity in the rotted trunk. The cavity headied down the tree towards the ground, no evidence of bats.	No	Low	PRF - I
6	G216	3	TQ 03388 78045	crack willow	Dead	30	No	12	1	Limb	Lifting-bark	S	1.5m		A small section of lifted bark was noted on one of the limbs. This was checked with an endoscope gap under the bark was about two inches long; no evidance of bats was found.	No	Neg	PRF - I

6	G216	4	TQ 03384 78039	crack willow	Alive	50	No	7	1	Stem	Knot-hole	NE	2m		The two knotholes on the limb were checked by endoscope, no evidence of bats found	No	Neg	PRF - I
6	G216	5	TQ 03382 78034	crack willow	Alive	80	No	12	1	Stem	Transverse-sna	E	2m		split in stem most likley due to storm damage. Unabe to inspect with the endoscope.	No	Low	PRF - I
6	G216	6	TQ 03384 78025	crack willow	Alive	50	Yes x2	12	1	Stem	Transverse-sna	NW	2m		split in stem most likley due to storm damage. Unabe to inspect with the endoscope.	No	Low	PRF - I
6	G216	7	TQ 03387 78021	crack willow	Alive	80	No	12	1	Limb	Transverse-sna	N	90cm		A limb had pariatly snapped, likley due to storm damage, on this limb was also some minor areas of lifted bark	No	Low	PRF - I
7	G219	1	TQ 03746 78221	Crack Willow	Alive	400	Yes x5+	12	1	Limb	Lifting-bark	W	3m		Lifted bark	No	Low	PRF - I
7	G220	1	TQ 03935 78502	field maple	Alive	350	yes	10	1	Stem	Wound	W	3m				Mod	PRF - I
7	G220	1	TQ 03935 78502	field maple	Alive	350	yes	10	2	Stem	Wound	W	3.5m				Mod	PRF - I
7	G220	2	TQ 03942 78500	ash	Dead		no	10	1	Stem	Canker	W	5m		cluttered PRF	No	Low	PRF - I
7	G220	2	TQ 03942 78500	ash	Dead		no	10	2	Stem	Canker	NW	6m		cluttered PRF	No	Low	PRF - I
7	G220	3	TQ 03954 78415	ash	Alive		yes	10	1	Stem	Hole	NW	5m			Yes		PRF - I
7	G220	3	TQ 03954 78415	ash	Alive		yes	10	2	Stem	Rot-hole	W	3.5m			Yes	high	PRF - M
7	G220	3	TQ 03954 78415	ash	Alive		yes	10	3	Stem	Rot-hole	SW	2m			Yes	high	PRF - M
7	G220	4	TQ 03963 78418	unknown	Dead		No	10	1	Stem	Woodpecker-h	SE	7m		active woodpecker nest	No	high	PRF - M
7	G220	5	TQ 03941 78515	silver birch	Alive		No	10	1	Stem	Canker	SE	9m			No	Low	PRF - I
8	G226	1	TQ 04184 79497	Aspen	Alive	500	No	10	1	Stem	Woodpecker-h	MULTIPLE	4		Very damaged aspen with snapped stem and splits com	No	Mod	PRF - M
8	G226	2	TQ 04184 79508	Aspen	Alive	600	Yes x2	14	1	Stem	Wound	N	1-1.7		2 x wounds at 1-1.7m. Both appear to lead into cavities	No	Mod	PRF - M
8	G226	2	TQ 04184 79508	Aspen	Alive	600	Yes x2	14	2	Stem	Knot-hole	NE	2.5		2 x knot holes that possibly lead into cavities, not possi	Yes	Mod	PRF - M

Appendix 4 Photographs

			
Photograph 1: T026	Photograph 2: T027	Photograph 3: T031	Photograph 4: T032
			
Photograph 5: T033	Photograph 6: T034 PRF-I feature	Photograph 7: G069	Photograph 8: G075
			
Photograph 9: G075 PRF-M feature	Photograph 10: G080	Photograph 11: T082	Photograph 12: T083

			
Photograph 13: T084	Photograph 14: T085	Photograph 15: G086	Photograph 16: T087
			
Photograph 17: T087 PRF-M features	Photograph 18: G088	Photograph 19: T117	Photograph 20: T128
			
Photograph 21: G129	Photograph 22: G148	Photograph 23: G154	Photograph 24: G160

			
Photograph 25: G161	Photograph 26: G171	Photograph 27: G173	Photograph 28: G178
			
Photograph 29: G179	Photograph 30: G193	Photograph 31: T196	Photograph 32: T197
			
Photograph 33: G198	Photograph 34: G199	Photograph 35: G199 PRF-I feature	Photograph 36: T201

			
Photograph 37: T201 PRF-I feature	Photograph 38: G202	Photograph 39: G202 – PRF-I feature	Photograph 40: G203
			
Photograph 41: G211	Photograph 42: G216	Photograph 43: G216 PRF-I feature	Photograph 44: G217
			
Photograph 45: G219	Photograph 46: G220	Photograph 47: G220 PRF-I feature	Photograph 48: G220 PRF-M feature

			
Photograph 49: H221	Photograph 50: H222	Photograph 51: H223	Photograph 52: G226
			
Photograph 53: G226 PRF-M feature			