

## **Woking Borough Council Thames Basin Heath Special Protection Area Avoidance Strategy (SPD)**

### **Consultation Statement**

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; and
- 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 27 September and 8 November 2021. 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 following the consultation, 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 reflect the distinction between the Special Protection Area (SPA) and Special Area of Conservation (SAC).
- A new paragraph has been inserted at 3.11 to establish the principle for the future use of SANGs to meet biodiversity net gain requirements, as being brought forward through the Environment Act.
- An amendment has been made to clarify the location of Sheets Heath SSSI within the Borough.
- A link to the Thames Basin Heath Partnership website has been inserted into the document to enable the public to find out more information about the SPAs.
- Appendix 2 has been updated to reflect new Natural England guidance, and an extra requirement regarding cycle access, with consequential amendments.
- References to the NPPF and Site Allocations DPD have been updated.

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**

### **Specific consultee bodies**

AMEC  
Bisley Parish Council  
Bracknell Forest Council  
Chobham Parish Council  
DEFRA  
Department for Transport  
Elmbridge Borough Council  
Heritage England – South East Region  
Environment Agency  
Epsom and Ewell Borough Council  
Guildford Borough Council  
Hart District Council  
Highways England  
Mobile Operators Association  
Mole Valley District Council  
National Grid  
Natural England  
Network Rail  
Ockham Parish Council  
Pirbright Parish Council  
POS (SE)  
Reigate and Banstead Borough Council  
Ripley Parish Council  
Royal Borough of Windsor and Maidenhead  
Runnymede Borough Council  
Rushmoor Borough Council  
Send Parish Council  
Southern Gas Networks  
Spelthorne Borough Council  
Sport England South  
Surrey County Council  
Surrey Heath Borough Council  
Tandridge District Council  
Thames Water  
The Planning Inspectorate  
Veolia Water  
Waverley Borough Council  
West End Parish Council  
Wisley Parish Council  
Wokingham Borough Council  
Worplesdon Parish Council

### **Developers and Agents**

AAP Architecture Ltd  
Adams Planning And Development Ltd  
ADM Architecture  
Advoco Planning  
Alexson Homes  
Alliance Environment And Planning Ltd  
AMG Planning And Development  
Anderson Planning And Development  
Apcar Smith Planning  
ARR Developments Ltd  
Ashill Developments  
Aspire Architects LLP  
Axis Land Partnerships  
Banner Homes (Wessex) Ltd  
Baratt Homes  
Barratt Homes (Southern Counties)  
Barton Williams  
Batcheller Thacker  
BBF Fielding  
BCM  
Beaumonde Homes  
Beckbridge LTD  
Beechcroft Developments  
Bell Cornwall  
Bewley Homes PLC  
Birchwood Homes  
Bishopgate Homes Ltd  
Blue Cedar Homes  
Blue Sky Planning Ltd  
BNP Parabis Real Estate  
Bonham Homes Ltd  
Bovis Homes Limited  
Bovis Homes Ltd  
Brimble, Lea And Partners  
Broadway Malyan  
Bruton Knowles  
Bryan Jezeph Consultancy  
Burhill Golf And Leisure Limited  
Burhill Group Ltd  
Caistor Properties Limited  
Cala Homes (South)  
Cameron Jones Planning  
Carter Jonas  
Castle Wildish Chartered Surveyors  
Catesby Property  
CGMS  
Chapman Lily Planning Ltd  
Charles Church Developments Ltd  
Charterhouse Strategic Land

Childs & Co And Woodstead  
Properties Ltd  
Churchods  
CLA Southeast  
Clarence Country Homes Limited  
Clarke Willmott  
Conceptual Design  
Cooper Environmental Planning  
Crane And Associates  
Crest Nicholson  
Crest Strategic Projects  
D And M Planning Limited  
Dandara  
Danks Badnell  
David L. Walker Chartered Surveyors  
Dean Lewis Estates  
Deloitte  
Denning Male Polisano  
Development Planning Partnership  
Devine Homes PLC  
DHA Planning  
Doherty Baines  
DPDS Consulting Group  
Drivers Jones Deloitte  
Edgington Spink And Hyne Architects  
Fairview New Homes Plc  
Firstplan  
Form Architecture And Planning  
Frank Winter Associates  
Fullerthorne  
Fusion Online Limited  
Fusion Online Limited  
George Wimpey Ltd  
Gerald Eve  
Gillenden Development Company  
Gillings Planning  
GL Hearn  
Gladman Developments Limited  
Glen House Estates Ltd  
Goadsby And Harding Commercial  
Goldcrest Homes  
Grant Consultancy  
Grant Consultancy  
Gurney Consulting Engineers  
GVA Grimley  
Hackwood Homes Ltd  
Hallam Land Management Limited  
Hammerson UK  
Hayward Partnership  
Henry Adams Planning Ltd

