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06 February 2018

Anthony Hinton William Lacey Group

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By email only to: hintona@williamlacey.co.uk c/o david.butcher@wyg.com

Dear Anthony,

LAND AT LATCHETTS MEAD, CHOBHAM, SURREY: ECOLOGY ASSESSMENT FOR SANG SUITABILITY

Please find below the results from the ecological walkover survey at land at Latchetts Mead, Chobham (the 'site'). This report:

- 1) Assesses the potential ecological impacts of Suitable Alternative Natural Greenspace (SANG) creation on the site in respect of UK/EU Wildlife legislation, and national and local planning policy; and
- 2) Assesses the potential suitability of the site for SANGS to meet the requirements of the Thames Basin Heaths SPA: Delivery Framework and the Natural England SANGS Guidelines

BACKGROUND SITE INFORMATION

WYG was commissioned by William Lacey Group ('the client') on 20th December 2017 to undertake an ecological survey and assessment of the site's potential suitability for SANG use.

The site is approximately 1ha in area, centred on Ordnance Survey Grid Reference SU 97882 62051. The site comprises a parcel of woodland, to the east of Chobham village centre. The site is bounded by Mill Bourne Brook and grassland fields to the south, residential housing and gardens to the west and north, and grassland fields with tree lines and hedgerows to the east. The site in relation to the wider environment is shown in Figure 1, Appendix A.

It is currently proposed to put forward the site for use as SANG, to mitigate for adverse effects from recreational pressure on the Thames Basin Heath Special Protection Area (SPA) from new residential housing within Surrey Heath Borough Council. An overview of the legislation and planning policy in relation to SANG is provided in Appendix B.

An existing SANG, Chobham Meadows is located immediately adjacent to site (to the east and south). This is a council owned SANG, created to mitigate for adverse effects on the Thames Basin Heaths SPA from residential developments of fewer than 100 dwellings, within the relevant catchment.



Email: Website: www.wyg.com



SURVEY METHODOLOGY

Desk Study

An online desk study was carried out using Natural England's interactive, web-based MAGIC Map database and using the Surrey Heath Proposal Map (associated with the Surrey Heath Core Strategy, 2012).

The data search covers:

- Statutory nature conservation designations, such as Special Protection Areas (SPA) and Sites of Special Scientific Interest (SSSI);
- Non-statutory nature conservation designations, such as Sites of Nature Conservation Importance (SNCI); and
- Approved European Protected Species Licences (EPSL).

Ecological Walkover Survey

An Ecological Walkover survey was undertaken by WYG Principal Ecologist Vivienne Greenough MCIEEM¹ on 17th January 2018. The walkover was undertaken in line with the Joint Nature Conservancy Council's standard Phase 1 habitat survey technique. Dominant plant species were recorded for each habitat present. Furthermore, the Phase 1 habitat survey methodology was 'extended' by undertaking an assessment of the site's potential to support protected and notable faunal species, in line with Guidelines for Preliminary Ecological Appraisal produced by the Chartered Institute of Ecology and Environmental Management.

The weather conditions during the survey were dry, 7°C with 10% cloud and wind at Beaufort Scale 3-4.

LIMITATIONS

The Ecological Walkover survey was undertaken outside of the optimum plant growing season (i.e. April to September); however, this is not considered to have been a significant limitation. All of the habitats within the site were identifiable by the species present at the time of survey, therefore it was still possible to classify the habitats present and make an assessment of their potential to support protected species and species of conservation concern.

It is possible that ancient woodland indicator species (such as bluebell) are present in the woodland, but were missed during the survey (due to the survey being carried out outside of the plant growing season). This limitation has been addressed within this report.

RESULTS

Desk Study

The site does not fall within any nature conservation designations. The closest statutory designated sites are the Thames Basin Heaths SPA, Thursley, Ash, Pirbright and Chobham Special Area of

¹ Full Member of the Chartered Institute of Ecology and Environmental Management



Conservation (SAC), Chobham Common SSSI and Chobham Common National Nature Reserve (NNR). These sites are located approximately 1km north of the site.

The closest non-statutory designated site is the Chobham Meadows SNCI (comprising part of the existing Chobham Meadows SANG), located 50m south-east from the site. The nearest ancient woodland parcel is approximately 320m south of the site, this is the only parcel of ancient woodland present within 2km of the site.

There are four approved EPSL licences for bats within 2km of the site. These were all for bat species; common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus* and brown longeared bat *Plecotus auritus*.

