

## **Thames Basin Heath Special Protection Area Avoidance Strategy (SPD) Consultation Statement in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012**

The Thames Basin Heath Special Protection Area Avoidance Strategy Supplementary Planning Document (SPD) sets out an approach whereby new residential development between 400m and 5km of the Special Protection Area (SPA), an important habitat for rare species of birds, can avoid adverse effects on it. The SPD provides detail on achieving this by providing Suitable Alternative Natural Greenspace (SANG) as an alternative site for recreation, and by funding access management and monitoring measures on the SPA itself.

Before a Local Planning Authority adopts an SPD, Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires it to publish a statement setting out:

- i. The persons the local planning authority consulted when preparing the Supplementary Planning Document;
- ii. A summary of the main issues raised by those persons;
- iii. How those issues have been addressed in the Supplementary Planning Document.

This statement reflects these requirements. The Council carried out public consultation on the SPD for a period of six weeks between 5 September to 17 October 2025. A list of persons consulted during that consultation can be found in Appendix 1. In addition, the consultation was publicised through notices in local newspapers and on the Council's website. Representations made have been considered and the main issues are summarised in Appendix 2. This also includes reference to how the issues raised have been considered and addressed.

The following modifications have been made as a result of the representations received and are incorporated in the SPD. They enhance the quality of and/or provide updated information to the SPD:

- An amendment has been made to p18, paragraph 6.4 and p24 paragraph 10.10 'This will come into effect for all planning applications received once there is sufficient SANG capacity to do so. Therefore, the Council will continue to allocate on commencement (as per Building Control notification).'
- An amendment has been made based on Natural England comments page 23, management plans must contain in-perpetuity (minimum of 80 years) maintenance and management costings, as well as a named-management company, and step-in rights where applicable\*.

\*For bespoke/on-site SANGs, a management company must be elected at the planning application stage and agreed in writing for the management of the SANG in perpetuity. If it is not the Local Planning Authority/Land Trust or equivalent, then

step-in rights also need to be agreed in writing with the Local Planning Authority. Natural England need to see a named management company, and step in-rights secured if applicable.

- An amendment has been made to in response to Environment Agency comments, on page 23, 'Future SANG sites which have ecological value should have an ecological survey to ensure it contributes to the protection, enhancement and management of local biodiversity, nature conservation, and areas of hydrological importance.'
- On page 24, under 10.8 the word 'SANG' has been added for clarity

The Council is satisfied that the Thames Basin Heath Special Protection Area Avoidance Strategy SPD has been prepared in accordance with the Regulations and other relevant statutory procedures.

#### **Appendix 1: Persons and organisations consulted during consultation**

A. Priestley	Countryside Properties	Iceni Projects Limited	Persimmon Homes	Tesni Properties Limited
A.Ashley	Courtley Consultants Ltd	Iconic Design	Peter Brett Associates	Testament Land Company (TLC)
A.Elliott	CPRE Surrey	Indigo Planning Ltd	Petrofac	Tetlow King Planning
A.Jenner	Crane And Associates	Inland Waterways Association	Phase 2 Planning	Thakeham Homes
AAP Architecture Ltd	Crest Nicholson	Island Design	Phase2Planning	Thames Valley Housing Association
ABRI	Crest Strategic Projects	J. Hartley	Pinecroft Housing Association	Thames Water Planning/Property
Ace Marcelle Hope Limited	Croudace	James Smith Associates	Pirbright Parish Council	The East Hill Residents Association
Adams Planning And Development Ltd	Crystal Stream	JLL	Places for People and Surrey County Council	The Federation of Small Businesses

