

# Habitats Regulations Assessment of the Surrey Heath Local Plan

Regulation 18

Surrey Heath Borough Council

February 2022

## Quality information

Prepared by	Checked by	Verified by	Approved by
Damiano Weitowitz Senior HRA Consultant BSc, MSc, PhD, ACIEEM	James Riley Technical Director CEnv MCIEEM	Max Wade Technical Director CEcol FCIEEM	James Riley Technical Director CEnv MCIEEM

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**Prepared for:**

Surrey Heath Borough Council

**Prepared by:**

Damiano Weitowitz  
Senior HRA Consultant  
BSc, MSc, PhD - ACIEEM  
E: [damiano.weitowitz@aecom.com](mailto:damiano.weitowitz@aecom.com)

AECOM Limited  
Midpoint, Alencon Link  
Basingstoke  
Hampshire RG21 7PP  
United Kingdom

T: +44(0)1256 310200  
[aecom.com](http://aecom.com)

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# 1. Introduction

## Background

- 1.1 Surrey Heath Borough Council (SHBC) has commissioned AECOM to undertake a Habitats Regulations Assessment (HRA) of the emerging Surrey Heath Local Plan (SHLP), which will cover the period between 2019 – 2038. The objective of an HRA is to identify any aspects of a Plan that may result in Likely Significant Effects (LSEs) and, where relevant, adverse effects on the integrity of the National Site Network (NSN), either in isolation or in combination with other plans and projects. The NSN is comprised of European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites). Furthermore, the HRA is also to advise on appropriate policy mechanisms for delivering mitigation where adverse effects on integrity are identified. Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment of impact pathways is required, where a plan or project is likely to result in Likely Significant Effects (LSEs) upon a European Site, either individually or in combination.
- 1.2 The SHLP will guide future development in the Borough, including the provision of new homes, the protection of employment sites and the vitality of Surrey Heath's town, district and local centres. Additionally, it also seeks to protect other assets of the borough that are important to people, including the Green Belt, open spaces and historic sites. Overall, the SHLP allocates a minimum of 5,680 new homes and explicitly protects Strategic and Locally Important Employment Sites with the aim to meeting the forecast required increase in the total number of Employment Use Class jobs.
- 1.3 Surrey Heath Borough lies in the north-west corner of Surrey, adjoining the counties of Berkshire and Hampshire. The north-east part of the borough comprises countryside and heathland, which represent important environmental assets of the borough. The authority area covers approx. 9,507ha and has a population of 89,200. Most housing development is concentrated in the western part of the borough, including the major settlements of Camberley and Frimley, and smaller settlements such as Bagshot, Frimley Green, Mytchett and Deepcut. Surrey Heath Borough is permeated by several strategic transport routes connecting it to London and the south coast, including the M3, A331 Blackwater Relief Road, A322 and A30. Many of these roads run past sensitive heathland sites in the central and eastern part of the borough.
- 1.4 An initial appraisal of the European sites within and surrounding Surrey Heath Borough, and the impact pathways linking to the proposed growth, indicates that several sites require consideration. Importantly, the borough encompasses large parts of the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC, which have well-established and long-standing issues with recreational pressure and atmospheric pollution. Additionally, some sites located outside the borough boundary (e.g. Windsor Forest & Great Park SAC and the South West London Waterbodies SPA / Ramsar) and linked to the SHLP by impact pathways, also require consideration.

## Legislation

- 1.5 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019<sup>1</sup>.
- 1.6 The HRA process applies the 'Precautionary Principle'<sup>2</sup> to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be

<sup>1</sup> These don't replace the 2017 Regulations but are just another set of amendments.

<sup>2</sup> The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: "*When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis*".

undertaken of the Plan or project in question. Figure 1 below sets out the legislative basis for Appropriate Assessment.

- 1.7 Plans and projects that are associated with potential adverse impacts on European sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

#### **Conservation of Habitats and Species Regulations 2017 (as amended)**

The Regulations state that:

*“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.*

**Figure 1: The legislative basis for Appropriate Assessment**

- 1.8 Over time the phrase ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’.
- 1.9 In spring 2018 the ‘Sweetman’ European Court of Justice ruling<sup>3</sup> clarified that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a European site that would otherwise arise) should **not** be taken into account when forming a view on Likely Significant Effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA is cognisant of that ruling.

## Scope of the Project

- 1.10 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following European sites should be included in the scope of an HRA assessment:
- All European sites within the boundary of Surrey Heath Borough; and,
  - Other European sites shown to be linked to development set out in the SHLP through a known ‘pathway’ (discussed below).
- 1.11 Generally, it is uncommon for development plans to be deemed to have significant impacts on European sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size and the average vehicle commuting distance of a UK resident is approx. 10km. It should be noted that the presence of a conceivable impact pathway linking a Plan to a European site does not mean that Likely Significant Effects (LSEs) will occur.
- 1.12 In some cases, development impacts can extend beyond 10km, particularly where hydrological pathways are involved, which is why the source-pathway-receptor concept is also used to help determine whether there are potential pathways connecting development to European sites. This takes site-specific sensitivities into account, including issues such as nutrient neutrality or water levels, quantity and flow.
- 1.13 Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a European site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could affect European sites through, for example, disturbance of ground-nesting birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG) states that the HRA should be ‘*proportionate to the geographical scope of the [plan policy]*’ and that ‘*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*’ (MHCLG, 2006, p.6).

<sup>3</sup> People Over Wind and Sweetman v Coillte Teoranta (C-323/17)



- 1.14 This basic principle has also been reflected in court rulings. The Court of Appeal<sup>4</sup> has ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be ‘achieved in practice’ to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)<sup>5</sup>. In this case the High Court ruled that for ‘*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations*’.
- 1.15 Given an initial assessment of the relevant European sites and the impact pathways present, and referring to the HRA work that was undertaken for the adopted SHLP, this HRA will discuss (at least as far as the LSEs stage) the following European sites:
- Thames Basin Heaths SPA (a composite site with several parcels located within Surrey Heath);
  - Thursley, Ash, Pirbright & Chobham SAC (a composite site with several parcels located within Surrey Heath);
  - Windsor Forest & Great Park SAC (located approx. 1.8km to the north of Surrey Heath Borough in the authorities of Windsor & Maidenhead, Runnymede and Bracknell Forest);
  - South West London Waterbodies SPA / Ramsar (a composite site that lies approx. 4.9km to the north-east of Surrey Heath Borough at its closest point);
  - Thursley, Hankley and Frensham Commons SPA (located approx. 10.5km to the south of Surrey Heath in the authority of Waverley);
  - Thursley and Ockley Bog Ramsar (located approx. 11.8km to the south of Surrey Heath in the authority of Waverley);
  - Mole Gap to Reigate Escarpment SAC (located approx. 15.8km to the south-east of Surrey Heath in the authorities of Mole Valley and Reigate and Bansted);
  - Wealden Heaths Phase II SPA (a composite site that lies approx. 15.5km to the south of Surrey Heath Borough at its closest point in the authority of Waverley);
  - East Hampshire Hangers SAC (a composite site that lies approx. 16.6km to the south-west of Surrey Heath Borough at its closest point in the authority of East Hampshire);
  - Burnham Beeches SAC (located approx. 17.5km to the north of Surrey Heath Borough in the authority of South Bucks).
- 1.16 For the HRA, the views of the statutory nature conservation advisors, namely Natural England, will be sought as part of the consultation process on the scope of the European sites assessed. The distribution of the above European sites in relation to Surrey Heath Borough is shown in Appendix A. An introduction to, the qualifying features (species and habitats), Conservation Objectives, and threats and pressures to the integrity of these European sites are set out in Chapter 3. The screening assessment of policies in the SHLP is provided in Appendix B.
- 1.17 In order to fully inform the screening for LSEs stage, several studies and online information databases have been consulted. These include:
- Future development proposed (and, where available, HRAs) for the adjoining authorities of Guildford, Woking, Runnymede, Windsor and Maidenhead, Bracknell Forest, Hart and Rushmoor;
  - Road traffic statistics from the Department for Transport (<https://roadtraffic.dft.gov.uk>);
  - Journey-to-work data from the Population Census 2011 (<https://www.nomisweb.co.uk/census/2011/WU03UK>);

<sup>4</sup>No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015

<sup>5</sup>High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

- Visitor surveys carried out in the Thames Basin Heaths SPA by Footprint Ecology (initial survey in 2006, followed by a repeat survey in 2012 / 13) and EPR in 2018 (the later ones largely replicating the methodology of the initial survey to provide comparative data on recreational pressure);
- The HRA produced for the adopted Surrey Heath Local Plan;
- Site Improvement Plans and Supplementary Conservation Advice Notes for relevant European sites published by Natural England;
- The UK Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website ([www.magic.gov.uk](http://www.magic.gov.uk)).

## Quality Assurance

- 1.18 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.
- 1.19 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2019).

## 2. Methodology

### Introduction

- 2.1 The HRA has been carried out with reference to the general EC guidance on HRA<sup>6</sup> and general guidance on HRA published by government in July 2019<sup>7</sup>. AECOM has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.
- 2.2 Figure 2 below outlines the stages of HRA according to current EC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan.

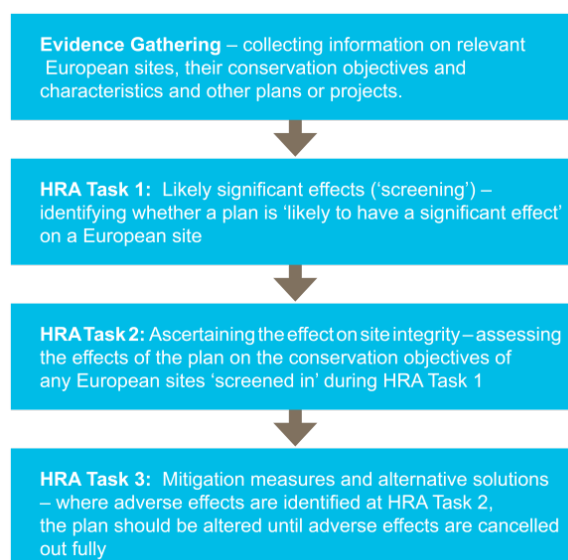


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001<sup>1</sup>.

### Description of HRA Tasks

#### HRA Task 1 – Screening for Likely Significant Effects (LSEs)

- 2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for Likely Significant Effects (LSEs), essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

*"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"*

- 2.4 The objective is to filter out those Plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon European sites, usually because there is no mechanism for a negative interaction. This stage is undertaken in Chapter 5 of this report and in Appendix B.

#### HRA Task 2 – Appropriate Assessment (AA)

- 2.5 Where it is determined that a conclusion of 'no Likely Significant Effects (LSEs)' cannot be drawn, the analysis proceeds to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses,

<sup>6</sup> European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

<sup>7</sup> <https://www.gov.uk/guidance/appropriate-assessment>

or level of technical analysis, that are classified by law as belonging to Appropriate Assessment compared to the screening stage.

- 2.6 By virtue of the fact that it follows screening for LSEs, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment would take any policies or allocations that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the European site(s)). A decision by the European Court of Justice<sup>8</sup> concluded that measures intended to avoid or reduce the harmful effects of a proposed Plan or project on a European site may no longer be considered by competent authorities at the screening for LSEs stage of HRA. That ruling has been taken into account in producing this HRA.
- 2.7 Also, in 2018 the Holohan ruling<sup>9</sup> was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*' [emphasis added]. Due account of this decision has been given in this HRA in relation to the Thames Basin Heaths SPA, which is designated for mobile ground-nesting birds (although it is to be noted that the qualifying species are not considered to be critically dependent on functionally linked habitats).

## HRA Task 3 – Avoidance and Mitigation

- 2.8 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and / or avoid adverse effects on European sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for impact pathways on European sites (e.g. regarding recreational pressure). The implication of this precedent is that it is not necessary for all measures to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.9 When discussing mitigation for a Local Plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since a Local Plan document is a high-level policy document.
- 2.10 In any Local Plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at the Plan level. This is because either:
- The policy in question does not contain any specifics as to what will be delivered or where, and so cannot be assessed in detail at the Plan level. In these cases, the Appropriate Assessment focusses on precautionary mitigation that can be included in the plan to ensure that whatever proposals come forward will not result in adverse effects on integrity; or
  - The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) are related to how the development will be designed and constructed, and therefore cannot be assessed in detail at the plan level. In these instances, the Appropriate Assessment focusses on available mitigation measures, the extent to which such measures would be achievable and effective, and whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any internationally designated sites.
- 2.11 In these instances, the advice of Advocate-General Kokott<sup>10</sup> is also worth considering. She commented that: '*It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis*

<sup>8</sup> People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

<sup>9</sup> Case C-461/17

<sup>10</sup> Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49 <http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

*of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure'* [emphasis added].

## 3. European Sites

### Thames Basin Heaths SPA

#### Introduction

- 3.1 The Thames Basin Heaths Special Protection Area (SPA) covers an area of approx. 8,274ha and spans 11 local authorities in south-west England. The site forms part of a larger network of sites in southern England that comprise blocks of lowland heathland, which have significantly shrunk in the past. The heathland forms important breeding habitats for bird populations, including Dartford warbler, nightjar and woodlark. Four SSSI units that form part of the SPA lie wholly or partly within Surrey Heath Borough; including Ash to Brookwood Heaths SSSI, Broadmoor to Bagshot Woods and Heaths SSSI, Chobham Common SSSI and Colony Bog and Bagshot Heath SSSI.
- 3.2 The SPA comprises agriculturally unimproved heathland, scrub and woodland that were once continuous, but have now been fragmented by roads, urban development and farmland. Furthermore, the heathland parcels represent an important recreational resource for the local population (about 75% of the SPA has open public access, either being designated as common land or open country under the Countryside and Rights of Way Act 2000). Therefore, recreational pressure, especially from dog walkers, has been a longstanding issue. All qualifying bird species nest on or close to the ground, making them especially vulnerable to disturbance and predation from free-roaming dogs. In order to ensure compliance with the Conservation of Habitats and Species Regulations 2017 (as amended), Surrey Heath Borough Council has produced the Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (SPD), which provides the council's approach to development in its authority area.

#### Qualifying Species<sup>11</sup>

- 3.3 The Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

##### During the breeding season

- Nightjar *Caprimulgus europaeus*
- Woodlark *Lullula arborea*
- Dartford warbler *Sylvia undata*

#### Conservation Objectives<sup>12</sup>

- 3.4 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.5 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
  - The structure and function of the habitats of the qualifying features
  - The supporting processes on which the habitats of the qualifying features rely
  - The population of each of the qualifying features, and,
  - The distribution of the qualifying features within the site.

<sup>11</sup> Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012141.pdf> [Accessed on the 06/12/2021]

<sup>12</sup> Available at: <http://publications.naturalengland.org.uk/publication/4952859267301376> [Accessed on the 06/12/2021]

## Threats / Pressures to Site Integrity<sup>13</sup>

3.6 Natural England's Site Improvement Plan (SIP) highlights the following key pressures / threats to the integrity of the Thames Basin Heaths SPA:

- Public access / disturbance
- Undergrazing
- Forestry and woodland management
- Hydrological changes
- Inappropriate scrub control
- Invasive species
- Wildfire / arson
- Air pollution: Impact of atmospheric nitrogen deposition
- Military
- Habitat fragmentation

## Thursley, Ash, Pirbright and Chobham SAC

### Introduction

3.7 The Thursley, Ash, Pirbright and Chobham SAC is a 5,154.5ha large site comprising heath / scrub (75%), bogs and marshes (10%), coniferous woodland (10%) and inland water bodies (5%), which largely overlaps with the Thames Basin Heaths SPA (discussed above). The site is an extensive complex of heaths (both wet and dry), acid mire and bog pools. The underlying geology (particularly the Sandgate Beds) are made up of finer-grained material, impeding drainage and giving rise to the wet heaths / mire systems.

3.8 The SAC includes outstanding examples of valley mire vegetation, supporting rich assemblages of wetland invertebrates, bryophytes and scarce plants. These in turn provide habitats for breeding birds, such as curlew, snipe and designated SPA species. For example, the SAC represents lowland northern Atlantic wet heaths. At Thursley Common the NVC type is M16 *Erica tetralix* – *Sphagnum compactum*, including a range of rare plants including great sundew *Drosera anglica*, bog hair-grass *Deschampsia setacea*, bog orchid *Hammarbya paludosa* and brown beak-sedge *Rhynchospora fusca*. The site is also an important site for the nationally rare white-faced darter *Leucorhinia dubia*. Much of the SAC (like the overlapping Thames Basin Heaths SPA) is accessible to the public, making it sensitive to recreational pressure through processes such as trampling damage and nutrient enrichment from dog fouling.

### Qualifying Features<sup>14</sup>

3.9 Annex I habitats that are a primary reason for selection of this site:

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths
- Depressions on peat substrates of the Rhynchosporion

### Conservation Objectives<sup>15</sup>

3.10 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

<sup>13</sup> Available at: <http://publications.naturalengland.org.uk/publication/6249258780983296> [Accessed on the 06/12/2021]

<sup>14</sup> Available at: <https://sac.jncc.gov.uk/site/UK0012793> [Accessed on the 06/12/2021]

<sup>15</sup> Available at: <http://publications.naturalengland.org.uk/publication/5141075941392384> [Accessed on the 06/12/2021]

- 3.11 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats
  - The structure and function (including typical species) of qualifying natural habitats, and
  - The supporting processes on which qualifying natural habitats rely.

## Threats / Pressures to Site Integrity<sup>16</sup>

- 3.12 Natural England's Site Improvement Plan (SIP) highlights the following key pressures / threats to the integrity of the Thursley, Ash, Pirbright and Chobham SAC:
- Public access / disturbance
  - Undergrazing
  - Forestry and woodland management
  - Hydrological changes
  - Inappropriate scrub control
  - Invasive species
  - Wildfire / arson
  - Air pollution: Impact of atmospheric nitrogen deposition
  - Military
  - Habitat fragmentation

## Windsor Forest and Great Park SAC

### Introduction

- 3.13 The Windsor Forest and Great Park SAC is located 2.7km from Surrey Heath Borough, largely within the authority of Windsor and Maidenhead. It covers an area of 1,680.18ha, comprising 95% of broadleaved deciduous woodland, dry grassland / steppes (4.5%) and inland water bodies (0.5%). The SAC represents old acidophilous oak woods in the south-eastern part of its UK range and supports the largest number of veteran oak trees in Britain (and likely Europe). It is important for its abundance and diversity of saproxylic invertebrates, including rare beetles (e.g. *Lacon querceus*), and a rich fungal assemblage.
- 3.14 The SAC is thought to support the largest population of click beetles *Limoniscus violaceus* in the UK. Primarily this is due to the site's large population of ancient trees, which combined with the historical continuity of woodland cover, offers optimal habitat for fauna that is dependent on decaying timber.

### Qualifying Features<sup>17</sup>

- 3.15 Annex I habitats that are a primary reason for selection of this site:
- Old acidophilous oak woods with *Quercus robur* on sandy plains
- 3.16 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:
- Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraea* or *Ilici-Fagenion*)

<sup>16</sup> Available at: <http://publications.naturalengland.org.uk/publication/6249258780983296> [Accessed on the 06/12/2021]

<sup>17</sup> Available at: <https://sac.incc.gov.uk/site/UK0012586> [Accessed on the 06/12/2021]



3.17 Annex II species that are a primary reason for selection of this site:

- Violet click beetle *Limoniscus violaceus*

## Conservation Objectives<sup>18</sup>

3.18 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.19 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

## Threats / Pressures to Site Integrity<sup>19</sup>

3.20 Natural England's SIP specifies the following threats / pressures to the integrity of the Windsor Forest and Great Park SAC:

- Forestry and woodland management
- Invasive species
- Disease
- Air pollution: Impact of atmospheric nitrogen deposition

## South West London Waterbodies SPA / Ramsar

### Introduction

3.21 The South West London Water Bodies SPA / Ramsar site lies 4.5km from Surrey Heath Borough. It comprises a series of embanked water supply reservoirs and former gravel pits that encompass a range of man-made and semi-natural still open water habitats. The composite site is situated in south-west London on the floodplain of the River Thames. The designated waterbodies differ in character from artificial concrete-lined reservoirs to restored sand and gravel pits that are adjoined by mature habitats, such as scrub, grassland and woodland.

3.22 The SPA is designated for overwintering waterfowl that use the waterbodies for feeding, roosting and resting. Recreational pressure is an issue in some of the lakes and reservoirs, principally those that are accessible to the public for sailing, canoeing, water-skiing, fishing, birdwatching, diver training and open water swimming. Additionally, there are several functionally linked waterbodies surrounding the SPA that are also used by overwintering waterfowl. Given their importance to the SPA bird populations, these off-site habitats must be viewed as part of the fabric that supports the SPA / Ramsar integrity. The Thorpe Park No.1 Gravel Pit SSSI is the closest component part of the site to Surrey Heath, thus making it the most likely destination of residents from the authority.

<sup>18</sup> Available at: <http://publications.naturalengland.org.uk/publication/517500009015296> [Accessed on the 06/12/2021]

<sup>19</sup> Available at: <http://publications.naturalengland.org.uk/publication/6221375450644480> [Accessed on the 06/12/2021]

## SPA Qualifying Features<sup>20</sup>

3.23 The SPA is designated for the following species that are listed in Annex II of Directive 92/43/EEC:

- Northern shoveler *Anas clypeata*
- Gadwall *Anas strepera*

## Ramsar Qualifying Features<sup>21</sup>

3.24 **Ramsar Criterion 6:**

Over winter the site regularly supports internationally important populations of gadwall *Anas strepera* and shoveler *Anas clypeata*.

## SPA Conservation Objectives<sup>22</sup>

3.25 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

3.26 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

## Threats / Pressures to Site Integrity of the SPA<sup>23</sup>

3.27 Natural England's SIP specifies the following threats / pressures to the integrity of the South West London Waterbodies SPA:

- Public access / disturbance
- Changes in species distributions
- Invasive species
- Natural changes to site conditions
- Fisheries: Fish stocking
- Inappropriate weed control

# Thursley, Hankley and Frensham Commons SPA

## Introduction

3.28 The Thursley, Hankley and Frensham Commons SPA (also known as Wealden Heaths Phase I SPA) is located 11km from Surrey Heath Borough. It forms a large complex of lowland heaths situated in Surrey, close to the Hampshire border. Surrounding habitats include oak woodland, coniferous woodland and small pastures. Its reason for designation is that the site provides breeding habitat for bird species that nest on or close to the ground, including Dartford warbler, nightjar and woodlark.

<sup>20</sup> Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012171.pdf> [Accessed on the 06/12/2021]

<sup>21</sup> Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1038RIS.pdf> [Accessed on the 06/12/2021]

<sup>22</sup> Available at: <http://publications.naturalengland.org.uk/publication/4901473695563776> [Accessed on the 06/12/2021]

<sup>23</sup> Available at: <http://publications.naturalengland.org.uk/publication/6662064386867200> [Accessed on the 06/12/2021]

- 3.29 The SPA lies close to the northern limit of the northern European range for Dartford warblers, which are strongly associated with lowland heaths and extensive patches of mature gorse. Dartford warblers are distributed widely across the site with particular numbers occurring on Hankley and Frensham Common. Nightjar regularly use areas of the SPA for nesting and feeding, with areas of preference in patches of heath with high structural diversity (e.g. bare patches, short vegetation). High numbers of nightjar have been recorded on Thursley, Hankley, Frensham and Elstead common. Woodlarks have been reported in high numbers across the entire site complex.
- 3.30 While several areas of the SPA are used for military training with controlled access, most of the remainder of the site (i.e. the commons) has open public access and is popular for recreational activities, such as dog walking, hiking, birdwatching, horse riding, cycling and orienteering. As such, the breeding birds of the SPA are at particular risk from disturbance by humans, trampling damage and free-roaming dogs.

## Qualifying Features<sup>24</sup>

3.31 The site is designed as a SPA for the following bird species listed in Annex II of Directive 92/43/EEC:

- Nightjar *Caprimulgus europaeus*
- Woodlark *Lullula arborea*
- Dartford warbler *Sylvia undata*

## Conservation Objectives<sup>25</sup>

- 3.32 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.33 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
  - The structure and function of the habitats of the qualifying features
  - The supporting processes on which the habitats of the qualifying features rely
  - The population of each of the qualifying features, and,
  - The distribution of the qualifying features within the site.

## Threats / Pressures to Site Integrity<sup>26</sup>

- 3.34 The following threats / pressures to the integrity of the Thursley, Hankley and Frensham Commons SPA have been identified in Natural England's SIP:
- Public access / disturbance
  - Undergrazing
  - Forestry and woodland management
  - Hydrological changes
  - Inappropriate scrub control
  - Invasive species
  - Wildfire / arson
  - Air pollution: Impact of atmospheric nitrogen deposition

<sup>24</sup> Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012131.pdf> [Accessed on the 06/12/2021]

<sup>25</sup> Available at: <http://publications.naturalengland.org.uk/publication/5735025425252352> [Accessed on the 06/12/2021]

<sup>26</sup> Available at: <http://publications.naturalengland.org.uk/publication/6249258780983296> [Accessed on the 06/12/2021]

- Military
- Habitat fragmentation

## Thursley and Ockley Bog Ramsar

### Introduction

- 3.35 The Thursley and Ockley Bog Ramsar lies approx. 12km from Surrey Heath Borough. The site represents a valley mire complex and lies within the Thursley, Hankley and Frensham Commons SPA, in a matrix of heathland parcels. Mire habitat has formed as a consequence to impeded drainage, resulting in the build-up of a deep peat layer from decaying remains of bog-moss *Sphagnum* spp. Several areas of open water also exist within the site, contributing to the overall structural diversity of the site, which includes acidic boggy pools, ditches and large ponds.
- 3.36 Interestingly, Ockley bog has developed on relatively flat, poorly drained ground and shows remarkable similarity to a raised mire in that the surface of the bog is gradually growing above groundwater influence. The presence of a river valley mire with clear vegetation zonation and relatively high nutrient status along the central water-course, adds to the interest of the Thursley peatland complex.

### Qualifying Features<sup>27</sup>

3.37 **Ramsar Criterion 2**

Supports a community of rare wetland invertebrate species including notable numbers of breeding dragonflies.

3.38 **Ramsar Criterion 3**

It is one of the few sites in Britain to support all six native reptile species. The site also supports nationally important breeding populations of European nightjar *Caprimulgus europaeus* and woodlark *Lullula arborea*.

### Conservation Objectives

- 3.39 Conservation Objectives are not published for Ramsar sites.

### Threats / Pressures to Site Integrity

- 3.40 The key environmental sensitivities of the site include adverse changes in water quality and significant alterations of water quantity, level and flow. However, the Information Sheet on Ramsar Wetlands indicates that there currently are no factors that negatively impact on the site's ecological character.

## Mole Gap to Reigate Escarpment SAC

### Introduction

- 3.41 The Mole Gap to Reigate Escarpment SAC lies approx. 16km from Surrey Heath Borough. It is a 892.3ha large site, comprising broad-leaved deciduous woodland (60%), dry grassland / steppes (25%) and heath / scrub (15%). Extensive areas of (ancient) woodland remain within this site, such as at Dean Wood and Updown Wood. On the lime-rich chalk slopes, dominant tree species include beech, ash, yew, field maple, whitebeam and occasional large-leaved lime, a scarce native tree. Box is only native at this site and a few other places in Britain.
- 3.42 The chalk grassland supports local or rare plants, including musk orchid *Herminium monorchis*, green-winged orchid *Orchis morio*, round-headed rampion *Phyteuma orbiculare*, early gentian *Gentianella anglica* (found only in Britain), ground pine *Ajuga chamaepitys* and meadow clary *Salvia pratensis*. Areas of open turf at Burford Bridge Ridge and Juniper Top support a rich lichen flora with many noteworthy species. A

<sup>27</sup> Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB647RIS.pdf> [Accessed on the 06/12/2021]

small area of chalk heath is found, a habitat that is particularly sensitive to damage, and now only found in a few places in Britain.

- 3.43 A large number of rare beetles (Coleoptera) have been recorded and a large true bug (a Hemipteran) *Gonocerus acuteangulatus* found here occurs nowhere else in Britain. A wide variety of woodland birds breed within the site, including hawfinch, sparrowhawk, nightingale, and all three species of British woodpecker. An old chalk mine is used as a winter roost by several species of bats, and the site also supports great-crested newts.

## Qualifying Features<sup>28</sup>

- 3.44 Annex I habitats that are a primary reason for selection of this site:

- Stable xerothermophilous formations with *Buxus sempervirens* on rock slopes (*Berberidion p. p.*)
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (\*important orchid sites)
- *Taxus baccata* woods of the British Isles

- 3.45 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- European dry heaths
- *Asperulo-Fagetum* beech forests

- 3.46 Annex II species present as a qualifying feature, but not a primary reason for selection of this site:

- Great-crested newt *Triturus cristatus*
- Bechstein's bat *Myotis bechsteinii*

## Conservation Objectives<sup>29</sup>

- 3.47 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

- 3.48 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

## Threats / Pressures to Site Integrity<sup>30</sup>

- 3.49 Natural England's SIP specifies the following threats / pressures to the integrity of the Mole Gap to Reigate Escarpment SAC:

- Disease

<sup>28</sup> Available at: <https://sac.jncc.gov.uk/site/UK0012804> [Accessed on the 06/12/2021]

<sup>29</sup> Available at: <http://publications.naturalengland.org.uk/publication/4911739200077824> [Accessed on the 06/12/2021]

<sup>30</sup> Available at: <http://publications.naturalengland.org.uk/publication/5966636066537472> [Accessed on the 06/12/2021]

- Inappropriate scrub control
- Change in land management
- Public access / disturbance
- Air pollution: Risk of atmospheric nitrogen deposition

## Wealden Heaths Phase II SPA

### Introduction

- 3.50 The Wealden Heaths Phase II SPA is a composite site made up of extensive areas of lowland heath, which are similar in character to the nearby heathland complexes in the Thames Basin Heaths SPA and Thursley, Hankley and Frensham Commons SPA. The qualifying features of the site include bird species that nest on or close to the ground, such as Dartford warbler, nightjar and woodlark. Dartford warblers, strongly associated with areas of lowland heath and mature gorse, have particular strongholds at Woolmer Forest and Ludshott Common. Nightjar, which use areas of heath with high structural diversity, are primarily found at Woolmer Forest and Bramshott Common. Woodlark, a species that depends on lowland heaths and rotationally managed conifer plantations, has its highest number recorded at Woolmer Forest and Broxhead Common.
- 3.51 While public access to the site is restricted in areas that are used for live military training, many other areas are popular for a wide range of recreational activities, including dog walking, walking, birdwatching, orienteering and cycling. Therefore, recreational impacts within the site are a primary consideration for the conservation status of the site. The closest component part of the SPA to Surrey Heath Borough is the Devil's Punch Bowl SSSI at approx. 16km distance.

### Qualifying Features<sup>31</sup>

- 3.52 The site is designated as a SPA for the following species listed in Annex II of Directive 92/43/EEC:
- Nightjar *Caprimulgus europaeus*
  - Woodlark *Lullula arborea*
  - Dartford warbler *Sylvia undata*

### Conservation Objectives<sup>32</sup>

- 3.53 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.54 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
  - The structure and function of the habitats of the qualifying features
  - The supporting processes on which the habitats of the qualifying features rely
  - The population of each of the qualifying features, and,
  - The distribution of the qualifying features within the site.

<sup>31</sup> Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012132.pdf> [Accessed on the 07/12/2021]

<sup>32</sup> Available at: <http://publications.naturalengland.org.uk/publication/5729030657540096> [Accessed on the 07/12/2021]

## Threats / Pressures to Site Integrity<sup>33</sup>

3.55 The following threats / pressures to the integrity of the Wealden Heaths Phase II SPA are listed in Natural England's SIP:

- Change in land management
- Invasive species
- Hydrological changes
- Public access / disturbance
- Military
- Air pollution: Impact of atmospheric nitrogen deposition
- Wildfire / arson

## East Hampshire Hangers SAC

### Introduction

3.56 The East Hampshire Hangers SAC is a 561.69ha large site, comprising broad-leaved deciduous woodland (79.3%), coniferous woodland (7%), mixed woodland (5%), humid grassland (5%) and dry grassland / steppes (3.7%). Overall, the site's main importance is due to its beech *Fagus sylvatica* woodland that are extremely rich in vascular plants, including white helleborine *Cephalanthera damasonium*, violet helleborine *Epipactis purpurata*, green-flowered helleborine *Epipactis phyllanthes* and Italian lords-and-ladies *Arum italicum*. Throughout the site there are transitions to mixed woodland, including areas of small-leaved lime *Tilia cordata* and yew *Taxus baccata*. The closest component SSSI of the SAC is the Upper Greensand Hangers: Empshott to Hawksley, approx. 17km from Surrey Heath Borough.

### Qualifying Features<sup>34</sup>

3.57 Annex I habitats that are a primary reason for selection of this site:

- *Asperulo-Fagetum* beech forests
- *Tilio-Acerion* forests of slopes, screes and ravines

3.58 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (\*important orchid sites)
- *Taxus baccata* woods of the British Isles

3.59 Annex II species present as a qualifying feature, but not a primary reason for selection of this site:

- Early gentian *Gentianella anglica*

### Conservation Objectives<sup>35</sup>

3.60 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.61 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

<sup>33</sup> Available at: <http://publications.naturalengland.org.uk/publication/5431913779036160> [Accessed on the 07/12/2021]

<sup>34</sup> Available at: <https://sac.jncc.gov.uk/site/UK0012723> [Accessed on the 07/12/2021]

<sup>35</sup> Available at: <http://publications.naturalengland.org.uk/publication/6500658190483456> [Accessed on the 07/12/2021]

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

## Threats / Pressures to Site Integrity<sup>36</sup>

3.62 Natural England's SIP highlights the following threats / pressures to the integrity of the East Hampshire Hangers SAC:

- Air pollution: Risk of atmospheric nitrogen deposition
- Invasive species
- Forestry and woodland management

## Burnham Beeches SAC

### Introduction

3.63 The Burnham Beeches SAC is a 383.71ha large site that comprises broad-leaved deciduous woodland (90%), coniferous woodland (5%) and heath / scrub (5%). It occupies an extensive area of the Burnham Plateau and supports mature / developing woodland, old coppice, scrub and heath. A large portion of the SAC consists of an extensive area of former beech *Fagus sylvatica* wood-pasture with many old pollards and associated beech and oak *Quercus robur* high forest. As a result, it is also one of the most important sites in the UK for saproxylic invertebrates and epiphytic communities (e.g. *Zygodon forsteri*). Within the site, an extensive area of acid mire with locally uncommon plants is found, including bog pimpernel *Anagallis tenella*, marsh St. John's wort *Hypericum elodes* and royal fern *Osmunda regalis*.

