

SURREY HEATH BOROUGH COUNCIL

BIODIVERSITY DUTY REPORT 2026



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I. Introduction

What is the Biodiversity Duty

The Biodiversity Duty requires public authorities to take steps for conserving and enhancing biodiversity in England.

When originally enacted, Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 required that *‘every public authority must, in exercising its functions, have regard, as far as is consistent with the proper exercise of these functions, to the purpose of conserving biodiversity’*. Section 102 (‘General duty to conserve and enhance biodiversity’) and Section 103 (‘Biodiversity reports’) of the Environment Act 2021 then amended Section 40 of the NERC, to strengthen the previous requirement.

[Guidance on the Biodiversity Duty](#) sets out that:

Public authorities who operate in England must consider what they can do to conserve and enhance biodiversity in England. This is the strengthened ‘biodiversity duty’ that the Environment Act 2021 introduces.

This means that, as a public authority, you must:

- 1. Consider what you can do to conserve and enhance biodiversity.*
- 2. Agree policies and specific objectives based on your consideration.*
- 3. Act to deliver your policies and achieve your objectives.*

The initial action for Local authorities was to complete a First Considerations Report covering what action is being, or could be taken, to improve biodiversity in the local area. This is publicly available on our website within the Climate Change subsection.

This Biodiversity Duty Report follows the First Consideration Report. The document opens by discussing the differing habitat and biodiversity that exists



within the Brough. It then goes on to list the current policies the Council has in place that benefit biodiversity, before reporting on Biodiversity Net Gain (BNG). Finally, actions taken so far to enhance biodiversity are reviewed and a future action plan is presented.

Biodiversity in the Borough

Surrey Heath supports a wide range of habitats that are of high value for biodiversity, including areas that sustain rare species and distinctive ecological communities. Much of this biodiversity has developed through long-established land management practices such as common grazing and hay meadow management, shaped by the borough's sandy soils and the fertile alluvial deposits found in its river valleys. Together, these factors have created landscapes of significant ecological importance.

Heathlands represent the most important biodiversity resource in the borough, with large areas such as Chobham Common forming complex mosaics of dry heath, wetter mires and acid grasslands. These habitats support a range of specialist species, including rare ground-nesting birds, native reptiles and notable invertebrates such as the Silver-studded Blue butterfly. Their ecological importance is reflected in international conservation designations, including Special Protection Areas and Special Areas of Conservation.

The borough's river valleys also contribute significantly to biodiversity, particularly where traditional grazing and hay-making practices have shaped species-rich meadows. Areas such as Chobham Water Meadows and parts of the Blackwater Valley support plants and wildlife associated with semi-natural grassland habitats, which are increasingly rare and play an important role in maintaining ecological diversity.

Wetland habitats further enhance the natural environment of Surrey Heath. The Basingstoke Canal is designated as a Site of Special Scientific Interest. Meanwhile



numerous ponds across the borough provide essential breeding and refuge habitats for species such as the Great Crested Newt, alongside a range of other amphibians and invertebrates.

Woodlands also form a key part of the borough's ecological network. These include deciduous and ancient woodlands, wet woodlands associated with watercourses, and areas of wood pasture such as Bagshot Park. Together, these habitats support diverse wildlife communities and contribute to long-term ecological resilience.

Urban areas, such as Camberley, play an increasingly important role in supporting nature and human well-being. Green infrastructure provides vital ecosystem services, including cooling during hot weather, absorption of rainfall to reduce flooding, and improved air quality. They also function as wildlife corridors, helping species move between habitats across the borough.

Despite these valuable habitats, Surrey Heath has experienced significant biodiversity loss in recent decades. Around one third of Surrey's native species are now at risk or have already been lost, with 509 species recorded as locally extinct ([The State of Surrey's Nature](#), 2017). This is driven by habitat destruction, development pressures, changes in land management and the growing impacts of climate change. Reversing these trends will require coordinated action by local authorities, landowners, developers and residents to conserve and restore habitats, ensuring a healthier environment for both wildlife and people.



2. Policies for Biodiversity

The Council has a number of policies and strategies which support biodiversity in the Borough. A high-level summary of each of these is provided below.

Council Strategy 2024 – 2028

Sets five medium-term priorities, including strong environmental stewardship. Commits the Council to net-zero carbon, protecting and enhancing the natural environment, increasing biodiversity, and maintaining clean and green spaces.

