

**RUNNYMEDE BOROUGH COUNCIL**

**THAMES BASIN HEATHS SPA  
SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

**TOWN & COUNTRY PLANNING (LOCAL PLANNING)(ENGLAND)  
REGULATIONS 2012**

**REGULATION 12 STATEMENT OF CONSULTATION**

April 2021

- 1.1 The Town & County Planning (Local Planning)(England) Regulations 2012 requires in Regulation 12 that before a planning authority adopt a Supplementary Planning Document (SPD), they must prepare a statement (Statement of Consultation) setting out:
  - i) The persons the local planning authority consulted when preparing the SPD;
  - ii) A summary of the main issues raised by those persons; and
  - iii) How those issues have been addressed in the SPD
- 1.2 This document is the Statement of Consultation for the Thames Basin Heaths SPA SPD and sets out the persons the Council consulted in preparing the SPD and how their comments have been addressed.
- 1.3 A list of all those persons consulted on the Thames Basin Heaths SPA SPD are set out in Appendix A.
- 1.4 The Council consulted with the three statutory bodies (Environment Agency, Historic England, Natural England) in preparing the SPD and their responses and how these were taken into account can be found in Appendix B. The Council also consulted the statutory bodies on a Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) screening and the responses received and how they were addressed can be found in the SEA/HRA Screening Determination for the Thames Basin Heaths SPA SPD (October 2020).
- 1.5 The Council held public consultation on a draft SPD between Monday 30 November 2020 and 5pm Monday 18 January 2021. 10 representations were received and a summary of these and how they were taken into account can be found in Appendix C.

## Appendix A - List of Persons Consulted on the draft Thames Basin Heaths SPD

As well as the persons listed below a further 278 individuals on the Planning Policy consultation database were consulted.

G R Planning Consultancy Ltd	Lichfields
Brooklands College	Browns Group Holdings Ltd
Chobham Parish Council	Savills
Chiltern and South Bucks District Councils	Tesni Properties Limited
BENRA & The Ottershaw Society	Wood Plc
Sir William Perkins School	Renaissance Retirement
Iain Vellacott Associates Ltd	The Chobham Society
Tullow Oil	Historic England London and South East Region
CBRE Ltd	ASC Finance for Business
South Bucks District Council	The Runnymede on Thames
Barton Willmore	Halogen UK
A2Dominion Developments	JR Marine
Peacock and Smith Ltd	Thorpe Park (Merlin Entertainments Plc)
Troy Planning and Design	Rainbow Day Nursery & Pre-School
Barratt Homes	Home Builders Federation
Heathrow Airport	Calatec Ltd
Terence O'Rourke Ltd	Stellican Ltd
Churchill	Jaspar Group
Youngs RPS	Adams Group Real Estate Ltd (on behalf of Tarmac)
Emerson	Fairhurst
Carter Jonas	Tarmac
Lyne Hill Nursery	Carter Planning Ltd
Anderhay	Development Planning & Design Services Ltd
Hodders	Tetlow King Planning
Turley	The Planning Bureau Ltd
WYG	John Andrews Associates
Fortman Land & Planning	Turley
Richborough Estates	SETPLAN
Blue Cedar Homes	Strutt & Parker
Vanbrugh Land	Urban Green Developments
NK Homes	DHA Planning
Surrey Wildlife Trust	Reside Developments
Planning Potential Limited	Ashill Group
JSA Architects	Woolf Bond Planning
Berkeley Homes	SSA Planning
Stride Treglown Ltd	Shanly Homes
Shrimplins	Lichfields
Union4 Planning	DPDS Consulting

DevPlan	Pegasus Planning
Paul Dickinson and Associates	IQ Planning Consultants
Rickett Architects	WSP Indigo
Bell Cornwell	The Emerson Group
Montagu Evans LLP	Grosvenor Capital
Plainview Planning Ltd	Woolf Bond Planning
JP Electrical Ltd	Vail Williams LLP
Woking Borough Council	PRP
Revera Limited	Aston Mead Land & Planning
Devine Homes	Heatons
DP9 Ltd	Pegasus Group
Porta Planning LLP (representing Centrica plc (British Gas))	Quod
ST Modwen	AR Planning
Armstrong Rigg Planning	Sanders Laing
Optimis Consulting	Gladman Developments Ltd
Kinwell Property Investments Ltd	LRG
Vail Williams LLP	Wates Developments
Kevin Scott Consultancy	Allied Telesis
R Clarke Planning Ltd	Glanville Consultants
CBRE Ltd	Avison Young obo National Grid
Meadowcroft Community Infant School	TASIS The American School in England
DfE	Meath School
Brooklands College	Brooklands College
BLARA, BENRA, RRA & RAR	Philip Southcote School
Runnymede Access Liaison Group, Elmbridge & Runnymede Talking Newspaper Association, Runnymede Disabled Swimmers Board, Surrey Coalition of Disabled People, North Surrey Disability Empowerment Group, Surrey Vision Action Group	The Kings Church
The Ramblers	West Addlestone Residents Association
The Georgian Group	The Gardens Trust
Virginia Water Community Association	Turn2us
Friends families and travellers	Chertsey Residents Association
Wentworth Residents Association	Franklands Drive Residents Association
Stonehill Crescent Residents Association Limited Company	The Twentieth Century Society
Egham Residents' Association	TWRA
Runnymede Art Society	Thorpe Village Hall
Woburn Hill Action Group	Addlestone Historical Society
RSPB England	Woodham Park Way Association
Christian Science Society Egham	Wentworth Residents Association
Environment Agency	United Church of Egham
National Grid	Kennedy Memorial Trust