Ecological Walkover Survey

A Phase 1 Habitat Plan showing the location of habitats within the site is shown on Figure 2, Appendix A. Photographs from the survey are shown in Appendix C.

Habitats

Semi-natural broadleaved woodland

The entire area of the site comprises semi-natural broadleaved woodland, which is mature in age. (See Photograph 1 and 2). Dominant species comprise oak *Quercus robur* with occasional ash *Fraxinus excelsior* and cherry *Prunus* sp. The understorey comprises holly *Ilex aquifolium*, hazel *Corylus avellana* (some of which is coppiced), bramble *Rubus fructicosus* agg. and hawthorn *Crataegus monogyna*. Ground flora observed during the survey included Lords and Ladies *Arum maculatum*, ground elder *Aegopodium podagraria*, dog's mercury *Mercurialis perennis* and tufted hair grass *Deschampsia cespitosa*. It is possible that bluebells *Hyacinthoides non-scripta* may be present in the woodland in the spring. Dog's mercury and bluebell are ancient woodland indicator species.

There are multiple piles of brash, logs and ceramic pots / tiles within the site, particularly along the western site boundary, which joins onto private residential gardens (see Photograph 3 and 4).

The woodland within the site is designated within MAGIC Map (and qualifies) as a Habitat of Principal Importance (HPI) under the NERC Act, 2006.

Wet Ditch

A wet ditch runs along the northern boundary of the site and cuts into the site at the north-east corner of the site (see Photograph 5). In places, the ditch is slow flowing. The ditch was lacking in any aquatic vegetation (however the survey was undertaken outside of the main growing season). At the edges of the ditch, species tolerant of wet conditions were observed, such as tufted hair grass and pendulous sedge *Carex pendula*.

Fence

A barbed wire fence is present along the eastern and part of the northern site boundary. Garden fences (various types) are present along the western site boundary.

Target Notes

Six target notes were recorded within the site:



Table 1: Target Notes Recorded on Site

Target Note	Description
TN1	A low-lying brick wall structure. Previous
	use unknown. See Photograph 6.
TN2	Garden waste piles. See Photograph 4.
TN3	Rhododendron, likely garden escape.
	Schedule 9 invasive species under the
	Wildlife and Countryside Act, 1981. See
	Photograph 7.
TN4	2 x Barn owl box on trees, see Photograph
	8.
TN5	Mammal digging, see Photograph 9.
TN6	Potential Variegated yellow archangel
	Lamiastrum galeobdolon argentatum,
	Schedule 9 invasive species under the
	Wildlife and Countryside Act, 1981. See
	Photograph 10.

Surrounding Area

The areas to the south and east comprises the Chobham Common SANG (also part designated as an SNCI). Habitats include hedgerows with mature trees, grassland (some likely to be rush pasture, a HPI habitat) and wet ditches (see Photograph 11). The Mill Bourne Brook runs along part of the southern boundary of the site (see Photograph 12). To the north and west are private residential properties with associated gardens.

Protected Species

The site was assessed for its potential to support flora and fauna protected by UK and EU legislation. See Table 2 below. Recommendations for mitigation and further survey are detailed after Table 4.

Table 2: Protected Species Potential

Species	Potential on site
Bluebell	The woodland may support bluebell. (Survey was undertaken outside of growing
	season). Bluebell is a protected species under the Wildlife and Countryside Act,
	1981.
Dormouse	The woodland on site provides suitable habitat for dormouse <i>Muscardinus</i>
	avellanarius. Furthermore, the site is well connected to the surrounding area by
	hedgerows with mature trees. A small amount of hazel coppice is present on site
	(a favoured food source of dormouse) as well as oaks and bramble. The site is
	assessed as having a moderate potential to support dormouse.
Bats	The woodland and surrounding area have a high potential to support roosting,
	foraging and commuting bats. Three trees were recorded to have a moderate
	bat roost suitability, see T1, T2 and T3 on Figure 2 and Photographs 13 and 14.
	The woodland, wet ditches and surrounding grassland (being well connected)
	are likely to provide high value foraging and commuting habitat for bats.