Annual Plan 2024/25

Delivers the Council Strategy through specific annual projects and targets. Includes cross-service actions to protect and enhance the environment and biodiversity.

Climate Change Action Plan

Sets out actions to achieve net-zero carbon by 2030 and improve climate resilience. Includes measures across energy, transport, environment, behaviour change and Council operations, with regular progress updates.

Tree Strategy and Action Plan 2023-2033

Provides a long-term framework for tree planting, canopy protection and tree management. Promotes native planting, community involvement and education initiatives.

Thames Basin Heaths Special Protection Area Delivery Framework

Protects sensitive heathland habitats from the impacts of development. Controls development near the SPA and requires mitigation through Suitable Alternative Natural Greenspace (SANG).



Surrey Heath Adopted Core Strategy (2011 to 2028)

Sets the current planning policy framework for development management. Key policies protect designated biodiversity sites, require ecological assessment and mitigation, and safeguard green infrastructure.

Surrey Heath Submission Local Plan (2019 to 2038)

Strengthens biodiversity protection and enhancement through updated planning policies. Requires a minimum 20% Biodiversity Net Gain, protects priority habitats and supports habitat connectivity and nature recovery.

Contract with Ecology Planning Advice Service, Surrey Wildlife Trust

Provides specialist ecological advice to support planning decisions. Includes advice on protected species and Biodiversity Net Gain requirements.

Biodiversity Net Gain Guidance and requirements

Sets out how Biodiversity Net Gain must be delivered in Surrey Heath. Requires a minimum 20% net gain and is supported by trained officers and specialist ecological advice.

Byelaws for Green spaces

Apply to all Council-managed parks and green spaces. Used to protect the natural environment and support biodiversity management.

Local Plan Annual Monitoring Report, including SSSI condition report

Monitors the effectiveness of planning policies, including biodiversity outcomes. Reports on the condition of all SSSIs in the borough based on Natural England assessments.



Biodiversity Opportunity Area Policy Statements (Surrey Nature Partnership)

Identify priority areas for habitat restoration and ecological connectivity. Guide landscape-scale biodiversity enhancement, particularly for heathlands and river corridors.

Surrey Local Nature Recovery Strategy (Produced by SCC)

Surrey County Council (SCC) have led the development of Surrey's Local Nature Recovery Strategy with Surrey Heath Borough Council offering support and comments. This is due to be published around Easter 2026. The document sets county-wide priorities and spatial mapping for nature recovery. It will also become a material consideration in planning decisions.



3. Biodiversity Net Gain (BNG) Monitoring

Securing Biodiversity Gains in Planning Applications

For the period from the introduction of Biodiversity Net Gain in 2024, up to 31st December 2025, Surrey Heath Borough Council has applied Biodiversity Net Gain requirements in the determination of planning applications, as follows:

- 17 permissions have been granted which required to achieve BNG.
- 0 final Biodiversity Gain Plans (BGPs) have been approved, at Discharge of Condition stage.

Details of increases in Biodiversity Units will be monitored as BGPs are approved in the future.

Using Council Land for a Biodiversity Gain Site

The Council has investigated the use of council land to provide a strategic Biodiversity gain site to supply off-site biodiversity units to developers. Windlemere SANG near West End, has been shortlisted as a preferred site. Feasibility work has considered how the site could be enhanced alongside existing use as a Suitable Alternative Natural Green Space (SANG). Initial discussions have been held with third party infrastructure owners with assets at the site to ensure proposals would be compliant with wayleave agreements. Any decisions to further progress the project will be taken after the establishment of the new unitary authority of West Surrey.

Supporting Development of a Local BNG Market

The Council is supporting development of the local BNG market in a variety of ways:



- Links to a variety of biodiversity unit finder websites are provided on the [Council's website](#), signposting developers to source units from the range of suppliers.
- Understanding local BNG market, such as through a briefing session for Planning Officers with a registered Biodiversity Gain site provider in the same National Character Area as the Council i.e. Wild Cobham in Elmbridge borough.
- The Council's guidance document for BNG encourages landowners in borough to contact the council if they are considering creating a 'Habitat bank' style Biodiversity Gain site on their land. The Council has so far not been presented with any detailed proposals for private/third-sector owned Biodiversity sites in the borough.



