

**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; 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 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 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.

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 Cornwell
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 Assent. 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.

		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.	
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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