ADM Architecture	Curchods	Joanne Prior	Planning Issues And Churchill Retirement	The Hoyte
Advoco Planning	D And M Planning Limited	John Ebdon Homes	Planning Issues Ltd	The John Phillips Planning Consultancy
Affinity Waters	Dalton Warner Davis LLP	Jones Day	Planning Potential	The Landmark Trust
Age Concern	Dandara	Jones Lang LaSalle Ltd	Planware Ltd	The National Trust
Age Concern Woking	Danks Badnell	JSA Architects	Pleydell Smithyman Limited	The Planning Bureau Limited
Al Birr	David L. Walker Chartered Surveyors	Keith Hiley Associates Ltd	POS (SE)	The Planning Inspectorate
Alderking Planning Consultants	Deafplus	Kiely Planning	PRC	The Ramblers
Alexson Homes	Dean Lewis Estates	Kier Homes Ltd	Prey Heath	The Riding Residents Association
Alpha Road Residents Association	DEFRA	King Sturge	Probation services	The Rotary Club Of Woking
AMG Planning And Development	Deloitte	Knaphill Residents Association	PRP Architects	The Sirius Group
Anderson Planning And Development	Development Planning Partnership	Knowles	Pyrford Green Belt Action Group	The Woking Asian Business Forum
Anthony's Residents Association	Devine Homes PLC	Lacey Simmons Ltd	Pyrford Homes Ltd	The Woodland Trust
Apcar Smith Planning	DHA Architecture	Lambert Smith Hampton	Pyrford Neighbourhood Forum	The Byfleet, West Byfleet & Pyrford Residents' Association
Archaeology UK	DHA Planning	Lamron Developments Ltd	Quinton Scott Chartered	Thomas Eggar LLP

			Surveyors And Estate Agents	
Arcus Consultancy Service Ltd	DHS Engineering	Landlords Organisation	Quod	Tourism South East
ARR Developments Ltd	DM Planning	Landmark Information Group Ltd	R.Cook	Tower Homes Ltd
Ashill Developments	Doherty Baines	LDA Design	R.G. Mole and Co. Ltd	Transform Housing
Aspire Architects LLP	Downland Housing Association	Leach And Co	Rapleys LLP	Travellers Law
Avison Young	DPDS Consulting Group	Leigh Place Properties Ltd	Red Berry Living	Turley
Axis Land Partnerships	DPDS Planning Consultant	Leith Planning Ltd	Redrow Homes Southern Division	Turley Associates
B and C.Watt	Drivers Jones Deloitte	Lewandowski Architects	Reef Estates Ltd	UK Power Networks
B.Read	Edgington Spink And Hyne Architects	Linden Homes	Reigate And Barnstead Borough Council	Union4 Planning
Banner Homes (Wessex) Ltd	Egley Road Residents Association	Linden Homes South-East Limited	Reside Developments	Vail Williams
Barratt Homes	Elivia Homes Southern	Linden Properties Surrey Ltd	Reside Developments Ltd.	Veolia
Barratt Homes (Southern Counties)	Elmbridge Borough Council	Link Leisure	RG And P Ltd	Veolia Water Central
Barton Willmore	Environment Agency	Lizard Estates	Richborough	
Barton Willmore LLP	Epsom And Ewell Borough Council	LOC Consulting	Richborough Estates	Victorian Society
Basingstoke Canal Authority	Fairview New Homes Plc	London And Quadrant Housing Trust	Ridge and Lytton Road Residents Association	Village Foundations

Batcheller Thacker	Firstplan	M. Bartley	Ripley Parish Council	W.Davies
BCM	Ford And Farm Road Residents Association	MAA Architects	Rippon Development Services	Walsingham Planning
BDB Pitmans LLP	Forestry Commission	Main Allen Property Consultancy Ltd	Rolfe Judd	Waterfall, Durrant And Barclays
BDW SOUTHERN COUNTIES	Form Architecture And Planning	Marcus Iaing	Romans Land	Wates Developments
Beaumonde Homes	Frank Winter Associates	Marrons Planning	Rosemary Simmons Memorial Housing Association	Watkin Jones
Beckbridge LTD	Friars Rise Residents Association	Martin Critchell Architects	Rosetower Ltd	Waverley Borough Council
Beechcroft Developments	Friends Of The Earth	Martin Gardner	Royal Borough Of Windsor And Maidenhead	Webb South East Put and Surrey County Council
Bell Cornwell	Fullerthorne	Martin Grant Homes	RSPB	Welmede Housing Association
Bellway Homes Ltd	G And B O'Malley	Mary Hackett And Associates	Ruby Wilkinson	West Byfleet Golf Club
Bewley Homes	G. Greavett	Maven Plan Ltd	Runnymede Borough Council	West Byfleet Neighbourhood Forum
Birchwood Homes	gandt forum	Maybury Sheerwater Partnership Garden Project	Runnymede Borough Council	West End Parish Council
Bishopgate Homes Ltd	Garden society	Mayer Brown	Runnymede Homes Ltd	West Estates Ltd
Bisley Parish Council	Gatineau	Mayford Village Society	Rushmon Homes	West Hall Estate Company Ltd
Blue Cedar Homes	Gay Surrey	MBH Partnership	Rushmon New Homes	West Hall Estate Ltd