3.64 In the last 20 years low intensity grazing has been reintroduced in parts of the site to reflect former management practices. This takes place on 164ha of the site, with the aim to create a more open and diverse structure within the SAC. Importantly, part of the SAC has open public access and is a very attractive recreational space welcoming over 500,000 visitors annually. The SAC is managed by the City of London and is partly designated as a National Nature Reserve.

### Qualifying Features<sup>37</sup>

3.65 Annex I habitats that are a primary reason for selection of this site:

- Atlantic acidophilous beech forests with *Ilex* and sometimes *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Illici-Fagenion*)

### Conservation Objectives<sup>38</sup>

3.66 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.67 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

<sup>36</sup> Available at: <http://publications.naturalengland.org.uk/publication/5890345141272576> [Accessed on the 07/12/2021]

<sup>37</sup> Available at: <https://sac.jncc.gov.uk/site/UK0030034> [Accessed on the 07/12/2021]

<sup>38</sup> Available at: <http://publications.naturalengland.org.uk/publication/6014456282742784> [Accessed on the 07/12/2021]



- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely.

## Threats / Pressures to Site Integrity<sup>39</sup>

3.68 The following threats / pressures to the integrity of the Burnham Beeches SAC are identified in Natural England's SIP:

- Air pollution: Risk of atmospheric nitrogen deposition
- Public access / disturbance
- Habitat fragmentation
- Deer
- Species decline
- Invasive species

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<sup>39</sup> Available at: <http://publications.naturalengland.org.uk/publication/5689860228644864> [Accessed on the 07/12/2021]

## 4. Impact Pathways

### Recreational Pressure

- 4.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels<sup>40</sup>, and impacts on European protected sites<sup>41 42</sup>. This applies to any habitat, but recreational pressure from housing growth is of particular significance for European sites designated for their bird interest. Different European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents<sup>43</sup>.

### Trampling Damage, Nutrient Enrichment and Wildfires

- 4.2 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage, which dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:
- 4.3 Wilson & Seney<sup>44</sup> examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- 4.4 Cole et al<sup>45</sup> conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphology was found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- 4.5 Cole<sup>46</sup> conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there

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<sup>40</sup> Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/iuz019>

<sup>41</sup> Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. *Natural England / Footprint Ecology*.

<sup>42</sup> Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. *Footprint Ecology / Dorset County Council*.

<sup>43</sup> The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

<sup>44</sup> Wilson, J.P. & J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

<sup>45</sup> Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

<sup>46</sup> Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no differential impact on vegetation cover.

- 4.6 Cole & Spildie<sup>47</sup> experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.
- 4.7 In heathland sites, trampling damage can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates<sup>48</sup>. Species that burrow into flat surfaces such as the centres of paths, are likely to be particularly vulnerable, as the loose sediment can no longer maintain their burrow. In some instances, nature conservation bodies and local authorities resort to hardening paths to prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.
- 4.8 A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews, e.g.<sup>49</sup>). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually<sup>50</sup>. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components<sup>51</sup>. Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

## Bird Disturbance

- 4.9 Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. by damaging habitat or reducing bird fitness in less obvious ways such as through inducing stress responses). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While such changes are less noticeable, they might result in major population-level changes by altering the balance between immigration / birth and emigration / death<sup>52</sup>.
- 4.10 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and time spent responding to disturbance is time that is not spent feeding<sup>53</sup>. Disturbance therefore increases energetic expenditure while reducing energetic intake, which can adversely affect the 'condition' and ultimately survival of birds. Additionally, displacement of birds from one feeding site to another can increase the pressure on the resources available within alternative foraging sites, which must sustain a greater number of birds<sup>54</sup>. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to

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<sup>47</sup> Cole, D.N., Spildie, D.R. (1998). Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* **53**: 61-71

<sup>48</sup> Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

<sup>49</sup> Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

<sup>50</sup> Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* **11**:16-19.

<sup>51</sup> Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

<sup>52</sup> Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

<sup>53</sup> Riddington, R. *et al.* (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* **43**:269-279.

<sup>54</sup> Gill, J.A., Sutherland, W.J. & Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* **12**: 67-72.

predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar<sup>55 56</sup>.

- 4.11 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Disturbance in winter may be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, this may be counterbalanced by fewer recreational users in the winter months and lower overall sensitivity of birds outside the breeding season. Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking<sup>57</sup>. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers<sup>58</sup>. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type is a factor that ought to be taken into account in HRAs.

## Summary

- 4.12 Several European sites relevant to Surrey Heath Borough are designated for habitats and species that are sensitive to recreational pressure, including the Ashdown Forest SAC (supports parcels of dry and wet heathland), Ashdown Forest SPA (supports nightjar and Dartford warbler, which nest on or close to the ground) and the Castle Hill SAC (designated for semi-natural dry grassland and scrubland). The increase in residential development allocated in the SHLP will lead to an increase in the local population and demand for access to outdoor spaces. The HRA process needs to adequately assess potential recreational pressure effects of the Plan on these European sites.
- 4.13 Overall, the following European sites within 20km of the Surrey Heath Borough boundary are sensitive to increased recreational access, due to the allocation of residential development in the Surrey Heath Local Plan (the sites in **bold** are taken forward into the following HRA chapters):
- **Thames Basin Heaths SPA** (some of the SSSI component parts of the SPA lie wholly or partly within Surrey Heath, including the Broadmoor to Bagshot Woods and Heaths SSSI, Chobham Common SSSI, Colony Bog and Bagshot Heath SSSI and Ash to Brookwood Heaths SSSI)
  - **Thursley, Ash, Pirbright and Chobham SAC** (some of the SSSI component parts of the SAC lie wholly or partly within Surrey Heath, including the Chobham Common SSSI, Colony Bog and Bagshot Heath SSSI and Ash to Brookwood Heaths SSSI)
  - **Thursley, Hankley & Frensham Commons SPA** (the SPA lies approx. 10.5km to the south of Surrey Heath Borough, in the authority of Waverley)
  - **Wealden Heaths Phase II SPA** (the closest component part of the SPA is the Devil's Punch Bowl SSSI approx. 15.5km to the south of Surrey Heath Borough, in the authority of Waverley)
  - **South West London Waterbodies SPA / Ramsar** (the closest component part of the SPA / Ramsar is the Thorpe Park No.1 Gravel Pit SSSI approx. 4.9km to the north-east of Surrey Heath Borough, in the adjoining authority of Runnymede)
  - **Windsor Forest & Great Park SAC** (the SAC lies approx. 1.8km to the north of Surrey Heath Borough and is distributed over the authorities of Runnymede, Windsor & Maidenhead and Bracknell Forest)
  - **Burnham Beeches SAC** (the SAC lies approx. 17.5km to the north of Surrey Heath Borough in the authority of South Bucks)

<sup>55</sup> Clarke R.T., Liley D., Sharp J.M., Green R.E. (2013). Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. <https://doi:10.1371/journal.pone.0072984>.

<sup>56</sup> Liley D. & Clarke R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* **114**: 219-230.

<sup>57</sup> Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.

<sup>58</sup> Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* **29**: 124-132.

## Atmospheric Pollution (Nitrogen and Ammonia Deposition)

4.1 The main pollutants of concern for European sites are oxides of nitrogen (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>) and are summarised in Table 1. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges<sup>59</sup>. NO<sub>x</sub> can also be toxic at very high concentrations (far above the annual average Critical Level). High levels of NO<sub>x</sub> and NH<sub>3</sub> are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats<sup>60 61</sup>.

**Table 1: Main sources and effects of air pollutants on habitats and species<sup>62</sup>**

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO <sub>2</sub> )	<p>The main sources of SO<sub>2</sub> are electricity generation, and industrial and domestic fuel combustion. However, total SO<sub>2</sub> emissions in the UK have decreased substantially since the 1980's.</p> <p>Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO<sub>2</sub> have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO<sub>2</sub> emissions in the UK.</p>	<p>Wet and dry deposition of SO<sub>2</sub> acidifies soils and freshwater, and may alter the composition of plant and animal communities.</p> <p>The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.</p> <p>However, SO<sub>2</sub> background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.</p>
Acid deposition	<p>Leads to acidification of soils and freshwater via atmospheric deposition of SO<sub>2</sub>, NO<sub>x</sub>, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.</p>	<p>Gaseous precursors (e.g. SO<sub>2</sub>) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.</p> <p>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants.</p> <p>Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.</p>
Ammonia (NH <sub>3</sub> )	<p>Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. It is also emitted from some vehicles.</p>	<p>The negative effect of NH<sub>4</sub><sup>+</sup> may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation.</p> <p>Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in</p>

<sup>59</sup> [http://www.apis.ac.uk/overview/pollutants/overview\\_NOx.htm](http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm).

<sup>60</sup> Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176.

<sup>61</sup> Dijk, N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607.

<sup>62</sup> Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>).

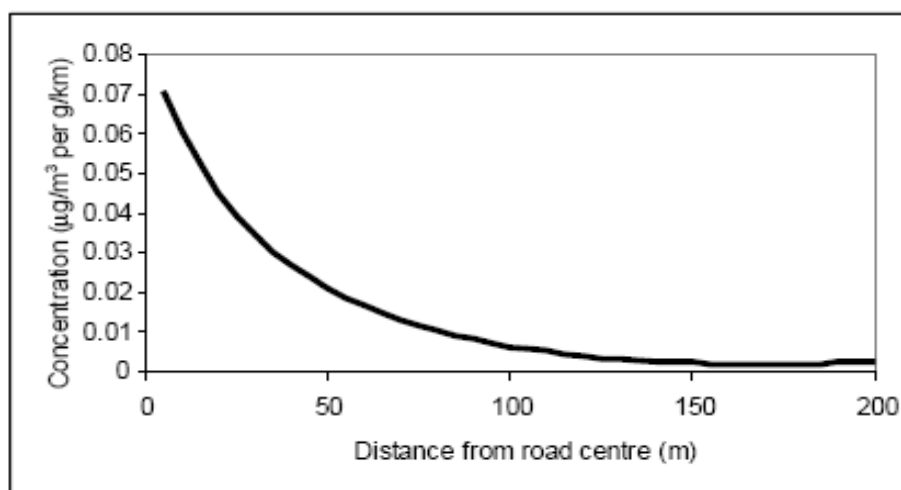
Pollutant	Source	Effects on habitats and species
	<p>Ammonia reacts with acid pollutants such as the products of SO<sub>2</sub> and NO<sub>x</sub> emissions to produce fine ammonium (NH<sub>4</sub><sup>+</sup>) - containing aerosol. Due to its significantly longer lifetime, NH<sub>4</sub><sup>+</sup> may be transferred much longer distances (and can therefore be a significant trans-boundary issue).</p> <p>While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.</p>	<p>dominance from heath species (lichens, mosses) to grasses is often seen.</p> <p>As emissions mostly occur at ground level in the rural environment and NH<sub>3</sub> is rapidly deposited, some of the most acute problems of NH<sub>3</sub> deposition are for small relict nature reserves located in intensive agricultural landscapes.</p>
Nitrogen oxides (NO <sub>x</sub> )	<p>Nitrogen oxides are mostly produced in combustion processes. Half of NO<sub>x</sub> emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes.</p> <p>In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles.</p>	<p>Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO<sub>x</sub> for all vegetation types has been set to 30 ug/m3.</p> <p>Deposition of nitrogen compounds (nitrates (NO<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>) and nitric acid (HNO<sub>3</sub>)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification.</p> <p>In addition, NO<sub>x</sub> contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.</p>
Nitrogen deposition	<p>The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO<sub>x</sub>) or reduced (e.g. NH<sub>3</sub>) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices.</p> <p>The N pollutants together are a large contributor to acidification (see above).</p>	<p>All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally.</p> <p>Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species.</p> <p>N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.</p>
Ozone (O <sub>3</sub> )	<p>A secondary pollutant generated by photochemical reactions involving NO<sub>x</sub>, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above).</p> <p>Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.</p>	<p>Concentrations of O<sub>3</sub> above 40 ppb can be toxic to both humans and wildlife, and can affect buildings.</p> <p>High O<sub>3</sub> concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.</p>

4.2 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping<sup>63</sup>. Ammonia emissions

<sup>63</sup> [http://www.apis.ac.uk/overview/pollutants/overview\\_SO2.htm](http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm).

originate from agricultural practices<sup>64</sup>, with some chemical processes also making notable contributions. As such, it can be excluded that material increases in SO<sub>2</sub> emissions will be associated with the Surrey Heath Local Plan. NO<sub>x</sub> emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NO<sub>x</sub> footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison<sup>65</sup>. Emissions of ammonia can also be linked to traffic although vehicles are not the major source. Therefore, emissions of NO<sub>x</sub> and ammonia can reasonably be expected to increase due to the Plan, compared to a situation without the plan, primarily due to an increase in the volume of commuter traffic associated with housing growth.

- 4.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NO<sub>x</sub> concentration (critical threshold) for the protection of vegetation is 30 µg m<sup>-3</sup> and the threshold for sulphur dioxide is 20 µg m<sup>-3</sup>. Additionally, ecological studies have determined 'Critical Loads'<sup>66</sup> of atmospheric nitrogen deposition (that is, NO<sub>x</sub> combined with ammonia NH<sub>3</sub>).
- 4.4 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (Figure 3 and <sup>67</sup>). Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive European sites may arise due to implementation of the Plan.



**Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT<sup>68</sup>)**

- 4.5 Atmospheric pollution is a well-established issue in European sites in south-east England that are designated for lowland heathland, including both the Thames Basin Heaths SPA and Wealden Heaths Phase II SPA. For example, Natural England's Site Improvement Plan for the Thames Basin Heaths SPA<sup>69</sup> highlights that nitrogen deposition exceeds site-relevant Critical Loads for ecosystem protection. Changes in species composition have been observed across the SPA, such as transitions in mires from *Sphagnum*-dominated to *Molinia*- and sedge-dominated communities, and the spread of *Molinia* into wet and dry heath. Relevant authorities have set out the requirement for assessing air pollution impacts in Supplementary Planning Documents (SPDs). For example, Runnymede's Thames Basin Heaths Special Protection Area SPD<sup>70</sup> (Surrey Heath's own SPD is discussed later) identifies that '*new residential and employment development within Runnymede has the potential to increase air pollution. Ongoing studies have highlighted a link between nitrogen deposition from air pollution to adverse impacts on the Heaths' ecology... Any measures proposed to avoid or mitigate the effects of air pollution on the SPA must be agreed with the*

<sup>64</sup> Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. (1998). A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* **32**: 309-313.

<sup>65</sup> Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php> [Accessed on the 21/10/2021]

<sup>66</sup> The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

<sup>67</sup> Available at: <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013> [Accessed on the 21/10/2021]

<sup>68</sup> Available at: <http://www.dft.gov.uk/ha/standards/dmr/vol11/section3/ha20707.pdf> [Accessed on the 21/10/2021]

<sup>69</sup> Available at: <http://publications.naturalengland.org.uk/publication/6249258780983296> [Accessed on the 15/12/2021]

<sup>70</sup> Runnymede Borough Council. (April 2021). Runnymede 2030 Local Plan – Thames Basin Heaths Special Protection Area Supplementary Planning Document (SPD). 50pp. Available at: <https://www.runnymede.gov.uk/downloads/file/830/protection-area> [Accessed on the 15/12/2021]

*Council and Natural England and satisfy the Habitats Regulations.* Atmospheric pollution from road traffic clearly is a contributing threat to the integrity of these sites and requires particular attention in HRAs of Local Plans.

4.6 Overall, the following European sites within 20km of the Surrey Heath Borough boundary are sensitive to an increase in atmospheric pollution, primarily as a result of increased commuter journeys due to development outlined in the Surrey Heath Local Plan (the sites in **bold** are taken forward into the following HRA chapters):

- **Thames Basin Heaths SPA** (some of the SSSI component parts of the SPA lie wholly or partly within Surrey Heath, including the Broadmoor to Bagshot Woods and Heaths SSSI, Chobham Common SSSI, Colony Bog and Bagshot Heath SSSI and Ash to Brookwood Heaths SSSI)
- **Thursley, Ash, Pirbright and Chobham SAC** (some of the SSSI component parts of the SAC lie wholly or partly within Surrey Heath, including the Chobham Common SSSI, Colony Bog and Bagshot Heath SSSI and Ash to Brookwood Heaths SSSI)
- **Windsor Forest & Great Park SAC** (the SAC lies approx. 1.4km to the north of Surrey Heath Borough and is distributed over the authorities of Runnymede, Windsor & Maidenhead and Bracknell Forest)
- **Thursley, Hankley & Frensham Commons SPA** (the SPA lies approx. 10.5km to the south of Surrey Heath Borough, in the authority of Waverley)
- **Mole Gap to Reigate Escarpment SAC** (the SAC lies approx. 15.8km to the south-east of Surrey Heath Borough in the authorities of Mole Valley and Reigate and Bansted)
- **Wealden Heaths Phase II SPA** (the closest component part of the SPA is the Devil's Punch Bowl SSSI approx. 15.5km to the south of Surrey Heath Borough, in the authority of Waverley)
- **East Hampshire Hangers SAC** (the closest component part of the SAC is the Upper Greensand Hangers: Wyck to Wheatley SSSI approx. 16.6km to the south-west of Surrey Heath Borough in the authority of East Hampshire)
- **Burnham Beeches SAC** (the SAC lies approx. 17.5km to the north of Surrey Heath Borough in the authority of South Bucks)

## Water Quantity, Level and Flow

4.7 The water level, its flow rates and the mixing conditions are important determinants of the condition of European sites and their qualifying features. Hydrological processes are critical in influencing habitat characteristics in wetlands, terrestrial systems that have hydrological associations (e.g. wet heath) and coastal waters, including current velocity, water depth, dissolved oxygen levels, salinity and water temperature. In turn these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition.

4.8 A highly cited review paper summarised the ecological effects of reduced flow in rivers and connected water-dependent ecosystems. Droughts (ranging in their magnitude from flow reduction to a complete loss of surface water) have both direct and indirect effects on dependent floral and faunal communities. For example, the unique nature of wetlands combines shallow water and conditions that are ideal for the growth of organisms at the basal level of food webs, which feed many species of birds, mammals, fish and amphibians.

4.9 Maintaining a steady water supply is of critical importance for many hydrologically dependent SPAs, SACs and Ramsars. For example, in many freshwater bodies and wetlands the hydrological regime is essential for sustaining a variety of foraging habitats for SPA / Ramsar waterfowl species. However, different species vary in their requirements for specific water levels. Splash and / or shallow flooding is required to provide suitable feeding areas and roosting sites for ducks and waders. In contrast, deeper flooding is essential to provide foraging and loafing habitats for Bewick's swans and whooper swans.

4.10 Wetland habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of water is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply



might cause the water level to be outside of the required range of qualifying birds, invertebrate or plant species. This might lead to the loss of the structure and functioning of wetland habitats. There are two mechanisms through which urban development might negatively affect the water level in European Sites:

- The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce the water levels in European Sites sharing the same catchment.
- The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often this pluvial flooding results in downstream inundation of watercourses and the potential flooding of wetland habitats.

4.11 Surrey Heath Borough does not lie sufficiently close to European sites that are sensitive to excessive flooding. Therefore, surface water runoff from impermeable urban surfaces is not considered further in this HRA. However, two sites in the wider geographic setting around the borough are sensitive to material changes in the water table, including the South West London Waterbodies SPA / Ramsar and the Thursley and Ockley Bog Ramsar. The Surrey Heath Local Plan would mediate such impacts primarily through the increased demand and supply of potable water to new residential and employment development, and this impact pathway requires further HRA consideration.

4.12 Overall, the following European sites within 20km of the Surrey Heath Borough boundary are sensitive to increased recreational access, due to the allocation of residential development in the Surrey Heath Local Plan (the sites in **bold** are taken forward into the following HRA chapters):

- **South West London Waterbodies SPA / Ramsar** (the closest component part of the SPA / Ramsar is the Thorpe Park No.1 Gravel Pit SSSI approx. 4.9km to the north-east of Surrey Heath Borough, in the adjoining authority of Runnymede)
- **Thursley & Ockley Bog Ramsar** (the Ramsar lies approx. 11.8km to the south of Surrey Heath Borough in the authority of Waverley – it forms part of the Thursley, Hankley & Frensham Commons SPA and the Thursley, Ash, Pirbright & Chobham SAC)

## Water Quality

4.13 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
- Eutrophication, the enrichment of water with nutrients, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing bioavailable nitrogen.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

4.14 The primary concern in relation to freshwater and freshwater-dependent sites is the discharge of phosphorus in treated sewage effluent into connecting waterbodies or European sites themselves. Development in Surrey Heath Borough over the Plan period will increase wastewater production. Wastewater from within the borough is treated by Thames Water within Chobham Wastewater Treatment Works (WwTW), Camberley WwTW and Lightwater WwTW. The treated sewage discharged from these WwTWs flows into the Bourne or the River Loddon, which both drain to the R. Thames. None of these rivers are European sites.

- 4.15 Surrey Heath Borough Council has been involved in the HMA-wide Water Cycle Study (WCS). WCS headroom modelling has identified that both Camberley WwTW and Lightwater WwTW would not have sufficient headroom under existing discharge permits to accommodate planned levels of future growth. For example, at both WwTWs there is limited flow capacity to accommodate further growth, with both technological upgrades and careful development phasing being required in the future. Treatment process upgrades will also be required using conventional treatment technologies to meet river quality targets. If upgrades are carried out, there will be no adverse impacts on receiving waters.
- 4.16 However, none of the waterbodies receiving effluent from Surrey Heath Borough are hydrologically connected to the European sites relevant to the borough. Therefore, it is considered that there is no linking pathway of impact present. This impact pathway is screened out from further consideration.

## Urbanisation

- 4.17 This impact is linked to recreational pressure, in that it also stems from an increased population, primarily within close proximity to an ecological receptor. Urbanisation encompasses an extensive range of process, including the following:
- *Increased fly-tipping* – Rubbish tipping is unsightly, but the principle adverse ecological effect of tipping is the introduction of invasive alien species with garden waste. Garden waste results in the introduction of invasive aliens precisely because it is the ‘troublesome and over-exuberant’ garden plants that are typically thrown out. Alien species may also be introduced deliberately or may be bird-sown from local gardens.
  - *Cat predation* - A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period. A high proportion of domestic cats is associated with densely populated centres, with increasing residential development likely leading to increased cat predation.
  - *Invasive species* – Where private gardens lie near SAC / SPA habitats, there is a potential risk of introducing invasive species, such as through airborne seed dispersal, disposal of garden waste and cross-over of seedlings from boots / vehicle tyres. Invasive species introduction can increase competition in space-limited habitats and lead to changes in community composition
  - *Wildfire / arson* – An increase in residential development within close proximity to European sites can lead to an increase in the occurrence of wildfire / arson, such as through illicit BBQs, disposal of cigarettes and deliberate arson. Such fires can lead to significant habitat loss, requiring extensive regeneration times to reach former complexity / maturity
- 4.18 Considerations regarding the proximity of residential development to sensitive European sites largely derive from the Dorset Heathlands SPA and, to a lesser extent, from the Thames Basin Heaths SPA. Natural England and its Local Authority partners produced a ‘Supplementary Planning Document’ (SPD) for the Dorset Heathlands SPA<sup>71</sup>, which identifies a framework for accommodating development while protecting the interest features of the site. This included the implementation of a series of zones within which varying constraints would be placed upon development. The zones relating to recreational pressure expanded to 5km and 7km respectively (these were determined to be the core recreational catchments for the sites). However, regarding urbanisation impacts (e.g. predation of chicks of ground-nesting birds by domestic cats, recreational pressure that cannot be readily diverted, fly tipping, increased incidence of fires), it was concluded that adverse impacts from residential development within 400m of the site boundaries could not be adequately mitigated.
- 4.19 Overall, the following European sites within 20km of the Surrey Heath Borough boundary are particularly sensitive to intensified urbanisation, particularly when residential development is allocated in close proximity (the sites in **bold** are taken forward into the following HRA chapters):
- **Thames Basin Heaths SPA** (some of the SSSI component parts of the SPA lie wholly or partly within Surrey Heath, including the Broadmoor to Bagshot Woods and Heaths SSSI, Chobham Common SSSI, Colony Bog and Bagshot Heath SSSI and Ash to Brookwood Heaths SSSI)

<sup>71</sup> <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/joint-planning-policy-work/pdfs/heathlands/dorset-heathlands-planning-framework-supplementary-planning-document-2015-2020.pdf> [accessed 20/11/2018]

- **Wealden Heaths Phase II SPA** (the closest component part of the SPA is the Devil's Punch Bowl SSSI approx. 15.5km to the south of Surrey Heath Borough, in the authority of Waverley)

## 5. Screening for Likely Significant Effects (LSEs)

### Recreational Pressure

#### Thames Basin Heaths SPA

- 5.1 The designated bird species in the Thames Basin Heaths SPA that nest on (nightjar, woodlark) or close (Dartford warbler) to the ground are sensitive to recreational disturbance, particularly from visitors that walk their dogs off-lead. Disturbance can lead to reduced time spent incubating eggs, provisioning for chicks, increased energy expenditure and, in the case of prolonged disturbance, abandonment of eggs. Recreational trampling can also lead to the destruction of eggs, killing of chicks and damage to SAC vegetation upon which qualifying birds rely. Furthermore, adults, chicks and eggs are at high risk of predation by free-roaming dogs that are not under control by their owners. Natural England's Site Improvement Plan (SIP) identifies public access as the most important pressure / threat to the site, potentially impacting breeding birds. The SIP states that '*Parts of the Thames Basin Heaths... are subject to high levels of recreational use... This is likely to be affecting the distribution and overall numbers of ground-nesting Annex 1 birds (and breeding success)... There is also concern at the growing use of parts of the complex by commercial dog walkers and desire to control this.*'
- 5.2 Three component SSSIs of the Thames Basin Heaths SPA lie in Surrey Heath Borough, including the Broadmoor to Bagshot Woods and Heaths SSSI, Colony Bog and Bagshot Heath SSSI and Chobham Common SSSI. Given the SPA's popularity as a recreational resource, it is reasonable to expect that new housing delivered in the Surrey Heath Local Plan (SHLP) will lead to an increase in visitor numbers to the site, particularly in those SSSIs that lie closest to settlements where significant growth is allocated, including Camberley and Frimley.
- 5.3 **The available evidence base highlights that recreational pressure is a significant concern for the Thames Basin Heaths SPA, with visitor numbers expected to increase in line with housing growth allocated in the SHLP and development plans of adjoining authorities. Therefore, LSEs of the SHLP on the Thames Basin Heaths SPA regarding recreational pressure cannot be excluded and the site is screened in for Appropriate Assessment.**

#### Thursley, Ash, Pirbright and Chobham SAC

- 5.4 The Thursley, Ash, Pirbright and Chobham SAC supports two habitats that are sensitive to recreational pressure, including Northern Atlantic wet heaths with *Erica tetralix* and European dry heaths. One main mechanism through which recreation can have negative impacts on these SAC habitats is via direct trampling damage, effectively direct destruction of individual plants by visitors that venture off footpaths. However, various other mechanisms can also threaten the integrity of SAC habitats, such as continual path widening and erosion. Furthermore, one of the main processes adversely affecting heathland habitats is nutrient enrichment, which arises from dog fouling and, to a much lesser extent, horse riding. Because dog walking is an extremely popular activity, the cumulative input of nutrients to heaths, habitats uniquely adapted to low nutrient conditions, can equate to a strong fertiliser input.
- 5.5 Large sections of the Thursley, Ash, Pirbright and Chobham SAC overlap with the Thames Basin Heaths SPA, and thus have a similar distribution in relation to Surrey Heath Borough. In relation to the SHLP, the SAC's component SSSIs that are most relevant are the Colony Bog and Bagshot Heath SSSI, Ash to Brookwood Heaths SSSI and the Chobham Common SSSI. Because the SHLP allocates much of its housing growth in the western section of the authority, an increase in recreational pressure may be most likely in the Colony Bog and Bagshot Heath SSSI and Ash to Brookwood Heaths SSSI, which are both located in the western part of Surrey Heath.
- 5.6 **Overall, given the presence of sensitive habitats and its proximity to urban centres, recreational pressure is a significant concern for the Thursley, Ash, Pirbright and Chobham SAC. As was highlighted in relation to the Thames Basin Heaths SPA, visitor numbers will increase due to an**

**increase in housing allocated in the SHLP and other development plans (cumulatively referred to as the in-combination growth). Therefore, LSEs of the SHLP on the SAC regarding recreational pressure cannot be excluded and the site is screened in for Appropriate Assessment.**

## Thursley, Hankley and Frensham Commons SPA

- 5.7 The Thursley, Hankley and Frensham Commons SPA (also known as Wealden Heaths Phase I SPA), is designated for bird species that nest on or close to the ground, including nightjar, Dartford warbler and woodlark. As discussed in relation to the Thames Basin Heaths SPA, which partly lies within Surrey Heath Borough, these qualifying birds are sensitive to recreational disturbance, particularly from dogs that are walked off-lead. Notably, however, the SPA lies in Waverley District, which is less densely populated than other parts of south-east England.
- 5.8 It is to be noted that the closest point of the SPA lies approx. 10.5km to the south of the Surrey Heath Borough boundary, which is relatively far beyond the typical core catchment zone that is documented for terrestrial European sites. The HRA in support of Waverley Borough Council's Local Plan Part 1<sup>72</sup> identified that the Thursley, Hankley and Frensham Commons SPA has a catchment of roughly 9km, which would exclude all parts of Surrey Heath. Furthermore, it must be noted that similar destinations in terms of habitat, general feel and wildlife interest are found in Surrey Heath Borough itself. Therefore, it is unlikely that new residents in Surrey Heath would regularly undertake the longer journeys to the SPA in Waverley, particularly for frequent activities such as dog walking. Overall, it is therefore concluded that LSEs of the SHLP on the Thursley, Hankley and Frensham Commons SPA regarding recreational pressure can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## Wealden Heaths Phase II SPA

- 5.9 As established in the previous sections, the breeding nightjar, woodlark and Dartford warbler within the Wealden Heaths Phase II SPA are sensitive to public access and recreational disturbance. The allocated housing in the SHLP and development plans of adjoining authorities will place an increased demand on recreational greenspaces, particularly those that are of high societal value. The SPA is a composite site comprised of four component SSSIs, including the Devil's Punch Bowl SSSI, Woolmer Forest SSSI, Broxhead and Kingsley Commons SSSI and Bramshott and Ludshott Commons SSSI. At 15.5km distance, the Devil's Punch Bowl SSSI is the closest component part to Surrey Heath Borough.
- 5.10 Surrey Heath lies well beyond the core recreational catchment that has been established for the Wealden Heaths Phase II SPA (5km). Only a small number of future residents are likely to regularly travel such a distance, particularly considering that similar destinations lie within the authority itself (i.e. the Thames Basin Heaths SPA). Overall, it is therefore concluded that LSEs of the SHLP on the Wealden Heaths Phase II SPA regarding recreational pressure can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## South West London Waterbodies SPA / Ramsar

- 5.11 The qualifying species of the South West London Waterbodies SPA / Ramsar include two overwintering waterfowl species, namely gadwall and shoveler. These ducks make use of seven discrete SSSI waterbodies that collectively make up the SPA / Ramsar. Recreational disturbance has the potential to affect the natural foraging and resting behaviours of the ducks, with potential implications for the distribution of individuals across the component sites. Importantly, the qualifying ducks also use functionally linked waterbodies outside the SPA boundary, which may also be subject to recreational pressure and must be considered in HRAs.
- 5.12 The Thorpe Park No.1 Gravel Pit SSSI is the closest component part of the SPA to Surrey Heath at approx. 4.5km distance. Considering data that is available for other inland freshwater European sites, this is considered within a typical core catchment zone of roughly 5km. Therefore, it can reasonably be expected that future residents of Surrey Heath would visit the site, adding to its overall recreational burden. However, the specific characteristics of this SSSI also require consideration. The primary use of St. Ann's Lake, which lies in the SSSI, is for water-skiing facilities. Access to the lake is restricted by the operating club and is only

<sup>72</sup> AECOM (2016) Local Plan Part 1: Strategic Policies and Sites. Pre-Submission Draft (July 2016) Habitats Regulations Assessment.

permitted for a limited number of people at any given time. Natural England's Site Condition Assessment indicates that the SSSI is in favourable condition with consistently good abundances of qualifying species, despite the lake's use for watersports.