Species	Potential on site
Amphibians	The woodland within the site provides potential foraging and resting habitat for
	amphibians. The nearest pond is located 450m south-east from the site and is
	separated by the Mill Bourne Brook – which has a medium flow in places. As
	such, it is considered unlikely that any amphibians using this pond would utilise
	the terrestrial habitats on site. There is a network of ditches in the surrounding
	area and one of these ditches traverses the site in the north-east corner. It is
	possible that amphibians (including potentially great crested newt <i>Triturus</i>
	cristatus) may use these ditches. Overall, the site is considered to have low
	potential to support breeding amphibians and moderate potential to support
	amphibians during their terrestrial phase.
Reptiles	The woodland within the site (particularly the brash and rubble piles) provide
	foraging, resting and hibernating habitat for reptiles, mainly slow worm <i>Anguis</i>
	fragilis. The edges of the woodland may provide basking opportunities for
	reptiles, and the wet ditch network within the surrounding area may support
	grass snake <i>Natrix natrix</i> (which are associated with wet habitats). Overall, the
	site is considered to have moderate potential to support reptiles.
Birds	The site has a high potential to support breeding birds and also provides high
	value foraging habitat. A total of 15 birds were recorded during the survey,
	including the Schedule 1 listed Red Kite <i>Milvus milvus</i> . Red kite are unlikely to
	breed within the site, but may breed within the local area. Two barn owl boxes
	were observed in the woodland, attached to mature trees along the western
	boundary of the site.
Badgers	No evidence of badger <i>Meles meles</i> was recorded during the survey, however
	the woodland within the site provides potentially suitable habitat for them.
Otter, Water	Otter are considered highly unlikely to be present within the site, the site is flat
vole and	and lacks mature trees adjacent to the Mill Bourne Brook. Otter may pass
Invertebrates	through the Mill Bourne Brook along the southern boundary occasionally, they
	may also make use of woodland and grassland habitat within 100m of the Mill
	Bourne Brook occasionally.
	Water vole are extinct in Surrey therefore the potential for the site to support
	them is negligible (the habitats are sub optimal as well).
	The site is likely to provide habitat for a range of invertebrates, the dead wood
	within the site may support stag beetle <i>Lucanus cervus</i> .
Invasive	Rhododendron and potential Variegated yellow archangel were recorded within
Species	the site (see TN3 and TN6). These species are listed on Schedule 9 of the
	Wildlife and Countryside Act, 1981, which makes it an offence 'plant or
	otherwise cause to grow in the wild". These species have a negligible
	ecological value.

SANG ASSESSMENT

As the site is 1ha in area and is not of a sufficient size to act as a stand-alone SANG, William Lacey Group (the client) are proposing the site acts as an extension to the adjacent Chobham Meadows SANG. This means that additional parking is not proposed, however new footpaths (boardwalk or bark-covered route) would be created along with new signage and improved perimeter fencing.



Table 3 and Table 4 together demonstrate that the **site is considered suitable for SANG** and could meet Natural England guidance. The site would be able to adhere to **all of the must / should have criteria** and **all but one of the desirable criteria**.

Table 3: Assessment of site with the 'must / should haves' Natural England SANG criteria, 2008

'Must / should haves' SANG criteria	Meets criteria?	Assessment of site
There must be adequate parking for visitors. The amount of car parking should be determined by the anticipated use of the site and reflect the visitor catchment of both the SANG and the SPA	N/A	No additional parking is proposed, as the SANGS is designed to link to the existing Chobham meadows. Providing it can be demonstrated that the existing public car park for Chobham Meadows (Chobham High Street Car Park) has sufficient spaces, this criterion can be achieved.
It should be possible to complete a circular walk of 2.3 to 2.5km around the SANG	✓	Linked to Chobham Meadow at the east, a circular walk of 2.5km would be possible.
Car parks must be easily and safely accessible by car and should be clearly sign posted.	N/A	No additional parking is proposed, as the SANG is designed to link to the existing Chobham Meadows SANG. The Chobham High Street car park meets this criterion.
The accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for.	✓	It is anticipated that most visitors to the site (SANG extension) will be walkers with or without dogs. The location of the new SANG extension will be linked directly to the Chobham Meadows SANG, facilitating easy access for these groups on foot.
The SANG must have a safe route of access on foot from the nearest car park and/or footpath/s.	✓	There are existing footpaths within Chobham Meadows SANG which will easily be able to link up with newly created footpaths within the site. It may be necessary to create a bridge over the existing wet ditch within the site (should the footpath be routed to go over the ditch).
All SANGs with car parks must have a circular walk which starts and finishes at the car park.	✓	There is an existing footpath within Chobham meadows SANG which is circular. An additional circular loop can be created within the site that adjoins to the existing circular route within Chobham Meadows.