BNP Parabis Real Estate	General Medical Council	MBR Wealth	Rushmoor Borough Council	Westfield (Hoe Valley) Residents Association
Boodia	George Wimpey West London Ltd	McClosky And Bingham	Ruston Planning Limited	Westfield Common Preservation Society
Bovis Homes Limited	Gerald Eve	McLaren Technologies Group LTD	Rutland Group	Westfield Common Resident Association
Boyer Planning Limited	Gillenden Development Company	MDA	Rydon Homes	Wey Estates
Bracknell Forest Council	Gillings Planning	MDA Planning	Sandy Way Residents Association	Wheelchair Accessible Vehicles (WAVS)
Brambledown Residents Association	GL Hearn	Menzies	Savills	Will Forster MP Parliament
Brimble, Lea And Partners	Gladman Developments Ltd	Mercury Planning	Scottish Gas Networks	William Lacey Group
British Land Properties	Glen House Estates Ltd	Mike Hart Architect	Send Parish Council	Wisley Parish Council
Broadway Malyan	Gloster Road And Priors Croft Residents Association	Miss Sarah Green	Seymours	Woking Chamber Of Commerce
Brookwood And Bridley Neighbourhood Forum	Goadsby And Harding Commercial	Mitchell Evans Partnership	Shanly Homes	Woking Cycle Users Group
Brookwood Village Association	Goldcrest Homes	Mobile Operators Association	Sheerwater Residents Association	Woking Football Club
Brown and Co	Goldsworth Park Community Association	Mole Valley District Council	Sheets Heath Residents Association	Woking Mind

Bruton Knowles	Grant Consultancy	Montagu Evans	Shrimplin Brown Planning And Development	Woking Scouts
Bryan Jezeph Consultancy	Gravitas 1061 Limited	Montague Alan Ltd	Southern Gas Networks	Woking Sports Council
BT Connect	Greenoak Housing Association	Morgan Smithyes	Southern Gas Networks	Woking Youth Council
Burhill Golf And Leisure Limited	Guildford Borough Council	Mott Macdonald	Southern Star Property Investments	Wokingham Council
Burhill Group Limited	Gurney Consulting Engineers	Mouchel	Sovereign	Wood Plc
Byfleet Neighbourhood Forum	GVA Grimley	Moyallen	Spelthorne Borough Council	Woodham And Horsell Neighbourhood Forum
Byfleet Residents Neighbourhood Forum	Gypsy Traveller org	Mr And Mrs David Thompson	Sport England	Woodham Way Residents Association
Byfleet United Charities	Hackwood Homes Ltd	Mr Paul Wigley	SSA Planning Limited	Woodland Trust
Byfleet Village Association	Hallam Land Management	Mr Robert Shrimplin	St. Modwen	Woolf Bond Planning
Byfleet, West Byfleet and Pyrford Residents' Association	Hart District Council	Mr Simon Owen HTA Design LLP	Stanhope Plc	Work Space Group
C T Planning	Hayward Partnership	N K Accountancy	Sterling Portfolio Management On Behalf Of Leylani Ltd	Worplesdon Parish Council
Caistor Properties Limited	Henry Adams Planning Ltd	Nathaniel Lichfield And Partners	Stewart Ross Associates	Wych Hill Way Residents Association

CALA House	Henry Smith	National Gas	Stonham Housing Association	WYG
Cameron Jones Planning	Heritage Property Consultant	National Grid	Strategic Land Partnerships	WYG Environment Planning Transport Ltd
Campaign To Protect Rural England	Heritage Architecture	National Housing Federation	Strutt & Parker	
CapGemini	Heronsbrook	National Trust	Stuart Ross Associates	
Carter Jonas	Highways England	Natural England	Surrey And Farming Wildlife Advisory Group	
Carter Planning Ltd	Historic England	Neighbourhood Planning	Surrey Campaign to Protect Rural England	
Castle Wildish Chartered Surveyors	Hockering Gardens Residents Association	Network Rail	Surrey Coalition Of Disabled People	
Catesby Property	Hockering Residents Association	NFU Office	Surrey Connect	
CBRE	Hoe Valley Residents Forum	NHS	Surrey County Council	
CGMS	Holder Mathias Architects	Obsidian Strategic	Surrey County Playing Fields Association	
Chalmers	Homes And Communities Agency	Ockham Parish Council	Surrey Heath Borough Council	
Chapman Lily Planning Ltd	Homes and Community Agency	Octagon	Surrey Heathland Project	
Charles Church Developments Ltd	Homes England	Octagon Developments Ltd	Surrey Lifelong Learning Partnership	