- 5.13 Two waterbodies with potential functional linkage to the SPA at similar distances to Surrey Heath have also been investigated for their value to SPA birds. The Twiners Angling Complex to the south-east of the Thorpe Park No. 1 Gravel Pit SSSI is heavily fished and is deemed to be of low value to overwintering gadwall and shoveler. However, Longside Lake, approx. 4.3km from Surrey Heath, supports high numbers of gadwall (and these individuals also use the nearby SSSI) and anecdotal data indicate that the site is used primarily by dog walkers and fishermen. Notwithstanding this, AECOM considers that the likely increase in visitor numbers due to the SHLP is very likely to be limited, especially considering that existing use levels of the lake are low. The HRA of the Runnymede Local Plan considered the potential for impacts on Longside Lake from housing growth in Runnymede (within which Longside Lake is situated). It concluded that Longside Lake was used only occasionally by dogwalkers and fishermen, and was relatively undisturbed. In 2011 there were reports of occasional anti-social behaviour (specifically quad bikes) around this lake but the site owners installed kissing gates to restrict this activity. There is no parking at Longside Lake, such that only pedestrians are likely to visit the site. This makes visits from residents of Surrey Heath unlikely given the distances involved. Overall, it is concluded that LSEs of the SHLP on the South West London Waterbodies SPA / Ramsar regarding recreational pressure can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## Windsor Forest and Great Park SAC

- 5.14 The Windsor Forest and Great Park SAC is designated for habitats that are directly sensitive to recreational pressure, including old acidophilous oak woods and Atlantic acidophilous beech forests. Importantly, the site supports a high number of ancient and veteran trees, the root zones of which are particularly sensitive to soil compaction and hydrological changes that arise from trampling damage. Furthermore, the violet click beetle, Annex II species of the SAC, is dependent on a sufficient supply of decaying timber, the removal of which could adversely impact its population abundance.
- 5.15 The SAC lies approx. 1.7km to the north of Surrey Heath Borough, well within a typical 5km core recreational catchment for terrestrial European sites. However, importantly Natural England's SIP does not highlight recreational pressure as an issue in the SAC. Most likely, this is due to the well-established path network within the site and ancient trees being sufficiently protected to prevent damage to the root systems. This matches the conclusion of the Windsor & Maidenhead Local Plan HRA which concludes that the SAC is resilient to recreational disturbance and that no likely significant effect will therefore arise through this impact pathway. Regarding the violet click beetle, it is generally not possible to relate development plans to relatively rare, isolated behaviours. For example, only a very small proportion of visitors will remove deadwood or decaying timber from within the SAC, which is not expected to significantly decrease the habitat available to the beetle. Overall, it is concluded that LSEs of the SHLP on the Windsor Forest and Great Park SAC regarding recreational pressure can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## Burnham Beeches SAC

- 5.16 The Burnham Beeches SAC is designated for Atlantic acidophilous beech forests with *Ilex* and *Taxus* in the shrublayer. It is a very popular recreation destination for locals, as well as for visitors travelling from further afield. The trees within the site boundary comprise an important community of veteran trees, which are particularly vulnerable to trampling damage and soil compaction processes, which may affect water and nutrient uptake. Natural England's Site Improvement Plan lists recreational pressure as a significant pressure / threat to the integrity of the site<sup>73</sup>. Visitor surveys were undertaken by Footprint Ecology on behalf of the City of London Corporation in 2014, 2016 and 2017. Data from these surveys were used to establish the core catchment for the SAC (based on the distance that 75% of visitors travel to the site), which has been shown to be 5.6km. and have confirmed that Surrey Heath lies well beyond the core catchment. However, Surrey Heath Borough lies approx. 17.5km from the Burnham Beeches SAC, placing it well beyond its Zone of Influence (Zoi). Therefore, LSEs of the SHLP on the Burnham Beeches SAC regarding recreational pressure can be excluded and the site is screened out from Appropriate Assessment regarding this impact pathway.

<sup>73</sup> Available at: <http://publications.naturalengland.org.uk/publication/5689860228644864> [Accessed on the 14/01/2022]

## Screening of Policies

5.17 The following policies contained within the SHLP are screened in regarding recreational pressure in the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC, primarily because they will result in an increase in the local population and additional pressure on recreational spaces:

- Policy SS1 – Spatial Strategy (identifies an overall housing supply requirement of 6,082 new homes, while providing for a delivery of at least 5,680 homes in Surrey Heath Borough between 2019 and 2038, with approx. 4,852 dwellings being delivered in the west of the borough in the settlements of Camberley, Deepcut, Frimley, Frimley Green, Mytchett and Bagshot; the policy also provides for an unspecified increase in employment opportunities across the authority)
- Policy HA1 – Housing Allocations (allocates several smaller housing sites to meet the borough's overall housing demand, including allocations in Bagshot, Camberley, Deepcut, Frimley and Windlesham)
- Policy HA2 – London Road Block, Camberley Town Centre (allocates a strategic residential-led mixed use redevelopment at the London Road Block in Camberley Town Centre, with provision for 550 new dwellings, town centre uses and supporting infrastructure)
- Policy HA3 – Land East of Knoll Road, Camberley Town Centre (allocates a residential-led redevelopment on Land East of Knoll Road in Camberley Town Centre, with provision for 475 new dwellings and supporting infrastructure)
- Policy HA4 – Mindenhurst, Deepcut (allocates strategic residential development in Mindenhurst / Deepcut, with provision for 1,200 new dwellings, a care home and supporting infrastructure)
- Policy H12 – Site Allocations for Gypsy and Travelling Showpeople Accommodation (allocates an indicative number of four gypsy and traveller pitches at Diamond Ridge Woods, Bagshot)
- Policy CTC1 – Camberley Town Centre (identifies Camberley Town Centre as a key focal area for residential and employment growth, although no specific growth quanta are provided)

## Atmospheric Pollution

### Thames Basin Heaths SPA

5.18 The Thames Basin Heaths SPA is designated for breeding birds that depend on dwarf shrub heath, primarily for nesting and foraging. As such, the quality of these habitats is directly linked to the SPA meeting its Conservation Objectives. The Air Pollution Information System (APIS) identifies nitrogen Critical Loads for both dwarf shrub heath (10-20 kg N/ha/yr) and coniferous woodland (5-15 kg N/ha/yr). Based on APIS, an exceedance of the CL for dwarf shrub heath can lead to transitions in heather to grass dominance, decline in lichens, changes in plant biochemistry and increased sensitivity to abiotic stress. APIS concludes that atmospheric pollution effects are associated with potential negative impacts on the qualifying species due to effects on the species' supporting habitats.

5.19 The potential for LSEs associated with development plans primarily depends on the presence of potential major commuter routes within 200m of sensitive qualifying habitats. Habitat mapping on MAGIC indicates that lowland heathland lies within this distance of strategic commuter routes in Surrey Heath Borough, including the M3 (which passes adjacent to the Colony Bog and Bagshot Heath SSSI and bisects the Chobham Common SSSI). Furthermore, various heathland parcels in the Colony Bog to Bagshot Heath SSSI also lie within 200m of the A322, which connects Surrey Heath with the authority of Woking.

5.20 **Overall, given the location of air quality-sensitive heathland adjacent to these major roads, LSEs of the SHLP on the Thames Basin Heaths SPA regarding atmospheric pollution cannot be excluded. Therefore, the site is screened in for Appropriate Assessment.**

### Thursley, Ash, Pirbright and Chobham SAC

5.21 The Thursley, Ash, Pirbright and Chobham SAC is designated for Northern Atlantic wet heaths and European dry heaths, two habitats which APIS identifies as being sensitive to atmospheric nitrogen deposition (see section above). The SAC largely overlaps with the Thames Basin Heaths SPA and also

comprises the Colony Bog to Bagshot Heath SSSI and Chobham Common SSSI. Therefore, it is situated similarly in relation to major commuter routes (i.e. the M3 and A322).

- 5.22 **Overall, given the location of air quality-sensitive heathland adjacent to these major roads, LSEs of the SHLP on the Thursley, Ash, Pirbright and Chobham SAC regarding atmospheric pollution cannot be excluded. Therefore, the site is screened in for Appropriate Assessment.**

## Windsor Forest and Great Park SAC

- 5.23 The Windsor Forest and Great Park SAC is partly designated for two habitats that are sensitive to nitrogen and ammonia deposition. For example, old acidophilous oak woods with *Quercus robur* have an established nitrogen CL of 10-15 kg N/ha/yr. Exceedance impacts may include a decrease in mycorrhiza, loss of epiphytic lichens and bryophytes, and changes in ground vegetation. Specifically, this habitat contains both lichens and bryophytes, which are highly sensitive to ammonia deposition. The current nitrogen deposition trend for this habitat indicates that the maximum deposition far exceeds the maximum CL, specified on APIS as being 28.6 kg N/ha/yr.
- 5.24 The second habitat, Atlantic acidophilous beech forests with *Ilex* and *Taxus* in the shrublayer, has a nitrogen CL of 10-20 kg N/ha/yr, which is also exceeded by the current maximum nitrogen deposition of 28.6 kg N/ha/yr. Exceedance impacts are likely to be very similar to those in oak woods described above. This habitat also comprises lichens and bryophytes, making it susceptible to ammonia deposition.
- 5.25 The SAC is traversed and / or adjoined by several main roads, including the A329, A332, B383 and B3022. As such, it can be reasonably expected that an increase in commuter traffic would have the potential to result in air quality impacts within the site. However, Census 2011 journey-to-work data highlight that of 19,805 outflowing car journeys from Surrey Heath, 978 are to the authority of Windsor and Maidenhead (i.e. approx. 5%), which is a relatively small proportion of the total commuter load and an even smaller proportion of the total number of commuting visits arising from Surrey Heath residents when journeys to work that start and end in Surrey Heath borough are taken into consideration. Furthermore, following a review of the road network in relation to Surrey Heath, it is to be noted that even the small number of commuter trips to the main settlements of Windsor and Maidenhead may use alternative routes that do not pass within 200m of the SAC. Overall, in consideration of this, it is concluded that LSEs of the SHLP on the Windsor Forest and Great Park SAC regarding atmospheric pollution can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## Thursley, Hankley and Frensham Commons SPA

- 5.26 The Thursley, Hankley and Frensham Commons SPA, designated for breeding nightjar, Dartford warbler and woodlark, is sensitive to atmospheric pollution as a result of impacts on the supporting habitats of these species, including dwarf shrub heath and coniferous woodland. As highlighted earlier, APIS identifies nitrogen CLs of 10-20 kg N/ha/yr (lowland heathland) and 5-15 kg N/ha/yr (coniferous woodland) for these habitats. The potential exceedance impact would be to see changes in community or ground flora composition with potential knock-on effects on breeding birds.
- 5.27 While the SPA lies in a less urbanised part of south-east England (compared to Surrey Heath), several major roads, the A3, A286 and A287, traverse SPA heathland habitat in the authority of Waverley. However, the relatively long distances of these stretches of road to Surrey Heath must be a primary consideration. The closest point of the Thursley, Hankley and Frensham Commons SPA lies approx. 11.1km from Surrey Heath (with the relevant parts of the road network being even more distant), which is beyond the average commuting distance of a UK resident of 10.1km. Therefore, it is considered that relatively few future residents of Surrey Heath would commute along the A3 into Waverley District, particularly given the relatively convoluted routes that would need to be taken to travel within 200m of the SPA.
- 5.28 Overall, in consideration of this, it is concluded that LSEs of the SHLP on the Thursley, Hankley and Frensham Common SPA regarding atmospheric pollution can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## Mole Gap to Reigate Escarpment SAC

- 5.29 The Mole Gap to Reigate Escarpment SAC is designated for five habitats which APIS identifies as having varying degrees of sensitivity to atmospheric pollution. The most air quality-sensitive habitat feature are the



*Taxus baccata* woods of the British Isles with a nitrogen CL of 5-15 kg N/ha/yr, followed by European dry heaths (10-20 kg N/ha/yr) and *Asperulo-Fagetum* beech forests (10-20 kg N/ha/yr). For most of the habitat types in the SAC, current maximum nitrogen CL are already being exceeded, placing the habitats under increased threat of further nitrogen deposition effects. However, none of the qualifying habitats occupy the entire SAC area and, therefore, a detailed assessment of these ecological receptors in relation to the road network is required.

- 5.30 Most importantly, the closest point of the SAC lies approx. 16km from the Surrey Heath Borough boundary, and even further from the main settlements where the SHLP allocates the largest portion of growth. The M25 and A24 are the two major commuter arteries that pass within 200m of sensitive habitat features, but residents from Surrey Heath would have to undertake very long and convoluted routes to use these roads. Clearly, the M25 represents a regionally important strategic corridor, which may also be used by a limited number of Surrey Heath residents. The M25 passes within 200m of calcareous grassland, a qualifying feature of the SAC. In December 2017, RPS undertook a HRA screening exercise in support of the Gatwick Runway 2 project, which incorporated an ecological survey of SAC habitats within SSSI Management Unit 23. The HRA concluded that the calcareous grassland was currently of insufficient condition to support orchid species and, therefore, LSEs of the project on the Mole Gap to Reigate Escarpment SAC could be excluded.
- 5.31 Overall, considering the distance of the SAC to Surrey Heath and the condition of SAC habitat within 200m of the M25, it is concluded that LSEs of the SHLP on the Mole Gap to Reigate Escarpment SAC regarding atmospheric pollution can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## Wealden Heaths Phase II SPA

- 5.32 The Wealden Heaths Phase II SPA is a composite site that is designated for bird species that nest on or close to the ground, including nightjar, Dartford warbler and woodlark. As highlighted in relation to European sites discussed above, these species are reliant on habitats that are sensitive to atmospheric pollution (lowland heathland and coniferous woodland). The Devil's Punch Bowl SSSI is the closest component part of the SPA to Surrey Heath Borough, at a distance of approx. 15.5km.
- 5.33 While there are major commuter routes within 200m of SPA habitats, the distance to Surrey Heath is a key consideration. The average commuter distance of a UK resident is 10.1km, which is well below the distance between the borough and the SPA. As such, it is concluded that a negligible number of future Surrey Heath residents would regularly commute along the relevant roads within 200m of the Wealden Heaths Phase II SPA. Overall, considering the distance of the SPA to Surrey Heath, it is concluded that LSEs of the SHLP on the Wealden Heaths Phase II SPA regarding atmospheric pollution can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## East Hampshire Hangers SAC

- 5.34 The East Hampshire Hangers SAC is a composite site, comprising a series of woodlands on the western edge of the Weald. Primarily, the site is designated for two woodland habitats, including *Taxus baccata* woods and *Tilio-Acerion* forests of slopes, screes and ravines. APIS specifies nitrogen CLs for yew woodland of 5-15 kg N/ha/yr and *Tilio-Acerion* forests of 15-20 kg N/ha/yr. Importantly, current nitrogen deposition rates far exceed the CL range, indicating that increased nitrogen deposition is a serious threat to the integrity of the site.
- 5.35 However, the closest component SSSI to Surrey Heath Borough is the Upper Greensand Hangers: Wyck to Wheatley, at approx. 16.6km distance. This is relatively far beyond the distance that most Surrey Heath commuters are likely to travel to work. It is also to be noted that there are no major roads within 200m of this part of the SAC, which is the maximum distance at which atmospheric pollution impacts are known to occur. In conclusion, LSEs of the SHLP on the East Hampshire Hangers SAC regarding atmospheric pollution can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## Burnham Beeches SAC

- 5.36 The Burnham Beeches SAC is designated for extensive tracts of Atlantic acidophilous beech forests and its characteristic shrublayer. This habitat has a nitrogen CL of 10-20 kg N/ha/yr and exceedances may lead to

changes in ground vegetation and mycorrhiza, nutrient imbalances and altered soil fauna. APIS specifies that the current nitrogen deposition (28.1 kg N/ha/yr) significantly exceeds the maximum CL. Notably, the SAC also supports notable assemblages of lichens and bryophytes, which have high sensitivity to ammonia deposition.

- 5.37 The most important major road within 200m is the A355, which runs along the eastern boundary of the SAC on a north-south trajectory. However, the SAC lies approx. 17.5km to the north of Surrey Heath Borough and very few Surrey Heath residents are likely to regularly commute such distances. It follows that residents from the borough contribute a negligible proportion to atmospheric pollution in the SAC. Therefore, LSEs of the SHLP on the Burnham Beeches SAC regarding atmospheric pollution can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

## Screening of Policies

- 5.38 Policies that support the delivery of residential and employment development will increase the overall volume of commuter traffic within Surrey Heath and with other adjoining authorities. The geographic location of such development (in conjunction with the road network) will determine the routes undertaken by commuters and whether future additional traffic will pass within 200m of sensitive habitats. Therefore, the following policies contained within the SHLP are screened in regarding atmospheric pollution in the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC:

- Policy SS1 – Spatial Strategy (identifies an overall housing supply requirement of 6,082 new homes, while providing for at least 5,680 homes in Surrey Heath Borough between 2019 and 2038, with approx. 4,852 dwellings being delivered in the west of the borough in the settlements of Camberley, Deepcut, Frimley, Frimley Green, Mytchett and Bagshot; the policy also provides for an unspecified increase in employment opportunities across the authority)
- Policy HA1 – Housing Allocations (allocates several smaller housing sites to meet the borough's overall housing demand, including allocations in Bagshot, Camberley, Deepcut, Frimley and Windlesham)
- Policy HA2 – London Road Block, Camberley Town Centre (allocates a strategic residential-led mixed use redevelopment at the London Road Block in Camberley Town Centre, with provision for 550 new dwellings, town centre uses and supporting infrastructure)
- Policy HA3 – Land East of Knoll Road, Camberley Town Centre (allocates a residential-led redevelopment on Land East of Knoll Road in Camberley Town Centre, with provision for 475 new dwellings and supporting infrastructure)
- Policy HA4 – Mindenhurst, Deepcut (allocates strategic residential development in Mindenhurst / Deepcut, with provision for 1,200 new dwellings, a care home and supporting infrastructure)
- Policy H12 – Site Allocations for Gypsy and Travelling Showpeople Accommodation (allocates an indicative number of four gypsy and traveller pitches at Diamond Ridge Woods, Bagshot)
- Policy CTC1 – Camberley Town Centre (identifies Camberley Town Centre as a key focal area for residential and employment growth, although no specific growth quanta are provided)
- Policy CTC2 – Camberley Town Centre Primary Shopping Area (provides for Class E development in the Camberley Town Centre Primary Shopping Area, thereby increasing employment opportunities within Surrey Heath Borough)
- Policy ER1 – Economic Growth and Investment (supports the retention and growth of existing businesses across Surrey Heath Borough including the regeneration / redevelopment of Strategic and Locally Important Employment Sites with consequential increase in employment opportunities)
- Policy ER2 – Strategic Employment Sites (safeguards Strategic Employment Sites in Camberley, Frimley, Windlesham, Chobham and Mytchett and supports their redevelopment for the provision of additional employment floorspace)
- Policy ER3 – Locally Important Employment Sites (safeguards Locally Important Employment Sites in Camberley, Frimley Green, Bagshot and Mytchett and supports their redevelopment for the provision of additional employment floorspace)

- Policy ER4 – Yorktown Business Park (identifies the Yorktown Business Park as the borough's most important employment site and supports its potential redevelopment with an associated increase in employment floorspace)
- Policy ER5 – The Rural Economy (supports the provision of employment development outside Strategic or Locally Important Employment Sites, including in the Green Belt, provided that certain conditions are met; no growth quantum is specified)

## Water quantity, level and flow

### South West London Waterbodies SPA / Ramsar

- 5.39 The qualifying species of the South West London Waterbodies SPA / Ramsar are designated for waterfowl species, including shoveler and gadwall. These species, especially gadwall, are known to require terrestrial fringe habitats to rest up out of the water. These typically include areas of short vegetation, including grassland, rush pasture and waterside scrub. Therefore, if the potable water supply to Surrey Heath Borough would require the top level of any of the designated waterbodies to be increased to meet demand, this could result in the loss of habitats surrounding the reservoir margins, with potential knock-on impacts on SPA / Ramsar waterfowl.
- 5.40 An investigation into the water supply companies of Surrey Heath Borough indicates that the western part of the Borough (in which most of the growth is allocated in the SHLP), specifically the urban centres of Frimley and Camberley are supplied by South East Water. Some of the main settlements in the more rural eastern part of the borough, such as Chobham, are supplied by Affinity Water. Thames Water is the water company that uses some of the reservoirs that form part of the SPA / Ramsar. However, it does not supply potable water to Surrey Heath Borough. Importantly, even if some inter-company water transfer were to take place, Thames Water's Water Resources Management Plan (WRMP) for the period between 2020 and 2100 does not specify this to be an intended solution for its water supply strategy.
- 5.41 As a result, primarily because a link between water supply in Surrey Heath Borough and the SPA / Ramsar cannot be drawn, LSEs of the SHLP on the South West London Waterbodies SPA / Ramsar regarding water quantity, level and flow can be excluded, both alone and in-combination. The site is screened out from Appropriate Assessment regarding this impact pathway.

### Thursley and Ockley Bog Ramsar

- 5.42 The Thursley and Ockley Bog Ramsar is a valley mire complex that forms part of the Thursley, Hankley and Frensham Commons SPA. This mire occurs within an area of impeded drainage due to low-permeability underlying geology. Importantly, the Ramsar supports a community of rare wetland invertebrates (such as breeding dragonflies), which are critically dependent on sufficient water levels, such as for larval development. An increase in Surrey Heath's potable water demand may have potential impacts on the Ramsar, if it were obtained from water sources in hydrological continuity with Thursley and Ockley Bog. As discussed in the previous paragraph, the company supplying potable to the western part of Surrey Heath Borough, including the growth areas of Camberley and Frimley, is South East Water (SEW). An assessment of SEW's WRMP indicates that the Thursley and Ockley Bog Ramsar lies on the eastern edge of Water Resource Zone (WRZ) 5 – Farnham. While the western parts of Surrey Heath lie in a different WRZ (WRZ 4 – Bracknell), South East Water's WRMP indicates that there will be some water transfer between WRZs 4 and 5, highlighting a potential for the Ramsar to be impacted from increased water abstractions.
- 5.43 **Overall, given that the SHLP is associated with an increased demand for water resources to supply residential and industrial developments, and that the Ramsar lies within one of the company's WRZs, LSEs of the Plan on the Thursley and Ockley Bog Ramsar regarding water quantity, level and flow cannot be excluded. Therefore, the site is screened in for Appropriate Assessment.**

## Screening of Policies

- 5.44 The following policies contained within the SHLP are screened in regarding water quantity level and flow in the Thursley and Ockley Bog Ramsar because they will result in increased demand for potable water:
- Policy SS1 – Spatial Strategy (identifies an overall housing supply requirement of 6,082 new homes, while providing for at least 5,680 homes in Surrey Heath Borough between 2019 and 2038,

with approx. 4,852 dwellings being delivered in the west of the borough in the settlements of Camberley, Deepcut, Frimley, Frimley Green, Mytchett and Bagshot; the policy also provides for an unspecified increase in employment opportunities across the authority)

- Policy HA1 – Housing Allocations (allocates several smaller housing sites to meet the borough's overall housing demand, including allocations in Bagshot, Camberley, Deepcut, Frimley and Windlesham)
- Policy HA2 – London Road Block, Camberley Town Centre (allocates a strategic residential-led mixed use redevelopment at the London Road Block in Camberley Town Centre, with provision for 550 new dwellings, town centre uses and supporting infrastructure)
- Policy HA3 – Land East of Knoll Road, Camberley Town Centre (allocates a residential-led redevelopment on Land East of Knoll Road in Camberley Town Centre, with provision for 475 new dwellings and supporting infrastructure)
- Policy HA4 – Mindenhurst, Deepcut (allocates strategic residential development in Mindenhurst / Deepcut, with provision for 1,200 new dwellings, a care home and supporting infrastructure)
- Policy H12 – Site Allocations for Gypsy and Travelling Showpeople Accommodation (allocates an indicative number of four gypsy and traveller pitches at Diamond Ridge Woods, Bagshot)
- Policy CTC1 – Camberley Town Centre (identifies Camberley Town Centre as a key focal area for residential and employment growth, although no specific growth quanta are provided)
- Policy CTC2 – Camberley Town Centre Primary Shopping Area (provides for Class E development in the Camberley Town Centre Primary Shopping Area, thereby increasing employment opportunities within Surrey Heath Borough)
- Policy ER1 – Economic Growth and Investment (supports the retention and growth of existing businesses across Surrey Heath Borough including the regeneration / redevelopment of Strategic and Locally Important Employment Sites with consequential increase in employment opportunities)
- Policy ER2 – Strategic Employment Sites (safeguards Strategic Employment Sites in Camberley, Frimley, Windlesham, Chobham and Mychett and supports their redevelopment for the provision of additional employment floorspace)
- Policy ER3 – Locally Important Employment Sites (safeguards Locally Important Employment Sites in Camberley, Frimley Green, Bagshot and Mychett and supports their redevelopment for the provision of additional employment floorspace)
- Policy ER4 – Yorktown Business Park (identifies the Yorktown Business Park as the borough's most important employment site and supports its potential redevelopment with an associated increase in employment floorspace)
- Policy ER5 – The Rural Economy (supports the provision of employment development outside Strategic or Locally Important Employment Sites, including in the Green Belt, provided that certain conditions are met; no growth quantum is specified)

## Urbanisation

### Thames Basin Heaths SPA

- 5.45 Urbanisation impacts generally result from increased development in close proximity to European sites. The Thames Basin Heaths SPA is designated for three bird species that nest on, or close to, the ground. Negative impacts from urbanisation can be realised through a range of pathways affecting SPA birds or the habitats they rely upon, including an increase in fly-tipping, arson / uncontrolled fires, cat predation (a significant concern, because cats may freely roam many kilometres per night) and introduction of invasive species (e.g. from private gardens). The geography of Surrey Heath implies that urbanisation is a key concern for the authority, with parts of its urban centres (e.g. Frimley and Camberley) all falling within 400m of the Thames Basin Heaths SPA. Natural England have undertaken extensive work with its Local Authority

partners, set out in the Thames Basin Heaths Special Protection Area Delivery Framework, in which urbanisation effects are considered as a priority.

- 5.46 Generally, it was shown that 400m is a distance routinely covered by cats, resulting in increased risk of chick predation of ground-nesting SPA birds. It is also the buffer zone that is considered to be within the routine roaming distance of local residents, with higher potential for vandalism, arson and fly-tipping. Moreover, it is deemed that these impacts cannot be adequately mitigated, because it is impossible to restrict the free movement of cats and people. Therefore, the framework recommended implementing a series of zones in which varying levels of constraint are placed on development. This includes a 400m exclusion zone around the SPA in which no net new residential development is permitted. AECOM considers that the delineation of the 400m exclusion zone effectively negates any potential impacts of urbanisation, restricting residential development to further away (where impacts are removed and / or can be mitigated through other mechanisms, such as SANG and SAMM provision).
- 5.47 Therefore, LSEs of the SHLP on the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright and Chobham SAC regarding urbanisation effects can be excluded, both alone and in-combination. These sites are screened out from Appropriate Assessment regarding this impact pathway.

## 6. Appropriate Assessment

### Recreational Pressure

#### Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC

##### Recreation Patterns

- 6.1 Given the sensitivity of the SPA and SAC to recreational pressure and existing high levels of recreational access, several visitor surveys have been undertaken at key access points to the sites. In 2005, English Nature (predecessor of Natural England) commissioned a study of visitor access patterns<sup>74</sup> at 26 locations across the Thames Basin Heaths SPA to provide a baseline of recreational pressure at key access points to the site.
- 6.2 In 2012/13 a repeat visitor survey<sup>75</sup> was undertaken, replicating the methodology and most access locations (including those that are likely to be particularly relevant to residents of Surrey Heath Borough):
- Survey Locations 4 (Top of Bracknell Road) and 5 (Top of Kings Ride) that enable access to the Bagshot Woods & Heaths SSSI to the north of Camberley
  - Survey Location 14 (Lightwater Country Park) that provides access to the Ockham & Wisley Commons SSSI
  - Survey Location 15 (Sandpit Hill) at the Colony Bog & Bagshot Heaths SSSI
  - Survey Locations 12 (Chobham Road) and 13 (Chobham Common, Staple Hill), both providing access to the Chobham Common SSSI
- 6.3 Many of the component parts of the Thames Basin Heaths SPA are spread across Surrey Heath Borough. Given that proximity to home is a major determinant for the likelihood of visiting, it is unsurprising that Surrey Heath residents made up by far the largest proportion of interviewees (540 of 2,316 interviewees, 23%). Overall, 2,177 mapped postcodes (94%) fell within the 5km core catchment zone delineated around the SPA. Of the local car visitors, defined as people that were visiting on a day trip from home, 75% live within 4.61km of the visited access point. These results highlight that the adopted 5km mitigation zone still represents an adequate area in which to apply mitigation requirements. Importantly, it is noted that visitor counts (defined as the total number of visitors entering respective survey locations in August) has increased markedly at several survey locations relevant to Surrey Heath Borough. For example, Location 13 (Chobham Common, Staple Hill) experienced a 79% increase in visitor numbers between 2005 and 2012/13. A 61% increase in visitors was recorded for Location 15 (Sandpit Hill).
- 6.4 In line with the 5-yearly requirement for updated visitor monitoring, EPR undertook a visitor questionnaire survey in 2018<sup>76</sup> at all survey locations that were included in the 2012/13 study. The main purpose of this study was to reassess recreation patterns in the SPA and, ultimately, demonstrate whether the deployed mitigation measures are effective. Importantly, the data highlight that the number of entries per hour has dropped slightly from 6.8 to 6.3 between 2012/13 and 2018, despite an increase in housing growth surrounding the SPA. The percentage change in hourly footfall (average of entries and exits) significantly differs between survey points, with some locations experiencing declines (e.g. Chobham Common, -64.1%) and considerable increases being observed at other access points (e.g. Lightwater Country Park, +432.7%).

<sup>74</sup> Liley D., Jackson D. & Underhill-Day J. (2005). Visitor Access Patterns on the Thames Basin Heaths. English Nature Research Report. English Nature, Peterborough. 51pp. Available at: <https://www.footprint-ecology.co.uk/reports/Liley%20et%20al.%20-%202006%20-%20Visitor%20Access%20Patterns%20on%20the%20Thames%20Basin%20Heaths.pdf> [Accessed on the 07/01/2022].

<sup>75</sup> Fearnley H. & Liley D. (2013). Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA). Natural England Commissioned Reports, Number 136. 107pp. Available at: <http://publications.naturalengland.org.uk/publication/4514481614880768> [Accessed on the 07/01/2022].

<sup>76</sup> Southgate J., Brookbank R., Cammack K. & Mitchell J. (2018). Visitor Access Patterns on the Thames Basin Heaths SPA: Visitor Questionnaire Survey 2018. Natural England Commissioned Report. 82pp. Available at: <https://surreyheath.moderngov.co.uk/documents/s16014/07di%20-%20SAMM%20Project%20Report%20Annex%20C%20Thames%20Basin%20Heaths%20Visitor%20Access%20Survey.pdf> [Accessed on the 07/01/2022].

Compared to the survey years 2005 (59%) and 2012/13 (66%), there was a marked increase in the proportion of dog walkers (74.6%). Overall, it appears that the pressure by dog walkers on the bird interest of the SPA is increasing. Notwithstanding this, the report concludes that the implementation of the SANG is very likely to have contributed to the decline in visitor footfall that has been recorded between 2005 and 2018 at many locations in the SPA.

## Surrey Heath's Thames Basin Heaths SPA Avoidance Strategy

- 6.5 To comply with the Conservation of Habitats and Species Regulations 2017 (as amended) and allow future housing development to come forward, Surrey Heath Borough Council published the Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (SPD)<sup>77</sup> in 2012, which was subsequently updated in 2019. This sets out the principles for avoidance of harm, how these will be delivered and the framework put in place to manage financial developer contributions.
- 6.6 The SPD recognises the large number of authorities involved and the in-combination scope required to address recreation impacts. The Thames Basin Heaths Joint Strategic Partnership Board (JSPB) has been installed as a strategic platform from which adequate mitigation measures are administered. A strategic delivery framework has been endorsed by the JSPB, which is based on the following three pillars:
- A 400m exclusion zone for residential development surrounding the SPA has been established, because adverse effects arising from recreational pressure within this short walking distance cannot be mitigated
  - Provision of Suitable Alternative Natural Greenspace (SANG) – these are un- or underused areas that are not currently in use for recreation and are tailored to provide attractive alternative recreation destinations (discussed in paragraph 6.5)
  - Provision of Strategic Access Management and Monitoring (SAMM) – these are inter-authority management and monitoring measures for visitor pressure within the SPA (e.g. education programmes, on-ground wardening and visitor monitoring; discussed in paragraph 6.8)
- 6.7 Surrey Heath's SPD establishes key criteria for the delivery of SANGs to ensure that adequate provision is made. Generally, the authority requires SANG delivery at a rate of 8ha per 1,000 population increase as a minimum, which is subject to a case-by-case consultation with Natural England. Residential developments comprising fewer than 136 net new dwellings may acquire from strategic SANGs, while developments over 136 dwellings are generally required to provide bespoke on-site SANG. When calculating the amount of SANG capacity required for a development, this is based on a tiered structure determined by the number of bedrooms per dwelling. Importantly, the SPD states that SANG delivery must be secured in-perpetuity (defined as 125 years), meaning that recreational pressure will also be offset indefinitely. SANG capacity should be in place prior to the occupation of new dwellings. All SANG proposals must be accompanied by a detailed SANG Management Plan that outlines habitat management measures and how Natural England's SANG criteria will be met. Furthermore, the SPD outlines the process of strategic SANG contributions, which requires developers to pay the Council towards strategic SANGs via the CIL Charging Schedule or, in some cases, Section 106 payments.

## SANG Mitigation

- 6.8 Surrey Heath Borough is situated amidst parcels of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC. All residential sites allocated in the SHLP lie within the 5km core catchment zones of these sites and will require mitigation through SANG. Table 2 lists Surrey Heath's housing allocations and their corresponding capacities, resulting in a total growth of 3,501 dwellings. In turn, 70.02ha of SANG will be required to support the projected growth (Table 3).

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<sup>77</sup> Surrey Heath Borough Council. (March 2019). Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document. 32pp. Available at: <https://www.surreyheath.gov.uk/sites/default/files/Thames%20Basin%20Heaths%20Special%20Protection%20Area%20SPD%202019.pdf> [Accessed on the 07/01/2022]

**Table 2: Residential sites allocated in the SHLP, sorted from highest to lowest capacity, and the SANG these are most likely to be counted towards.<sup>78</sup>**

Site ID	Site Name	Capacity	SANG most likely counted towards
HA4	Mindenhurst, Deepcut	1,200	Bespoke (Deepcut PRB)
HA2	London Road Regeneration Block	550	Bespoke (Unknown, potentially strategic SANG in Bracknell Forest)
HA3	Land East of Knoll Road	522	Bespoke (Unknown, potentially strategic SANG in Bracknell Forest)
HA1/09	Sir Williams Sieens Square, Chobham Road	325	Bespoke (Unknown)
HA1/10	Land West of Sturt Road	161	Bespoke (Unknown, allocated to a SANG in Hart District through an agreement with the council)
HA1/03	Land East of Park Street, North of Princess Way	120	Diamond Ridge Woods or Shepherds Meadows
HA1/12	Housing Reserve Site, East of Heathpark Drive	116	Bespoke (Unknown)
HA1/13	Chobham Rugby Club, Windsor Road, Chobham	91	Chobham Meadows
HA1/06	Camberley Station, Station House Pembroke Broadway	75	Diamond Ridge Woods or Shepherds Meadows
HA1/11	Land east of Benner Lane	73	Windlemere
HA1/08	Land at Frimhurst Farm, Deepcut Bridge Road	65	Diamond Ridge Woods or Shepherds Meadows
HA1/04	84-100 Park Street	61	Shepherds Meadows
HA1/02	Bagshot Depot and Archaeology Centre, London Road	50	Windlemere
HA1/05	Camberley Centre, Francis Hill Drive	35	Diamond Ridge Woods or Shepherds Meadows
HA1/07	York Town Car Park, Sullivan Road	27	Diamond Ridge Woods or Shepherds Meadows
HA1/01	134 and 136 London Road	26	Windlemere
HA12/01	Diamond Ridge Woods, Bagshot	4 (pitches)	Diamond Ridge Woods
<b>Total</b>		<b>3,501</b>	

**Table 3: Summary of SANG requirement for the SHLP, taking account of average occupancy rates (based on a three bedroom dwelling) and Natural England SANG standards.**

Total dwellings proposed in the 5km mitigation zone	Additional generated population (at average housing occupancy of 2.5)	SANG required (ha; at 8ha / average 1,000 population increase)
3,501 <sup>79</sup>	8,753 (3,501 * 2.5)	70.02ha (8,753 * 0.008)

6.9 SHBC recognises the need for adequate SANG provision to support emerging residential planning applications and has produced a SANG Acquisition Strategy. This provides background on existing SANG capacity in Surrey Heath, details the approach taken to secure additional capacity and identifies potential future SANG sites in the borough. Table 4 provides a summary of the bespoke and strategic SANGs

<sup>78</sup> According to the SPA Avoidance Strategy, all residential sites in excess of 136 dwellings will need to be supported by bespoke SANG, whereas sites of 136 dwellings or fewer can contribute towards strategic SANG.