'Must / should haves' SANG criteria	Meets	Assessment of site
	criteria?	
SANGs must be designed so that they are perceived to be safe by users; they must not have tree and scrub covering parts of the walking routes.	✓	The woodland is already relatively open, and select clearance along a boardwalk or bark pathways will encourage passage through the SANG. The footpath can be routed to avoid dense patches of undergrowth.
Paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming too urban in feel.	√	Paths are proposed to be boardwalks over wet areas or chipped bark (or similar) in others.
SANGs must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.	✓ with some additional planting along western boundary	The woodland is mature in nature and provides a natural space. No buildings are present within the site, nor are any proposed. There is some encroachment of garden waste along the western boundary of the site. Secure fencing should be installed along the western site boundary to prevent the encroachment of garden waste from the adjacent residential properties. Furthermore, planting of UK native shrub species (hawthorn, hazel) is recommended to be carried out to provide a vegetative screen along the western boundary. Signage will be kept to a minimum to allow navigation through the walk.
SANGs must aim to provide a variety of habitats for users to experience	√	In combination with Chobham Meadows SANG, the site will add broadleaved woodland to the suite of grassland, parkland, hedgerow and wet ditch habitat already available.
Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.	✓	It is already possible to walk dogs off the lead within Chobham Meadows SANG. Within the site, fencing is recommended to be improved at the northern and western perimeter, ideally posts and rails with chain-link (or similar) to prevent dogs escaping. Consideration is required regarding the potential presence of protected species, see Section below.



'Must / should haves' SANG criteria	Meets criteria?	Assessment of site
SANGs must be free from unpleasant intrusions (e.g. sewage treatment works smells etc).	✓	No such intrusions currently known.
SANGs should be clearly sign-posted or advertised in some way.	✓	This is readily achievable. The SANG extension will can be signposted from footpaths within the Chobham Meadows SANG and detailed on notice boards at the existing car park.
SANGS should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.	✓	This is readily achievable. Marketing the site to be discussed with the LPA.

 Table 4: Assessment of site with the 'desirable' features in Natural England SANG criteria, 2008

Table 4: Assessment of site with the 'desirable' features in Natural England SANG criteria, 20		
'Desirable' SANG criteria	Meets criteria?	Assessment of site
It would be desirable for an owner to be able to take dogs from the car park to the SANGs safely off the lead.	✓	This is already achievable from the existing car park to Chobham Meadows SANG.
Where possible it is desirable to choose sites with a gently undulating topography for SANGs	-	The site is flat in nature, as is Chobham Meadows. However, there is a diversity of habitats which add diversity and interest.
It is desirable for access points to have signage outlining the layout of the SANGs and the routes available to visitors.	✓	This is readily achievable. Signage to be discussed with LPA.
It is desirable that SANGs provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable.	√	In combination with Chobham Meadows, the site adds a dense area of woodland. There are already a ditch network and small brook running through Chobham Meadows SANG.
Where possible it is desirable to have a focal point such as a view point, monument etc within the SANGs	✓	Although there are no views or monuments within the site or Chobham Meadows SANG, the mature tree lines within Chobham Meadows and mature woodland on site provide a natural view point from the adjacent and further afield grassland fields.



Other Ecological Considerations

Full detail on mitigation relating to ecology will be provided within an Ecological Appraisal, which will be undertaken to support a future planning application for the site (should the site be taken forward). An overview of mitigation and likely / potential further surveys is provided below.

The woodland within the site is a HPI, under the NERC Act, 2006. The SANG proposals for the site will not necessitate substantial removal of woodland habitat. However, some clearance of shrubs / brash piles will be required for health and safety reasons and to allow a clear footpath to be created.

Scheme Design

To minimise ecological impacts:

- the footpath is recommended to be routed so that the least amount of vegetation clearance is required; i.e. making use of the more open areas within the woodland; and
- All mature trees are recommended to be retained.

Invasive Species

Rhododendron and potential variegated yellow archangel were found along the western boundary of the site (see TN3 and TN6). These species are listed on Schedule 9 (Part II) of the W&CA which makes it an offence to 'plant or otherwise cause to grow in the wild'. To avoid the spread of these species further, they are recommended to be removed and disposed of appropriately. If removal is not possible, the footpath route and any other clearance works should avoid impacting these plants (to avoid spreading).