Henry Smith  
Heriage Property Consultant  
Heritage Architecture  
Heronsbrook  
Holder Mathias Architects  
House Builders Federation  
HTA Design  
HTA Design LLP  
Hunterhill Estates Ltd  
Hyder Consulting (UK) Ltd  
ICENI  
Iceni Projects Limited  
Iconic Design  
Indigo Planning Limited  
James Smith Associates  
John Ebdon Homes  
Jones Lang LaSalle Ltd  
JSA Architects  
K Jones  
Keith Hiley Associates Ltd  
Kiely Planning  
Kier Homes Ltd  
King Sturge  
Kingdom  
Lacey Simmons Ltd  
Lambert Smith Hampton  
Lamron Developments Ltd  
Landmark Information Group Ltd  
LDA Design  
Leigh Place Properties Ltd  
Leith Planning Ltd  
Linden Homes South-East Limited  
Linden Properties Surrey Ltd  
Lizard Estates  
LOC Consulting  
London And Quadrant Housing Trust  
MAA Architects  
Main Allen Property Consultancy Ltd  
Mark Leedale  
Marrons Planning  
Martin Critchell Architects  
Martin Grant Homes  
Mary Hackett And Associates  
Maven Plan Ltd  
Mayer Brown  
McClosky And Bingham  
MDA  
Mercury Planning  
MGA Town Planning  
Michael Shanley Group

Mike Hart Architect  
Millgate Homes  
Mitchell Evans Partnership  
Morgan Smithyes  
Mott Macdonald  
Mouchel  
Simon Owen HTA Design LLP  
National Housing Federation  
Octagon Developments Ltd  
Omega Partnership  
One World Architects  
Paradigm Planning Limited  
Parnell Design Partnership LLP  
PBA  
PC Dalton Planning  
Peacock And Smith  
Pegasus Group  
Persimmon Homes  
Peter Allan  
Peter Black Associates  
Peter Brett Associates LLP  
Petrofac  
Phase2Planning  
Pitmans  
Planning Issues And Churchill  
Retirement  
Planware Ltd  
Pleydell Smithyman Limited  
PRC  
Pyrford Homes Ltd  
Quinton Scott Chartered Surveyors  
And Estate Agents  
Quod  
Quod Ingeni Building  
R Perrin Town Planning Consultants  
Rapleys LLP  
Red Berry Living  
Reef Estates Ltd  
Reside Developments  
RG And P Ltd  
Richborough Estates  
Rippon Development Services  
Rolfe Judd  
Romans Land And Planning  
Rosetower Ltd  
Royal London Mutual Insurance  
Society Ltd  
Runnymede Homes Ltd  
Rushmon New Homes  
Ruston Planning Limited

Rutland Group  
Rydon Homes  
Savills  
Seymours  
Shanly Homes  
Shrimplin Brown Planning And  
Development  
SJR KMN Woking LLP  
Solum  
South Ridge Development LLP  
Southern Star Property Investments  
Sovereign  
SSA Planning Limited  
St. Modwen  
Stanhope Plc  
Stewart Ross Associates  
Strategic Land Partnerships  
Strutt & Parker  
Stuart Ross Associates  
Tanner And Tilley Town Planning  
Consultants  
Taylor Wimpey Strategic Lane  
Terence O'Rourke  
Tesni Properties Limited  
Testament Land Company (TLC)  
Tetlow King Planning  
Thakeham Homes  
The John Phillips Planning  
Consultancy  
The Landmark Trust  
The Planning Bureau Limited  
The Planning Inspectorate  
Thomas Eggar LLP  
Tower Homes Ltd  
Turley  
Union4 Planning  
Vail Williams  
Village Foundations  
Vincent James Homes Ltd  
Wates Developments  
Watkin Jones  
William Lacey Group  
Woolf Bond Planning  
WYG

### **Housing Associations**

A2 Dominion  
Ability Housing Association  
Accent Peerless Ltd  
Affinity Sutton