<sup>79</sup> It is to be noted that for a proportion of this housing figure, bespoke or strategic SANG has already been allocated (see Table 2).



currently operational within Surrey Heath Borough and relevant adjoining authorities. In developing the Regulation 18 Preferred Options Plan, SHBC is exploring three key SANG sources to meet the needs of housing to 2038<sup>80</sup>:

- Diamond Ridge Woods SANG will provide additional mitigation for 350 dwellings (at 2.5 average occupancy), subject to increasing area of and securing improvements to the site – this is discussed further below
- Following discussions with Bracknell Forest Council, a residual capacity of up to 500 units has been identified at Shepherds Meadows SANG due to an extension to the site boundary and underutilising of existing capacity
- Additional SANG capacity has been identified at private SANGs in Bracknell Forest through conversations with site owners; the catchment areas of these SANGs reach strategic sites in Camberley Town Centre and therefore could be used towards mitigation of the London Road Block (550 dwellings)

**Table 4: List of Suitable Alternative Natural Greenspaces (SANGs) as currently operational in Surrey Heath Borough and relevant adjoining authorities, detailing SANG type and area (ha).**

SANG Name	SANG Type	Area (ha)
Deepcut PRB SANG	Bespoke	35.65
Ridgewood		7.3
Earlswood		7.33
St Catherine Road		1.62
Waters Edge		11.89
Little Heath Nursery		6.6
Windlemere	SHBC Strategic	15.11
Diamond Ridge Woods		17.83
Chohbam Meadows		25.88
Chobham Place Woods (identified as being at capacity)		12.58
Shepherds Meadows	Bracknell Forest District Council Strategic	35.15
Hawley Meadows and Blackwater Park	Hart District Council Bespoke	35.14
Swan Lakes		9.1

6.10 In consultation with Natural England, the SHBC Greenspaces Team has developed an inventory of amendments and improvements to the Diamond Ridge Woods SANG, allowing for its capacity to be maximised. The 18ha area of the SANG to the south of Upper College Ride can be given full capacity (without discounting requirements), with an indicative capacity of 2,250 people. In contrast, the SANG area to the north of Upper College Ride will be removed from the site, because it facilitates direct access to the SPA, and instead will be targeted for biodiversity enhancements. Further improvements, including sound buffering along London Road and specific path improvements, will also be pursued. Parking provision for the site will be explored at the playing field and Camberley Judo Club sites. Subject to these alterations

<sup>80</sup> This is in addition to existing capacity.

being put in place, the SANG's residual capacity is 878 people (considering that 1,372 people are already allocated to the site).

- 6.11 Additional work to identify new SANGs is ongoing. In its Acquisition Strategy, SHBC highlights several sites that are being explored for meeting future SANG requirements. A promising target site is Land East of St Catherines Road, a densely wooded area that is situated south of Frith Hill woodland and east of St Catherines Road to the east of Frimley. The potential SANG has an area of 30ha (equating to 3,750 people) and catchment size of 5km. This would cover the entire Western Urban Area and meet roughly 99% of the demand in this part of the authority (SANG deficit in the West of Borough is currently being identified as 3,790 dwellings). However, deliberations with the owner regarding this site are at a very early stage and delivery of this site remains uncertain. Based on the foregoing, however, there is no reason to believe at this stage of plan preparation that sufficient SANG capacity could not be achieved to address the needs of the allocated development.

## SAMM Mitigation

- 6.12 Contribution to SAMM is required for all net new residential development within 5km of the Thames Basin Heaths SPA. SAMM measures are funded through a single tariff that is collected centrally and utilised strategically across the SPA. Hampshire County Council is the administrative body that collects monies from the relevant authorities and Natural England then delivers the mitigation. SAMM contributions are determined on a per-bedroom basis, with larger residential developments paying higher tariffs. For example, currently, a one-bedroom unit is subject to a tariff of £465.98, which increases to £1228.63 for a five-bedroom unit<sup>81</sup>. Furthermore, SAMM contributions are updated annually in line with inflation and / or changing costs of works and personnel.

## Mitigation Contained in the Local Plan

- 6.13 The SHLP encompasses several policy mechanisms that are designed to protect the integrity of the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC. Most importantly, **Policy E1 (Thames Basin Heaths Special Protection Area)** establishes the key mitigation approach towards the Thames Basin Heaths SPA, including:
- 400m exclusion zone around the SPA in which no new residential development is being permitted
  - 5km mitigation zone around the SPA in which all net new residential developments will be required to provide and / or contribute to SANG and SAMM provision
- 6.14 The supporting text to Policy E1 also refers to the Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document 2019, which sets out further detail on the types of development affected, SANG creation guidelines and financial contributions. For example, all developments of 10 or more dwellings will need to lie in the catchment of the SANG they are allocated to. Furthermore, developments with 136 units or more will generally be required to provide bespoke SANG solutions. Importantly, given the limited space in built-up environments, it has been identified that larger developments in the Western Urban Area will also be able to utilise strategic SANG capacity.
- 6.15 More generic protection to European sites is provided in **Policy E2 (Biodiversity and Geodiversity)**, which stipulates that '*Development proposals will be permitted where they will not have an adverse impact on biodiversity... Where harm or loss cannot be avoided, mitigation will be required such that it can be robustly demonstrated that: a) There will be no adverse effect on the integrity of international, national and local designated sites.*' This policy text ensures that harmful effects on the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC will not arise. Furthermore, this policy also assigns the highest weight of protection to internationally designated sites. Effective avoidance, mitigation and compensation will be secured through legal planning obligations, which ties in the policy with Policy E1.
- 6.16 In addition to SANG provision, **Policy IN5 (Green Infrastructure)** and **Policy IN6 (Green Space)** provide additional mechanisms through which the SPA and SAC may be buffered from recreational pressure. Policy IN5 outlines two key proposals with regard to green infrastructure:
- Reinforce, link, buffer and create new green infrastructure
  - Promote, manage and enhance public enjoyment of green infrastructure

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<sup>81</sup> Tariffs have been last updated in April 2021. Available at: <https://www.surreyheath.gov.uk/residents/planning/planning-policy/thames-basin-heaths-special-protection-area/suitable-alternative> [Accessed on the 27/01/2022]

The provision of connected and attractive green infrastructure, while not subject to stringent SANG standards, is an important pillar of mitigating recreational pressure. If a network of local greenspaces is available locally, especially when allowing for long-distance circular routes, residents are more likely to make use of such spaces and, potentially, avoiding the SPA. Policy IN5 also protects Surrey Heath from the loss of green infrastructure. Policy IN6 recognises the recreational value of designated green spaces and protects the borough against their loss.

## Conclusions

- 6.17 Overall, given that SHBC is working on identifying sufficient SANG capacity in collaboration with Natural England and adequate reference to the Avoidance Strategy is made in the Plan, AECOM concludes that there will be no adverse effects of the SHLP on the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC regarding recreational pressure, both alone and in-combination. No additional policy recommendations are made for inclusion in the Plan.

# Atmospheric Pollution

## Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC

### Sensitivity of the SPA and SAC to Atmospheric Pollution

- 6.18 Both the Thames Basin Heaths SPA (indirectly via effects on nesting / foraging habitats of qualifying birds) and the Thursley, Ash, Pirbright & Chobham SAC are sensitive to atmospheric pollution. Heathlands are nutrient-poor and particularly susceptible where they lie near major roads. The major impact of nitrogen fertilisation is a change in community composition with a marked decline in heather *Calluna vulgaris* and increased abundance of grasses. The physical and measurable manifestations of heathland responses to atmospheric pollution generally occur as reductions in species richness, vegetation cover and habitat structure / function<sup>82</sup>. The Air Pollution Information System (APIS) identifies a nitrogen Critical Load (CL) of 10-20 kg N/ha/yr for both European dry heaths and Northern Atlantic wet heaths with *Erica tetralix*.
- 6.19 In addition to nitrogen deposition, ammonia pollution can also lead to direct damage of sensitive species, including lichens, mosses and heather. Furthermore, deposition of excessive ammonia can lead to changes in ground flora community assemblages, particularly bryophytes and lichens. An ammonia Critical Level of 1 ug/m<sup>3</sup> has been established for these plant groups using field observations and using a statistical technique to identify a no-effects level.
- 6.20 Two qualifying bird species in the Thames Basin Heaths SPA, the European nightjar and wood lark, partly depend on coniferous woodland in their life cycle. APIS identifies coniferous woodland has having a nitrogen CL of 5-15 kg N/ha/yr, with exceedance impacts including changes in soil processes, nutrient imbalance, altered mycorrhiza and ground vegetation composition. However, the coniferous woodland in the SPA represents rotationally managed plantation. It is considered that the associated management practices are much more likely to determine habitat suitability than nitrogen deposition, such that any atmospheric pollution impacts will be negligible.

### Road Traffic Network

- 6.21 Owing to the developed nature of Surrey Heath Borough, various component SSSIs of the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC lie within 200m of major traffic arteries. Sensitive lowland heathland is typically widely distributed within the site boundary, such that specific locations are not highlighted here. The most significant commuter artery is the M3, which traverses Surrey Heath Borough on a west-east axis. The Department for Transport's road traffic statistics highlight that manual count point 46010, sandwiched between the component parts of Chobham SSSI (which forms part of both the SPA and SAC), had Annual Average Daily Traffic (AADT) of 71,490 cars, 19,450 light goods vehicles and 7,615 heavy goods vehicles in 2020. This is by far the busiest road in the borough and it is expected that traffic growth due to the SHLP will be highest here.
- 6.22 Another important road is the A322 (Guildford Road) that connects Camberley and Bagshot with the east of the borough and the adjoining authority of Woking. Importantly, the northern stretch of the A322 is a dual

<sup>82</sup> CIEEM. (2021). Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK. 25pp. Available at: <https://cieem.net/wp-content/uploads/2020/12/Air-Quality-advice-note.pdf> [Accessed on the 06/01/2022]

carriageway, reducing to a single carriageway at the intersection with the A319. DfT statistics show that the stretch of dual carriageway had an AADT of 16,849 cars, 5,437 light goods vehicles and 857 heavy goods vehicles in 2020. The traffic volume on the road reduces significantly where it becomes a single carriageway. The difference in current and future traffic flows is expected to have significant consequences for the load of atmospheric pollutants deposited to roadside habitats.

- 6.23 The A30 connects Camberley in the western part of Surrey Heath with the authority of Hart, traversing the Castle Bottom to Yateley and Hawley Commons SSSI (part of the Thames Basin Heaths SPA). DfT road traffic statistics indicate an AADT of 8,669 cars, 1,785 light goods vehicles and 164 heavy goods vehicles for 2020 at manual count point 6311. Similar to the A322, the A30 also becomes a dual carriageway in the east of Hart District, indicating that traffic volume and atmospheric pollution are likely to be more significant issues along this section of the road.

## Recommendations for Traffic and Air Quality Modelling

- 6.24 The borough of Surrey Heath lies in a highly populated area of south-east England, adjoining other urban centres, and is served by a complex road network. As such, it can be difficult to identify obvious routes or accurately predict traffic flows. Clearly, air quality assessments must focus on the strategic routes that are likely to be associated with the largest increase in commuter traffic. The following road links and associated air quality transects are recommended for modelling:

- Two road links on the A30 (London Road) in the adjoining authority of Hart, representing sections of single and dual carriageway of the road that connects to Surrey Heath to the north of Camberley – two transects covering sensitive heathland in the Castle Bottom to Yateley and Hawley Commons SSSI should be modelled;
- Two road links on the A322 (Guildford Road) in Surrey Heath Borough to the south of Bagshot, representing sections of single and dual carriageway of the road that leads to the eastern part of the borough and the adjoining authority of Woking – two transects extending westward covering sensitive heathland in the Colony Bog and Bagshot Heath SSSI should be modelled;
- One road link on the M3 in the eastern part of Surrey Heath Borough traversing the Chobham Common SSSI and connecting to the adjoining authority of Runnymede – two transects, north and south of the M3 respectively, covering sensitive heathland should be modelled.

## Traffic & Air Quality Modelling

- 6.25 At the time of writing, traffic and air quality modelling has not been completed. Traffic modelling will be undertaken in the first instance to assess the in-combination impact of the SHLP on traffic flows at relevant road links. These results will then feed into Air Quality Impact Assessment (AQIA), in essence nitrogen and ammonia deposition rates along 200m from major roads at identified transects. An ecological interpretation of air quality will be undertaken to assess the potential of the SHLP to result in adverse effects on the integrity of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC. **Given that these data are not yet available, adverse effects on the integrity of these European sites cannot be excluded. This section of the HRA will be updated upon completion of the modelling exercises.**

## Mitigation Contained in the Local Plan

- 6.26 The SHLP includes several policies that contain positive wording regarding the issues of atmospheric pollution. **Policy E2 (Biodiversity and Geodiversity)** extends general protection to environmental designations, based on their status and significance. The policy states that '*Development proposals will be permitted where they will not have an adverse impact on biodiversity... Where harm or loss cannot be avoided, mitigation will be required such that it can be robustly demonstrated that: a) There will be no adverse effect on the integrity of international, national and local designated sites.*' Furthermore, **Policy E4 (Pollution and Contamination)** protects Surrey Heath Borough from unacceptable levels of pollution. Specifically, it stipulates that '*Where development is proposed on or near a site that may be impacted by... pollution, such a proposal must be supported by an assessment that investigates the risks associated with the site and the possible impacts on the development... and the natural and built environment. The assessment should propose adequate mitigation or remediation when required to achieve a safe and acceptable development.*' While Policy E4 is not specifically targeted at atmospheric pollution, it does imply that any air quality impacts on the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC will need to be considered and, where relevant, mitigated.

- 6.27 A more specific mitigation pillar of the SHLP directly addresses the emissions from fossil-fuelled vehicles. The Plan has a strong focus on sustainable transport modes with the aim to help shift road traffic towards electric vehicles. **Policy IN2 (Transportation)** supports new development that '*is located where travel can be minimised and the use of sustainable transport modes is maximised.*' The policy also gives '*priority to walking and cycling routes over vehicular traffic and maximising catchment areas for bus or other public transport services.*' New development which provides Electric Vehicle Charging points in accordance with the Council's adopted standards will be supported.

## Water Quantity, Level and Flow

### Thursley and Ockley Bog Ramsar

- 6.28 The Thursley and Ockley Bog Ramsar is situated in the authority of Waverley and comprises a valley mire complex that lies in an area of heathland with impeded drainage. A deep layer of peat has built up from decaying *Sphagnum* spp, which represents the dominant vegetation within the site. Several areas of open water, including acidic boggy pools, ditches and large ponds, contribute to the overall diversity of the site. The Ramsar is designated for its community of rare wetland invertebrate species (such as dragonflies) and diverse assemblage of native reptile species (including all six native species). The fauna of the site critically depends on sufficient water levels for all stages of its life cycle and is, therefore, at particular risk of drying up of aquatic habitats.
- 6.29 The SHLP allocates a minimum of 4,852 new dwellings in the western part of Surrey Heath Borough, such as in Camberley, Deepcut, Frimley, Frimley Green, Mytchett and Bagshot. Furthermore, policies contained in the Plan also allow for the regeneration / redevelopment of employment sites in the western part of the borough, particularly in Camberley. There is a statutory requirement for all these developments to be supplied with potable water, which will place increased pressure on regional water resources. Meeting the increased water demand in the western part of Surrey Heath may require increases to existing abstraction consents or the utilisation of new water resources. Such resource options would have the potential to reduce the water level in the Thursley and Ockley Bog Ramsar, if they were to affect surface waterbodies or groundwater sources that are in hydrological continuity with the site.
- 6.30 Water in the western part of Surrey Heath Borough, including most of its strategic growth areas, is supplied by South East Water (SEW). SEW's strategy for water supply is outlined in its 2019 Water Resources Management Plan (WRMP). It is noted that the company operates in an area of high water stress, which is defined as an area where current and projected water demand constitutes a high proportion of the effective rainfall. The supply areas of water companies are typically divided into distinct Water Resource Zones (WRZs), within which water resources are largely (but not fully) self-contained. SEW's WRMP indicates that the western section of Surrey Heath lies in the company's 'West' area in WRZ4 (Bracknell). In contrast, the Thursley and Ockley Bog Ramsar is situated in WRZ5 (Farnham). Therefore, typically, resource options to address any supply-demand deficit in WRZ4 would be considered unlikely to impact environmental designations in WRZ5. However, the WRMP also specifies that there is a degree of inter-zonal water transfer between WRZ4 and WRZ5 (although this is not quantified), indicating that increased supply to western Surrey Heath may have impacts on the Ramsar.
- 6.31 In line with guidance from the Environment Agency, SEW undertook separate assessments of the integrity of each WRZ and potential resource options required to meet identified water supply deficits. The most relevant aspects of these assessments are briefly discussed in the following. The WRMP highlights that WRZ4 (in which parts of Surrey Heath lie) will go into supply-demand deficit in 2039/40, reaching -55.7 MI/d by 2079/80. A negative supply-demand balance indicates water supply shortage and a need for resource options to be deployed, either in the form of additional resources being exploited or demand management options. The company's Preferred Plan for addressing the supply-demand deficit in WRZ4 is summarised on page 156 of the WRMP, which includes leakage reduction, water efficiency measures, catchment management and a temporary reduction of inter-company water transfer. Importantly, there is no planned increase in water transfer from WRZ5, which includes the Thursley and Ockley Bog Ramsar.
- 6.32 With regard to potential impacts on the water quantity, level and flow in the Thursley and Ockley Bog Ramsar, the hydrological characteristics of the site must also be considered. SEW's WRMP specifies that a high proportion (approx. 73%) of its water supply is abstracted from underground aquifers, including the chalk and greensand. Bogs may be fed from groundwater sources or surface water sources (e.g. streams, rainfall, etc.). As highlighted earlier, the Ramsar lies amidst heathland with impeded drainage, suggesting

that it is unlikely to be highly reliant on deeper geologies, including the aquifer that will be used by SEW for public water supply. Therefore, any additional water abstractions undertaken in WRZ5 to meet increased demand in WRZ4 (including the western part of Surrey Heath) are considered very unlikely to hydrologically impact the Thursley and Ockley Bog Ramsar.

- 6.33 Overall, it is concluded that the SHLP will not result in adverse effects on the Thursley and Ockley Bog Ramsar regarding water quantity, level and flow. No policy wording recommendations regarding this impact pathway are made.

## 7. Conclusions & Recommendations

7.1 Surrey Heath Borough Council (SHBC) commissioned AECOM to undertake a Habitats Regulations Assessment (HRA) of the emerging Surrey Heath Local Plan (SHLP), which allocates a minimum of 6,082 new homes and protects / provides for potential expansion of existing Strategic and Locally Important Employment Sites. The objective of this HRA was to identify any aspects of a Plan that may result in Likely Significant Effects (LSEs) and, where relevant, adverse effects on the integrity of the National Site Network (NSN), either in isolation or in combination with other plans and projects. Furthermore, the HRA is also to advise on appropriate policy mechanisms for delivering mitigation where adverse effects on integrity are identified. While several European sites were considered initially, Likely Significant Effects (LSEs) screening resulted in only three sites being taken forward to Appropriate Assessment:

- Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC – regarding recreational pressure and atmospheric pollution; and
- Thursley and Ockley Bog Ramsar – regarding water quantity, level and flow.

### Recreational Pressure

7.2 The Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC are sensitive to recreational pressure and, being located in a highly populated area, have well-documented issues with visitor pressure. As a result, adjoining authorities have developed legally binding planning guidance in collaboration with Natural England, aimed at protecting the integrity of these sites. SHBC published the Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (SPD)<sup>83</sup> in 2012, which was subsequently updated in 2019. The authority recognises the need for adequate SANG provision to support emerging residential planning applications and has produced a SANG Acquisition Strategy. This provides background on existing SANG capacity in Surrey Heath, details the approach taken to secure additional capacity and identifies potential future SANG sites in the borough. Three key SANG sources have been proposed to meet the needs of housing to 2038:

- Diamond Ridge Woods SANG will provide additional mitigation for 350 dwellings (at 2.5 average occupancy), subject to increasing area of and securing improvements to the site
- Following discussions with Bracknell Forest Council, a residual capacity of 500 units has been identified at Shepherds Meadows SANG due to an extension to the site boundary and underutilising of existing capacity
- A private SANG in Bracknell Forest District provides the opportunity for mitigating 550 dwellings for the London Road Block site, because its catchment zone encompasses strategic residential sites in Camberley town centre

7.3 Contribution to SAMM is required for all net new residential development within 5km of the Thames Basin Heaths SPA. SAMM measures are funded through a single tariff that is collected centrally and utilised strategically across the SPA. Hampshire County Council is the administrative body that collects monies from the relevant authorities and Natural England then delivers the mitigation. SAMM contributions are determined on a per-bedroom basis, with larger residential developments paying higher tariffs. For example, currently, a one-bedroom unit is subject to a tariff of £465.98, which increases to £1,228.63 for a five-bedroom unit. Furthermore, SAMM contributions are updated annually in line with inflation and / or changing costs of works and personnel.

7.4 Overall, given that SHBC is working on identifying sufficient SANG capacity in collaboration with Natural England, SAMM monies are being secured and adequate reference to the Avoidance Strategy is made in the Plan, AECOM concludes that there will be no adverse effects of the SHLP on the Thames Basin Heaths

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<sup>83</sup> Surrey Heath Borough Council. (March 2019). Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document. 32pp. Available at: <https://www.surreyheath.gov.uk/sites/default/files/Thames%20Basin%20Heaths%20Special%20Protection%20Area%20SPD%202019.pdf> [Accessed on the 07/01/2022]

SPA and Thursley, Ash, Pirbright & Chobham SAC regarding recreational pressure, both alone and in combination. No additional policy recommendations are made for inclusion in the Plan.

## Atmospheric Pollution

7.5 This HRA identified two European sites that are sensitive to atmospheric pollution, which may be impacted by the SHLP (due to sensitive habitat occurring within 200m of major commuter routes). The following road links and associated air quality transects are recommended for modelling:

- Two road links on the A30 (London Road) in the adjoining authority of Hart, representing sections of single and dual carriageway of the road that connects to Surrey Heath to the north of Camberley – two transects covering sensitive heathland in the Castle Bottom to Yateley and Hawley Commons SSSI should be modelled;
- Two road links on the A322 (Guildford Road) in Surrey Heath Borough to the south of Bagshot, representing sections of single and dual carriageway of the road that leads to the eastern part of the borough and the adjoining authority of Woking – two transects extending westward covering sensitive heathland in the Colony Bog and Bagshot Heath SSSI should be modelled;
- One road link on the M3 in the eastern part of Surrey Heath Borough traversing the Chobham Common SSSI and connecting to the adjoining authority of Runnymede – two transects, north and south of the M3 respectively, covering sensitive heathland should be modelled.

7.6 At the time of writing, traffic and air quality modelling was not completed. Traffic modelling will be undertaken in the first instance to assess the in-combination impact of the SHLP on traffic flows at relevant road links. These results will then feed into Air Quality Impact Assessment (AQIA), in essence nitrogen and ammonia deposition rates along 200m from major roads at identified transects. An ecological interpretation of air quality will be undertaken to assess the potential of the SHLP to result in adverse effects on the integrity of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC. **Given that these data are not yet available, adverse effects on the integrity of these European sites cannot be excluded. This section of the HRA will be updated upon completion of the modelling exercises.**

## Water Quantity, Level and Flow

7.7 Water in the western part of Surrey Heath Borough, including most of its strategic growth areas, is supplied by South East Water (SEW). SEW's WRMP indicates that the western section of Surrey Heath (in which much of the SHLP development will occur) lies in the company's 'West' area in WRZ4 (Bracknell). In contrast, the Thursley and Ockley Bog Ramsar is situated in WRZ5 (Farnham). Therefore, typically, resource options to address any supply-demand deficit in WRZ4 would be considered unlikely to impact environmental designations in WRZ5. However, the WRMP also specifies that there is a degree of inter-zonal water transfer between WRZ4 and WRZ5 (although this is not quantified), indicating that increased supply to western Surrey Heath may have impacts on the Ramsar.

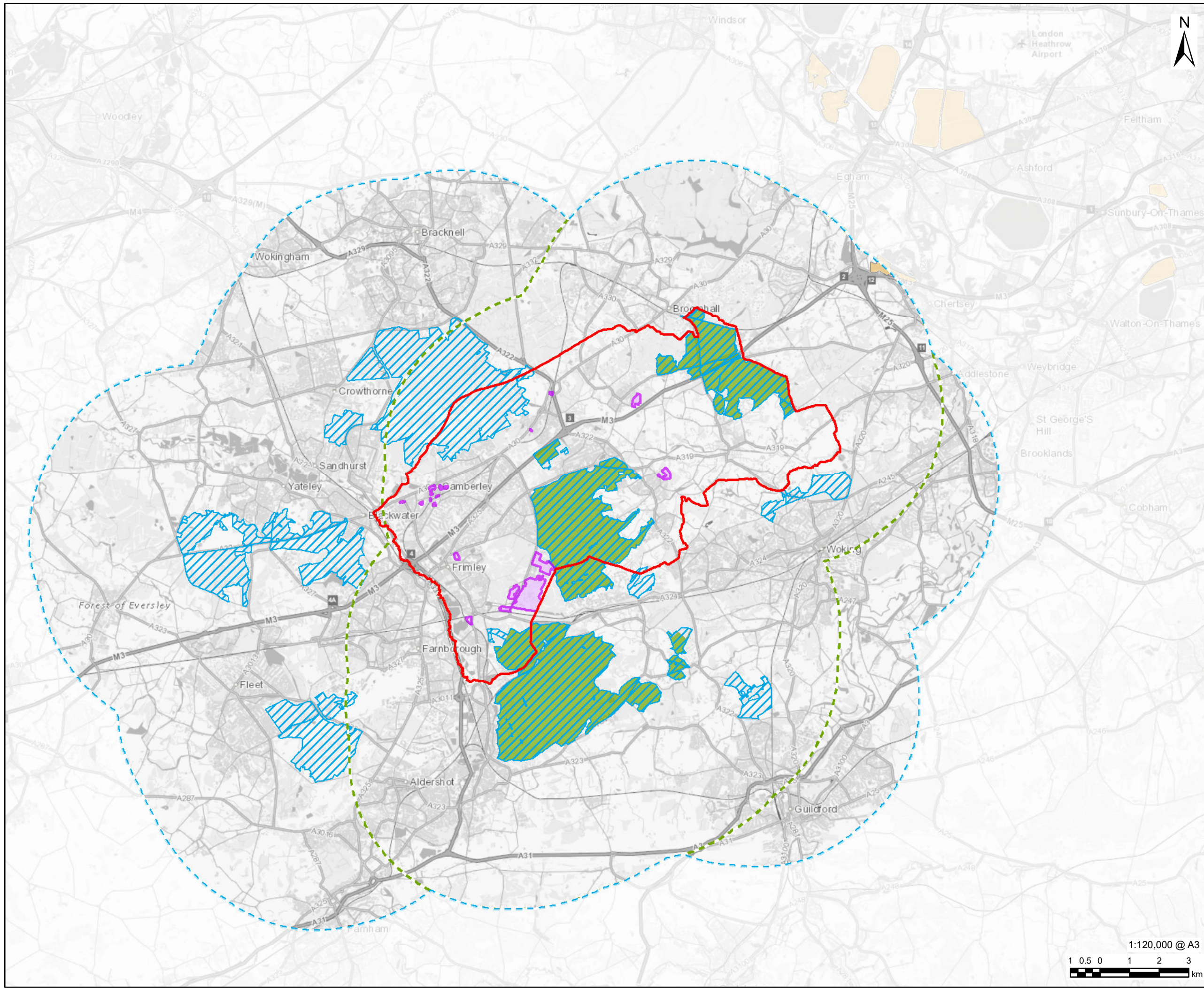
7.8 Therefore, with regard to potential impacts on the water quantity, level and flow in the Thursley and Ockley Bog Ramsar, the hydrological characteristics of the site were considered. SEW's WRMP specifies that a high proportion (approx. 73%) of its water supply is abstracted from underground aquifers, including the chalk and greensand. Bogs may be fed from groundwater sources or surface water sources (e.g. streams, rainfall, etc.). However, the Ramsar lies amidst heathland with impeded drainage, suggesting that it is unlikely to be highly reliant on deeper geologies, including the aquifer that will be used by SEW for public water supply. Therefore, any additional water abstractions undertaken in WRZ5 to meet increased demand in WRZ4 (including the western part of Surrey Heath) are considered very unlikely to hydrologically impact the Thursley and Ockley Bog Ramsar.

7.9 Overall, it is concluded that the SHLP will not result in adverse effects on the Thursley and Ockley Bog Ramsar regarding water quantity, level and flow. No policy wording recommendations regarding this impact pathway are made.



# Appendix A

**Figure 4: Sites allocated in the Surrey Heath Local Plan and European sites within 10km of the Surrey Heath Borough boundary.**



**PROJECT**  
Habitats Regulations Assessment  
of the Surrey Heath Local Plan –  
Preferred Options

**CLIENT**  
Surrey Heath Borough  
Council

**CONSULTANT**  
Aldgate Tower  
2, Leman Street  
London, E1 8FA  
United Kingdom  
T +44-0207-645-2000

- LEGEND**
- Surrey Heath District Boundary
  - Allocated Site
  - South West London Waterbodies SPA / Ramsar
  - Thames Basin Heaths SPA
  - Thames Basin Heaths SPA - 5km Buffer
  - Thursley, Ash, Pirbright & Chobham SAC
  - Thursley, Ash, Pirbright & Chobham SAC - 5km Buffer

**NOTES**  
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**ISSUE PURPOSE**  
DRAFT  
**PROJECT NUMBER**  
60564795

**FIGURE TITLE**  
Map showing site allocations and the  
European sites within 10km of Surrey  
Heath Borough

**FIGURE NUMBER**  
Figure 4



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**Table 5: HRA screening assessment of policies contained within the draft Surrey Heath Local Plan. Where policies have been coloured green in the LSEs column, this highlights that they do not contain potential impact pathways linking to European sites and have been screened out from Appropriate Assessment. Where policies have been coloured orange in the LSEs column, this indicates that they relate to potential impact pathways linking to European sites and have been screened in for Appropriate Assessment.**

Policy	Policy Text	Likely Significant Effects (LSEs) Screening Outcome
Policy SS1 – Spatial Strategy	<p>1) To deliver sustainable growth, the Council will permit development which is consistent with the following broad spatial framework for the scale and location of development:</p> <ul style="list-style-type: none"> <li>a) New development will be directed to the defined settlement areas in the west of the Borough, as shown on the policies map, and comprising the following areas:                             <ul style="list-style-type: none"> <li>i. Camberley</li> <li>ii. Frimley</li> <li>iii. Frimley Green</li> <li>iv. Mytchett</li> <li>v. Deepcut, and</li> <li>vi. Bagshot village.</li> </ul> </li> <li>b) Within this area, Camberley Town Centre will be a focus for significant new development, at high density, to support the regeneration of the town centre.</li> <li>c) The east of the Borough is heavily constrained by environmental designations and Green Belt and will have limited capacity to accommodate new development. Development opportunities in this area will be focused in:                             <ul style="list-style-type: none"> <li>i. Lightwater village;</li> <li>ii. Bisley, West End and Windlesham villages, which are inset within the Green Belt; and</li> <li>iii. Chobham village, which is proposed to be inset within the Green Belt.</li> </ul> </li> </ul> <p><b>New Homes</b></p> <p>2) Over the period 2019 – 2038, the Council will ensure that, subject to the availability of deliverable avoidance and mitigation measures in respect of the Thames Basin Heath Special Protection Area, provision is made for the delivery of at least 5,680 new homes in the Borough. This housing requirement will be delivered as follows:</p> <ul style="list-style-type: none"> <li>a) Approximately 4,852 homes focused in the settlement areas in the West of the Borough, from completions, existing planning permissions, allocations and SLAA sites including:                             <ul style="list-style-type: none"> <li>i. In Camberley, approximately 2,207 (net) new homes, including approximately 1,700 net new homes in Camberley Town Centre, focused on two large site allocation at London Road Block (approximately 550 net new homes) and Land East of Knoll Road (approximately 475 net new homes),</li> <li>ii. A major site allocation at Mindenhurst in Deepcut (Princess Royal Barracks site)</li> </ul> </li> </ul>	<p><b>Likely Significant Effects (LSEs) of Policy SS1 on European sites cannot be excluded.</b></p> <p><b>This policy represents the spatial strategy for Surrey Heath and identifies several important growth parameters. It stipulates that an overall quantum of 5,680 new homes will be delivered in the Borough during the Plan period between 2019 and 2038, of which 4,852 dwellings are allocated in the west of the district (e.g. Camberley, Frimley, Frimley Green, Mytchett, Deepcut and Bagshot). Employment sites across the district will be supported and expanded.</b></p> <p><b>The distribution and quantum of residential and employment development is the main factor that determines the magnitude of impact pathways linking to European sites. For example, the number and proximity of homes to sensitive European sites determines the extent of additional recreational pressure arising from new development.</b></p> <p><b>Therefore, Policy SS1 is screened in for Appropriate Assessment.</b></p>

- of about 1,200 homes and Suitable Alternative Natural Greenspace,
- iii. In Frimley, approximately 373 (net) new homes,
  - iv. In Frimley Green, approximately 200 (net) new homes,
  - v. In Mytchett, approximately 285 (net) new homes, and
  - vi. In Bagshot Village, approximately 418 (net) new homes.
- b) Approximately 789 homes in the east of the Borough, including about 676 (net) new homes on sites in villages.
  - c) Other sources of supply to meet the housing requirement will be windfalls and other SLAA sites below the site allocation threshold.