4. Actions Taken to Comply with the Biodiversity Duty

The below table contains an update on the actions set out in the First Considerations report that was published in 2025. A progress update is listed for each action, detailing what has been completed and ongoing work where an action is not quite finished.

Objective Area	Action	Responsible Officer	Timeframe	Progress Update
I. Local Plan	Progress Local Plan through 'Examination in Public' in 2025 and then adoption in Autumn 2025, in line with published Local Development Scheme	Planning Policy and Conservation Manager	Examination in summer 2025, subject to Planning Inspectorate confirmation	Ongoing – Local Plan Hearing held in Autumn 2025. Plan is likely to be found sound, subject to modifications which will be consulted on in 2026.



Objective Area	Action	Responsible Officer	Timeframe	Progress Update
2. Development Management	Continue to fulfil statutory duties in capacity of Local Planning Authority with regard to ecology and BNG, including take note of updated Biodiversity and Planning Manual from the Surrey Nature Partnership.	Development Manager	Ongoing	Ongoing - Regulating BNG as per statutory duty.
2. Development Management	Investigate schemes for District Level Licensing for Great Crested Newts, such as Nature Space.	Development Manager	By October 2025	Complete – Joined Nature Space scheme to enable more positive outcomes for habitat for Great Crested Newts and more efficient route to consent for developers.



Objective Area	Action	Responsible Officer	Timeframe	Progress Update
3. Biodiversity Net Gain monitoring	Collate monitoring data on applications which are required to deliver Biodiversity Net Gain	Development Manager	By January 2026	Complete – Collecting data and reporting it within this Biodiversity Duty Report – see relevant section in this report.
4. Offsite Biodiversity units	Investigate feasibility of business case and consider legal agreement options, for Biodiversity Gain site at Windlemere SANG to increase availability of Biodiversity Units for developers	Climate Change Officer	By July 2025	Complete – Business case complete with a plan to advance project after Local Government Reorganisation (LGR).



Objective Area	Action	Responsible Officer	Timeframe	Progress Update
5. Green Space Management	Council owned SSSIs: Review funding arrangements for management plans for Council-owned SSSIs and update as necessary, in light of transition from Countryside Stewardship to ELMS funding, to support sites to maintain/achieve 'Favourable' condition	Leisure & Recreation Manager	By July 2025, to be reviewed annually	Complete - annual review completed in 2025.
5. Green Space Management	Council owned SNCLs: Consider if management plans are up to date and adequately resourced for implementation	Leisure & Recreation Manager	By July 2025, reviewed every 3 years	Complete – management plan reviewed in 2025, next review in 2028.



Objective Area	Action	Responsible Officer	Timeframe	Progress Update
5. Green Space Management	Council owned SANGs: Review existing SANG management plans	Leisure & Recreation Manager	By July 2025, reviewed every 3 years	Complete – management plan reviewed in 2025. Habitat management has been undertaken including invasive species control, tree planting and conservation-led grass cutting regimes.
5. Green Space Management	Expand SANG provision with new site at St Catherines Wood, including delivering biodiversity enhancements to comply with requirements of Biodiversity Net Gain.	Leisure & Recreation Manager	By September 2025	Complete - planning for works to turn St Catherines Wood into a SANG accepted in Jan 2026. Site to be developed with the aim of being a future BNG habitat bank.



Objective Area	Action	Responsible Officer	Timeframe	Progress Update
5. Green Space Management	Assess in-house and contractor (Glendale) protocols and practices for the use of fertilisers, pesticides and herbicides, to ensure and demonstrate that usage is minimised and is aligned with the Green Flag Award Pesticide Reduction Good Practice Guide.	Leisure & Recreation Manager	By July 2025	Complete - annual assessment of practices completed in 2025
6. Property and public realm projects	Consider urban greening from the outset, in the Council's property development and public realm projects, such as urban trees, natural SUDs and bio-solar roofs.	Head of Property & Economic Development	Ongoing	Ongoing – there have been no projects where this has been feasible to deploy.