Further Surveys / reports

The following further surveys are likely to be required to inform a future planning application for the site:

- Ecological Appraisal Report and 2km Desk Study;
- Tree survey by a qualified arboriculturist (for health and safety purposes);
- A walkover survey in late April to establish the presence or absence of bluebells, other ancient woodland indicator species, other invasive plant species in the woodland and to inform the route of the footpath. A check of the barn owl boxes (TN4) will also be carried out at the same time to establish whether barn owls are present (and breeding) within the site.

The route of the footpath should be designed so that it has minimal impact on ecology. If imapcts cannot be avoided, the following further surveys may be required to inform a future planning application for the site:

- Should any mature trees require felling, a bat roost inspection to assess the suitability of the tree for roosting bats (European protected species); and
- Should a substantial amount of tree / shrub removal be required (likely to be informed by the results of the tree survey), a dormouse presence / absence survey is likely to be required.



The survey would involve the placement of dormouse tubes in early spring, followed by six monthly checks.

Post Planning Considerations

Pre-commencement checks

As badgers are highly mobile and create (and use) multiple setts, a check for badger evidence should be carried out at least two days prior to any works (including clearance works) commencing on site.

Sensitive working methods for ecology

It is likely that certain timings and working methods will be required during vegetation removal and footpath creation. For example, above ground habitat clearance, and brash / rubble removal should ideally take place outside of the bird breeding season, which is generally considered to extend between March and September inclusive (i.e. habitat should be cleared to 30cm above ground level between October to February). Ground vegetation (30cm or below) should be carried out between March and October inclusive.

No clearance of habitats should take place until the dormouse survey has been completed.

Furthermore, clearance of rubble and brash piles will require supervision by an ecologist (to safe guard reptiles and amphibians). Further details will be provided within an Ecological Appraisal report (to support a future planning application).

SUMMARY

An assessment of the site against the Natural England SANGS guidelines show that the site meets all of the 'must/should have' requirements, and all but one of the 'desirable' features. As such, consultation with Natural England and the LPA is recommended to commence to discuss the next stage / steps for the site.

To support a future planning application for the site, invasive species removal / mitigation (by avoidance), a tree survey, walkover survey for bluebell, other ancient woodland indicator species and invasive plant species, barn owl check is likely to be required, to adhere to legislation and planning policy, inform footpath routing as well as identify any required mitigation. A bat inspection and dormouse survey may also be required should any trees / shrubs require removal.

A pre-commencement badger check and specific timings and methodologies will also likely be required for birds, reptiles and amphibians. The specifics of these details will be contained within a full Ecological Appraisal, should a future planning application for the site be submitted.

I hope this is useful to you. Please do not hesitate to contact me should you have any queries,

Yours sincerely,

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Tamsin Clark MCIEEM
Associate Ecologist