### **Employment**

- 3) The Borough's defined Strategic and Locally Important Employment Sites will be protected and supported for employment uses, to ensure that the employment land needs of the Borough, as part of the Hart, Rushmoor and Surrey Heath Functional Economic Area can be met. These sites will contribute to meeting the forecast increase in the total number of Employment Use Class jobs (Use Class E(g) and Uses Classes B2 and B8) in the Functional Economic Area over the Plan period.

### **Town Centre Uses**

- 4) Surrey Heath's hierarchy of town centre, district centres, local centres and neighbourhood parades will be protected and enhanced by encouraging a range of uses consistent with the scale and function of the centre having regard to its place in the following hierarchy:
  - a) Camberley town centre,
  - b) Bagshot and Frimley district centres,
  - c) Local centres (as defined in policy ER8),
  - d) Neighbourhood parades (as defined in policy ER9).
- 5) Main Town centre uses including retail will be focused within Camberley town centre to support its vitality and viability in line with policy CTC1 and in other centres in accordance with their role and function and as set out in policies ER8 and ER9.
- 6) Development for main town centre uses will be assessed sequentially in accordance with national policy and Policy ER7.
- 7) Residential uses in centres will be supported on allocated sites and on upper floors, and in ground floor locations where this would support the vitality and viability of the town centre.

### **Green Belt and Countryside Beyond the Green Belt**

- 8) In the Green Belt new development will be strictly limited and only permitted where it is in line with the NPPF and policy GB1.

	<p>9) In the Countryside beyond the Green Belt new development will be limited in line with the NPPF and policy GB2.</p>	
<p>Policy SS2 – Presumption in Favour of Sustainable Development</p>	<p>1) In considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF).</p> <p>2) Planning proposals that accord with the policies in the Surrey Heath Local Plan and with any Neighbourhood Plan policies will be generally be approved unless material considerations indicate otherwise. The Council will work with applicants to secure development that improves the social, environmental and economic condition of the Borough.</p> <p>3) Where there are no policies relevant to the application or the most relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise taking into account:</p> <ul style="list-style-type: none"> <li>a) The application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposal;</li> <li>b) The availability and deliverability of avoidance and mitigation measures relating to the protection of the Thames Basin Heaths Special Protection Area; and</li> <li>c) Whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.</li> </ul>	<p>LSEs of Policy SS2 on European sites can be excluded.</p> <p>This is a development management policy that aligns the Surrey Heath Local Plan with the National Planning Policy Framework (NPPF), particularly with regard to sustainable development. There are no impact pathways that link this policy to European sites.</p> <p>Therefore, Policy SS2 is screened out from Appropriate Assessment.</p>
<p>Policy SS3a – Climate Change Mitigation</p>	<p>1) To support a decarbonisation trajectory to net zero by 2050, the Council will seek to deliver significant reductions in carbon emissions for the Borough. This will be achieved by:</p> <ul style="list-style-type: none"> <li>a) Ensuring that new development contributes to addressing climate change through low/zero carbon design and improves energy efficiency for all residential and non-residential buildings, as set out in Policy DH8;</li> <li>b) Supporting renewable and low carbon energy and heating schemes for major development proposals in accordance with Policy E5;</li> <li>c) Supporting the low carbon economy, a focus of the emerging Local Industrial Strategy for the Enterprise M3 Local Enterprise Partnership (LEP)<sup>84</sup>;</li> <li>d) Directing development to locations in the defined settlement areas in the West of the Borough that will minimise the need to travel and maximise the use of sustainable modes of transport, promoting a modal shift away from private car use;</li> <li>e) Promoting sustainable modes of transport through Policy IN2, including provision and installation of electric vehicle charging points for all developments;</li> </ul>	<p>LSEs of Policy SS3a on European sites can be excluded.</p> <p>This policy supports mitigation against climate change by outlining a decarbonisation trajectory to 2050. Among other targets, the policy promotes low / zero carbon design, renewable and low carbon energy sources and promoting a modal shift away from private car usage. This is a positive policy for the environment but has no direct implications for European sites.</p> <p>Therefore, Policy SS3a is screened out from Appropriate Assessment.</p>

<sup>84</sup> See [enterprisem3.org.uk/hub/clean-growth](https://enterprisem3.org.uk/hub/clean-growth)

- f) Ensuring that trees are protected, in accordance with Policy DH5, and that there is no net loss in the carbon storage capacity provided by the Borough's trees<sup>85</sup>;
  - g) Increasing the potential for green infrastructure and habitats to sequester<sup>86</sup> and store carbon, including through biodiversity net gain as set out in Policy E3, and supporting the planting of trees in the Borough; and
  - h) Requiring new development to manage construction waste effectively and responsibly to reduce the carbon emissions of construction activities, set out in policy DH8.
- 2) Development proposals will need to demonstrate how they are maximising reductions in carbon emissions and contributing to the decarbonisation trajectory for net zero by 2050. Unless otherwise required through site allocation policies, proposals for over 500 dwellings will be required to deliver zero carbon development, either through on-site measures or, if it is demonstrated that is not feasible, through carbon offsetting.

Policy SS3b – Climate  
Change Adaptation

- 1) New development will be permitted which helps build communities that are resilient to climate change and contribute to healthy living by:
  - a) Being designed so as to maximise the potential for climate change adaptation, as set out in Policy DH1, to ensure that new development minimises vulnerabilities and provides resilience to impacts arising from climate change;
  - b) Positively contributing to creating high quality, active, safe and accessible places;
  - c) Maximising sustainable water use, in accordance with Policy DH4;
  - d) Addressing existing and future flood risk, in accordance with Policy E6;
  - e) Maximising the potential of green infrastructure in the design of new development to facilitate adaptation to climate change, in accordance with Policy IN5;
  - f) Planting trees and other vegetation, where appropriate as part of the landscape scheme, to provide shading of amenity areas, buildings and streets;
  - g) Delivering urban greening, including incorporating green walls and green roofs into new development;
  - h) Delivering biodiversity net gain and avoid the loss of biodiversity, in accordance with Policies E2 and E3; and
  - i) Minimising the potential for heat stress, particularly areas or types of development at greater risk of heat stress, through innovative design.
- 2) Development proposals will need to demonstrate how they are maximising their adaptive capacity. Planning applications relating to major development, infrastructure and potentially vulnerable developments will be required to provide severe weather management plans.

LSEs of Policy SS3b on European sites can be excluded.

This is a development management policy that addresses climate change mitigation, primarily by designing new developments accordingly. For example, delivery of water efficiency measures and green infrastructure will be maximised. This is a positive policy for the environment but has no direct implications for European sites.

Therefore, Policy SS3b is screened out from Appropriate Assessment.

<sup>85</sup> This generally equates to ensuring that there is no net loss in the biomass equal to the original tree.

<sup>86</sup> Carbon sequestration can be defined as actions required for the long-term storage of carbon dioxide or other forms of carbon to either mitigate or defer global warming and avoid dangerous climate change.

- 3) Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated into new development where appropriate. Proposals for major development schemes should incorporate a Health Impact Assessment (HIA).

Policy HA1 – Housing  
Allocations

- 1) The following sites are allocated for housing to support the delivery of new homes to meet Surrey Heath’s local housing need:

Site Reference	Site Name / Address	Indicative (Gross)	Homes	Net Homes
HA1/01	134 and 136 London Road, Bagshot	26		26
Description	Outline planning permission has been granted for a residential-led scheme totalling 26 apartments at the site.			
Development Requirements	1) Development proposals are required to: <ol style="list-style-type: none"> <li>a) retain and enhance the local character of the area,</li> <li>b) implement a scheme with distinctive yet sympathetic identity, which provides an appropriate focal point given the site’s prominent location on London Road.</li> <li>c) incorporate suitable pedestrian and cyclist access from the site, helping to encourage linkages between the site and Bagshot District Centre to the east, and Camberley to the west.</li> <li>d) retain the existing vegetation boundary along London Road as far as reasonably practicable.</li> <li>e) provide high-quality landscaping and usable private and communal amenity spaces, whilst avoiding future pressures to remove TPO trees.</li> </ol>			

Site Reference	Site Name / Address	Indicative (Gross)	Homes	Net Homes
HA1/02	Bagshot Depot and Archaeology Centre, London Road, Bagshot, GU19 5HN	50		50
Development Requirements	1) Development proposals are required to:			



**Likely Significant Effects (LSEs) of Policy HA1 on European sites cannot be excluded.**

This policy lists several smaller housing sites that are allocated to meet Surrey Heath’s housing needs. Importantly, this specifies both a quantum and geographic location of new homes, which determine where in the borough impact pathways will arise (e.g. recreational pressure due to increased demand for greenspaces).

The following sites are allocated in this policy:

- 134 and 136 London Road, Bagshot – 26 new homes
- Bagshot Depot and Archaeology Centre, London Road, Bagshot – 50 new homes
- Land east of Park Street, North of Princess Way (former House of Fraser) – 120 new homes
- 84-100 Park Street, Camberley – 61 new dwellings
- Camberley Centre, France Hill Drive, Camberley – 35 new dwellings
- Camberley Station, Station House, Pembroke Broadway, Camberley – 75 new dwellings
- York Town Car Park, Sullivan Road, Camberley – 27 new dwellings
- Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut – 65 new dwellings
- Sir William Siemens Square, Chobham Road, Frimley – 200 new dwellings

	a) demonstrate that the design of the scheme is genuinely conservation-led, having special regard to the retention and enhancement of the character of the Bagshot Park Conservation Area and its setting, in which the Grade II listed Bagshot Park forms the centre piece.
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Site Reference	Site Name / Address	Indicative (Gross)	Homes	Net Homes
HA1/03	Land East of Park Street, North of Princess Way (former House of Fraser)	120		120
Development Requirements	<p>1) Development proposals are required to implement a design-led, mixed-use redevelopment scheme that:</p> <p>a) incorporates active town-centre uses at ground-floor level.</p> <p>b) provides flatted development above the ground-floor level at a suitable density for the town-centre location.</p> <p>c) utilises high-quality architectural design to improve engagement with the street-scene, contributing to urban greenery and providing distinctive public realm within this prominent central location.</p> <p>d) provides an enhanced gateway into Camberley Town Centre from Park Street, incorporating an attractive promenade that leads through to The Square Shopping Centre and an attractive link to Princess Square.</p> <p>e) maximises the corner location to create an attractive, design-led, contemporary urban living environment that takes account of external views from new flatted development, uses the built form, changes in materials, and hard and soft landscaping, to define public and private spaces effectively.</p> <p>f) supports the broader regeneration of Camberley Town Centre, providing a contemporary and sustainable development that delivers an attractive and accessible public realm, including integrated services for the public.</p>			

Site Reference	Site Name / Address	Indicative (Gross)	Homes	Net Homes
HA1/04	84-100 Park Street, Camberley	61		61

- Land west of Sturt Road, Frimley Green – 160 new dwellings
- Land east of Benner Lane (partial Housing Reserve Site), West End – 73 new dwellings
- Housing Reserve Site East of Heathpark Drive, Windlesham – 116 new dwellings
- Chobham Rugby Club, Windsor Road, Chobham – 91 new dwellings

Furthermore, the policy also allocates three strategic housing sites (two in Camberley and one in Deepcut). However, these sites are supported by their own policies, which are screened separately below.

The sites allocated in this housing policy imply that much of development will be forthcoming in the western part of Surrey Heath, with potential implications for arising impact pathways.

Overall, Policy HA1 is screened in for Appropriate Assessment.



Description	The site benefits from planning permission for 61 sheltered apartments. However, the site has been identified as being suitable for a revised, residential (C3) development scheme.
Development Requirements	<ol style="list-style-type: none"> <li>1) Development proposals are required to: <ol style="list-style-type: none"> <li>a) comprise flatted accommodation of a suitable density given the town-centre location, within walking distance of Camberley Train Station.</li> <li>b) utilise high-quality architectural design to provide a coherent building-line along Park Street that contributes to and engages the existing street-scene in this prominent central location, improving the public realm.</li> <li>c) incorporate vehicular access to the site from Southwell Park Road.</li> <li>d) demonstrate that the detailed site layout has been informed by the proximity to the railway flanking the southern boundary of the site regarding safety, noise, and visual barrier effects.</li> <li>e) retain and strengthen the existing tree planting and landscape buffering between the site and the railway line, to reduce noise and visual impacts from the railway.</li> </ol> </li> </ol>

Site Reference	Site Name / Address	Indicative dwellings gross	Net Homes
HA1/05	Camberley Centre, France Hill Drive, Camberley, GU15 3QG	35	35
Development Requirements	<ol style="list-style-type: none"> <li>1) Development proposals are required to: <ol style="list-style-type: none"> <li>a) retain and reuse the existing Adult Education Centre (AEC) building, a local heritage asset, including the generous landscape setting.</li> <li>b) implement a design-led development that is sympathetic to and integrates well with the scale, height, and character of the existing Adult Education Centre (AEC) building.</li> <li>c) retain as far as practicable the existing abundance of trees and landscaping, which contributes to the local distinctiveness of the site.</li> <li>d) retain the existing educational community use on-site, or re-provide the use at a suitable off-site location.</li> </ol> </li> </ol>		

	<ul style="list-style-type: none"> <li>e) provide improved pedestrian and cycle access to the site from Camberley Town Centre.</li> <li>f) provide suitable vehicular access to the site, and suitable highways access within the site.</li> </ul>
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Site Reference	Site Name / Address	Indicative Homes (Gross)	Net Homes
HA1/06	Camberley Station, Station House, Pembroke Broadway, Camberley	75	75

Development Requirements	<ul style="list-style-type: none"> <li>1) Development proposals are required to: <ul style="list-style-type: none"> <li>a) deliver a high-quality, design-led, sustainable development suitable for the prominent gateway location to Camberley Town Centre.</li> <li>b) be sympathetic to the complex surrounding context of the site with regard to scale, height, and massing. Particular consideration should be given to the adjacent King's Court and the former Magistrate's Court development site.</li> <li>c) incorporate a new or improved train station, with associated transport interchange facilities, including car and cycle parking.</li> <li>d) incorporate high-quality, design-led, public realm and wayfinding improvements for pedestrians and cyclists, improving connectivity to Camberley Town Centre and to both Portesbery Road and Knoll Road. Public realm improvements should focus on improving connectivity, safety, and sense of place.</li> <li>e) improve interconnectivity between Camberley Train Station and the bus stops on Pembroke Broadway, through high-quality urban design, use of hard and soft landscaping, sightlines and signage.</li> <li>f) enhance visual connectivity between the site and Camberley Town Centre, through layout, arrangement of built form and public space, massing, design, materials and signage.</li> <li>g) be informed by the results of a full Noise Impact Assessment that considers the proximity to the railway line.</li> </ul> </li> </ul>
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Site Reference	Site Name / Address	Indicative Homes (Gross)	Net Homes
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HA1/07	York Town Car Park, Sullivan Road, Camberley	27	27
Development Requirements	<p>1) Development proposals are required to:</p> <p>a) deliver a high-quality, design-led development that is sympathetic to the existing character of the area, and has regard to the design, scale, height, and built-form of the adjacent approved development at Victoria Court, 407-409 London Road And 9-13A Victoria Avenue, Camberley (Application reference: 19/0251).</p> <p>b) incorporate high-quality landscaping, including tree-planting along Sullivan Road, increasing the overall amount of greenery and vegetation in the locality and softening the existing townscape.</p> <p>c) retain and/or re-provide the public car-parking currently on-site.</p> <p>d) incorporate public access from the site to Frimley Road and Victoria Avenue, to encourage permeability and create linkages.</p>		

Site Reference	Site Name / Address	Indicative (Gross) Homes	Net Homes
HA1/08	Land at Frimhurst Farm, Deepcut Bridge Road, Deepcut, GU16 6RF	65	65
Development Requirements	<p>1) Development proposals are required to:</p> <p>a) deliver a high-quality, design-led development that is sympathetic to the existing character of the area. Particular consideration should be given to the enhancement of the character of the Basingstoke Canal Conservation Area.</p> <p>b) incorporate high-quality landscaping, enhancing and retaining the existing treed character of the site, which contribute to local distinctiveness.</p> <p>c) demonstrate that the detailed site layout has been informed by the proximity to the railway flanking the southern boundary of the site regarding safety, noise, and visual barrier effects.</p> <p>d) demonstrate that the detailed site layout has been informed by the proximity to the Basingstoke Canal Conservation Area to the north of the site.</p>		

	<ul style="list-style-type: none"> <li>e) retain and strengthen the existing tree planting and landscape buffering between the site and the railway line on the southern boundary of the site, to reduce noise and visual impacts from the railway.</li> <li>f) demonstrate that the proximity of the site to the Basingstoke Canal SSSI has been taken into consideration.</li> </ul>
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Site Reference	Site Name / Address	Indicative (Gross)	Homes	Net Homes
HA1/09	Sir William Siemens Square, Chobham Road, Frimley	200		200
Development Requirements	<ul style="list-style-type: none"> <li>1) Development proposals are required to:                             <ul style="list-style-type: none"> <li>a) deliver a high-quality, design-led re-development scheme that is sympathetic to the character of the area, providing a density, scale, height and massing appropriate for the local context of Frimley village whilst making the most effective use of the land.</li> <li>b) contribute to the urban greening of the area, providing integrated amenity roof terraces and/or atrium courtyards within the envelope of the development.</li> <li>c) retain the continuous green, rural character of Chobham Road, including the retention of mature trees that contribute to the local distinctiveness.</li> <li>d) incorporate high-quality, integrated hard and soft landscaping, seeking to retain and enhance the geometric layout of the site.</li> <li>e) be sympathetic to and enhance the green, rural character of the neighbouring playing fields.</li> <li>f) be sympathetic to the amenity of neighbouring residential areas.</li> <li>g) incorporate improved pedestrian and cycle access to, and through, the site, with appropriate linkages to Frimley District Centre and the Station.</li> <li>h) provide the maximum number of Gypsy and Traveller pitches or Travelling Showpeople plots that can be reasonably accommodated on the site, having regard to the level of local need within Surrey Heath and the criteria set out within Policy H10.</li> </ul> </li> </ul>			



Site Reference	Site Name / Address	Indicative (Gross)	Homes	Net Homes
HA1/10	Land west of Sturt Road, Frimley Green	160		160
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> <li>a) retain an undeveloped area of greenspace at the southern extent of the site, providing distinct separation from the settlement of Mytchett. The protected trees in the southern area of the site should be retained as part of this.</li> <li>b) incorporate a landscape buffer along the boundary of the site with Sturt Road. This should include grass verges and tree planting to soften views of the development and reflect the rural character of the land to the east of Sturt Road.</li> <li>c) conserve and enhance the setting of the Grade II listed Church of St Andrews on the opposite side of Sturt Road, improving visual connections with the site.</li> <li>d) retain the historic pump-houses and their setting, reusing the buildings for residential purpose.</li> <li>e) demonstrate that the detailed site layout has been informed by the proximity to the two railway lines that flank the northern and south-eastern boundaries of the site regarding safety and potential noise impacts.</li> <li>f) be supported and informed by a detailed Noise Impact Assessment, which considers potential adverse effects arising from the railway lines.</li> <li>g) demonstrate that the design and layout of the development has been informed by the physical and visual barrier effects of the railway banks and bridges adjacent to the site.</li> <li>h) demonstrate that consideration has been given to traffic safety at Sturt Road, including safe pedestrian and cycle access to Frimley Green Local Centre.</li> <li>i) provide appropriate pedestrian and cycle access to the site, improving linkages to Frimley Green Local Centre and Frimley Lodge Park in particular.</li> <li>j) provide suitable vehicular access from Sturt Road and suitable highways access within the site.</li> <li>k) be supported and informed by a Biodiversity Survey and Report, given the site's proximity to an adjacent SINC.</li> <li>l) be supported and informed by an Archaeological Study of the site.</li> </ul>			



	<p>m) be supported and informed by a Flood Risk Assessment. Suitable flood mitigation measures, including SuDS, are required to address surface water flooding arising from the proximity to railway banks.</p> <p>n) provide the maximum number of Gypsy and Traveller pitches or Travelling Showpeople plots that can be reasonably accommodated on the site, having regard to the level of local need within Surrey Heath and the criteria set out within Policy H11.</p>
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Site Reference	Site Name / Address	Indicative Homes (Gross)	Net Homes
HA1/11	Land east of Benner Lane (partial Housing Reserve Site), West End	73	73
Development Requirements	<p>1) Development proposals are required to:</p> <p>a) be sympathetic to and integrate with the design and layout of surrounding development at the former West End Reserve Site.</p> <p>b) incorporate a significant landscape buffer along the eastern edge of the site that adjoins the Green Belt, helping to preserve the rural character of the area and providing a soft transitional edge to the developed area.</p> <p>c) retain the Grade II listed Malthouse Farm and its curtilage, and preserve its setting.</p> <p>d) incorporate suitable vehicular access to, within, and through the site.</p> <p>e) provide linkages to West End Local Centre through improved pedestrian and cycle access to the site.</p> <p>f) be supported and informed by an Archaeological Study, Flood Risk Assessment, and Biodiversity Survey and Report.</p> <p>g) be supported and informed by an Heritage Assessment, which ascertains the setting of Malthouse Farm, a C16 timber framed Grade II listed farmhouse with ancillary barn and outbuildings that forms part of the site, and the visual relationship between the historic property and its immediate and wider setting.</p>		

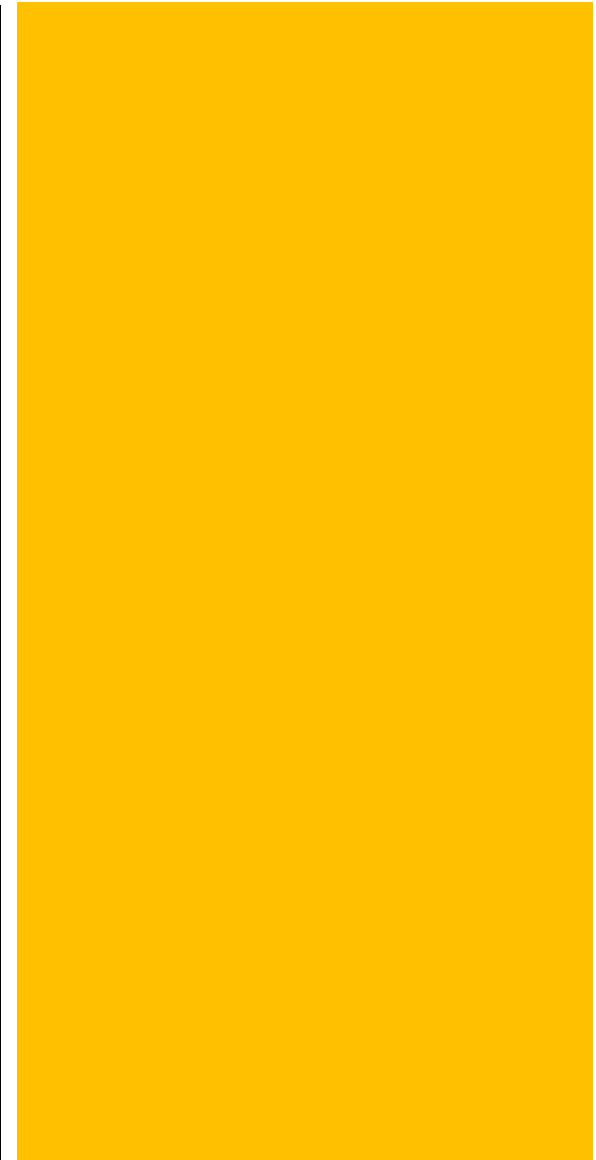
Site Reference	Site Name / Address	Indicative Homes (Gross)	Net Homes



HA1/12	Housing Reserve Site East of Heathpark Drive, Windlesham	116	116
Description	Outline planning permission has been granted for 140 residential dwellings at the site. A Reserved Matters application has since been submitted for 116 dwellings.		
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> <li>a) incorporate within the design and layout of the proposed scheme, as far as reasonably practicable, soft-landscaping and the retention of existing trees and greenspaces to reflect the verdant wooded character of the site.</li> <li>b) incorporate a significant landscape buffer along the eastern edge of the site, providing a soft edge to the developed area and ensuring a transitional character adjoining the Green Belt.</li> <li>c) provide suitable vehicular access to the site from Woodlands Lane and suitable highways access within and throughout the site.</li> <li>d) provide suitable pedestrian and cycle access from the site to create linkages to Windlesham Local Centre.</li> <li>e) provide a bespoke, on-site SANG to provide mitigation for the impact of the residential development on the Thames Basin Heaths Special Protection Area. Where an on-site SANG cannot be provided, this should be demonstrated to the Council's satisfaction at the planning application stage.</li> <li>f) be supported and informed by an Archaeological Study, Flood Risk Assessment, and Biodiversity Survey and Report.</li> <li>g) provide a community facility and incorporate adequate open space and recreational play provision in accordance with the Councils adopted standards.</li> </ul>		

Site Reference	Site Name / Address	Indicative Homes (Gross)	Net Homes
HA1/13	Chobham Rugby Club, Windsor Road, Chobham, GU24 8LD	91	91
Development Requirements	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> <li>a) deliver a high-quality, design-led, sustainable development that is suitable for the location of the site in Chobham village.</li> </ul>		

	<ul style="list-style-type: none"> <li>b) secure a suitable alternative location for the re-provision of the existing community and recreational uses on-site, within the Borough, which would be secured through an S106 agreement with the Council.</li> <li>c) retain an appropriate provision of open green space on-site to be accessible by local residents, which is well-integrated into a network of green infrastructure throughout the site.</li> <li>d) deliver a strong sense of place that reinforces local distinctiveness and provides an attractive and functional living environment, established through a sensitive design that responds to the local context; including the topography and landscape of the area given the open space on and neighbouring the site.</li> <li>e) retain and enhance the local character of the area; incorporating high-quality landscaping that integrates well with the open, treed character of the surrounding area.</li> <li>f) retain and enhance the existing trees that form part of the boundary to the site as far as reasonably practicable.</li> <li>g) deliver a site layout that encourages permeability throughout the site and incorporates suitable pedestrian and cycle access from the site to nearby community facilities; in particular, to encourage linkages to the south toward Chobham high street.</li> <li>h) be sympathetic to the amenity of neighbouring residential areas and to enhance the green, open character of the neighbouring open space to the East.</li> <li>i) incorporate suitable vehicular access to the site from Windsor Road.</li> <li>j) incorporate adequate, high-quality open space and Areas of Plan on-site, in accordance with the Council's adopted standards.</li> <li>k) deliver a network of high quality, attractive streets and spaces that are convenient and safe to use.</li> <li>l) provide appropriate rainwater management through SuDs integrated with landscape design to visually and environmentally enhance the public realm.</li> <li>m) incorporate wildlife habitat creation and enhancements, including through the use of bird boxes, bat boxes, swift bricks and beehives in appropriate locations within the development.</li> </ul>
<p><b>Camberley Town Centre Strategic Sites</b></p>	





Site Name / Address	Indicative Number of Homes (Gross)	Indicative Number of Homes (Net)	Policy Reference
London Road Regeneration Block, Camberley	576	550	Refer to Policy HA2 for further detail
Land East of Knoll Road, Camberley	475	475	Refer to Policy HA3 for further detail

Strategic Site – Mindenhurst, Deepcut			
Site Name / Address	Indicative Number of Homes (Gross)	Indicative Number of Homes (Net)	Policy Reference
Mindenhurst, Former Princess Royal Barracks, Deepcut	1200	1098	Refer to Policy HA4

Sites Promoted for Extra Care or Residential Care Uses	
Site Name / Address	Development Requirements
HA01/14 Pinehurst, 141 Park Road, Camberley	<p>1) Development proposals are required to:</p> <ul style="list-style-type: none"> <li>a) be sympathetic to and integrate with the design of surrounding development.</li> <li>b) provide high-quality, usable communal amenity spaces.</li> <li>c) incorporate high-quality landscaping, retaining and enhancing the existing treed character of the site's boundaries, which contributes to local distinctiveness.</li> <li>d) provide suitable vehicular access to the site and suitable highways access within the site.</li> </ul>

	<ul style="list-style-type: none"> <li>e) provide suitable pedestrian and cycle access from the site to create linkages to Camberley Town Centre.</li> <li>2) Development proposals for residential (C3) or extra-care (C2) use on these sites are required to clearly identify how the proposed development addresses the identified site-specific considerations or requirements.</li> <li>3) Where development proposals cannot clearly demonstrate that the identified site-specific considerations or requirements have been addressed, the planning application will be refused.</li> </ul>
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Policy HA2 – London Road Block, Camberley Town Centre (Site Area 1.3ha)

- 1) The London Road Block site is allocated for comprehensive, residential-led, mixed-use redevelopment, comprising:
  - a) approximately 550 new homes (net) with supporting infrastructure,
  - b) an appropriate mix of Town-Centre uses with well-integrated services,
  - c) the creation of a high-quality public realm.
- 2) Development proposals are required to accord with a masterplan for the site that is agreed by the Council.
- 3) Development proposals are required to:
 

**Housing**

  - a) Deliver approximately 550 new homes (net);
  - b) provide a minimum of 40% affordable housing, in accordance with Policy H7 (subject to detailed viability assessment);
  - c) deliver an appropriate mix of new homes, reflecting the evidence in the most up-to-date Housing Need Assessment, whilst having regard to the Town Centre location and the need to provide flatted development.
  - d) Deliver a combination of predominantly flatted development and elements of townhouses, recognising the Council's ambition to significantly increase density within the Town Centre, and make efficient use of land

**Commercial and Community Uses**

  - e) incorporate a mix of commercial, retail, leisure, and community uses appropriate for the urban location, supporting the viability and vitality of Camberley Town Centre, including:
    - i. small-scale retail uses and financial and professional services,

**Likely Significant Effects (LSEs) of Policy HA2 on European sites cannot be excluded.**

**This policy allocates a residential-led mixed-use redevelopment at London Road Block in Camberley Town Centre for 550 new dwellings, a mix of town centre uses and supporting infrastructure. As such, this allocation will be associated with a range of impact pathways including recreational pressure and atmospheric pollution.**

**Importantly, the policy requires the developer to deliver an off-site SANG to mitigate any impacts that will be arising on the Thames Basin Heaths SPA with regard to recreational pressure.**

**Overall, Policy HA2 is screened in for Appropriate Assessment.**

- ii. restaurants and cafés, and
  - iii. office floorspace comprising conventional offices and/or flexible co-working space.
- f) Development proposals are required to demonstrate that consideration has been given to incorporating the following uses within the development:
- i. a library and learning centre, and other community and health uses; and
  - ii. cultural, civic and leisure facilities.
- g) incorporate active frontages at the ground-floor level as appropriate, to enliven the development and provide an animated and vibrant streetscape;

**Improved Public Realm**

- h) deliver a comprehensively-planned public realm that is coherent, inclusive, safe and attractive, which includes;
- i. new public open space providing a variety of scale and character, designed with high-quality, durable materials for everyone to enjoy
  - ii. attractive and multi-purpose street furniture, utilising cutting-edge green technology,
  - iii. appropriate outdoor lighting, water features, and signage,
  - iv. public art, both permanent and temporary, and
  - v. significant landscaping, which incorporates mature tree-planting and vegetated areas;
- i) deliver a public realm that reinforces local distinctiveness and create a positive sense of place;
- j) deliver a network of high quality, attractive streets and spaces that are convenient and safe to use;
- k) contribute to a better experience for all transport modes in the town centre, in particular walking and cycling;
- l) provide an enhanced gateway into Camberley Town Centre from London Road, which incorporates an attractive promenade with a sequence of hard and soft landscaped gardens that lead into The Square Shopping Centre;
- m) incorporate buildings of an appropriate scale, proportion, and architectural character, to enhance and reinforce a new, high-quality public square, which focuses on community and civic activity;
- n) deliver a widened and transformed streetscape fronting London Road, which incorporates mature tree-planting, sheltered waiting areas, pedestrian and cycle zones, taxi zone, drop off, a new bus stop and attractive hard-landscaping that differentiates the distinct zones;

- o) provide improved pedestrian accessibility between the High Street, Park Street, London Road, and Camberley's main public transport terminus at Pembroke Broadway;

#### **Design and Character**

- p) provide a new, urban quarter within Camberley Town Centre that is dynamic, and animated, containing retail, commercial, cultural and community uses with a contemporary, sustainable and distinctive building design, whilst reinforcing and complementing the established surrounding town centre areas;
- q) deliver an attractive and vibrant urban living environment where bespoke built form, integrated blue and green infrastructure, distinct views and a variety of high quality materials and landscaping are all well integrated and contribute to a dynamic environment for everyone to enjoy who lives, works and visits Camberley;
- r) provide a development of high quality architectural standards, appropriate scale, height and massing with an average building height of 4 – 7 storeys, incorporating up to two landmark buildings with a maximum building height of 15 storeys, taking into account external views from the flatted development,
- s) incorporate buildings of no more than 3 storeys on the High Street frontage, which complement the historic Edwardian and Victorian character of this part of the town centre
- t) deliver a development which benefits from sustainable design and flexible layouts that permits adaptation over time, durable materials, sustainable construction methods, and the integration of roof gardens and vertical greenery, especially along London Road.
- u) demonstrate that the proposed development is consistent with locally adopted Design Codes;
- v) incorporate adequate open space and recreational play provision in accordance with the Councils adopted standards.

#### **Transport Infrastructure**

- w) provide appropriate contributions toward highways and public transport improvements<sup>87</sup>;
- x) incorporate improved transport infrastructure, comprising:
  - i. improvements to the London Road junctions with the High Street and Park Street and the creation of pedestrian friendly areas at Obelisk Way (east) and the High Street (north).
  - ii. improved pedestrian and cycle links between the High Street and Park Street, and London Road to the Square Shopping Centre;
  - iii. provision of a new bus stop and taxi rank at the London Road gateway;
  - iv. improved pedestrian and cycle links along the London Road
  - v. potential provision of a short-stay drop-off/pick-up point and on-street disabled

<sup>87</sup> Further detail of the mitigation required will be explored through further work in the Infrastructure Delivery Plan (IDP) following completion of the Transport Assessment.