Bracknell Forest Homes  
Catalyst Housing  
Downland Housing Association  
Greenoak Housing Association  
Housing 21  
Hyde Housing Association (Hyde  
Martlet)  
London & Quadrant Housing Trust  
Mount Green Housing Association  
New Vision Homes  
Paragon Housing Association  
Places for People Ltd  
Rosemary Simmons Memorial  
Housing  
Association  
Rosetower Ltd  
Servite Houses  
South Neighbourhood: L&Q Housing  
Trust  
Stonham Housing Association  
Surrey Heath Housing  
Thames Valley Housing Association  
The Guinness Trust  
Tower Homes Ltd  
Transform  
Welmede Housing Association

### **Businesses**

ASDA Stores Ltd  
BNB Management  
Cap Gemini  
Carisbrooke Investments  
Charles Austen Pumps Ltd  
CEPF II (Woking) Limited  
Chris Thomas Ltd  
Christchurch Bookshop  
Clerical Medical Managed Funds Ltd  
Clifford Chance Secretaries Limited  
Country Land And Business  
Association  
Ellingham Limited  
Enterprise First  
Federation Of Small Businesses  
Greenfields Ireland  
Horsell Businesses' And Traders'  
Association  
Island Design  
Jones Day  
Kendall Cars Ltd  
Kier Homes Ltd

Lodge Farm Distribution Centre  
Mantle Panel Ltd  
McLaren Group Limited  
McLaren Technologies Group LTD  
Moyallen  
NULAP (Aviva Investors)  
Peacocks Centre  
Reflected Reality  
Repropoint  
RG Mole And Co. Ltd  
Surrey Chamber Of Commerce  
Surrey Connects  
The Lightbox  
Turley  
West Byfleet Business Association  
William Nash PLC  
Woking And District Trades Council  
Woking Asian Business Forum  
Woking Chamber Of Commerce  
Woking Shopmobility  
Woking Shopping

### **Community Groups including youth groups**

Byfleet Residents Action Group  
Community Learning Partnership  
Gay Surrey  
Goldsworth Park Community  
Association  
Home-Start Woking  
Home-Start Woking  
Horsell Park Neighbourhood  
Watch/WAN  
Just Advocacy  
Lakeview Community Action Group  
Lakerview Youth Centre  
Liaise 158  
Liaise Women's Centre  
Phoenix Cultural Centre  
Probation Service  
PROWD  
Pyrford Green Belt Action Group  
Sheerwater Neighbourhood Watch  
Sheerwater Youth Centre  
Surrey Access Forum  
Surrey Community Action  
Surrey Lifelong Learning Partnership  
Tenants Representative  
Tenants Representatives Woking  
The Barnsbury Project

The Grove Area LTD  
The Sheerwater And Maybury  
Partnership  
Transform Housing  
West Byfleet Women's Institute  
Woking Association Of Voluntary  
Service (WAVS)  
Woking Youth Arts Centre  
Woking Scouts  
Woodlands Community Group  
York Road Project

### **Residents – numbering 5605**

#### **Residents Associations**

Alpha Road Residents Association  
Anthony's Resident Association  
Brambledown Residents Association  
Brookwood Village Association  
Byfleet Neighbourhood Forum, West  
Byfleet and Pyrford Resident  
Association  
Cheapside Residents Association  
East Hill Residents Association  
Egley Road Residents Association  
Ford And Farm Road Residents  
Association  
Friars Rise Residents Association  
Hockering Gardens Residents  
Association  
Hockering Residents Association  
Hoe Valley Residents Forum  
Hook Heath Residents Association  
Horsell Park Residents Association  
Horsell Residents Association  
HRA Planning Sub-Committee  
Knaphill Residents Association  
Maybourne Rise & Woodpecker Way  
Residents Association  
Mayford Village Society  
Moor Lane Area Residents  
Old Woking Community Association  
The Ridge and Lytton Road Residents  
Association  
Sandy Way Residents Association  
Sheerwater Residents Association  
Sheets Heath Residents Association  
St John's Village Society  
Sutton Green Association

Sutton Green Village Hall And  
Association  
The Ridge And Lytton Road Residents  
Association  
The Riding Residents Association  
Westfield (Hoe Valley) Residents  
Association  
Woodham And Horsell Neighbourhood  
Forum  
Woodham Way Residents  
Association  
Wych Hill Way Residents Association

#### **Neighbourhood Forums (NF) and Groups** (note that inclusion here does not imply their statutory designation)

Brookwood And Bridley  
Neighbourhood Forum  
Byfleet Neighbourhood Forum  
Hook Heath Neighbourhood Forum  
Pyrford Neighbourhood Forum  
West Byfleet Neighbourhood Forum  
Woodham and Horsell Neighbourhood  
Forum