Appendix A: Figure 1: Site Location

Figure 2: Phase 1 Habitat Map

Appendix B: SANG Legislation and Planning Policy

Appendix C: Site Photographs

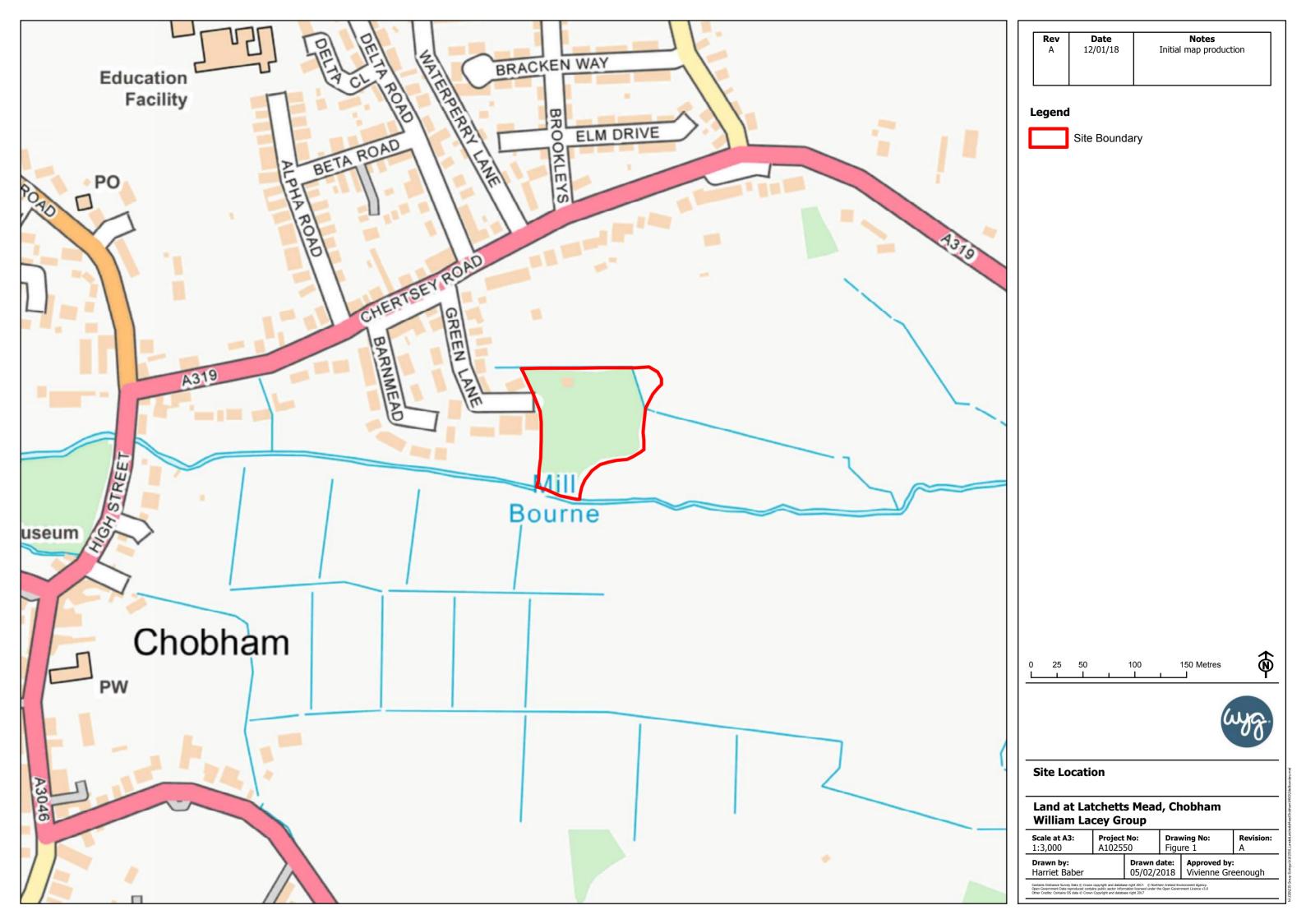
References

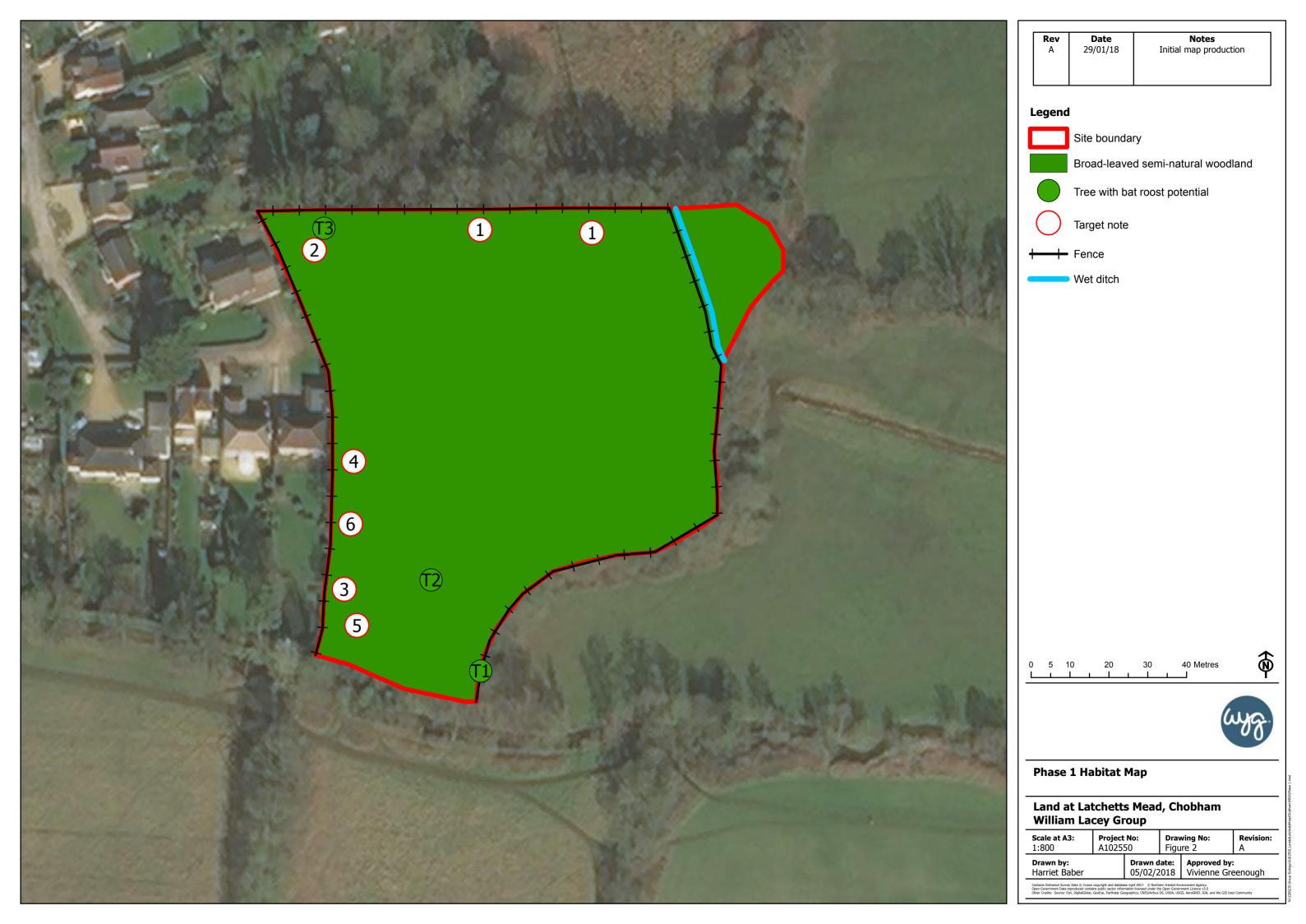
• Chartered Institute for Ecology and Environmental Management (2013). Guidelines for Preliminary Ecological Appraisal.