- parking located at the London Road gateway, which provides electric vehicle charging capacity for all parking spaces;
- vi. support for accessible and well-connected bus services to the London Road Gateway;
- vii. appropriate accesses for service vehicles that are convenient for use but designed discreetly to ensure they do not detract from the attractiveness of the new development;

**Infrastructure**

- y) provide mitigation for the additional pressure on education provision;
- z) provide mitigation for the impact of increased pressure on healthcare services in consultation with healthcare providers;
- aa) provide suitable, well integrated parking provision in accordance with adopted parking standards for the proposed land uses, and reflecting the town centre location, along with provision of adequate public car and cycle parking to serve the wider town centre and to meet the needs of residents and visitors;
- bb) incorporate measures to provide a green urban environment, such as green roofs, green walls, and both public and private garden amenity space for flatted development;
- cc) Measures to avoid and mitigate any impact of the development on the Thames Basin Heaths Special Protection Area through the delivery of a suitable off-site SANG solution;

**Environmental Requirements and Climate Change**

- dd) utilise net zero carbon design, including on-site renewable energy and/or decentralised energy generation;
- ee) incorporate wildlife habitat creation and enhancements, including through the use of bird boxes, bat boxes, swift bricks and beehives in appropriate locations within the development;
- ff) provide appropriate rainwater management through SuDs integrated with landscape design to visually and environmentally enhance the public and private realm.

Policy HA3 – Land East of Knoll Road, Camberley Town Centre (Site Area: 2.44ha)

- 1) The site is allocated for comprehensive, residential-led redevelopment to create a vibrant new residential quarter within Camberley Town Centre, comprising;
  - a) approximately 475 new homes (C3), with supporting infrastructure and an enhanced public realm, and
  - b) the protection and enhancement of the existing designated green space at Camberley Park.
- 2) Development proposals are required to accord with a masterplan for the site that is agreed by the Council.
- 3) Development proposals are required to provide:

**Likely Significant Effects (LSEs) of Policy HA3 on European sites cannot be excluded.**

**This policy allocates a residential-led redevelopment on Land East of Knoll Road in Camberley Town Centre for 475 new dwellings, supporting infrastructure and enhanced public realm. As such, this allocation will be associated with a range of impact pathways including recreational pressure and atmospheric pollution.**

### Housing

- a) approximately 475 new homes (net);
- b) a minimum of 40% affordable housing in accordance with Policy H7 (subject to detailed viability assessment);
- c) an appropriate mix of new homes, reflecting the evidence in the most up-to-date housing need assessment, whilst recognising the town-centre location;
- d) flatted development adjoining Knoll Road comprising 4 – 7 storeys (inclusive), reflecting the urban character of the area;
- e) an appropriate mix of townhouses and small-scale flatted development at the former Portesbery School and adjoining Camberley Park, reflecting the verdant, wooded character of the area;
- f) parking provision in accordance with adopted parking standards, reflecting the town centre location, providing adequate public, private and on-street vehicle and cycle parking to meet the needs of residents and visitors;

### Public Realm

- g) high-quality public realm throughout the site, which provides improved permeability to the site from Knoll Road, including improved pedestrian, cycle, and vehicular links to Camberley High Street, London Road Block, and Camberley Station;
- h) an attractive new streetscape throughout the site, which utilises hard landscaping to differentiate pedestrian, cyclist, and vehicular zones, and soft landscaping incorporating mature tree planting and vegetated areas;
- i) a green corridor linking the site to Knoll Road and Camberley High Street, incorporating Camberley Park and adjoining woodland to the east, providing an enhanced green enclave within Camberley Town Centre, for residents and visitors to enjoy;

### Design and Character

- j) a strong sense of place, with a distinctive, attractive, and functional living environment, established through a sensitive design that responds to the local context, including topography, landscape, and heritage;
- k) the protection and enhancement of the Grade II Listed Obelisk and its setting within a wooded part of Camberley Park;
- l) a design and layout that ensures new sightlines between the wooded setting of The Obelisk and the heart of Camberley Town Centre are established;
- m) demonstrate that the proposed development is consistent with locally adopted Design Codes;

### Transport Infrastructure

- n) appropriate contributions toward highways and public transport improvements;

**Importantly, the policy requires the developer to deliver an off-site SANG to mitigate any impacts that will be arising on the Thames Basin Heaths SPA with regard to recreational pressure.**

**Overall, Policy HA3 is screened in for Appropriate Assessment.**

- o) a site layout that encourages permeability throughout the site and to surrounding areas;
- p) transport infrastructure comprising:
  - i. vehicular accesses to the site from Knoll Road to the west and Hillside to the southeast;
  - ii. differentiation of user zones and crossings through changes to the materials and colours used for surfacing;
  - iii. improved pedestrian and cyclist links between the site and Camberley High Street, and Camberley Station, with suitable crossing points implemented at Knoll Road;
  - iv. improvements to the streetscape of Knoll Road, delivering psychological traffic calming measures through design and surfacing changes to provide a pedestrian and cyclist friendly environment;
  - v. the retention of existing bus stops at Knoll Road and improved pedestrian access to Camberley Train Station, seeking to encourage residents and visitors to use public transport;
  - vi. support for accessible and well-connected bus services to Knoll Road;

#### **Infrastructure**

- q) mitigation for additional pressure on education provision<sup>88</sup>;
- r) mitigation for the impact of increased pressure on healthcare services in consultation with healthcare providers;
- s) the protection and enhancement of the existing designated green space at Camberley Park including the wooded setting of the Grade II Listed Obelisk;
- t) measures to provide a green urban environment, such as green roofs, green walls, and both public and private garden amenity spaces, including children's playspace, for flatted development;
- u) measures to avoid and mitigate any impact of the development on the Thames Basin Heaths Special Protection Area through the delivery of a suitable off-site SANG solution;
- v) the creation of a distinct green corridor along the Eastern side of Knoll Road.
- w) a green corridor incorporating Camberley Park and The Obelisk, which will form part of the wider green infrastructure network in Surrey Heath, enhancing the ecological value of the site's surroundings and contributing to overall biodiversity net gain;
- x) the retention and expansion of the play area facilities at Camberley Park including woodland trails, an equipped play area and open space;

#### **Environmental Requirements and Climate Change**

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<sup>88</sup> Details of the mitigation required will be explored through further work in the Infrastructure Delivery Plan (IDP).

	<ul style="list-style-type: none"> <li>y) a net zero carbon design including on-site renewable energy and/or decentralised energy generation;</li> <li>z) wildlife habitat creation and enhancements including bird boxes, bat boxes, swift bricks and beehives in appropriate locations within the development;</li> <li>aa) appropriate rainwater management through SuDs integrated with landscape design to visually and environmentally enhance the site.</li> </ul>	
<p>Policy HA4 – Mindenhurst, Deepcut</p>	<ul style="list-style-type: none"> <li>1) The former Princess Royal Barracks as defined on the Policies Map is allocated for 1,200 new dwellings, a care home and associated infrastructure.</li> <li>2) The continued development of the site will be supported where development meets the following criteria: <ul style="list-style-type: none"> <li>a) Delivery of a safe and high quality environment reflecting the rural nature of Deepcut's setting and the parameters of the hybrid permission 12/0546 (or as amended) and the approved design codes and the adopted Deepcut SPD;</li> <li>b) 15% of housing to be provided as affordable housing on those parcels where affordable housing is to be delivered as agreed under permission 21/0004/DTC subject to the review mechanisms set out in that permission;</li> <li>c) A housing mix to reflect the approved density plans and having regard to the identified need in accordance with Policy H5 (Range and Mix of Housing);</li> <li>d) The provision of retail and associated town centre uses in accordance with hybrid permission 12/0546 (or as amended) to create sustainable shopping patterns, complementing or extending the existing Neighbourhood Centre at Deepcut;</li> <li>e) Phased delivery, or where otherwise agreed, funding for social, physical and community infrastructure, including health, education, library and formal and informal sports facilities;</li> <li>f) Physical infrastructure that is climate change resilient, in particular, addressing the issue of ground and surface water flood risk and making provision for electric vehicle charging or other suitable technologies that arise through the plan period;</li> <li>g) Agreed measures for on-going maintenance for surface water drainage systems within the development including provision of financial contributions where appropriate;</li> <li>h) New non-residential development shall achieve efficient use of resources, and reach a 'Very Good' BREEAM status as a minimum;</li> <li>i) Measures to reduce the impact of traffic upon and arising from Deepcut which will include reducing demand for travel, improved public transport provision, a safe integrated footpath/cycle route network linking to neighbouring settlements and key services and improvements to the surrounding highway network and other measures as set out in the Transport Assessment accompanying the approved application and improvements and contributions set out in the Section 106 agreement and subsequent amendments;</li> </ul> </li> </ul>	<p><b>Likely Significant Effects (LSEs) of Policy HA4 on European sites cannot be excluded.</b></p> <p><b>This policy allocates a residential development in Mindenhurst, Deepcut for 1,200 new dwellings, a care home and associated infrastructure. As such, this allocation will be associated with a range of impact pathways including recreational pressure and atmospheric pollution.</b></p> <p><b>Importantly, the policy requires the developer to deliver a green infrastructure network and SANG, as well as making contributions to Strategic Access Management and Monitoring (SAMM) measures, which will mitigate any impacts that will be arising on the Thames Basin Heaths SPA with regard to recreational pressure.</b></p> <p><b>Overall, Policy HA4 is screened in for Appropriate Assessment.</b></p>



- j) Measures to avoid new development having an impact upon designated European Sites comprising on site SANG and a contribution towards Strategic Access and Management Monitoring Measures;
- k) Measures to avoid new development having an impact upon the features and sites of local importance for biodiversity and delivery of a net gain in biodiversity in line with Policy E3;
- l) Maintain the countryside gaps between Deepcut and Heatherside, Deepcut and Pirbright and Deepcut and Frimley Green;
- m) Delivery of a green infrastructure network to support improved connectivity and to include formal public open space, allotments and informal open space, including Suitable Alternative Natural Green Space (SANGs);
- n) Enhancement of the setting of and improved linkages to the Basingstoke Canal from the development and the wider area;
- o) Preserves or enhances the character and setting of heritage assets including the Basingstoke Canal Conservation Area and St Barbara's Church.

Policy HA5 – Range  
and Mix of Housing

#### General Housing Mix

- 1) Proposals for residential development will be permitted where they meet a range of accommodation needs in Surrey Heath through the provision of a mix of tenure, type and size<sup>89</sup> of dwellings that:
  - a) Reflects the housing need, set out in the Housing Need Assessment (2020)<sup>90</sup> or any subsequent update;
  - b) Has regard to the size, characteristics and location of the site; and
  - c) Is compliant with the percentages for affordable housing provision set out in Policy H7.

#### Accessible and Adaptable Homes

- 2) Homes should be adaptable and accessible for changing needs over time so that people can be enabled to stay in their homes for longer. To build homes that are accessible and adaptable, all proposals for residential development should meet Building Regulations Part M4(2)<sup>91</sup>, unless it can be robustly demonstrated it would not be possible to do so due to site-specific circumstances.
- 3) On sites of 20-50<sup>92</sup> or more net new dwellings, at least 5%<sup>93</sup> of new homes should meet Building Regulations M4(3)<sup>91</sup>, unless it can be robustly demonstrated it would not be possible to do so due to site-specific circumstances.

LSEs of Policy HA5 on European sites can be excluded.

This is a development management policy that identifies the range and mix of housing to be provided across Surrey Heath, including accessible / adaptable homes, self / custom-build homes and Build to Rent homes. However, these targets have no bearing on European sites.

Therefore, Policy HA5 is screened out from Appropriate Assessment.

<sup>89</sup> Dwelling size is measured by the number of bedrooms to be provided in each dwelling.

<sup>90</sup> Surrey Heath Housing Need Assessment 2020: [www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf](http://www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf).

<sup>91</sup> Or any subsequently amended standards for accessible and adaptable dwellings or wheelchair user dwellings.

<sup>92</sup> The specific threshold figure for new homes that should meet Building Regulations M4(3) will be informed by the whole plan viability assessment.

<sup>93</sup> Rounded to the nearest whole unit.

### **Self-Build and Custom Housebuilding**

- 4) Development proposals for 20 or more net new dwellings will be expected to make available 5%<sup>94</sup> of the total homes for sale as serviced plots for self-build and custom housebuilding, whilst there is an identified need<sup>95</sup> for this type of housing in the Borough.
- 5) Proposals for 20 or more net new dwellings that do not satisfy the above requirement may be supported provided they are justified in relation to evidence of housing need, viability, or site-specific physical or environmental constraints.
- 6) Proposals for standalone self-build or custom build developments in appropriate locations within settlement areas will also be supported.
- 7) The need to grant planning permission for self-build and custom-build homes is measured from the number of entrants on Part 1 of the Council's Self-build and Custom-Housebuilding Register. Entrants to the Self-Build and Custom Housebuilding Register must meet the Council's Local Connection Test and Financial Solvency Test in order to be eligible for inclusion on Part 1 of the Register.

### **Build to Rent Homes**

- 8) Proposals for build to rent schemes will be permitted provided they:
  - a) are suitably located;
  - b) meet an identified local demand;
  - c) include provision of a minimum 20% affordable private rented accommodation; and,
  - d) provide tenancy agreements for renters for a minimum of three years with a break clause which allows the tenant to end the tenancy with a month's notice any time after the first six months and which include defined in-tenancy rent reviews that are clearly set out.
- 9) The affordable private rented dwellings must meet the requirements set out in the government's planning guidance for build to rent homes, including a minimum discount of 20% below market values for the same or equivalent property<sup>96</sup>. The affordable private rented housing must be provided in perpetuity<sup>97</sup>;
- 10) All build to rent schemes should be secured in single ownership providing solely for the rental market for a minimum 20 year term with provision for clawback of affordable housing contributions should the covenant not be met.

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<sup>94</sup> Rounded to the nearest whole unit.

<sup>95</sup> The need for self-build and custom housebuilding serviced plots is identified on the Surrey Heath Self-Build and Custom Housebuilding Register.

<sup>96</sup> Available online at: <https://www.gov.uk/guidance/build-to-rent>.

<sup>97</sup> In perpetuity is at least 125 years, in accordance with the Perpetuities and Accumulations Act 2009: [http://www.legislation.gov.uk/ukpga/2009/18/pdfs/ukpga\\_20090018\\_en.pdf](http://www.legislation.gov.uk/ukpga/2009/18/pdfs/ukpga_20090018_en.pdf).

Policy H6 – Specialist  
Housing

- 1) Proposals for the development of specialist housing including suitable supported or extra care housing and registered bed spaces in residential care homes will be permitted, provided they:
  - a) meet the identified needs of older people and households with specific needs that are evident at the time of the proposal;
  - b) are supported by the appropriate authorities responsible for primary health care provision<sup>98</sup>, taking account of the increased demands associated with the proposal's occupiers;
  - c) will be suitable for the intended occupiers having regard to the quality and type of facilities, the level of independence and the provision of support and/or care;
  - d) will be accessible to local shops, services, public transport and community facilities, where appropriate to the needs of the intended occupiers;
  - e) will not result in the over-concentration of specialist housing in a particular locality, leading to a material change in character; and,
  - f) Will not have a detrimental impact to the vitality and viability of town centres, where residential care and nursing homes (use class C2) are located in or adjacent to designated centres; and
  - g) Where appropriate delivers affordable housing in accordance with the requirements of Policy H7: Affordable Housing.
- 2) The mix of tenures negotiated by the Council will have regard to advice from the appropriate authorities responsible for primary health care provision, as necessary.
- 3) Proposals that would involve a net loss of specialist housing units or bed spaces, will only be permitted where appropriate replacement specialist accommodation will be provided that satisfies the criteria (a) to (e) of this policy, or it is demonstrated, using local evidence<sup>99</sup> that there is no local need for the existing type specialist housing to be retained.
- 4) Where permission is granted for specialist accommodation, the Council reserves the right to use a legal agreement to ensure that proposals are retained for the purpose they were intended.

LSEs of Policy H6 on European sites can be excluded.

This is a development management policy that stipulates the council's support for specialist housing, including older people and those with extra care needs. However, such provision has no bearing on European sites.

Therefore, Policy H6 is screened out from Appropriate Assessment.

Policy H7 – Affordable  
Housing

- 1) Residential development on all sites of 10 or more residential dwellings, or a site area of 0.5ha and above, will be permitted that deliver 40% affordable housing. Where a development site meets this threshold affordable housing shall be delivered in accordance with the following criteria:

LSEs of Policy H7 on European sites can be excluded.

This is a development management policy that stipulates the council's support for affordable

<sup>98</sup> Currently, Surrey County Council as the Adult and Social Care Commissioner, and the Surrey Heath Clinical Commissioning Group (CCG) and Surrey Heartlands CCG as the local commissioners of health and care services.

<sup>99</sup> Surrey Heath Housing Need Assessment 2020 or any subsequent update to the housing need evidence base: [www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf](http://www.surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Housing%20Needs%20Assessment%202020.pdf).

- a) 25% of affordable housing will be provided as First Homes;
  - b) Having accounted for First Homes, the mix of tenures for the remaining affordable housing must, to the Council's satisfaction, reflect local needs identified in the Housing Need Assessment (2020)<sup>100</sup> or any subsequent update, and must be affordable having regard to local incomes and house rents and/or prices;
  - c) In cases where the percentage calculation provides a part dwelling, a financial contribution will be sought equivalent to that part of the residential dwelling;
  - d) The mix of dwelling sizes must reflect the Council's housing needs evidence as set out in the Housing Need Assessment (2020)<sup>101</sup> or any subsequent update, and have regard to the size, characteristics and location of the site;
  - e) On-site affordable housing must be well integrated within the proposed development and should be indistinguishable in appearance from market housing on site.
- 2) Where land has been subdivided into smaller development parcels that cumulatively meet the thresholds in criterion (i) of this policy, the Council will consider the site as a whole and will therefore seek 40% affordable housing on each parcel.
  - 3) Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process. In order to demonstrate viability constraints to the Council's satisfaction proposals must be supported by an independent viability assessment on terms agreed by the local planning authority and funded by the developer/applicant. If less than 40% is justified to the Council's satisfaction, the Council may include a review clause in a S106 agreement.
  - 4) Affordable housing must be provided on site, unless exceptional circumstances can be demonstrated, to the Council's satisfaction, that on site provision and management would be impractical due to size or location of the development. In such instances, agreement must be obtained from the Council for the affordable housing to be provided either off-site or through a commuted sum, taking account of site specific circumstances.

housing, requiring a certain proportion of affordable homes to be delivered on sites over 10 dwellings or 0.5ha in size. However, such provision has no bearing on European sites.

Therefore, Policy H7 is screened out from Appropriate Assessment.

Policy H8 – Loss of  
Housing

- 1) Proposals for the redevelopment, conversion or change of use of land or buildings involving the net loss of residential units will not be permitted unless one of the following circumstances apply:
  - a) The proposal would enable units of sub-standard size to be enlarged or replaced with alternative residential provision within the same use class, in order to meet residential space standards; or,

LSEs of Policy H8 on European sites can be excluded.

This is a development management policy that prevents the loss of housing in Surrey Heath, unless certain conditions are met. However, this approach has no bearing on European sites.

<sup>100</sup> At the time of this Plan's publication, the Council's most recent evidence base for housing need is set out in the Surrey Heath Housing Need Assessment 2020: [Local Housing Needs Assessment](#).

<sup>101</sup> At the time of this Plan's publication, the Council's most recent evidence base for housing need is set out in the Surrey Heath Housing Need Assessment 2020: [www.surreyheath.gov.uk/sites/default/files/Surrey\\_Heath\\_Housing\\_Needs\\_Assessment\\_2020.pdf](http://www.surreyheath.gov.uk/sites/default/files/Surrey_Heath_Housing_Needs_Assessment_2020.pdf).

- b) The proposal would enable existing affordable homes to be adapted to address an identified shortfall in larger affordable dwelling sizes; or,
  - c) The proposal would ensure that a building of historic importance can be retained or renovated; or,
  - d) The proposal would provide a non-commercial social, community or cultural service or facility where both of the following criteria apply:
    - i. The applicant can demonstrate a local need; and,
    - ii. It has been demonstrated that the service or facility cannot be provided elsewhere.
- 2) Development proposals that would result in the loss of part of an existing unit of residential accommodation will only be permitted where any retained residential accommodation would be of a satisfactory standard in terms of amenity and internal space.
- 3) Where evidenced by local needs the Council will support the retention of housing designed to meet the needs of the Borough's older population and people with disabilities, such as single storey homes.

Therefore, Policy H8 is screened out from  
Appropriate Assessment.

Policy H9 – Rural  
Exception Sites

- 1) Small scale developments of affordable housing which are outside defined rural settlement boundaries will only be permitted where they meet all of the following criteria:
- a) the number, size and tenure of homes has been demonstrated to meet, or contribute to meeting, the evidenced affordable housing needs of the local area;
  - b) it has been demonstrated that the need cannot be met within a settlement boundary;
  - c) the site adjoins a rural settlement; and can be demonstrated to be in a sustainable location;
  - d) the affordable homes are secured in perpetuity;
  - e) that the housing will be for those with a local connection in the first instance and this will be ensured through legal agreement; and
  - f) the development is in keeping with the character and size of the settlement.
- 2) The minimum number of market dwellings within a rural exception site will only be permitted in exceptional circumstances where the following is evidenced:
- a) the scheme would be unviable without the inclusion of market housing;
  - b) it would not inflate the threshold land value<sup>102</sup>; and
  - c) the development physically integrates open market and affordable housing.

LSEs of Policy H9 on European sites can be excluded.

This development management policy specifies the conditions under which affordable housing is permitted outside defined rural settlement boundaries (rural exception sites). However, rural exception sites have no bearing on European sites.

Therefore, Policy H9 is screened out from  
Appropriate Assessment.

<sup>102</sup> This is the minimum land value likely to trigger an owner to sell the land.

Policy H10 – First  
Homes Exception Sites

- 1) Proposals for First Homes which are outside defined settlement boundaries and lie within the Countryside beyond the Green Belt will be permitted where they meet all of the following criteria:
  - a) the site adjoins a defined settlement boundary and can be demonstrated to be in a sustainable location;
  - b) the First Homes are secured in perpetuity;
  - c) the need for First Homes is not being met within the Borough;
  - d) the development is small scale and proportionate to the character and size of the settlement; and
  - e) the development will not lead to visual or physical coalescence of settlements.
- 2) Market dwellings within a First Homes exception site will only be permitted in exceptional circumstances where the following is evidenced:
  - a) the requirements set out in a - e are satisfactorily met;
  - b) the scheme would be unviable without the inclusion of market housing;
  - c) it would not inflate the threshold land value<sup>103</sup>; and
  - d) The amount of market housing is only that required for viability purposes; and
  - e) the development physically integrates open market and affordable housing.
- 3) The provision of other forms of affordable housing as part of the affordable housing mix will be permitted where local evidence demonstrates a significant local need.

LSEs of Policy H10 on European sites can be excluded.

This development management policy specifies the conditions under which first homes are permitted outside defined settlement boundaries (first homes exception sites). However, such sites have no bearing on European sites.

Therefore, Policy H10 is screened out from Appropriate Assessment.

Policy H11 – Gypsies,  
Travellers and  
Travelling Showpeople

**Safeguarding Existing Supply**

- 1) Existing sites permitted for Gypsy and Traveller and Travelling Showpeople will be safeguarded in perpetuity. Proposals which fail to protect existing Gypsy and Traveller or Travelling Showpeople sites, or involve a loss of pitches or plots will not be permitted unless it can be evidenced that they are no longer required or new suitable equivalent provision can be made.

**Planning Applications**

- 2) Planning permission for the expansion to existing sites or new sites to accommodate Gypsy and Traveller and Travelling showpeople accommodation, will only be permitted outside of allocated sites if the following criteria are met for the site:

LSEs of Policy H11 on European sites can be excluded.

This development management policy relates to the provision of gypsy and traveller pitches across Surrey Heath (effectively residential development). However, the policy's primary aim is to safeguard existing sites. Furthermore, Policy H11 specifies that gypsy and traveller accommodation will be delivered on development sites comprising 100 dwellings or more. As such, it is considered that these sites will be automatically assessed as part of the overall housing quantum and individual housing allocations.

<sup>103</sup> This is the minimum land value likely to trigger an owner to sell the land.

- a) Safe pedestrian, cycle and vehicular access on to the highways network can be provided, taking into account the type of vehicles that could reasonably be expected to use or access the site;
  - b) Is capable of being provided with essential utilities, including mains water, electricity, sewerage, drainage and waste disposal, in addition to appropriate amenity space. In the case of plots for Travelling Showpeople, adequate storage space must also be provided;
  - c) Accords with the criteria set out in Policy E5: Flood Risk and Sustainable Drainage;
  - d) Local services and facilities – such as shops, public transport, schools, can be readily accessed;
  - e) Does not pose a significant risk to the health and safety of the site's residents;
  - f) Would not give rise to an unacceptable adverse impact on the amenity of adjoining properties and land uses or the character of the surrounding area. Appropriate boundary treatment and landscaping must be capable of being provided;
  - g) Sites are located, and can be managed, so as not to result in any significant conflict with existing land uses;
  - h) Provides adequate space for vehicle parking, turning and servicing of large vehicles, storage, play and residential amenity;
  - i) Arrangements are put in place to ensure the proper management of the site to seek to ensure community cohesion between the settled and traveller communities.
- 3) Any permission granted for a Gypsy and Traveller and Travelling Showpeople site will be subject to a condition limiting occupation to Gypsies and Travellers and Travelling Showpeople, as appropriate.

**Meeting Future Needs Within Strategic development sites**

- 4) To meet the needs of Gypsy and Traveller and Travelling Showpeople households whether they meet the planning definition or not, accommodation is expected to be provided on development sites of 100 homes or more whilst there remains an identified need within Surrey Heath. Developments located within a town centre, which deliver regeneration and comply with the Council's town centre strategy, will not be expected to provide provision.
- 5) The number of pitches and plots required will reflect the level of local need within Surrey Heath. However, sites will have at least 3 pitches/plots, and should contain the maximum number of pitches/plots that can be reasonably accommodated on the site.
- 6) If a development site is required to make on-site provision for traveller accommodation and has robustly demonstrated that it is unable to do so, offsite provision will be considered.
- 7) Offsite accommodation will only be considered appropriate where all of the following criteria are met:

Overall, therefore, Policy H11 is screened out from Appropriate Assessment.

- a) The exceptional circumstances demonstrating on-site provision is not feasible have been proven;
- b) The alternative site provides for at least the same quantity of provision;
- c) The alternative site is considered as sustainable in regards to access to services, location and size as allocation on site;
- d) The alternative site complies with the other policies of this Plan, including Green Belt policies; and
- e) The site can be developed within the timeframe of the housing development.

Policy H12 – Site Allocations for Gypsy and Travelling Showpeople Accommodation

- 8) The following site is allocated for Gypsy and Traveller accommodation:

Site Reference	Site Name / Address	Indicative Pitches
HA12/01	Diamond Ridge Woods, Bagshot	4
Development Requirements	<ul style="list-style-type: none"> <li>1) Development proposals are required to:                             <ul style="list-style-type: none"> <li>a) Retain the existing vegetation boundary along London Road as far as reasonably practicable;</li> <li>b) Provide high quality landscaping and appropriate and usable private and communal amenity space;</li> <li>c) Be supported by a Green Space Management Plan addressing the future management of land remaining as SANGS;</li> <li>d) Be informed by the results of a full Noise Impact Assessment that considers the proximity to the A30 London Road, in addition to further species specific survey work; and,</li> <li>e) Provide suitable vehicular access to, and within the site.</li> </ul> </li> </ul>	

**Likely Significant Effects (LSEs) of Policy H12 on European sites cannot be excluded.**

**This policy allocates four gypsy and traveller pitches at Diamond Ridge Woods, Bagshot, which will increase the local population. As such, this policy will be associated with a range of impact pathways including recreational pressure and atmospheric pollution.**

**Importantly, the policy requires development proposals to be supported by a Green Space Management Plan that will set out the future management of land remaining as SANG.**

**Overall, Policy H12 is screened in for Appropriate Assessment.**

#### Section 4: Town Centres, Retail and Economy

Policy CTC1 – Camberley Town Centre

- 1) Development will be permitted within the defined town centre boundary that maintains or enhances the vitality and viability of Camberley town centre and which, as appropriate to the scale and type of development:

**Likely Significant Effects (LSEs) of Policy CTC1 on European sites cannot be excluded.**

**This policy permits development within the defined boundary of Camberley Town Centre, including high-quality homes, flexible employment uses and public realm improvements. While it defines a location of development, it does not provide a quantum of**



- a) Contributes to the delivery of a healthy and vibrant, experience based town centre by ensuring it is the focus for the development of Main town centre uses<sup>104</sup> and provides for all sectors of the community;
- b) Protects a robust retail core in the Primary Shopping Area by supporting a concentration of retail uses in line with Policy CTC2;
- c) Is consistent with the delivery of the priority regeneration sites including London Road Block as set out in Policies HA1: Housing Allocations; HA2; London Road Block and HA3: Land East of Knoll Road;
- d) Retains and enhances existing markets and supports opportunities for the creation of new markets;
- e) Delivers a safe, healthy and accessible environment, supporting the 20 Minute Neighbourhood principles;
- f) Delivers a mix of high quality homes, including affordable homes meeting local needs, on suitable sites within the town centre, including above ground floor level and as set out in Policies HA1, HA2 and HA3.
- g) Delivers flexible employment uses appropriate in the town centre;
- h) Delivers high quality public realm improvements, maximizing opportunities to “Green” the town centre environment, including Camberley Park and providing attractive places to dwell and space to accommodate outdoor events;
- i) Delivers improved accessibility and permeability for all, both within the town centre and between the town centre and the wider settlement with a focus on improved east/west connectivity and in line with Policy CTC3.
- j) Delivers good quality design, in line with existing and future national and local Design Guidance and Design Codes;
- k) Conserves and enhances the Victorian/Edwardian historic character and setting of the High Street, including key views;
- l) Relocates the library and/or Camberley Theatre to more central locations should opportunities arise;
- m) Includes provision of the most up to date digital technology;
- n) Supports actions that deliver a low carbon town centre and provide appropriate adaptation and mitigation measures in relation to climate change in accordance with Policies SS3a and b including:
  - i. Provision of electric charging points;

**growth (although note that it refers to housing allocations and priority regeneration sites).**

**Because it provides a geographic location for growth and proximity to relevant European sites, including recreational pressure and atmospheric pollution.**

**Overall, Policy CTC1 is screened in for Appropriate Assessment.**

<sup>104</sup> Main Town Centre Uses: As defined in the NPPF - The uses that should normally be found within defined town centres, including uses within Class E, Class F1, F2 and certain sui generis uses i.e. retail development, leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices and employment uses appropriate to a town centre location; schools and colleges; places of worship; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

			<ul style="list-style-type: none"> <li>ii. Urban greening and shading;</li> <li>iii. Delivery of low carbon heating.</li> </ul>	
Policy CTC2 – Camberley Town Centre Primary Shopping Area		<ul style="list-style-type: none"> <li>1) Within the defined Primary Shopping Area in Camberley town centre, development will be permitted which satisfies the following criteria: <ul style="list-style-type: none"> <li>a) It supports or enhances the centre’s vitality and viability;</li> <li>b) It is for a Class E Use which maintains an active ground floor frontage, generates footfall and supports the retail function of the primary shopping area;</li> <li>c) A change of use from retail (Class Ea) will not result in the over concentration of non retail uses to the detriment of the retail function and attractiveness of the primary shopping area.</li> </ul> </li> </ul>		<p><b>Likely Significant Effects (LSEs) of Policy CTC2 on European sites cannot be excluded.</b></p> <p><b>This policy permits development in Camberley Town Centre that enhances the centre’s vitality and contributes to Class E uses. As such, this policy will increase employment opportunities in Camberley, which are primarily associated with air quality impacts.</b></p> <p><b>Overall, Policy CTC2 is screened in for Appropriate Assessment.</b></p>
Policy CTC3 – Movement and Accessibility		<ul style="list-style-type: none"> <li>1) The Council will work with partners including Surrey County Council, Network Rail and the rail and bus operators to improve the accessibility of the town centre with priority given to providing a safe and connected environment for pedestrians and cyclists and for improved access by public transport.</li> <li>2) As appropriate to its nature, scale and location, new development within the town centre will be required to provide or make a financial contribution towards: <ul style="list-style-type: none"> <li>a) Improved pedestrian and cyclist facilities and connectivity to and through the town centre;</li> <li>b) Improved accessibility by bus;</li> <li>c) Enabling of better integration of transport modes in particular bus, train and taxi to include an improved transport interchange and rail station facilities at Pembroke Broadway;</li> <li>d) Enabling of effective circulation of traffic around and to the town centre, including use of signage to minimise congestion;</li> <li>e) Provision of on and off street parking facilities, including for taxis, the disabled and motorcycle and cycle in accordance with adopted standards;</li> <li>f) Works to accommodate any other impacts upon the highway network arising from the development; and</li> <li>g) A travel plan for the town centre.</li> </ul> </li> </ul>		<p>LSEs of Policy CTC3 on European sites can be excluded.</p> <p>This development management policy enhances movement and accessibility in Camberley Town Centre. This includes improvements to public transport (bus and rail), as well as enhancing pedestrian and cycle connectivity. Overall, this is a positive policy because it encourages residents to use sustainable travel modes, potentially contributing to reductions in atmospheric pollution (such as is relevant to the Thames Basin Heaths SPA).</p> <p>Therefore, Policy CTC3 is screened out from Appropriate Assessment.</p>
Policy ER1 – Economic Growth and Investment		<ul style="list-style-type: none"> <li>1) The growth and retention of existing businesses and inward investment into Surrey Heath will be supported by:</li> </ul>		<p><b>Likely Significant Effects (LSEs) of Policy ER1 on European sites cannot be excluded.</b></p>

- a) Protecting Strategic Employment Sites as defined on the Policies Map for Employment Use<sup>105</sup> and enabling the regeneration/redevelopment of these sites for employment uses (Policy ER2);
  - b) Protecting Locally Important Employment Sites as defined on the Policies Map for Employment Use and enabling the regeneration/redevelopment of these sites for employment (Policy ER3);
  - c) Encouraging the growth of small and micro businesses by protecting employment units capable for use by a small business or industry and supporting the siting of small to medium size employment units in Strategic and Locally Important Employment sites or other appropriate locations;
  - d) Encouraging development of the rural economy in accordance with Policy ER5 (Rural Economy).
- 2) Employment uses in Class E(g) on Strategic and Locally Important Employment Sites will be controlled by condition and/or legal agreement where up to date evidence demonstrates that there is a need to protect these uses in perpetuity.
  - 3) Opportunities to develop the following key employment sectors, at Strategic and Locally Important Employment sites, will be encouraged and supported:
    - a) medical technology;
    - b) Specialist/advanced manufacturing (including research and development) and logistics and distribution, particularly at established industrial locations in the Borough at Yorktown and Frimley;
    - c) information technology and financial/business services.
  - 4) Large scale developments<sup>106</sup> should deliver local skills and training initiatives, unless it can be demonstrated that this is not feasible.