#### **Parish Councils**

Bisley Parish Council  
Chobham Parish Council  
Ockham Parish Council  
Pirbright Parish Council  
Ripley Parish Council  
Send Parish Council  
West End Parish Council  
Wisley Parish Council  
Worplesdon Parish Council

#### **Disability and elderly groups**

Age Concern  
Carers Support Woking  
Deafplus  
Friends of The Elderly  
Surrey Coalition of Disabled People  
Surrey Disabled People's Partnership  
The Squirrels  
Woking MIND

#### **Ethnic, and Gypsy and Traveller groups**

Friends, Families And Travellers  
Gypsy And Traveller Forum

Irish Community Association  
Irish Travellers Movement In Britain  
Surrey Gypsy Traveller Communities  
Forum  
Surrey Minority Ethnic Forum  
Surrey Travellers Community  
Relations Forum  
The Bangladesh Cultural Association  
The Gypsy Council  
The Gypsy Council  
The Indian Association Of Surrey  
The Maybury Centre  
Woking Pakistan Muslim Welfare  
Association

### **Religious Organisations**

Al Asr Education and Community  
Centre  
All Saint's Church  
Christian Clinic For Environmental  
Medicine  
Church Comissioners  
Congregation Of St Mary's Chruch  
Byfleet  
First Church Of Christ Scientist  
Guildford Diocese  
Jehovah's Witnesses  
Masjid Albirr  
Muslim Community Centre, Walton  
Road  
New Life Church  
Religious Society Of Friends  
Shah Jahan Mosque  
St Mary's Church Office  
St. Edward Brotherhood  
The Church Of England Guildford  
Diocesan Board Of Finance  
Woking People Of Faith

### **Schools and colleges**

Barnsbury Primary School  
Beaufort Community Primary School  
Brookwood Primary School  
Byfleet Primary School  
Kingfield School  
Knaphill Lower School  
Knaphill School  
Maybury Infant School

New Monument School  
Pyrford C Of E (Aided) School  
St Dunstan's Roman Catholic Primary  
School  
St Hugh Of Lincoln Catholic Primary  
School  
St John The Baptist R.C Secondary  
School  
St John's Primary School  
The Bishop David Brown School  
The Hermitage School  
The Marist Catholic Primary School  
The Oaktree School  
The Park School  
The Winston Churchill School  
West Byfleet Infant School  
West Byfleet Infant School  
Westfield Primary School  
Wishmore Cross School  
Woking College  
Woking High School

### **Environment, conservation and heritage organisations** (some of

these organisations are statutory  
consultees and are also listed above  
as specific consultees):

Ancient Monuments Society  
Basingstoke Canal Society  
Council For British Archaeology  
CPRE Surrey  
DEFRA  
Environment Agency  
Forestry Commission  
Friends Of The Earth  
Georgian Group  
Historic England  
Horsell Common Preservation Society  
Inland Waterways Association  
Maybury Sheerwater Partnership  
Garden Project  
National Trust  
Natural England  
Surrey Farming Wildlife Advisory  
Group  
Surrey Archaeological Society  
Surrey Campaign to Protect Rural  
England  
Surrey County Council  
Surrey Heathland Project



Surrey Nature Partnership  
Surrey Wildlife Trust  
The Garden History Society  
The National Trust  
The RSPB  
The Society For The Protection Of  
Ancient Buildings  
The Twentieth Century Society  
The Woodland Trust  
Victorian Society  
Westfield Common Preservation  
Society  
The Woodland Trust

**Leisure and Sports organisations**

Ambassadors Theatre Group  
Arts Council For Woking  
Link Leisure  
Open Spaces Society  
Playing Field Association - Surrey  
County  
Sport England  
Surrey Playing Fields Association  
The Lawn Tennis Association  
The Ramblers  
The Rotary Club Of Woking  
The Theatres Trust  
Tourism South East  
Woking Community Play Association  
Woking Football Club  
Woking Ramblers  
Woking Sports Council

**Charitable, voluntary, political and other organisations**

Byfleet United Charities  
Lighthouse, Woking  
National Farmers Union SE Region  
National Landlords Association  
NATS Ltd (Safeguarding)  
Neighbourhood Commander  
Network Rail  
Woking Cycle Users Group  
Places For People  
Woking Conservatives  
Woking Constituency Labour Party  
Woking Liberal Democrats