- Joint Nature Conservation Committee (2010). Handbook for Phase 1 Habitat Survey: A technique for environmental audit. JNCC, Peterborough
- Natural England (2008) Three Rivers District Council Core Strategy Issues and Options, Appropriate Assessment Screening, Appendix 4; Natural England SANGS Guidance
- The Thames Basin Heaths Joint Strategic Partnership Board (2009) Thames Basin Heaths SPA: Delivery Framework
- Surrey Heath Borough Council (2012) Core Strategy and Development Management Policies 2011-2028



Appendix A: Figures







Appendix B: Legislation and Planning Policy

Natural England SANGS Guidance, 2008

The Thames Basin Heaths was classified as a Special Protection Area on 9 March 2005 under the Conservation Regulations 1994 (Habitat Regulations) in accordance with EU Directives on Birds (79/409/EEC) and Habitats (92/43/EEC).

The SPA consists of number of areas of lowland heathland scattered across three counties (Hampshire, Surrey and Berkshire) and 11 local authority areas. The International designation is to support three species of heathland birds and their populations - woodlark, nightjar and Dartford warbler.

Under the European Directives, an "Appropriate Assessment" must be undertaken where it is deemed that a development either individually or in combination would have a significant effect on the SPA. Local authorities shall only agree to a scheme where it does not adversely affect the integrity of the site (SPA). A causally link has been established between the destruction of bird nests on the ground and increased recreational use of the SPA, especially dogs being walked, but also human visits, and cat predation.

Following the release of Natural England's Draft Delivery Plan in 2006, and the subsequent debate at the South East Plan Examination in Public in 2007, the South East Plan set out the formal planning policy as supported by the Thames Basin Heaths SPA: Delivery Framework published by the Thames Basin Heaths Joint Strategic Partnership Board (February 2009). Policy NRM6 within the South East Plan (adopted May 2009) is 'saved', and is part of the development plan. Local authorities formulate development plan policies at the local level based on Policy NRM6, as well as avoidance and mitigation strategies.

The 'saved' policy sets out the criteria in relation to geographical zones and the provision of SANG. In particular, it established the following key principles:

- All new residential development is captured by the policy with no exemptions;
- No residential development within 400 metres of the SPA ("Exclusion Zone");
- Mitigation measures, including SANG for residential development between 400 metres and 5 kilometres of the SPA ("Zone of Influence");
- SANG land calculated on the basis of a minimum of 8 hectares per 1,000 population;
- Permission for developments of fewer than 10 dwellings can only be given where there is sufficient SANG capacity, but there is no specific distance to the SANG; and
- Large development to provide bespoke mitigation, including on-site SANG.

