



Land at Rose Farm, Istead Rise 20251233

Bat Tree Assessment

1. INTRODUCTION

Background

- 1.1 Planning permission is sought for the proposed development of land at Rose Farm, Downs Road, Istead Rise ('the Site'). Ecological Planning & Research (EPR) has been commissioned by Esquire Developments to assess the suitability of trees which have been identified for removal to accommodate the proposals to support roosting bats.
- 1.2 Relevant background information regarding the statutory protection afforded to bats and their roosts is provided in the submitted Ecological Impact Assessment (EcIA) report.

2. METHODS

Ground Level Tree Assessment

- 2.1 A Ground Level Tree Assessment (GLTA) was completed on 30th June 2026 by a suitably experienced and Natural England-licensed EPR bat surveyor, Philip Brown BSc (Hons) MSc (R) MCIEEM, in dry, calm conditions.
- 2.2 The GLTA targeted those trees scheduled for removal in the submitted Arboricultural Impact Assessment Report (AIA; #RF23434, 27/11/25), and also extended to adjacent (retained) trees, where it was considered that these might be subject to potentially significant indirect effects. Trees and tree groups encompassed within the scope of this assessment are listed in **Appendix 1** and shown in **Figure 1**.
- 2.3 During the GLTA, trees were closely inspected from ground level with binoculars and a high-powered torch to look for the presence of any potential roosting features (PRFs) suitable for use by bats.
- 2.4 Trees were preliminarily assessed as either:
 - Not containing features suitable to support roosting bats ('None/Negligible');
 - Containing features suitable to support individual or small numbers of bats ('PRF-I'); or
 - Containing features suitable to support multiple bats and bat roosts of higher conservation significance ('PRF-M').

PRF Inspection Survey

- 2.5 Concurrent with the GLTA, trees which were assessed as either PRF-I or PRF-M from ground level, and which were safely accessible from the ground or via use of aerial inspection techniques, received close endoscopic examination of PRF's.
- 2.6 The purpose of the close PRF inspection survey was to verify or refine the categorisation of each tree, identify any evidence of roosting behaviour, and determine whether bats were present at the time of survey.

Emergence Survey

- 2.7 A dusk emergence survey was conducted covering two PRF-M trees which could not, on account of poor physiological condition arising from Ash Dieback *Hymenoscyphus fraxineus* infection, safely be investigated through aerial inspection.
- 2.8 The target trees were watched by suitably experienced EPR bat surveyors, equipped with Batlogger M ultrasound bat detectors and Night Vision Aids (NVA) in the form of Nightfox Whisker IR cameras with supplementary IR lamps.
- 2.9 Surveyor positions are indicated in **Figure 2**. Field of view and IR illumination captured by NVA units are shown in **Appendix 2**.
- 2.10 Emergence survey metadata is given in **Table 2.1** below

Table 2.1: Emergence survey metadata

Date	Start/Finish	Sunset	Temp (°C)	Cloud (%)	Wind (BFS)	Rain
30/07/26	20:34 – 22:30	20:49	22 – 21	100 – 30	2 – 3	Heavy rain shower 30 mins before survey. No rain during survey.

Constraints

- 2.11 While GLTAs can be conducted at any time of year, the summer months are considered less optimal on account of the effects of foliage on the visibility of tree structure and PRFs. Where possible, this constraint was taken into account in the scope of the concurrent PRF inspection survey, *i.e.*, through the close inspection of trees from which the likely absence of PRFs could not be confidently excluded from ground level.
- 2.12 While it is anticipated that further assessment will be conducted in due course, trees attributed with PRF-M suitability have been subject to a single presence/likely absence survey visit to date. Subject to the most suitable survey approach for each tree, this has either been a close PRF inspection survey, or an emergence survey. Applicable guidance recommends a total of three separate visits, albeit with the caveat that even the recommended three separate surveys is unlikely to provide complete confidence in a negative result.
- 2.13 This interim assessment nevertheless provides a useful indication of the extent of the roosting habitat resource which is likely to be affected by the currently proposed development.

