

	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 Assent. It is important to future prove 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	<p>In broad terms, we consider that the Revised Avoidance Strategy SPD correctly reflects the key principles of the TBHSPA Delivery Framework. Clarify that SSSI Sheets Heaths lies within the boundary of the borough and not</p>	<p>The Avoidance Strategy has been amended to clarify Sheets Heath SSSI position in the Borough.</p>

		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.	
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.</p> <p>https://www.tbhpartnership.org.uk</p>
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