**Health and Education** (some organisations and providers are

statutory consultees and are also listed above as specific consultation bodies):  
Department for Education  
Surrey County Council Education  
Authority  
Surrey Health And Wellbeing Board  
Adult Social Care NW Surrey  
Adult Social Care Surrey NW  
Health And Safety Executive  
NHS England (South)  
NHS Guildford And Waverley Clinical  
Commissioning Group  
NHS Guildford And Waverley Clinical  
Commissioning Group  
NHS Guildford And Waverley Clinical  
Commissioning Group  
NHS Property Services  
NHS Surrey Heath Clinical  
Commissioning Group  
NHS Surrey Heath Clinical  
Commissioning Group  
North West Surrey CCG  
South East Coast Strategic Health  
Authority

**Transport and Telecomms** (some organisations and providers are statutory consultees and are also listed above as specific consultation bodies):

Abellio Surrey  
Arriva  
Arriva Southern Counties  
Carlone Buses  
Civil Aviation Authority  
Department For Transport  
EE  
Freight Transport Association  
Highways England  
Mobile Operators Association  
Network Rail  
Office Of Rail Regulations  
Office Of Rail Regulations  
Reptons Coaches  
South West Trains  
Stagecoach South  
Three  
Walden Telecom Ltd  
Woking Community Transport Ltd  
Woking For Pedestrians

**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	Mike Waite on behalf of Surrey Nature Partnership	<p>The SPA and SAC are designated under two separate sets of criteria and the effects on each are considered different and not the same as you have stated.</p> <p>It would be helpful to have a bulleted summary of the Avoidance Strategy.</p> <p>Ideal opportunity to discuss compatibility of SANGs and Local Nature Reserves. Developers biodiversity net gain commitments and bespoke SANG could be combined, the two objectives are not mutually incompatible and indeed given pressure on land use they may become essential.</p>	<p>The European Union Directive under which the SPAs and the SACs were originally designated draw a distinction between the two designations. In this regard, the representation to separate them is reasonable and justified. The SPA Avoidance Strategy has been amended to reflect the provisions of the Directive.</p> <p>The avoidance strategy requires technical precision to ensure its compliance. A bulleted summary as suggested by the representation risks losing necessary details that applicants are required to adhere to.</p> <p>The Environment Bill has received its Royal Ascent. It is important to future proof the SPA avoidance Strategy to provide the basis for the future use of SANG land to meet biodiversity net gain requirements. An opportunity has therefore been taken to insert a new paragraph (paragraph 3.11) in the Avoidance Strategy to establish the principle for the future use of SANGs for that purpose.</p>
2	Jack Thompson on behalf of RSPB	In broad terms, we consider that the Revised Avoidance Strategy SPD correctly reflects the key principles of the TBHSPA Delivery	The Avoidance Strategy has been amended to clarify Sheets Heath SSSI position in the Borough.

		<p>Framework. Clarify that SSSI Sheets Heaths lies within the boundary of the borough and not adjacent to it as you have stated. Thank you for removing the text we recommended at the targeted consultation, in order to satisfy the requirements of the Habitats Regulations, SPA avoidance and mitigation measures (including SANGs) must be secured and provided for the lifetime of the impact.</p>	
3	James Greene on behalf of SCC Transport	No Comment	Noted
4	Tony Howe on behalf of SCC Historic Environment	No Comment	Noted
5	Beata Ginn on behalf of Highways England	No Comment	Noted

6	Mr R Smith	<p>The document should include a map delineating the heathlands areas to show which species are being protected, without this map the written content has little merit. I trust this will be addressed before the document is finalised.</p>	<p>The SPAs are a network of heathlands that provides habitat for the following protected birds – nightjars, woodlarks and Dartford warblers. The Avoidance Strategy provides guidance to ensure that development impacts do not cause unacceptable harm to the protected birds contained in the Thames Basin Heath SPA. These birds nest on the ground and are easily disturbed by recreational activities, in particular, dog walking. The Avoidance Strategy already includes a Map of the location of the SPAs (Map 1). It also contains a Map of the SANGs (Map 2). The Maps are sufficiently comprehensive to provide guidance on the location of the SPAs/SANGs, A link to the Thames Basin Heath Partnership website has been inserted into the document for the public to find out more information about the SPAs. <a href="https://www.tbhpartnership.org.uk">https://www.tbhpartnership.org.uk</a></p>
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