3. RESULTS

Ground Level Tree Assessment

3.1 The following trees and tree groups were assessed as potentially suitable to support roosting bats in the course of the GLTA and concurrent PRF inspection survey:

- G16a
- G16b
- G16c
- T17
- T18
- T24
- T25
- G47
- T64
- T84
- T86

3.2 Tree and PRF descriptions are provided in **Appendix 1**; locations are shown in **Figure 1**.

PRF Inspection Survey

3.3 Following the completion of the close inspection survey, the following trees and tree groups were assessed as supporting lower suitability or 'PRF-I' features:

- G16a
- G16b
- T17
- T18
- G47
- T64
- T84

3.4 The following trees were assessed as supporting 'PRF-M' features:

- G16c
- T24
- T25
- T86

- 3.5 The close inspection by endoscope of G16c found that the identified PRF-M extends upwards approximately 50cm and doesn't extend downwards.
- 3.6 The close inspection by endoscope of T86 found that the identified PRF-M extends upwards approximately 30cm and downwards approximately 10cm.
- 3.7 No bats or evidence of bats were recorded during the PRF inspection.

Emergence Survey

- 3.8 Bat activity during the survey was limited to a single Soprano Pipistrelle *Pipistrellus pygmaeus* pass as 21:23 (34 minutes after sun set) and intermittent Common Pipistrelle *Pipistrellus pipistrellus* foraging around T24, T25 and nearby trees at 21:23 and 21:45 as indicated in **Figure 2**.
- 3.9 No bat activity associated with roosting was recorded during the emergence survey.
- 3.10 No bat activity associated with roosting was identified during the review of NVA footage completed post survey.

4. CONCLUSIONS & RECOMMENDATIONS

- 4.1 As set out in **Section 3**, the assemblage of trees that may be affected by the currently proposed development includes:
- Six PRF-I trees;
 - One PRF-I tree group (G47, a group of four apple trees); and
 - Four PRF-M trees.
- 4.2 All of the foregoing are currently proposed for removal, with the exception of one PRF-M tree, T24, which was precautionarily included within the scope of the assessment in view of its proximity to trees proposed for removal within the indicated route of the proposed spine road.
- 4.3 This section presents the conclusions of the assessment work undertaken to date and the recommendations applicable to the respective categories of trees and tree groups within the Site.
- 4.4 Notwithstanding the respective measures prescribed below, an update assessment is likely to be required if more than two further survey seasons elapse before the commencement of clearance works.

Trees Not Assessed

- 4.5 The scope of this assessment is limited to those trees and tree groups listed in **Appendix 1** (and represented in **Figure 1**). Further ecological assessment would be required in the unanticipated event that any additional trees are subsequently identified for significant arboricultural intervention or are otherwise considered likely to be subject to significant direct or indirect effects arising from the proposals.

'None/Negligible' Trees

- 4.6 Trees and tree groups categorised as 'None/Negligible' in **Appendix 1** and **Figure 1** were found to support no PRFs and have no or negligible suitability to supporting roosting bats.
- 4.7 Subject to the foregoing proviso regarding update assessment, no further bat-related ecology input is currently required in respect of such trees.

'PRF-I' Trees

- 4.8 Trees categorised as 'PRF-I' on the basis of the GLTA and verifying PRF inspection survey, were found to support features suitable to support individual or small numbers of bats only. No further survey work is required for trees within this category.
- 4.9 Where removal is required, PRF-I trees will be carefully section-felled under a Precautionary Working Method Statement (PWMS), the details of which can be provided within a Construction Environmental Management Plan (or otherwise secured by condition), but will accord with the approach set out at 6.5.8ff of the Bat Mitigation Guidelines (2025) – or any succeeding guidance.
- 4.10 An overall net gain in tree-roosting opportunities can be achieved through the installation of proprietary bat boxes on suitably located retained trees at a provision rate of two boxes per individual PRF-I tree removed – the details of which can be secured by condition.