Natural England has produced specific guidelines in relation to the design of SANGS, which also give some background to the requirements: *It provides quidelines on the*

- type of site which should be identified as SANGS; and
- measures which can be taken to enhance sites so that they may be used as SANGS.

These guidelines relate specifically to the means to provide mitigation for housing within the Thames Basin Heaths Planning Zone. They do not address nor preclude the other functions of green space (e.g. provision of disabled access). Other functions may be provided within SANGS, as long as this does not conflict with the specific function of mitigating visitor impacts on the SPA.

SANGS may be created from:



- existing open space of SANGS quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public;
- existing open space which is already accessible but which could be changed in character so
 that it is more attractive to the specific group of visitors who might otherwise visit the SPA;
 and
- land in other uses which could be converted into SANGS.

Importantly it also states:

The identification of SANGS should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANGS, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan.

The Natural England guidelines provide a checklist of 'essential' and 'desirable' features against which the SANGS site is assessed.

Surrey Heath Core Strategy, 2012

CP14A Biodiversity and Nature Conservation

The Borough Council will seek to conserve and enhance biodiversity within Surrey Heath. Working with partners, new opportunities for habitat creation and protection will be explored in particular on biodiversity opportunity areas. Development that results in harm to or loss of features of interest for biodiversity will not be permitted.

Particular regard will be had to the following hierarchy of important sites and habitats within the Borough (as identified upon the Proposals Map):

- (i) Special Protection Areas (SPA) and Special Areas of Conservation (SAC) (European)
- (ii) Sites of Special Scientific Interest (SSSI) and National Nature Reserves (National)
- (iii) Sites of Nature Conservation Importance (SNCI), Local Nature Reserves (LNR), other Ancient Woodland not identified in (ii) above (Local)

Outside of these areas, new development will where appropriate be required to contribute to the protection, management and enhancement of biodiversity. On locally designated sites this will include those habitats and species listed in the Surrey Biodiversity Action Plan (BAP).

Within locally designated sites development will not be permitted unless it is necessary for appropriate on site management measures and can demonstrate no adverse impact to the integrity of the nature conservation interest. Development adjacent to locally designated sites will not be permitted where it has an adverse impact on the integrity of the nature conservation interest.

The Council will work in partnership to restore and enhance Biodiversity Opportunity Areas in particular those also designated as SPA or SAC which are of strategic importance.

CP14B European Sites

The Council will only permit development where it is satisfied that this will not give rise to likely significant adverse effect upon the integrity of the Thames Basin Heaths Special Protection Area and/or the Thursley, Ash, Pirbright & Chobham Common Special Area of Conservation.



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. Accordingly only new development that complies with the following requirements will be permitted.

- (i) No (net) new residential development will be permitted within 400m of the SPA.
- (ii) Non-residential development within 400m of the SPA will be required to demonstrate that it is not likely to have a significant effect either alone or in combination with other plans or projects.

Proposals for residential development elsewhere in the Borough will be required to provide appropriate measures to avoid adverse effects upon the Thames Basin Heath Special Protection Area in accordance with the Borough Councils adopted Avoidance Strategy (or as subsequently amended)

Such measures shall include:

- (iii) All net new residential development shall provide or contribute toward the provision of Suitable Alternative Natural Greenspaces(SANGs)
- (iv) SANGS will be provided at a standard of at least 8ha per 1,000 new occupants.
- (v) Developments of 10 or more net new dwellings will only be permitted within the identified catchment areas of SANGs
- (vi) All net new residential development shall contribute toward strategic access management and monitoring (SAMM) measures

The effective avoidance of any identified adverse effects must be demonstrated and secured prior to approval of the development.'



Appendix C: Photos

Photograph 1: Semi-Natural Broadleaved Woodland, view looking west



Photograph 2: Semi-Natural Broadleaved Woodland under storey



Photograph 3: Brash piles (TN2)





Photograph 4: Log piles (TN2)



Photograph 5: Wet Ditch within site





Photograph 6: TN1, brick wall structure



Photograph 7: Rhododendron (TN3)



Photograph 8: Barn Owl Box (TN4)





Photograph 9: Mammal digging (TN5)



Photograph 10: Potential variegated yellow archangel (TN6)



Photograph 11: Land to east of site (Chobham Meadows SANG), footpath running north to-south just outside of eastern site boundary





Photograph 12: Mill Bourne Brook



Photograph 13: T1, tree with bat roost suitability



Photograph 14: T3, tree with bat roost suitability