Charterhouse Strategic Land	Hook Heath Neighbourhood Forum	Office of Rail and Road	Surrey Nature Partnership	
Cheapside Residents Association	Hook Heath Residents Association	Old Woking Community Association	Surrey Playing Fields	
Childs & Co And Woodstead Properties Ltd	Horne Associate	Omega Architects	Surrey Police	
Chobham Parish Council	Horsell Common Preservation Society	One World Architects	Surrey Wildlife Trust	
Churchods	Horsell Park Residents Association	Open Spaces Society	Sussex and Surrey Police	
CLA Southeast	Horsell Residents Association	Outline Surrey	Sussex Wildlife Trust	
Clarence Country Homes Limited	House Builders Federation	Paradigm Planning Limited	Sutton Green Association	
Clarke Willmott	HRA Planning Sub-Committee	Parnell Design Partnership LLP	Sutton Green Village Hall And Association	
Coal	HTA Design LLP	PBA	Tandridge District Council	
Conceptual Design	Hunterhill Estates Ltd	PC Dalton Planning	Tanner And Tilley Town Planning Consultants	
Convery Developments Ltd	Hyde Housing Association (Hyde Martlet)	Peacock And Smith	Tantalus Homes Ltd	
Cooper Environmental Planning	Hyder Consulting (UK) Ltd	Pegasus	Taylor Wimpey Strategic Lane	
Cornerstone Telecommunications Infrastructure Limited	ICENI	Pegasus Group	Terence O'Rourke	

## Appendix 2. Summary of the main issues raised in consultation, and how they have been considered and addressed

	Name of respondent	Summary of representation	Officer's response and modification
1	Martin Grant Homes	<ul style="list-style-type: none"> <li>Existing and proposed SANGs only meet housing needs to 2027; no recognition of increased housing need.</li> <li>Current CIL Charging Schedule may not support future housing delivery.</li> <li>Developments over 100 units may be required to provide bespoke SANGs. Council should adopt a flexible approach to avoid hindering housing supply.</li> <li>Priority given to Site Allocations DPD developments may limit support for other proposals. Support all suitable developments with available SANG capacity.</li> <li>SANG allocation occurs at planning permission stage. Identify SANG capacity earlier to support timely housing delivery.</li> <li>Latest AMR is outdated. Publish SANG capacity updates more regularly (at least annually).</li> </ul>	<ul style="list-style-type: none"> <li>Yes, this document focusses on the current local plan. The Council acknowledges the increased housing number and additional SANG capacity will be allocated in the updated Local Plan, which the council is currently working on. The Council has held a call for sites and is actively seeking additional SANG sites and working with developers to produce their own bespoke SANG.</li> <li>The Council will review the CIL Charging Schedule as part of the Local Plan update and will consult accordingly.</li> <li>The Council has a finite supply of SANG and must therefore prioritise strategic SANG, requesting developers to provide bespoke SANG where necessary. Each development will be assessed on a case-by-case basis to ensure sufficient SANG is available. Other policy compliant developments that are not included in the Site Allocation DPD are also prioritised.</li> <li>The council does discuss SANG at early stages such as at pre-app stage to ensure there is sufficient SANG to mitigate the development and at application stage where the SANG is named on the Appropriate Assessment. The Council will continue to allocate at commencement (as per Building Control notification) until there is sufficient SANG capacity to allocate at planning permission stage. A sentence has been added to the SPD to reflect this.</li> <li>Noted- The Council will ensure annual updates to SANG capacity are published in the AMR.</li> </ul>