'PRF-M' Trees

- 4.11 The four trees categorised as 'PRF-M' were found to support features capable of accommodating multiple bats – although no evidence of roosting bats was identified during the close PRF inspection survey conducted upon G16c and T86 nor the emergence survey conducted upon T24 and T25.
- 4.12 Two further survey visits of the respectively applicable survey method will be completed at suitable intervals during the active season to determine whether bat roosts are considered present or likely absent (with the caveat that bat tree surveys are unlikely to give complete confidence in a negative result).
- 4.13 If no evidence of roosting bats is recorded over three visits, and subject to the foregoing proviso on update assessment, PRF-M trees will be removed (where required) under a PWMS as described above, with tree-mounted bat boxes provided at a minimum rate of three bat boxes for each tree lost.
- 4.14 In the event that a roost is identified during subsequent survey work, the respective tree will be removed under a 'European Protected Species' mitigation licence (EPSML), if the current licensing system remains extant at the point of site clearance - or otherwise in accordance with the succeeding permitting regime. A mitigation licence has already been identified as a requirement for the proposed removal of structures within the Site supporting bat roosts.
- 4.15 In respect of the statutory protection afforded to 'European Protected Species', EPR's understating is that the obligations of the Local Planning Authority (LPA) at the stage of reviewing a planning application do not extend to duplicating the duties of Natural England (NE), and that the LPA only has a basis for refusing planning permission where, 1) a criminal offence

relating to a European Protected Species is likely to result from development, and 2) a licence from NE is 'unlikely' to be granted.

- 4.16 There is ample scope within the parameters of the current proposals for translocating or re-creating the types of PRF that could be affected by the proposed development, and for delivering the level of compensation likely to be required by NE in the event that a roost is identified. It is consequently not 'unlikely' that a mitigation licence will be granted should the need arise.

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Figure 1 Suitability of Trees Identified for Removal to Support Roosting Bats

KEY

Site boundary

Retained in AIA, but close to impacts

Tree suitability:

- PRF-M
- PRF-I
- None/Negligible
- PRF-I
- None/Negligible

N.B. Unless highlighted as retained, tree/tree groups are listed for removal in AIA

SCALE: 1:2,000 at A3

0255075100125 Metres

N





Figure 2 Emergence Survey - 30/07/2026

- KEY
- Site boundary
 - PRF-M
 - Surveyor position
 - Unmanned NVA
 - Approximate canopy of surveyed trees
 - Common Pipistrelle observed flight
 - Soprano Pipistrelle observed flight
 - (f) Foraging
 - (p) Pass

T24 - Tree to be retained
T25 - Tree to be removed

Main Map Frame:
SCALE: 1:200 at A3

0 2 4 6 8 10 Metres



CLIENT: Esquire Developments Ltd
PROJECT: Istead Rise, Kent
DATE: 03 August 2026

Appendix 1

Tree Assessment Results

The below table shows the results of assessment, inspection and survey work for trees identified for removal (white rows), and adjacent retained trees, where it was considered that these trees might be subject to potentially significant indirect effects (light blue rows).

Additional information about the trees listed below can be found in the Arboricultural Impact Assessment (AIA), ref #RF23434, dated 27th November 2025, produced by Down to Earth Trees Ltd.