**This policy supports the growth and retention of existing businesses across Surrey Heath, including the regeneration / redevelopment of Strategic and Locally Important Employment Sites. An increase in employment opportunities in the borough is linked to impact pathways, primarily atmospheric pollution in relation to the Thames Basin Heaths SPA.**

**Overall, Policy ER1 is screened in for Appropriate Assessment.**

Policy ER2 – Strategic  
Employment Sites

- 1) To contribute towards meeting the future economic growth needs of the Borough and the wider Functional Economic Area, the following sites are designated as Strategic Employment Sites as defined on the Policies Map, to be afforded the highest protection and safeguarding for Employment Uses<sup>107</sup>.
  - a) Admiralty Park, Camberley
  - b) Albany Park, Frimley
  - c) Land at Knoll Road, Camberley Town Centre

**Likely Significant Effects (LSEs) of Policy ER2 on European sites cannot be excluded.**

**This policy safeguards Strategic Employment Sites in Camberley, Frimley, Windlesham, Chobham and Mychett. It also endorses the redevelopment of these sites to provide additional floorspace for employment uses. An**

<sup>105</sup> As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).

<sup>106</sup> This will be determined on a case by case basis unless the Council prepares any Supplementary Planning Guidance on this issue but as an indication will include developments over 50 dwellings (net) or new commercial floorspace over 1,000m<sup>2</sup> (net).

<sup>107</sup> As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).

- d) Erl Wood, Windlesham
  - e) Former Defence Evaluation and Research Agency (DERA) Site Longcross, near Chobham
  - f) Former British Oxygen Company Site, Chobham
  - g) Mytchett Place, Mytchett
  - h) Frimley Business Park, Frimley
  - i) Lyon Way, Frimley
  - j) Watchmoor Business Park, Camberley
  - k) Yorktown Business Park, Camberley.
- 2) The redevelopment and regeneration of these sites will be supported to provide floorspace for Employment Uses<sup>108</sup> that meets the needs of the market.
- 3) Small-scale proposals for changes of use or redevelopment to non Employment Uses will be supported where they would provide complementary use(s) that are not detrimental to the function and operation of the Strategic Employment Site.

**increase in employment opportunities in the district is linked to impact pathways, primarily atmospheric pollution in relation to the Thames Basin Heaths SPA. This is because additional employment development is likely to increase the number of commuter journeys within 200m of air-quality sensitive habitats.**

**Overall, Policy ER2 is screened in for Appropriate Assessment.**

**Policy ER3 – Locally Important Employment Sites**

- 1) To contribute towards meeting the future economic growth needs of the Borough, the following sites are designated as Locally Important Employment Sites as defined on the Policies Map, and will be given protection against loss to non Employment uses.
- a) Bridge Road Trade and Industrial Park, Camberley
  - b) Linsford Business Centre Mytchett
  - c) Fairoaks Airport Employment Land
  - d) SC Johnson, Frimley Green
  - e) St Georges Industrial Estate and Helix Business Park, Camberley
  - f) Tanners Yard, Bagshot
- 2) The redevelopment and regeneration of these sites will be supported to provide floorspace for Employment Uses<sup>109</sup> that meet the needs of the market.
- 3) The change of use or redevelopment of land and buildings in Employment Use to non Employment Uses within the defined Locally Important Employment Sites will only be permitted where it can be demonstrated that:
- a) There are no strong economic reasons to retain the Employment Use;
  - b) Market signals indicate that the premises / site are unlikely to come back into an Employment Use;

**Likely Significant Effects (LSEs) of Policy ER3 on European sites cannot be excluded.**

**This policy safeguards Locally Important Employment Sites in Camberley, Frimley Green, Bagshot and Mychett. It also endorses the redevelopment of these sites to provide additional floorspace for employment uses. An increase in employment opportunities in the district is linked to impact pathways, primarily atmospheric pollution in relation to the Thames Basin Heaths SPA. This is because additional employment development is likely to increase the number of commuter journeys within 200m of air-quality sensitive habitats.**

**Overall, Policy ER3 is screened in for Appropriate Assessment.**

<sup>108</sup> As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).

<sup>109</sup> As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).

	<ul style="list-style-type: none"> <li>c) The proposal would generate a level of employment that is at least equivalent to the existing use; and</li> <li>d) The proposal would not be detrimental to the function and operation of the wider site; or</li> <li>e) The site is not appropriate for the continuation of its present use or any Employment Use due to a significant detriment to the environment or amenity of the area.</li> </ul>	
<p>Policy ER4 – Yorktown Business Park</p>	<ul style="list-style-type: none"> <li>1) The role of Yorktown Business Park as the Borough’s largest employment site and most extensive cluster of industrial uses is recognised. Proposals for redevelopment or enhancement for Employment Uses<sup>110</sup>, including the refurbishment of existing stock, and subdivision of larger units to provide multiple units will be supported.</li> <li>2) Proposals including provision of a net increase in the overall amount of Employment Use floorspace will be supported.</li> <li>3) The redevelopment of derelict or underutilised land for Employment Uses or Sui Generis uses with a strong employment element will also be supported, provided proposals would not result in a net reduction to the overall amount of Employment floorspace at the site.</li> <li>4) Proposals will be required to support the delivery of a structured landscape setting, in line with the Yorktown Landscape Strategy Supplementary Planning Document.</li> </ul>	<p><b>Likely Significant Effects (LSEs) of Policy ER4 on European sites cannot be excluded.</b></p> <p><b>This policy recognises the importance of Yorktown Business Park as the Borough’s most important employment site. Importantly, this policy also enables the redevelopment of the site and provides for a potential increase in employment floorspace.</b></p> <p><b>An increase in employment opportunities in the district is linked to impact pathways, primarily atmospheric pollution in relation to the Thames Basin Heaths SPA. This is because additional employment development is likely to increase the number of commuter journeys within 200m of air-quality sensitive habitats.</b></p> <p><b>Overall, Policy ER4 is screened in for Appropriate Assessment.</b></p>
<p>Policy ER5 – The Rural Economy</p>	<ul style="list-style-type: none"> <li>1) Within the countryside, including the Green Belt, development proposals for economic uses located outside of Strategic or Locally Important Employment Sites will be supported which: <ul style="list-style-type: none"> <li>a) Enable the continuing sustainability or expansion of an existing business or enterprise;</li> <li>b) Are compatible with any existing agricultural or farm operation;</li> <li>c) Are consistent with Policies GBC1, GBC2 and GBC4, as relevant, and provide for a scale and use which does not conflict with wider countryside and Green Belt objectives;</li> <li>d) Do not have an unacceptable adverse impact on local amenity;</li> </ul> </li> </ul>	<p><b>Likely Significant Effects (LSEs) of Policy ER5 on European sites cannot be excluded.</b></p> <p><b>This policy supports general economic development proposals in the countryside, providing that several conditions are met. This includes the potential delivery of replacement or new dwellings to enable economic uses.</b></p>

<sup>110</sup> As defined in the Glossary and comprising uses within Classes B2, B8 and E (g).

- e) Accommodate incidental uses such as car parking and storage such that the visual impact is minimised;
  - f) Are to be accommodated within a building which is of permanent construction, structurally sound and capable of conversion without major alterations, adaptations or reconstruction for the use proposed.
- 2) Where it is demonstrated that the proposed use cannot be accommodated within an existing building, proposals for replacement or new buildings for farm diversification or economic purposes will be supported where they meet above criteria a) to e) and:
- a) The proposal is justified by a business case providing evidence of need for the scale of the development proposed and demonstrating that the business is viable;
  - b) Any building to be replaced is of a permanent construction;
  - c) Priority is given to siting the replacement building on previously developed land.
- 3) Within settlements in the rural areas<sup>111</sup> development for economic uses will be supported which are of a use and character appropriate to the proposed site and to the scale of the settlement and which do not have an unacceptable adverse impact on local communities particularly in terms of traffic, noise, lighting and visual impact.

**An increase in employment opportunities in the district is linked to impact pathways, primarily atmospheric pollution in relation to the Thames Basin Heaths SPA. This is because additional employment development is likely to increase the number of commuter journeys within 200m of air-quality sensitive habitats.**

**Overall, Policy ER5 is screened in for Appropriate Assessment.**

Policy ER6 – Frimley  
Park Hospital

- 1) Development proposals for the retention and improvement of healthcare facilities at Frimley Park Hospital will be supported provided that:
  - a) The proposals form part of a comprehensive development strategy or business plan that ensures that the continued development of the hospital is properly coordinated;
  - b) Where appropriate it is accompanied by a transport strategy to include:
    - i. a parking strategy;
    - ii. provision for an increase in the proportion of staff, patients and visitors who can access the hospital by public transport, cycling and walking; and
    - iii. the mitigation of any adverse impacts of traffic and car parking on the highway network and surrounding community;
  - c) There will be no significant detrimental impact on residential properties within the site or surrounding residential properties;
  - d) There is no detrimental impact to protected trees;
  - e) The proposals deliver a biodiversity net gain in line with Policy E3;
  - f) The proposal incorporates climate change mitigation measures, including on-site renewable energy generation, consideration for low carbon heating and making best use of existing combined heat and power (CHP) networks;

LSEs of Policy ER6 on European sites can be excluded.

This policy supports the retention and improvement of healthcare facilities at Frimley Park Hospital, including a potential transport strategy. Furthermore, the policy protects trees and ensures biodiversity net gain. However, enhancements to healthcare facilities have no bearing on European sites.

Therefore, Policy ER6 is screened out from Appropriate Assessment.

<sup>111</sup> As defined in the Surrey Heath Local Area Profiles section of this Plan.

<p>g) The proposal incorporates climate change adaptation measures, including reducing the risk of seasonal overheating through appropriate design.</p>	
<p>Policy ER7 – Edge of Centre and Out of Centre Proposals</p> <p><b>Sequential Test</b></p> <p>1) Main Town Centre Uses should be directed to Designated Centres in line with the sequential approach set out in the National Planning Policy Framework. Designated Centres include Camberley Town Centre and the Borough’s District and Local Centres. Proposals for retail or other main town centre uses which are outside a Designated Centre and which are not on sites allocated for such uses will be subject to the sequential test.</p> <p>2) If it can be demonstrated through the sequential test that there are no suitable sites available on edge of centre locations, sites will be given preference that are well connected to centres, are accessible by a range of sustainable transport options, including public transport, cycle, on foot and by people with disabilities.</p> <p><b>Impact Assessment</b></p> <p>3) Proposals for retail and leisure development over 280 sqm (gross) which are not within a Designated Centre and which are not on sites that are allocated for such uses must be accompanied by an impact assessment and will only be permitted if it is demonstrated that it will not cause a significant adverse impact on existing centres.</p>	<p>LSEs of Policy ER7 on European sites can be excluded.</p> <p>This policy stipulates that edge of centre and out of centre proposals will only be supported if sequential tests indicate a need and impact assessments have been completed. However, following this general procedure has no relevance for European sites.</p> <p>Therefore, Policy ER7 is screened out from Appropriate Assessment.</p>
<p>Policy ER8 – District and Local Centres</p> <p>1) The boundaries of the following designated District and Local Centres are shown on the Policies Map along with the Primary Shopping Areas. For Local Centres, the boundary of the Primary Shopping Area is the same as the boundary of the Local Centre.</p> <p>2) The District Centres are:</p> <p>a) Bagshot b) Frimley</p> <p>3) The Local Centres are:</p> <p>a) Chobham b) Frimley Green c) Lightwater d) Watchetts e) Windlesham.</p> <p>4) Within District and Local Centres, proposals for retail uses (Class E(a) and F2(a)) will be permitted provided they are in proportion to the scale and function of the centre.</p>	<p>LSEs of Policy ER8 on European sites can be excluded.</p> <p>This policy identifies Surrey Heath’s District and Local Centres, and the uses that are considered appropriate in these areas. However, the actual development proposals that are supported in these areas, are adequately assessed in other economic policies.</p> <p>Therefore, Policy ER8 is screened out from Appropriate Assessment.</p>

- 5) Proposals for other Main Town Centre uses (as defined in the Local Plan Glossary<sup>112</sup>) will be permitted provided they satisfy all of the following criteria:
  - a) They are appropriate to the Centre in scale and function;
  - b) They maintain or enhance the Centre's vitality and viability;
  - c) They provide an active frontage, if at ground floor level, such as a shop front or window display, which is in keeping with the character of the Centre;
  - d) They would not result in loss of amenity in terms of noise, fumes, vibrations, odour, or disturbance.
- 6) The loss of Main Town Centre uses at ground floor to other uses, including the loss of retail units within Class F2(a), will only be permitted where it can be demonstrated that the existing use is no longer viable. Such proposals must meet the above criteria and must also be supported by evidence that demonstrates active and appropriate marketing for a period of at least 12 months.
- 7) Residential development and B2 and B8 uses at ground floor level will not be permitted in District and Local Centres.
- 8) Residential development in a C3 or C4 use class at first floor level or above will be supported within District and Local Centres. Uses above ground floor level should have a safe and convenient access and must not inhibit the functioning of the ground floor use.

Policy ER9 Neighbourhood Parades	–	<ol style="list-style-type: none"> <li>1) The boundaries of the following designated Neighbourhood Parades are shown on the Policies Map:                     <ol style="list-style-type: none"> <li>a) Beaumaris Parade, Frimley Green</li> <li>b) Bisley (Guildford Road)</li> <li>c) Chertsey Road Parade, Chobham</li> <li>d) Deepcut</li> <li>e) Farm Road Parade, Frimley</li> <li>f) Frimley Road and London Road Parades, Camberley</li> <li>g) Heather Ridge Arcade, Heatherside</li> <li>h) Mytchett (Mytchett Road)</li> <li>i) Dean Parade, Old Dean<sup>113</sup></li> <li>j) The Parade, Gosden Road, West End.</li> </ol> </li> </ol>
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LSEs of Policy ER9 on European sites can be excluded.

This is a development management policy that designates Neighbourhood Parades in various settlements across Surrey Heath. Furthermore, it specifies the types of uses that are considered appropriate in these locations. However, the actual development proposals that are supported in these areas, are adequately assessed in other economic policies.

Therefore, Policy ER9 is screened out from Appropriate Assessment.

<sup>112</sup> Main Town Centre Uses: The uses that should normally be found within defined town centres, including uses within Class E, Class F1, F2 and certain sui generis uses i.e. retail development, leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices and employment uses appropriate to a town centre location; schools and colleges; places of worship; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<sup>113</sup> Dean Parade, Old Dean, Camberley will also be subject to the requirements of Policy ER10 – Old Dean.



- 2) Within Neighbourhood Parades, development proposals will be permitted provided they satisfy all of the following criteria:
  - a) They are appropriate to the Neighbourhood Parade in scale and function;
  - b) They maintain or enhance the Neighbourhood Parade's vitality and viability;
  - c) They would not undermine the retail and service function of the Neighbourhood Parade;
  - d) They would not result in loss of amenity in terms of noise, fumes, vibrations, odour, or disturbance;
  - e) They would provide an active frontage, if at ground floor level, such as a shop front or window display, which is in keeping with the character of the Neighbourhood Parade;
  - f) They would contribute to the provision of a range of retail, service and community uses, if at ground floor level, which provide for the day-to-day needs of local people.
- 3) Residential development and B2 and B8 uses at ground floor level will not be permitted in Neighbourhood Parades.
- 4) Residential development in a C3 or C4 use class at first floor level or above will be supported within Neighbourhood Parades. Uses above ground floor level should have a safe and convenient access and must not inhibit the functioning of the ground floor use.

Policy ER10 – Old Dean

- 1) A partnership approach will be taken towards continued neighbourhood improvement in Old Dean.
- 2) Development proposals will be supported which:
  - a) Are consistent with Policy E1 Thames Basin Heaths SPA;
  - b) Support the vitality and viability of the local centre;
  - c) Provide for a regenerated local centre;
  - d) Provide improvements to housing choice and quality;
  - e) Increase accessibility and opportunities for walking and cycling;
  - f) Provide enhanced community, healthcare and education facilities including through partnership working with providers and the delivery of appropriate infrastructure from new development;
  - g) Deliver environmental improvements to improve public realm and provides opportunities for greening the environment;
  - h) Contribute to community safety.

LSEs of Policy ER10 on European sites can be excluded.

This is a development management policy that supports continued neighbourhood improvement in Old Dean. However, it only specifies relatively vague proposals, such as improvements in housing choice and quality. In any case, the policy requires any proposals to be consistent with Policy E1 (Thames Basin Heaths SPA).

Therefore, Policy ER10 is screened out from Appropriate Assessment.

**Section 5: Infrastructure**

Policy IN1 –  
Infrastructure Delivery

- 1) Development will be permitted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet the requirements arising from new development.
- 2) Where additional infrastructure capacity is required this will be secured either through direct provision or financial contributions (Community Infrastructure Levy (CIL) and/or S106).
- 3) Development will be permitted provided that:
  - a) Reasonable on-site provision, off-site contribution or financial contributions to ensure sufficient capacity is provided towards infrastructure including, but not limited to:
    - i. site specific infrastructure requirements including those set out in Allocations policies in this Plan;
    - ii. community infrastructure including, but not limited to education, healthcare, libraries, community facilities;
    - iii. access to the development, pedestrian, cycling and highway safety improvements necessary to mitigate any impacts on the wider highway network;
    - iv. flood risk measures;
    - v. the delivery and ongoing maintenance of formal and informal open space;
    - vi. the delivery of agreed mitigation measures with regards to the Thames Basin Heaths Special Protection Area.
  - b) Infrastructure phasing is agreed with the Council in partnership with relevant partners and ensures that infrastructure is operational prior to, or alongside the development it will serve; and
  - c) Infrastructure is designed and located to be accessible to all; and
  - d) It can be demonstrated that all opportunities for dual use have been explored and maximised; and
  - e) Engagement with utilities and service providers including Surrey County Council have taken place, as appropriate to the development; and
  - f) There is no loss or reduction in capacity of existing infrastructure unless:
    - i. The loss of a Community Facility is compliant with Policy IN3; or
    - ii. For other infrastructure, replacement services or facilities are provided on-site or within the vicinity which meet the needs of the local population; or
    - iii. Necessary services can be delivered from other facilities without leading to, or increasing any shortfall in local provision; or
    - iv. It has been clearly demonstrated that there is no need for the facility.
- 4) Viability will only be considered a constraint in exceptional circumstances.
- 5) To demonstrate viability constraints to the Council's satisfaction proposals should be supported by an independent viability assessment on terms agreed by the local planning

LSEs of Policy IN1 on European sites can be excluded.

This is a positive infrastructure management policy because it ensures that sufficient infrastructure capacity will be provided to serve new developments. For example, the policy stipulates that development proposals which deliver the agreed mitigation measures in relation to the Thames Basin Heaths SPA will be permitted. The policy would also cover sufficient potable water provision and capacity at Wastewater Treatment Works (WwTWs). The adequate provision of such utilities ensures that there can be no adverse impacts on European sites in relation to the impact pathways water quantity, level and flow and water quality. There are no linking impact pathways to European sites.

Therefore, Policy IN1 is screened out from Appropriate Assessment.

authority and funded by the developer/applicant. If there are significant additional costs not anticipated through the Local Plan Viability Assessment, these should be clearly set out within the viability assessment.

- 6) Developers will be expected to pay towards the Council's costs of monitoring the implementation and payment of planning contributions.

Policy IN2  
Transportation

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- 1) New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable, including the mitigation of otherwise unacceptable impacts on highway safety and/or any severe residual cumulative impacts on the road network. This mitigation will:
  - a) maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities; and
  - b) address otherwise adverse material impacts on communities and the environment including impacts on amenity and health, noise pollution and air pollution.
- 2) New development will be supported which:
  - a) Is located where travel can be minimised and the use of sustainable transport modes is maximised;
  - b) Seeks to improve transport capacity and opportunities for travel by rail or bus transport;
  - c) Provides safe, convenient access both within the development and to adjoining areas for all potential users including those with disabilities, giving priority to walking and cycling routes over vehicular traffic and maximising catchment areas for bus or other public transport services;
  - d) Provides appropriate vehicular and cycle parking in accordance with the Councils-most recently adopted standards unless the provision of a car club, or car free development is agreed;
  - e) Provides Electric Vehicle Charging points in accordance with the Councils adopted standards;
  - f) Incorporates the flexibility for embracing technological advances in transport such as intelligent vehicle charging, wayfinding for parking space, car sharing scheme and car park management.
- 3) New development that generates significant amounts of movement will:
  - a) Provide sufficient information such that the transport impact can be assessed through a Transport Statement or Transport Assessment in accordance with the thresholds set out in the Local Planning Authority's Local Validation List, and advice from Surrey County Council;
  - b) Require a Travel Plan which will be proportionate to the size of the new development.

LSEs of Policy IN2 on European sites can be excluded.

This is a positive infrastructure management policy that relates to the provision of adequate transport infrastructure, including improvements to sustainable transport modes, the provision of electric vehicle charging points and Transport Assessments. Overall, this is a positive approach for European sites, particularly because it reduces reliance on fossil-fuelled vehicles and thereby may help reduce atmospheric pollution in the Thames Basin Heaths SPA.

Therefore, Policy IN2 is screened out from Appropriate Assessment.

Policy IN3 – Digital  
Infrastructure and  
Telecommunications

- 1) Proposals for major residential development (10 or more net new dwellings) and employment generating development (1,000sqm or more) will be supported where it is demonstrated through a Site Connectivity Plan that they are provided with up to date communications infrastructure. This should be through provision of Fibre to the Premises unless demonstrable reasons why this is not feasible are provided, or alternative technologies are available.
- 2) Planning permission for telecommunications development will be permitted where it can be demonstrated that:
  - a) The proposal does not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation that is operated in the national interest; and
  - b) Pre-application consultation has been undertaken with local groups and organisations which may be affected; and
  - c) Evidence is provided to demonstrate that there is no reasonable possibility of sharing existing facilities in the locality (either in terms of antennae, buildings or sites); and
  - d) Applications for an addition to an existing mast or base station are accompanied by a statement that self-certifies that the cumulative exposure, when operational, will not exceed guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP); and
  - e) Applications for a new mast or base station are accompanied by evidence that the applicant has explored the possibility of erecting aerials on an existing building, site, mast or other structure and a statement that self-certifies, when operational, that ICNIRP guidelines will be met.

LSEs of Policy IN3 on European sites can be excluded.

This is an infrastructure management policy that ensures the adequate provision of digital infrastructure and telecommunications equipment, especially in larger development sites. While the policy enables new mast and base stations, the European sites most relevant to Surrey Heath are not designated for animal species that are associated with the use of functionally linked habitats.

Therefore, Policy IN3 is screened out from Appropriate Assessment.

Policy IN4 – Community  
Facilities

- 1) Development proposals for the provision of new or improved community facilities will be supported. Proposals should demonstrate that they have explored opportunities for the new facility to be multifunctional.
- 2) Development proposals resulting in the loss of existing community facilities will not be permitted unless:
  - a) Evidenced adequate alternative provision already exists in the locality, or the loss would be replaced by an equivalent or better facility in a suitable and accessible location; or
  - b) A robust assessment has been carried out that demonstrates that:
    - i. a. There is no need for the facility or demand for another community use on site; and
    - ii. b. It would no longer be economically viable, feasible or practicable to retain the building or site for its existing use; and
    - iii. c. All reasonable efforts have been made to retain the facility, including evidence to confirm that the property or site has been actively and positively

LSEs of Policy IN4 on European sites can be excluded.

This is an infrastructure management policy that supports the delivery of and protects existing community facilities across Surrey Heath. However, the provision of such facilities has no bearing on European sites.

Therefore, Policy IN4 is screened out from Appropriate Assessment.

	<p>marketed for a meaningful period with reasonable commercial terms and that there is no realistic interest in its retention as a community use.</p> <p>3) If a community facility is listed as an Asset of Community Value this will be a material planning consideration.</p>	
Policy IN5 – Green Infrastructure	<p>1) The Council, in partnership with other organisations, will plan for a network of accessible and integrated green infrastructure across the Borough and linked to adjoining areas. The Council will seek to strengthen the role of the green infrastructure network.</p> <p>2) The Council will support proposals which:</p> <ol style="list-style-type: none"> <li>a) Reinforce, link, buffer and create new green infrastructure; and</li> <li>b) Promote, manage and enhance public enjoyment of green infrastructure.</li> </ol> <p>3) Development proposals will not be permitted where they will result in the loss or fragmentation of existing green infrastructure assets/components or compromise the integrity of the green infrastructure network as set out in the Green Infrastructure Strategy, unless replacement provision or suitable alternative provision that is equivalent or better value in terms of quantity, quality and accessibility can be made.</p> <p>4) Any adverse impacts on the green infrastructure network should in the first instance be fully mitigated through the provision or improvement of green infrastructure on-site or where this is not possible, through appropriate off-site compensatory measures.</p> <p>5) Where new infrastructure is provided, suitable arrangements must be put in place for its future management and maintenance.</p>	<p>LSEs of Policy IN5 on European sites can be excluded.</p> <p>This is a positive infrastructure management policy that provides for a network of accessible and integrated green infrastructure across the borough. It prevents any adverse impacts on the connectivity of green infrastructure and specifies that a Green Infrastructure Strategy will be implemented.</p> <p>The provision of green infrastructure is a key element of mitigation against recreational pressure impacts in sensitive European sites, such as the Thames Basin Heaths SPA. Well connected and attractive greenspaces are more likely to help absorb recreational pressure locally.</p> <p>Therefore, Policy IN5 is screened out from Appropriate Assessment.</p>
Policy IN6 – Green Space	<p>1) Green spaces, as shown on the Policies Map are allocated for their visual amenity and/or recreational value.</p> <p>2) Development will not be supported on areas designated as green spaces, unless:</p> <ol style="list-style-type: none"> <li>a) For sites designated for their recreational value: <ol style="list-style-type: none"> <li>i. an evidenced assessment has been undertaken that clearly and robustly demonstrates re-provision can be made elsewhere of equivalent or better community benefit in terms of quality, quantity and accessibility; or</li> <li>ii. The development is for sports and recreation provision the need for which clearly outweighs the loss of green space; or</li> <li>iii. An assessment has been undertaken, which has clearly shown the open space to be surplus to requirements in meeting need in Surrey Heath over the plan period.</li> </ol> </li> </ol>	<p>LSEs of Policy IN6 on European sites can be excluded.</p> <p>This positive policy designates green spaces across Surrey Heath that will be protected from loss through development.</p> <p>The provision and preservation of green spaces is a key element of mitigation against recreational pressure impacts in sensitive European sites, such as the Thames Basin Heaths SPA. This is because the availability of green spaces locally is likely to help absorb recreational pressure.</p>

	<p>b) For sites designated for their visual amenity, it can be clearly demonstrated that the loss will not have a negative impact upon residential amenity and local character, and an element of open space will be incorporated into the development proposal.</p> <p>3) Development proposals that include existing areas of ancillary green open space that are not designated<sup>114</sup>, but none the less contribute to an areas character, should be assessed in accordance with Green Infrastructure Policy IN5 of this Plan.</p>	<p>Therefore, Policy IN6 is screened out from Appropriate Assessment.</p>
<p>Policy IN7 – Indoor and Built Sports and Recreational Facilities</p>	<p>1) Indoor and built sports and recreational facilities will be promoted by safeguarding existing facilities and supporting proposals for new and improved, refurbished, replacement or extended indoor and built sport and recreational facilities in sustainable locations.</p> <p>2) The loss of existing indoor and built sport and recreational facilities will be resisted unless replacement facilities of an equivalent or increased quantity and standard are proposed in a location that is accessible to the current catchment, unless it can be demonstrated that:</p> <p>a) The existing use is unviable; and</p> <p>b) There is no longer a need for the existing facilities or an alternative indoor and built sport and recreational use.</p>	<p>LSEs of Policy IN7 on European sites can be excluded.</p> <p>This positive policy safeguards existing indoor sports / recreational facilities, as well as promoting expansions of existing and new complexes.</p> <p>The provision and expansion of sports / recreational facilities is a key element of mitigation against recreational pressure impacts in sensitive European sites, such as the Thames Basin Heaths SPA. This is because the availability of sports facilities locally is likely to help absorb recreational pressure.</p> <p>Therefore, Policy IN7 is screened out from Appropriate Assessment.</p>
<p>Policy IN8 – Safeguarded Land For Future Public Transport Provision</p>	<p>1) The Borough Council and the County Council will safeguard land at the Sturt Road “chord”, Frimley Green, as shown on the Policies Map, to ensure that inappropriate development does not prejudice its future re-use for rail transport.</p>	<p>LSEs of Policy IN8 on European sites can be excluded.</p> <p>This infrastructure management policy safeguards land at Sturt Road for the provision of future public transport provision. However, the mere safeguarding of land has no bearing on European sites.</p> <p>Therefore, Policy IN8 is screened out from Appropriate Assessment.</p>

## Section 6: Environment

<sup>114</sup> For example, due to their size.

Policy E1 – Thames  
Basin Heaths Special  
Protection Area

- 1) The Council will only permit development where it is satisfied that this will not give rise to likely significant adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (SPA), which includes Thursley, Ash, Pirbright & Chobham Common Special Area of Conservation (SAC), whether alone or in combination with other development.
- 2) Net new residential development will not be permitted within the 'exclusion zone' set at 400m linear distance from the SPA boundary. Non-residential development proposals within 400m of the SPA will need to demonstrate that they will not harm the integrity of the SPA through an Appropriate Assessment.
- 3) All new residential (net) development within 5km of the Thames Basin Heaths Special Protection Area is considered to give rise to the possibility of likely significant effect. Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity and be subject to an Appropriate Assessment. These measures are unlikely to be acceptable unless agreed with Natural England.
- 4) Such measures will include:
  - a) All net new residential development will provide or contribute toward the provision of Suitable Alternative Natural Greenspace (SANGs).
  - b) SANGs will be provided at a standard of at least 8ha per 1,000 new occupants.
  - c) Developments of 10 or more net new dwellings will only be permitted within the identified catchment areas of SANGs.
  - d) All net new residential development will contribute toward Strategic Access Management and Monitoring (SAMM) measures.
- 5) Where further evidence robustly demonstrates that the integrity of the SPA can be protected using amended or alternative measures, the Council will agree these in consultation with Natural England.

LSEs of Policy E1 on European sites can be excluded.

This is an important policy from an HRA perspective as it aligns the Surrey Heath Local Plan with the mitigation framework that is in place for the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC (which largely overlaps the SPA).

It comprises the following key elements:

- A 400m exclusion zone surrounding these sites where no new residential development is permitted
- A 5km mitigation zone in which all new residential developments are required to contribute to Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM)

As such, this policy ensures that there will be no adverse effects of the Local Plan on these European sites in relation to recreational pressure.

Therefore, Policy E1 is screened out from Appropriate Assessment.

Policy E2 – Biodiversity  
and Geodiversity

- 1) Development proposal will be permitted where they will not have an adverse impact on biodiversity and/or geodiversity. Where harm or loss cannot be avoided, mitigation will be required such that it can be robustly demonstrate that:
  - a) There will be no adverse effect on the integrity of international, national and local designated sites;
  - b) There will be no adverse impact on the conservation status of priority species;
  - c) There will be no loss or deterioration of a priority habitat type, and/or irreplaceable habitat;
  - d) There will be no adverse impact on the conservation objectives of Biodiversity Opportunity Areas; and

LSEs of Policy E2 on European sites can be excluded.

This positive policy protects Surrey Heath's biodiversity and geodiversity assets. Importantly, it prevents adverse effects on the integrity of internationally designated sites, which automatically implies that the Plan should not result in HRA-relevant impacts.

	<p>e) There will be no adverse effect on the integrity of linkages between designated sites and priority habitats.</p> <p>2) The weight attributed to the protection of nature conservation interests will be commensurate to their status and significance<sup>115</sup>, and any other designation applying to the site, habitat or species concerned. For proposals that affect nationally protected sites, very special circumstances would be required to robustly demonstrate that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate compensation will be sought.</p> <p>3) Effective avoidance, mitigation and compensation will be secured through the imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures.</p> <p>4) Development proposals, where appropriate, will need to take full account of the impact on soils. Development will be expected to avoid the best and most versatile agricultural land. Areas of lower quality agricultural land should be used for development in preference to the best and most versatile agricultural land.</p>	<p>Therefore, Policy E2 is screened out from Appropriate Assessment.</p>
<p>Policy E3 – Biodiversity Net Gain</p>	<p>1) Development proposals will be permitted provided that they can demonstrate the provision of a minimum 20% increase in biodiversity units when set against the baseline biodiversity value and be in accordance with national guidance. This may include the creation, restoration, enhancement and subsequent maintenance of habitats and features. In cases where requisite/required/adequate on-site net gain provision is demonstrated not to be achievable, off site provision should be provided.</p> <p>2) Development proposals should seek to similarly provide environmental net gain, in accordance with national guidance. Development proposals will be expected to provide suitable ecological survey information and assessment to establish biodiversity net gains and the extent of any potential impact on ecological features.</p>	<p>LSEs of Policy E3 on European sites can be excluded.</p> <p>This is a policy that ensures the delivery of biodiversity net gain targets (of a minimum of 20% increase in biodiversity units) in development proposals. The policy also secures the provision of environmental net gain.</p> <p>The policy does not propose a quantum or location of residential / employment development.</p> <p>Therefore, Policy E3 is screened out from Appropriate Assessment.</p>
<p>Policy E4 – Pollution and Contamination</p>	<p><b>Pollution</b></p> <p>1) Development will be permitted provided that:</p> <p>a) It does not give rise to, or would be subject to, unacceptable levels of pollution<sup>116</sup>; and</p>	<p>LSEs of Policy E4 on European sites can be excluded.</p> <p>This is a policy that protects against potential adverse impacts of pollution and contamination arising from</p>

<sup>115</sup> As set out in paragraph 5.