2	Environment Agency	<ul style="list-style-type: none"> <li>• 5km–7km zone omitted from protection.</li> <li>• Zone A developments lack robust mitigation strategy.</li> <li>• Suggests improvements to mapping,</li> <li>• Lack of formal cross-boundary cooperation.</li> <li>• Ecological sensitivity of proposed SANG sites.</li> <li>• Council staff should prioritise CIL funded projects before being agreed by elected members. This will aid in local knowledge being utilised.</li> <li>• Cumulative impact of small developments not addressed.</li> <li>• Support BNG inclusion</li> <li>• SANGs not included in wardening scheme.</li> <li>• Further detail on mitigation measures</li> <li>• Site area is unclear and should be defined as SANG area</li> </ul>	<ul style="list-style-type: none"> <li>• This is incorrect, on Page 4, it states, ‘Within a 5km to 7km zone around the SPA, the impact of major developments of more than 50 units is assessed on a case-by-case basis with Natural England’</li> <li>• Policy CS8 is clear that no net new development in Zone A is permitted because it cannot be fully mitigated. The onus is on the applicant to demonstrate if they have any exceptional circumstances which need to be considered by the LPA and Natural England.</li> <li>• The maps are separate as the proposed SANGs have not yet come forward. Once they are operational a new map will be formed to combine all the catchment areas with a clearer legend.</li> <li>• This is incorrect. The council is part of the Joint Strategic Partnership Board which are a board comprising of the Eleven Thames Basin Heath local authorities and other relevant partners including Natural England and Surrey Wildlife Trust, established to plan for the long term protection of the SPA. This ensures formal cross-boundary cooperation with neighbouring authorities.</li> <li>• The Council is aware some of the proposed SANGs are ecological sensitive and need to be designed carefully. The site Allocation DPD acknowledges this and for example in terms of Gresham mill SANG, due to ‘it’s proximity to the River Wey - detailed design should be sensitive to this biodiversity and ecological corridor, with any proposed physical ancillary development or infrastructure set back to create a 10m undeveloped buffer’ . A sentence will be added to reflect any future SANG sites will ensure it is accompanied by an ecological survey.</li> <li>• All the elected members live in the borough and have excellent knowledge of the needs of their area.</li> </ul>
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			<ul style="list-style-type: none"> <li>• Cumulative impacts of smaller developments are addressed as they are also mitigated against and are part of the Appropriate assessment process.</li> <li>• Support for BNG noted</li> <li>• Wardens are not a requirement for SANG as per Natural England SANG guidance.</li> <li>• Mitigation measures will vary depending on the type of development coming forward and where it is situated, this will be looked at on a case by case basis.</li> <li>• Noted and will change to SANG area. An amendment has been made to reflect this.</li> </ul>
3	Forestry Commission	<ul style="list-style-type: none"> <li>• supports the use of Suitable Alternative Natural Green Space (SANGS) to protect the integrity of the Thames Basin Heath SPA.</li> <li>• Opportunity to enhance SANGs through connectivity.</li> <li>• Value of tree and woodland cover in SANGs.</li> <li>• Supports Biodiversity Net Gain (BNG) requirements and suggests using trees and woodlands to meet BNG objectives.</li> <li>• Use of locally sourced materials.</li> </ul>	<ul style="list-style-type: none"> <li>• Support welcomed.</li> <li>• The Council will explore opportunities to enhance connectivity between SANGs and integrate woodland and green infrastructure principles where feasible.</li> </ul>
4	Natural England	<ul style="list-style-type: none"> <li>• SANG applications and management plans often lack in-perpetuity (minimum 80 years) maintenance and management costings, a named management company, and step-in rights where applicable. This can lead to delays and further information requests from Natural England.</li> <li>• Recommends including wording in the strategy to address these requirements and reduce delays.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategy will be updated to include requirements for in-perpetuity maintenance costings, identification of a named management company, and step-in rights where applicable.</li> </ul>

<b>5</b>	Surrey County Council	No comments raised.	Noted
<b>6</b>	Rushmoor Borough Council	No comments at this time. Requests to be notified of future consultations.	Noted
<b>7</b>	Historic England	No comments. Notes that the strategy is unlikely to have significant effects on the historic environment.	Noted
<b>8</b>	National Highways	Reviewed the strategy and has no comments. Notes interest in proposals that may affect the M3 and M25 motorways.	Noted