Tree number	Species	Removal status	Suitability, following GLTA and PRF inspection	Description of PRFs identified	Approach to further survey work	Results of completed presence/absence surveys
G11	Cherry	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
G12	Mixed	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T14	Sycamore	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T15	Ash	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
G16	Mixed	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
G16a	Sweet Chestnut	Listed for removal in AIA	PRF-I	Hazard beam, south, 5m. Features extend 10cm towards the main trunk and 30cm away from the main trunk but neither are particularly sheltered or protected, limiting suitability.	n/a	n/a
G16b	Ash	Listed for removal in AIA	PRF-I	Tear out, north, 10m. Large snapped off branch leaving large skyward facing wound which is open to the elements and therefore has limited suitability.	n/a	n/a

Tree number	Species	Removal status	Suitability, following GLTA and PRF inspection	Description of PRFs identified	Approach to further survey work	Results of completed presence/absence surveys
G16c	Ash	Listed for removal in AIA	PRF-M	Woodpecker hole, west, 4m. Cavity extends upwards from entrance by 50cm.	PRF Inspection	No bats or evidence of bats recorded
T17	Hornbeam	Listed for removal in AIA	PRF-I	Knot hole, north, 5m. Feature goes back 5cm but is open to the elements.	n/a	n/a
T18	Hornbeam	Listed for removal in AIA	PRF-I	Weld, south, 2m. Shallow feature.	n/a	n/a
T19	Hornbeam	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T21	Hornbeam	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T22	Hornbeam	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T24	Ash	Listed for retention, but close to T25 and indicated spine road	PRF-M	Wounds, north and south, 8m. Damage either side of main trunk in crown and canopy of T24 forms a functional part of the PRFs in T25 below.	Emergence survey	No bat activity associated with roosting was recorded
T25	Ash	Listed for removal in AIA	PRF-M	Woodpecker holes, west, 8m. 2x holes on main stem, with split below indicting that the cavity likely extends. Woodpecker hole, south, 6m. 1x hole likely linked to a split from an old tear out.	Emergence survey	No bat activity associated with roosting was recorded
G35	Hawthorn	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
G38	Mixed	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T46	Oak	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
G47	Apple	Listed for removal in AIA	PRF-I	Tear outs and knot holes, various aspects, all below 1m. Multiple PRF-I features across 4x trees, generally sky facing, open to elements and not sheltered.	n/a	n/a

Tree number	Species	Removal status	Suitability, following GLTA and PRF inspection	Description of PRFs identified	Approach to further survey work	Results of completed presence/absence surveys
T48	Ash	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T57	Walnut	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T58	Walnut	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T64	Judas Tree	Listed for removal in AIA	PRF-I	Tear out, south, 2m. Doesn't extend. Compression fork, north, 2m. Limited suitability around healed cuff.	n/a	n/a
T79	Scots Pine	Listed for retention, but close to interface with residential development	None/Negligible	n/a	n/a	n/a
T80	Cherry	Listed for retention, but close to interface with residential development	None/Negligible	n/a	n/a	n/a
T81	Silver Birch	Listed for retention, but close to interface with residential development	None/Negligible	n/a	n/a	n/a
G82	Mixed	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T83	Cherry	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T84	Cherry	Listed for removal in AIA	PRF-I	Butt-rot, north, 1m. Large wound and rot at base of tree. Fully inspected, limited suitability for bats as feature open to elements.	n/a	n/a
T85	Western Red Cedar	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T86	Silver Birch	Listed for removal in AIA	PRF-M	Tear out, south, 5m. Feature goes up 30cm and down 10cm. Entrance area open to elements.	PRF Inspection	No bats or evidence of bats recorded

Tree number	Species	Removal status	Suitability, following GLTA and PRF inspection	Description of PRFs identified	Approach to further survey work	Results of completed presence/absence surveys
T87	Cherry	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a
T88	Pear	Listed for retention, but close to interface with residential development	None/Negligible	n/a	n/a	n/a
T89	Pear	Listed for retention, but close to interface with residential development	None/Negligible	n/a	n/a	n/a
T90	Pear	Listed for removal in AIA	None/Negligible	n/a	n/a	n/a

Appendix 2

Field of view and IR illumination captured by NVA units at the darkest point of the emergence survey completed on 30/07/2026.

NVA 1 – T25, 2x woodpecker holes, with split below (8m west).

Survey Start



Survey End



NVA 2 – T25, 1x woodpecker hole and split from an old tear out (6m south).

Survey Start



Survey End