<sup>116</sup> Pollution refers to anything that affects the quality of land, air, water or soils which might lead to an adverse impact on human health, quality of life, the natural environment or general amenity. It includes noise, vibration, light, air quality, radiation, dust, fumes or gases, odours or other effluvia, harmful substances, or degradation of soil and water resources.



- b) It is satisfactorily demonstrated through an assessment that any adverse impacts of pollution<sup>117</sup> will be adequately mitigated or otherwise minimised to an acceptable level<sup>118</sup>.
- 2) Where development is proposed on or near a site that may be impacted by, or may give rise to, pollution, such a proposal must be supported by an assessment that investigates the risks associated with the site and the possible impacts on the development, its future users and the natural and built environment. The assessment should propose adequate mitigation or remediation when required to achieve a safe and acceptable development. This assessment should be written in line with best practice guidance.
- 3) Development will only be permitted in an Air Quality Management Area<sup>119</sup> (AQMA) where it can be demonstrated that it will not have any adverse impacts to human health or lead to a deterioration of air quality within the AQMA.

**Land contamination**

- 4) Development proposals on land which is suspected of being affected by historic or current land contamination will be required to investigate the nature and risk of the contamination both on the development proposal and the wider environment. Where contamination is revealed, the applicant will be required to submit and implement a scheme of remediation that is appropriate to the proposed use and which demonstrates the development site no longer meets the statutory definition of contaminated land.

**Policy E5 – Renewable and Low Carbon Energy and Heating Schemes**

- 1) Proposals for stand-alone and community led renewable, low carbon and decentralised sources of energy and heating schemes will be supported<sup>120</sup> provided that there is no significant harm to local amenity or to the built, historic and natural environments, in accordance with other policies in this Plan.
- 2) Major development<sup>121</sup> proposals will be required to submit an energy statement demonstrating how the following will be applied and implemented in the proposal:
  - a) Supply energy efficiency, and;
  - b) Use of renewable energy.
- 3) Development proposals of more than 20 dwellings and/or non-residential development of over 1,000sqm or more of net additional floorspace will be required to incorporate measures to supply a minimum of 25% of the development's energy needs from renewable and/or low

development proposals. For example, development in Air Quality Management Areas will only be permitted where it will not lead to a deterioration in air quality.

The policy does not propose a quantum or location of residential / employment development.

Therefore, Policy E4 is screened out from Appropriate Assessment.

LSEs of Policy E5 on European sites can be excluded.

This policy supports low carbon, decentralised energy and heating schemes, provided they represent no significant harm to the natural environment. It also sets renewable energy targets for larger development proposals. While this is a positive policy for the environment, it has no direct HRA relevance.

<sup>117</sup> Including those from the proposed development, including demolition and construction phases, which impact sensitive development or the environment.

<sup>118</sup> In accordance with recognised national and international standards, guidance and methodologies, or any local authority adopted supplementary guidance.

<sup>119</sup> The current AQMA in the Borough is the strip of land from Frimley Road Camberley to Ravenswood Roundabout Camberley which embraces the M3 Motorway and the houses on both sides of the motorway which border the highway.

<sup>120</sup> Except for applications relating to repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan, in accordance with paragraph 154 of the NPPF.

<sup>121</sup> Of 10 or more dwellings.

carbon technologies, in accordance with national technical standards, unless it can be clearly demonstrated with evidence that this is not feasible and/or viable for this form of energy provision.

The policy does not propose a quantum or location of residential / employment development.

Overall, Policy E5 is screened out from Appropriate Assessment.

Policy E6 – Flood Risk and Sustainable Drainage

- 1) Flood zones in Surrey Heath Borough are defined based on the definitions contained within national Planning Practice Guidance (PPG)<sup>122</sup> and the Council's Strategic Flood Risk Assessment (Level 1)<sup>123</sup>.
- 2) To ensure that development in the Borough reduces flood risk and minimises the impact of flooding, the Council will:
  - a) Steer development to the areas with a lower risk of flooding;
  - b) Apply the Sequential Test and Exception Test to site selection informed by existing evidence, where applicable; in accordance with the Surrey Heath Strategic Flood Risk Assessment;
  - c) Consider all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses;
  - d) Apply the sequential approach to site layout by locating the most vulnerable uses in parts of the site at the lowest risk of flooding;
  - e) Assess the cumulative impacts of development on flood risk;
  - f) Account for the impacts of future climate change; and
  - g) Safeguard the 'undeveloped' flood zone for flood management purposes, with the exception of the provision of essential infrastructure.
- 3) Development in areas at high or medium risk of flooding, as identified in the latest Surrey Heath Strategic Flood Risk Assessment and Environment Agency flood risk maps will be permitted provided it is demonstrated that:
  - a) A site-specific flood risk assessment demonstrates that the development, including access and egress, will be safe for its lifetime. This should take account of climate change, not lead to increased flood risk elsewhere and, where possible, reduce flood risk overall;
  - b) The vulnerability of the proposed use is appropriate for the level of flood risk on the site;
  - c) Where required, the proposal passes the exemption test as outlined in the NPPF and national guidance;
  - d) Site drainage systems are designed to contain the flood risk of a 1 in 100 year storm event, applying the appropriate allowance for the type of development and;

LSEs of Policy E6 on European sites can be excluded.

This policy addresses flood risk in Surrey Heath Borough through the application of the Council's Strategic Flood Risk Assessment, Sequential Test and Exception Test. It considers all sources of flooding, including fluvial, surface water, groundwater and sewers. This approach is important because it helps protect water quality and level in ecosystems, including European sites.

The policy does not propose a quantum or location of residential / employment development.

Overall, Policy E6 is screened out from Appropriate Assessment.

<sup>122</sup> Flood risk and coastal change section of the PPG, available here: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

<sup>123</sup> Surrey Heath Strategic Flood Risk Assessment 2020 (or as updated).

- e) The scheme incorporates flood protection, flood resilience and resistance measures appropriate to the site, giving due consideration to any neighbouring land or property.
  - f) For development proposals in the developed flood zone 3b, the footprint of the proposed building(s) is no greater than that of the existing building(s) and there will be no increase in vulnerability.
- 4) All development proposals are required to demonstrate that drainage provisions will be adequate and will not result in an increase of surface water run-off. Development should promote SuDS (Sustainable Drainage Systems) to manage surface water drainage, within the curtilage of the development. Where SuDS are provided, fully detailed documentation must be provided with the locations of any assets, maintenance regime and ownership (costs liability) clearly stated. Arrangements must also be put in place for the ongoing management and/or repair of any SuDS systems over their full lifetime. SuDS should:
- a) Ensure that surface water containment with any associated flood risk is managed as close to the source as possible and does not increase flood risk elsewhere;
  - b) Accord with all relevant building regulations, current at the time of development;
  - c) Where appropriate, discharge of surface water to watercourse or sewer system is not to exceed pre-development (greenfield) runoff rates;
  - d) Ideally be designed as multi-functional, incorporating storage (attenuation) into landscaping and public realm to improve amenity and biodiversity;
  - e) Be designed with due consideration for ease of future maintenance and meeting potential climate change needs.
- 5) Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided if it can be demonstrated, through technical detail, that there will be no adverse impact on the quality of groundwater resource and it does not put any risk of the ability to maintain public water supplies.

Policy E7 – Landscape  
Character

- 1) Development proposals will be permitted which respond to and wherever possible enhance the special character, key positive landscape attributes, value and landscape setting of settlements.
- 2) Development proposals should demonstrate that:
  - a) They can integrate with, and positively contribute to the landscape character of the area;
  - b) They are sited and designed so as to avoid any adverse impact on key positive landscape attributes identified in relevant Landscape Character Assessments and Landscape Sensitivity Studies;
  - c) They are sited and designed to minimise landscape and visual impacts, in line with the analysis, guidance and strategies provided in relevant Landscape Character Assessments and Landscape Sensitivity Studies

LSEs of Policy E7 on European sites can be excluded.

This development management policy protects Surrey Heath's landscape character. While positive, preservation of the landscape character has no bearing on European sites.

The policy does not propose a quantum or location of residential / employment development.

- d) They consider cumulative impacts with other existing and proposed development;
  - e) There is no adverse impact on historic landscapes and registered parks and gardens; and
  - f) They respect the role the landscape plays in the setting of settlements as set out in relevant landscape sensitivity or other study.
- 3) Where development proposals will have an impact on the landscape, a comprehensive landscaping proposal to show how the development would successfully integrate with the landscape and surroundings will be required.

Overall, Policy E7 is screened out from Appropriate Assessment.

## Section 7: Green Belt and Countryside

Policy GBC1 –  
Development of New  
Buildings within the  
Green Belt

### New Buildings

- 1) The construction of new buildings in the Green Belt is considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.
- 2) Development proposals will only be permitted where they are consistent with the exceptions listed in national planning policy and are consistent with Green Belt policies within the Local Plan.
- 3) Where new buildings are proposed to replace buildings that are not lawful or are temporary in nature, the loss of these will not be taken into account in assessing the proposal.

### Replacement Buildings

- 4) The replacement of an existing, lawful building with a new building in the same use will be permitted where it does not cause material harm to the openness of the Green Belt. Proposals for replacement buildings, will be permitted where:
  - a) The floor space, volume and height of the resultant building, is not materially larger than that it is to replace; and
  - b) The siting or the position of the proposed building substantially overlaps that of the original building.

### Proposals affecting Previously Developed Land

- 5) The limited infilling or partial or complete redevelopment of previously developed land will be permitted where it is in line with national policy.
- 6) In assessing proposals for the partial or complete redevelopment of previously developed land, regard will be had to:
  - a) The existing and proposed floor space and volume of the development;
  - b) The general height and storeys of existing and proposed buildings and their disposition around and within the site.

LSEs of Policy GBC1 on European sites can be excluded.

This positive development management policy protects Surrey Heath's Green Belt from new buildings, unless very special circumstances can be demonstrated. Replacement buildings or proposals affecting previously developed land will be permitted in line with national policy.

The policy does not propose a quantum or location of residential / employment development.

Overall, Policy GBC1 is screened out from Appropriate Assessment.

	<p><b>Limited Infilling</b></p> <p>7) Exceptionally, limited infilling may be acceptable within the Green Belt outside of defined settlement areas as designated on the Policies Map where it can be demonstrated that the site should be considered to be within the village, such applications will be determined on a case-by-case basis</p> <p><b>Other development</b></p> <p>8) Certain other forms of development are also considered not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, and these are listed in the NPPF.</p>	
<p>Policy GBC2 – Development of Existing Buildings within the Green Belt</p>	<p><b>Extensions or alterations to an existing building</b></p> <p>1) The extension or other alteration of a building will be permitted where it does not result in disproportionate additions over and above the size of the original building and does not cause material harm to the openness of the Green Belt. In assessing proposals for the extension or alteration of existing buildings, regard will be had to:</p> <ul style="list-style-type: none"> <li>a) The floor space, volume and height of the proposed development together with any previous extensions or enlargements, including works carried out under permitted development;</li> <li>b) Any changes to roof form;</li> <li>c) Alterations to footprint which may increase the spread and site coverage or materially increase the prominence of the building.</li> </ul> <p><b>Re-use of buildings</b></p> <p>2) The re-use of buildings will be permitted where proposals preserve the openness of the Green Belt. In assessing proposals for replacement buildings, regard will be had to:</p> <ul style="list-style-type: none"> <li>a) The condition of the building, which must be structurally sound and capable of conversion without major alterations, adaptations or reconstruction;</li> <li>b) The extent of ancillary works or features required to support the re-use of the building, such as external storage, hardstanding, car parking, boundary walling or fencing and the impact that this would have upon the openness and character of the Green Belt;</li> <li>c) Whether the proposal would restore/retain a building of architectural or historic interest.</li> </ul>	<p>LSEs of Policy GBC2 on European sites can be excluded.</p> <p>This development management policy provides further guidance on the (re)development of existing buildings in the Green Belt. For example, alterations to buildings should not result in additions to the size of existing buildings.</p> <p>The policy does not propose a quantum or location of residential / employment development.</p> <p>Overall, Policy GBC2 is screened out from Appropriate Assessment.</p>
<p>Policy GBC3 – Equestrian Facilities</p>	<p>1) Equestrian related development within the Green Belt and Countryside beyond the Green Belt will be permitted where the following criteria are met:</p> <ul style="list-style-type: none"> <li>a) The amount of development proposed is demonstrated to be reasonably related to its intended use and the amount of pasture land available;</li> <li>b) The re-use of existing buildings is prioritised;</li> </ul>	<p>LSEs of Policy GBC3 on European sites can be excluded.</p> <p>This development management policy supports equestrian facilities, provided that several criteria are met. For example, such facilities should not have a</p>

- c) Any new development required to accommodate the use has been demonstrated to be necessary and are suitable in respect of their siting, design, scale, layout, external materials and appearance;
  - d) The proposal would not adversely impact upon the character of the landscape, the nature conservation value of the land and the quality of the pasture, by reason of overgrazing or otherwise;
  - e) The development would not have a detrimental effect on the amenity of neighbouring properties and the wider local area by reason of noise, smell, overlooking, light pollution or other general disturbance in accordance with Policy E4; and
  - f) The development is sustainably located in terms of general accessibility and in relation to the existing bridleway network, and will not result in the over-use or deterioration of bridleways nor cause a hazard to other highway users.
- 2) In addition to the criteria above, proposals for equestrian facilities within the Green Belt will be expected to preserve the openness of the Green Belt and not conflict with the Green Belt purposes and be consistent with Policies GBC1 and GBC2.

detrimental impact on the nature conservation value of land and must be sustainably located in relation to the existing bridleway network.

The policy does not propose a quantum or location of residential / employment development.

Overall, Policy GBC3 is screened out from Appropriate Assessment.

Policy GBC4 –  
Development within the  
Countryside

- 1) The Council will protect areas of countryside for their intrinsic character and beauty. Development within the countryside beyond the Green Belt will only be permitted where it meets one or more of the following:
  - a) It consists of the re-use of a permanent and lawful building for alternative uses;
  - b) It comprises an extension or the replacement of an existing building;
  - c) It would meet proven essential need of a rural worker to live permanently at or near their place of work;
  - d) It supports the development or diversification of agricultural and other land-based enterprises;
  - e) It would provide for the growth and expansion of businesses in rural areas in accordance with Policy ER5;
  - f) It consists of operational development directly linked to institutional and other facilities and the need is proven;
  - g) It provides an exception site suitable for first time buyers in line with Policy H10 – First Homes Exception Sites;
  - h) It relates to the partial or complete redevelopment of previously developed land;
  - i) Provides small scale, informal recreation facilities required in association with a new or existing outdoor recreation use; and,
  - j) Other minor forms of development ancillary to the development/uses set out above.
- 2) Development within the countryside must:

LSEs of Policy GBC4 on European sites can be excluded.

This development management policy protects the borough's countryside for its intrinsic character and beauty. Development will only be permitted if certain criteria are met, such as the proven essential need for rural workers.

The policy does not propose a quantum or location of residential / employment development.

Overall, Policy GBC4 is screened out from Appropriate Assessment.

	<ul style="list-style-type: none"> <li>a) Not lead to harmful physical or visual coalescence between settlements;</li> <li>b) Be sustainable for the proposed use and of a high quality of design;</li> <li>c) Not cause unacceptable harm and where possible, enhance the open character and integrity of the countryside.</li> </ul> <p>3) The Council will encourage schemes that result in environmental and landscape improvement, enhance biodiversity and nature conservation, and support better accessibility by sustainable means.</p>	
<p>Policy GBC5 – Gordons School</p>	<ul style="list-style-type: none"> <li>1) Proposals for redevelopment or infilling on the site as shown on the Policies Map should not have a greater impact on the openness of the Green Belt than the existing development in line with Policies GBC1 and GBC2.</li> <li>2) In addition, development proposals should: <ul style="list-style-type: none"> <li>a) Form part of a comprehensive masterplan for the site; and</li> <li>b) Not affect the significance or setting of the Grade II listed buildings within the site in line with Policy DH7; and</li> <li>c) Not exceed the general height of the existing buildings; and</li> <li>d) Demonstrate that there are no alternative locations for the proposed development on site that will have a more minimal impact on the openness of the Green Belt or on heritage assets; and</li> <li>e) Incorporate sympathetic boundary treatment to mitigate the visual impact of the School site on the surrounding countryside.</li> </ul> </li> </ul>	<p>LSEs of Policy GBC5 on European sites can be excluded.</p> <p>This development management policy establishes redevelopment criteria for the Gordons School site. For example, proposals should not exceed the general height of existing buildings.</p> <p>The policy does not propose a quantum or location of residential / employment development.</p> <p>Overall, Policy GBC5 is screened out from Appropriate Assessment.</p>

**Section 8: Design and Heritage**

<p>Policy DH1 – Design Principles</p>	<ul style="list-style-type: none"> <li>1) All development must achieve a high standard of design that positively contributes to placemaking. Development proposals should be design-led and will be of a high quality and inclusive design that respects local distinctiveness and utilises opportunities to improve the character and quality of the area.</li> <li>2) Development will be permitted where it is demonstrated that it: <p><b>Local character</b></p> <ul style="list-style-type: none"> <li>a) Respects the distinct local character of the area and responds to and reinforces locally distinct patterns of development and their rural, village or urban setting paying particular regard to height, scale, materials, massing and bulk.</li> <li>b) Incorporates a level of architectural detail and use of materials that responds to the distinct local character of the area.</li> <li>c) Protects trees and other vegetation worthy of retention and includes high quality hard and soft landscaping that respects the distinct local character.</li> </ul> </li> </ul>	<p>LSEs of Policy DH1 on European sites can be excluded.</p> <p>This policy establishes the design principles that are to be applied in new developments across the borough. These principles relate to local character, residential amenity, climate change, accessibility and crime prevention. For example, developments should maximise pedestrian and cycle permeability. Providing for good connectivity with sustainable transport modes is a key approach to mitigating for atmospheric pollution.</p>
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- d) Would not have a detrimental impact upon heritage assets or their setting, in line with their significance.

**Residential amenity**

- e) Provides a high standard of residential amenity, including privacy and amenity space for future occupants appropriate to the proposed use.
- f) Would not adversely affect the amenities enjoyed by the occupants of neighbouring properties, having regard to loss of daylight and sunlight, loss of privacy, overbearing impact and pollution.

**Climate Change**

- g) Contributes positively towards climate change mitigation and adaptation by incorporating measures to reduce environmental impact and build resilience in accordance with Policy SS3b.

**A Healthy Place**

- h) Enables and supports healthy lifestyles, in accordance with Policy SS3, taking into account the design of buildings and neighbourhoods.

**Safe, connected and efficient places**

- i) Maximises permeability to enable good pedestrian and cycle movement through the development to support healthy living and the creation of a high quality public realm.
- j) Connects appropriately to existing street patterns, taking into account connectivity with the surrounding area, local services and, where relevant, the relationship and connectivity between the development and other sites allocated under Policy HA1 – HA4.
- k) Successfully integrates functional needs such as refuse, recycling, bicycle and car parking.
- l) Takes account of the needs and practicalities of services and long term management of public and shared private spaces and facilities.
- m) Maximises the opportunity for linkages between green spaces and public places.

**Crime prevention and security measures**

- n) Would reduce opportunities for crime and antisocial behaviour through the layout, specification and positioning of buildings, spaces and uses in line with national Secured by Design standards.
- o) Provides a safe and legible structure for public realm and private spaces.

**Access and inclusion**

- p) Meets the needs of all users, taking into account the setting of the building in the wider environment, the location of buildings within the site, the gradient of the plot, transport infrastructure and public realm.

The policy does not propose a quantum or location of residential / employment development.

Overall, Policy DH1 is screened out from Appropriate Assessment.



- q) Is flexible towards future adaptation in response to changing life needs.

**Infrastructure to create smart places**

- r) Includes provision of up to date digital communications infrastructure in accordance with Policy IN3.
- 3) In developing proposals, regard should be had to local design and character guidance contained within Conservation Area Appraisals, Neighbourhood Plans and Supplementary Planning Documents (SPDs).

**Policy DH2 – Making Effective Use of Land**

- 1) Residential development will be permitted where it makes efficient use of land, in a manner compatible with the site itself and the local character of the area.
- 2) Site allocations will be expected to deliver the minimum density specified within Policies HA1 – HA5 of the Local Plan. Proposals for all other major<sup>124</sup> residential developments are expected to achieve the following minimum net densities, based on their location in the Borough:

Location	Minimum Net Density (dwellings per hectare)
Camberley Town Centre	100dph
Sites within 800m walking distance of railway stations at: <ul style="list-style-type: none"> <li>• Bagshot;</li> <li>• Frimley;</li> <li>• Blackwater;</li> <li>• Camberley (outside of Camberley Town Centre).</li> </ul>	70dph
The Western Urban Area, comprising: <ul style="list-style-type: none"> <li>• Bagshot;</li> <li>• Deepcut;</li> <li>• Frimley;</li> <li>• Frimley Green;</li> <li>• Mytchett.</li> </ul>	40dph
Defined Settlement Areas of: <ul style="list-style-type: none"> <li>• Bisley;</li> </ul>	30dph

LSEs of Policy DH2 on European sites can be excluded.

This policy secures effective land use across the borough, which is positive as it minimises the loss of greenfield land. The policy stipulates the minimum density of dwellings to be delivered in different settlements of Surrey Heath.

The policy does not propose a quantum or location of residential / employment development.

Overall, Policy DH2 is screened out from Appropriate Assessment.

<sup>124</sup> In line with The Town and Country Planning (Development Management Procedure) (England) Order 2010, major development means the number of dwellings to be provided is 10 or more, the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more or development is to be carried out on a site having an area of 1ha or more.

	<ul style="list-style-type: none"> <li>• Chobham;</li> <li>• Lightwater;</li> <li>• West End; and,</li> <li>• Windlesham (including Snows Ride).</li> </ul>		
<p>Policy DH3 – Residential Space Standards</p>	<p>3) Proposals that do not meet these density standards will only be permitted where it has been demonstrated that development at the identified density would be inappropriate.</p> <p>4) Proposals for minor residential development are expected to demonstrate how they have achieved an efficient use of land.</p>	<p>1) Where planning permission is required, proposals for new residential development (Use Class C3) must ensure that the internal layout and size meet up-to-date nationally described technical housing standards for minimum internal space requirements.</p>	<p>LSEs of Policy DH3 on European sites can be excluded.</p> <p>This policy establishes that proposals for new residential development will need to meet national housing standards with regard to internal layout and size.</p> <p>The policy does not propose a quantum or location of residential / employment development.</p> <p>Overall, Policy DH3 is screened out from Appropriate Assessment.</p>
<p>Policy DH4 – Sustainable Water Use</p>	<p>1) All new homes are required to meet the water efficiency standard of 110 litres per person per day, to be achieved through compliance with the Building Regulations.</p> <p>2) New non-residential development of 1,000 sq. m. gross external area (GEA) or more will provide evidence on completion, through the submission of a post-construction BREEAM certificate, of achievement of the BREEAM 'excellent' standard for water consumption (or any national equivalent).</p> <p>3) The storage and use of rainwater in new developments (greywater recycling) for non-potable uses is encouraged in order to further reduce the need to draw upon limited resources.</p>	<p>1) All new homes are required to meet the water efficiency standard of 110 litres per person per day, to be achieved through compliance with the Building Regulations.</p> <p>2) New non-residential development of 1,000 sq. m. gross external area (GEA) or more will provide evidence on completion, through the submission of a post-construction BREEAM certificate, of achievement of the BREEAM 'excellent' standard for water consumption (or any national equivalent).</p> <p>3) The storage and use of rainwater in new developments (greywater recycling) for non-potable uses is encouraged in order to further reduce the need to draw upon limited resources.</p>	<p>LSEs of Policy DH4 on European sites can be excluded.</p> <p>This positive policy sets a water efficiency standard of 110 litres per person per day, to be achieved through Building Regulations. Furthermore, the storage and use of rainwater in new developments (greywater recycling) is encouraged to relieve pressure on water resources.</p> <p>The policy does not propose a quantum or location of residential / employment development.</p>

		Overall, Policy DH4 is screened out from Appropriate Assessment.
Policy DH5 – Trees	<ol style="list-style-type: none"> <li>1) Development proposals will be permitted where: <ol style="list-style-type: none"> <li>a) It can be demonstrated that trees, hedgerows and woodland of amenity or other value can be retained as an integral part of the design of development unless the requirements of 2) have been met; and</li> <li>b) Sufficient space is provided for trees and other vegetation to mature; and</li> <li>c) Provision is made for the care and protection of existing trees and hedgerows to be retained prior to, during and after the construction process, including measures for the long term management and maintenance of existing and new trees and landscaping.</li> </ol> </li> <li>2) Development will not be permitted which involves felling, significant pruning works (either now or in the foreseeable future) and/or potential root damage to trees of amenity or other value, unless one of the following circumstances apply: <ol style="list-style-type: none"> <li>a) their long-term survival would be compromised by their age or physical condition (except in cases of ancient or veteran trees); or</li> <li>b) there are exceptional and demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity and other value of the trees.</li> </ol> </li> <li>3) Where proposals would result in the loss of trees, appropriate replacement planting should be provided such that there is no net loss in the biomass equal to the original tree.</li> <li>4) Landscaping is an integral element in layout design. Trees and landscaping schemes for new residential development and commercial floorspace will be expected to: <ol style="list-style-type: none"> <li>a) Provide new trees appropriate to the landscape profile of the area;</li> <li>b) Ensure that, by nature of their location and species choice, they are designed so as to facilitate adaptation to climate change by providing shade, shelter and cooling; and,</li> <li>c) Provide sufficient space between development and the highway to enable new streets to be tree lined.</li> </ol> </li> <li>5) Trees and landscaping schemes, by nature of their location and species choice should ensure that they are designed so as to facilitate adaptation to climate change by providing shade, shelter and cooling.</li> </ol>	<p>LSEs of Policy DH5 on European sites can be excluded.</p> <p>This positive policy protects trees across Surrey Heath Borough. For example, trees, hedgerows and woodland are to be retained in new developments. Furthermore, the felling of and significant surgery to trees of significant value is not permitted. While positive for the environment, this policy has no direct relevance to European sites.</p> <p>The policy does not propose a quantum or location of residential / employment development.</p> <p>Overall, Policy DH5 is screened out from Appropriate Assessment.</p>
Policy DH6 – Shopfronts, Signage and Advertisements	<ol style="list-style-type: none"> <li>1) Development proposals for new, or changes to, existing shop fronts will be permitted where they: <ol style="list-style-type: none"> <li>a) Relate well to the building in which they are situated, having regard to scale, proportions, vertical alignment, architectural style and materials;</li> </ol> </li> </ol>	<p>LSEs of Policy DH6 on European sites can be excluded.</p> <p>This development management policy relates to the provision of shopfronts, signage and advertisements</p>

	<ul style="list-style-type: none"> <li>b) Present an open and active frontage to the street;</li> <li>c) Retain and restore where possible existing historic shopfronts and features of architectural interest;</li> <li>d) Take account of good architectural features of neighbouring shop fronts so that the development will fit in well with the street scene particularly if located within a conservation area or on a heritage asset.</li> </ul> <p>2) Advertisement consent will be granted where:</p> <ul style="list-style-type: none"> <li>a) The location, scale, proportions, form of illumination, design and materials of the advert respects the character and appearance of the host building (including any historic significance), site and area;</li> <li>b) The number of adverts is kept to a minimum to ensure that there is no harmful cumulative impact on the host building and/or the amenity of the area; and</li> <li>c) There is no harmful impact to public safety or residential amenity.</li> </ul>	<p>across Surrey Heath. However, these features have no bearing on European sites.</p> <p>The policy does not propose a quantum or location of residential / employment development.</p> <p>Overall, Policy DH6 is screened out from Appropriate Assessment.</p>
<p>Policy DH7 – Heritage Assets</p>	<ul style="list-style-type: none"> <li>1) Proposals for development that affects heritage assets (designated and non-designated) will be supported where they conserve and enhance the significance, special interest and character and appearance of the heritage asset and its setting.</li> <li>2) Proposals that would affect a designated or non- designated heritage asset must be supported by a heritage impact statement proportionate to the importance of the heritage asset and the potential impact of the proposal.</li> </ul> <p><b>Designated Heritage Assets</b></p> <ul style="list-style-type: none"> <li>3) Development proposals affecting designated heritage assets (Listed Buildings, Scheduled Monuments, and Historic Parks and Gardens) or their setting will be supported where they preserve and/or enhance the special character, appearance and distinctiveness of Surrey Heath’s historic environment in a manner appropriate to their historic significance.</li> <li>4) Great weight and importance will be attributed to preserving the significance of a designated heritage asset, irrespective of the potential level of harm.</li> <li>5) Proposals which would result in substantial harm to, or the complete loss of the significance of a designated heritage asset, or its setting, will not be approved unless: <ul style="list-style-type: none"> <li>a) The nature of the heritage asset prevents all reasonable uses of the site;</li> <li>b) No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;</li> <li>c) Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and,</li> <li>d) The harm or loss is outweighed by the substantial public benefit of bringing the site back into use.</li> </ul> </li> </ul>	<p>LSEs of Policy DH7 on European sites can be excluded.</p> <p>This development management policy protects the borough’s designated heritage assets and conservation areas, including listed buildings, scheduled monuments and historic parks and gardens. However, heritage assets have no bearing on European sites.</p> <p>The policy does not propose a quantum or location of residential / employment development.</p> <p>Overall, Policy DH7 is screened out from Appropriate Assessment.</p>

- 6) Where the development proposal would result in less than substantial harm to the significance of the designated heritage asset or its setting, this harm must be weighed against the public benefit of the proposal including, where appropriate, securing its optimum viable use. Clear and extensive justification for the harm should be set out in full in the Heritage Impact Statement.
- 7) Where there is a clear and convincing justification for the loss or partial loss of a heritage asset the Council will seek public benefits by requiring developers to investigate and record the features affected and provide publicly accessible interpretation which is appropriate to the scale and level of interest of the heritage asset.
- 8) Development proposals that affect Historic Parks and Gardens will be assessed by reference to the scale of harm, both direct and indirect, or loss to and the significance of the park or garden.

#### **Conservation Areas**

- 9) In accordance with legislation<sup>125</sup>, the Council has a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas in the Borough.
- 10) When considering development proposals within or adjoining a conservation area, including the alteration, extension or change of use of a building, the Council will support proposals which preserve or enhance:
  - a) existing architectural and historic character and associations by having regard to the positioning and grouping, form, scale, massing, detailing of development and the use of materials in its construction; and
  - b) areas of townscape quality; and
  - c) existing hard and soft landscaping features including areas of open space, trees, hedges, walls, fences, watercourses and surfacing and the special character created by them; and
  - d) the setting of the conservation area
- 11) Proposals that would have a detrimental effect on such features will not be permitted. Built development will not be permitted on public and private open spaces within or adjacent to conservation areas where those spaces make a positive contribution to its character or setting, as identified in the conservation area appraisal, unless it can be demonstrated that the public benefit demonstrably outweighs the harm.

#### **Archaeological Sites**

- 12) The Council will support development proposals which do not adversely affect nationally significant features of archaeological or historic importance or their setting.

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<sup>125</sup> The Planning (Listed Building and Conservation Areas) Act 1990.

- 13) Where a development has the potential to affect heritage assets with archaeological interest, the applicant will be required to submit an appropriate desk-based assessment and where necessary a field evaluation.
- 14) For scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equal significance to scheduled monuments, loss or substantial harm (through the removal of remains) should be wholly exceptional.
- 15) Within Areas of High Archaeological Potential or County Sites of Archaeological importance, as identified on the Proposals Map, or outside of these areas on any major development site of 0.4ha or greater, applicants will be required to undertake prior assessment of the possible archaeological significance of the site and the implications of their proposals, and will be required to submit, as a minimum, a desk-based assessment to accompany any application. Where desk-based assessment suggests the likelihood of archaeological remains, the Planning Authority will require the results of an archaeological evaluation in order to inform the determination of the application. Prospective developers should also refer to the Historic Environment Record to establish whether there is known or potential archaeological interest and the need for investigation and evaluation at an early stage.

**Non-designated heritage assets**

- 16) Planning permission will only be granted for development affecting a local heritage asset or its setting if it is demonstrated that due regard has been given to the impact on the assets significance and its setting and that it is demonstrated that the significance of the asset and its conservation has informed the design of the proposed development. In determining whether planning permission should be granted for a development proposal, which affects a local heritage asset, consideration will be given to the significance of the asset, the extent of impact on its significance, as well as the scale of any harm or loss to the asset as balanced against the public benefits that may result from the development proposals.
- 17) The re-use of vacant or underused locally listed buildings will be supported where they contribute positively to their conservation either individually or as part of wider strategies for regeneration.

**Buildings at Risk**

- 18) The Council will take a proactive stance to any heritage assets that may be at risk. This will include working with property owners to find a use that will enable the building at risk to be put back in to use.

Policy DH8 – Building  
Emission Standards

- 1) Proposals for zero carbon development are strongly supported. Planning permission will be granted for development which positively contributes to addressing climate change through low/zero carbon design that improves the energy efficiency of both new and existing buildings and provides low or zero carbon energy.
- 2) Development proposals for residential buildings will be supported where they adopt the fabric

LSEs of Policy DH8 on European sites can be excluded.

This development management policy promotes low / zero carbon design in new developments. Furthermore, it stipulates that non-residential

first<sup>126</sup> approach to contribute significantly towards achieving carbon emission reductions in accordance with Policy SS3.

- 3) Development proposals for non-residential buildings will be required to achieve final certification standards against the Building Research Establishment's Environmental Assessment Method (BREEAM) and/or CEEQUAL (or equivalents) as indicated in the table below. Development proposals which exceed these ratings will be supported and encouraged.

Development Type	Scale	2021-2029	2020-2037
New and Refurbished Non-Residential	500-5,000m <sup>2</sup>	BREEAM Very Good	BREEAM Excellent
	>5,000m <sup>2</sup>	BREEAM Excellent	
Public realm	Major works	CEEQUAL Very Good	CEEQUAL Excellent

- 4) Proposals with an estimated cost of £300,000 or above will be required to submit a Site Waste Management Plan (SWMP) which demonstrates how recycling and reuse will be maximised and carbon emissions minimised.

buildings will require assessment against BREEAM standards. While positive for the environment, this policy has no direct bearing on European sites.

The policy does not propose a quantum or location of residential / employment development.

Overall, Policy DH8 is screened out from Appropriate Assessment.

<sup>126</sup> See supporting text.

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