Objective Area	Action	Responsible Officer	Timeframe	Progress Update
7. Partnership working	Engage with Surrey County Council, to provide local information and consultation feedback, to inform the development the LNRS and then consider implications for the Council's policies and activities following publication to support strategy delivery.	Planning Policy and Conservation Manager, with Climate Change Officer	Respond to consultation within 28 day deadline	Ongoing – supported development of the LNRS by responding to consultation. Further implications will be considered after LNRS publication in 2026.
7. Partnership working	Engage with Natural England (NE) as they develop species conservation strategies and/or protected site strategies.	Planning Policy and Conservation Manager	As requested by Natural England	Ongoing - The Council has not been approached by Natural England on any conservation and/or protected site strategies.



Objective Area	Action	Responsible Officer	Timeframe	Progress Update
7. Partnership working	Consider biodiversity functions in the process of transitioning to a Unitary Authority structure as part of Central Government's LGR / Devolution proposals	Chief Executive Officer	Ongoing, in line with Government timetable	Ongoing – partnership working with Surrey County Council Ecology team on Biodiversity Net Gain monitoring, which will improve alignment ahead of establishment of West Surrey Council
7. Partnership working	Investigate options for prioritising and funding of regular SNCI surveys to inform effective site management to maintain and enhance ecological value of sites and maintain up to date evidence, in support of delivery of Local Nature Recovery Strategy (LNRS)	Planning Policy and Conservation Manager	In line with consultation and publication of LNRS	Commissioned an update to one SNCI in 2025 as part of new Local Plan. Also supported development of Surrey County Council's LNRS in 2025.



5.2026-2031 Action Plan

The below table include action that the Council will be taking to improve biodiversity over the next five-year reporting period. The Council is currently going through LGR which means that Surrey Heath Borough Council will cease to exist after April 2027. Only one action (review of the business case for a habitat bank at Windlemere SANG) goes beyond March 2027. In this case, the Council cannot ensure completion of this action, however, it is hoped this action will be taken up by West Surrey Council on its foundation. All other actions are business as usual activities.

Objective area	Action	Timeframe
1. Local Plan	Progress Local Plan through to adoption in 2026, including consultation on main modifications required.	In line with Local Development Scheme
1. Local Plan	Commence Local Plan Review, including having regard to biodiversity, including steering development away from areas of particular importance for biodiversity and having regard to the Local Nature Recovery Strategy for areas which could become important to biodiversity.	In line with Local Development Scheme
2. Development Management	Continue to fulfil statutory duties in capacity of Local Planning Authority with regard to ecology and BNG	Ongoing



Objective area	Action	Timeframe
3. Biodiversity Net Gain monitoring	Collate monitoring data on applications which are required to deliver Biodiversity Net Gain. This will allow for further Biodiversity Duty reporting in five years.	Ongoing
4. Offsite Biodiversity units	Review the business case for Windlemere SANG to be used as a habitat bank following operational start of West Surrey Council	March 2028
5. Green Space Management	Council owned SSSIs: Complete annual review of funding arrangements for management plans for Council-owned SSSIs and update as necessary	Ongoing – annual review
5. Green Space Management	Council owned SNCLs and SANGs: Complete a review of management plans every three years to ensure they are up to date and adequately resourced for implementation, next review in 2028	Ongoing – three-year review
5. Green Space Management	Assess in-house and contractor (Glendale) protocols and practices for the use of fertilisers, pesticides and herbicides, to ensure and demonstrate that usage is minimised	Ongoing – annual review
5. Green Space Management	Open St Catherine’s Wood as a SANG site	March 2027
5. Green Space Management	Complete annual SANG heathland conservation and fire break works	Ongoing – annual works



Objective area	Action	Timeframe
5. Green Space Management	Complete annual review of Chobham Water Meadow to review and manage Himalayan Balsam and Ragwort	Ongoing – annual works
6. Property and public realm projects	Consider urban greening from the outset, in the Council’s property development and public realm projects, such as urban trees, natural SUDs and bio-solar roofs	Ongoing
7. Partnership working	Consider implications for the Council’s policies and activities following publication of Surrey County Council’s LNRS in 2026 to support strategy delivery	March 2027
7. Partnership working	Engage with Natural England (NE) as they develop species conservation strategies and/or protected site strategies	Ongoing – as requested by NE
7. Partnership working	Consider biodiversity functions in the process of transitioning to a Unitary Authority structure as part of Central Government’s Local Government Reorganisation / Devolution proposals	March 2027