CMA Planning	CPRE Surrey
Theatres Trust	Woodland Trust
Thorpe Ward Residents' Association	Chertsey Good Neighbours
Runnymede Council Residents' Association	Chobham Commons Preservation Committee
Laleham Reach Residents' Association	Hants County Council
St. Paul's Church	Office of Road and Rail
WSPA	Enterprise M3 LEP
UW Club	Slough Borough Council
Spelthorne Borough Council	South East Coast Ambulance Service NHS Foundation Trust
Royal Borough of Windsor and Maidenhead	East Berks CCG
Surrey County Council	Teach First
Guildford Borough Council	C-Far
Wokingham Borough Council	Sport England
Waverley Borough Council	Imperial College
Bracknell Forest Council	Transport for London
Tandridge District Council	Natural England
Rushmoor Borough Council	Free Schools Capital Education and Skills Funding Agency
London Borough of Hillingdon	Homes England
Mayor of London	Civil Aviation Authority
Elmbridge Borough Council	Ashford & St. Peter's Hospital NHS Foundation Trust
Bigbury Neighbourhood Plan Steering Group	Highways England
Windlesham Parish Council	Affinity Water
Wraysbury Parish Council	

**Appendix B - Consultation Responses on Preparation of the Thames Basin Heaths SPD and how these were Addressed**

<b>Persons</b>	<b>Summary of Main Issues</b>	<b>How Addressed</b>
Environment Agency	No comment	No action required
Historic England	No comment	No action required
Natural England	Wording should be added in that says if a SANG does not have a car park then the catchment of it is 400m, regardless of its size.	Noted and amendment made to draft SPD

## Appendix C - Summary of Representations to the draft Thames Basin Heaths SPD and the Council's Response

Name	Response	Comment	Amend SPD?
CSA Environmental	<p>It would be useful to have an assumed occupancy rate for gypsy and traveller pitches, for the purposes of calculating SAMM and SANG requirements.</p> <p>Para 6.1.6 erroneously confuses financial contributions made to third party SANG owners/managers with SAMM contributions made to the Council.</p>	<p>Noted. Evidence of site capacity which supported the 2030 Local Plan used an occupancy for Traveller pitches of 3.6 people per pitch taken from the North Surrey GTAA (2007). This will be included in the SPD with a caveat that this will be considered on a case-by-case basis.</p> <p>Noted, paragraph to be amended.</p>	<p>Yes. Add Traveller pitch occupancy.</p> <p>Yes. Amend para 6.1.6.</p>
Environment Agency	No comments.	Noted.	N/A
Highways England	No comments.	Noted.	N/A
Natural England	Natural England's previous comments have been taken on board and as such Natural England has no further comments to make on this policy document.	Noted.	N/A
RSPB	<p>Broadly consider that the TBHSPA SPD correctly reflects the key principles of the TBHSPA Delivery Framework. However, some recommended changes and additions to sections of the TBHSPA SPD suggested.</p> <p><b>Section 1: Intro</b> Paragraph 1.2.1 states main purpose is to 'provide an updated avoidance and mitigation strategy to show how adverse effects of development on integrity of the Thames Basin Heaths SPA should be avoided and mitigation. This is essential to protect the Heaths from recreation-related harm and to permit a net increase of residential development between 400m and 5km of the SPA, whilst also ensuring that the Council is in line with the adopted Local Plan'.</p> <p>The RSPB is disappointed at the lack of policy wording to reflect the most effective means for reducing impacts</p>	<p>Noted.</p> <p>Noted</p> <p>Whilst this point is noted, it is the role of the Runnymede 2030 Local Plan, in particular the spatial</p>	<p>No.</p>

Name	Response	Comment	Amend SPD?
	<p>through avoidance measures to locate development away from the TBHSPA, and where possible outside of the 5km buffer zone. Strongly urge the inclusion of policy wording similar to NRM6 “<u>Priority should be given to directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures</u>” to correct this key omission.</p> <p><b>Section 2.2. Buffer Zones – Zero to 400m Exclusion Zone</b>  Paragraphs 2.3.3 – 2.2.6 highlight the presumption against residential development within 400m of the TBHSPA. The RSPB welcomes this presumption, but wording fails to take account of accepted evidence base demonstrating detrimental and un-mitigatable effects of new housing within 400m of heathlands. As the evidence suggests, new housing will not be able to be mitigated for its impacts on heathlands. Further, avoidance measures as highlighted in the text would consist of those identified in Paragraph 175 of the NPPF (2019), locating development on an alternative site with less harmful impacts. This would therefore need to be located outside of the Zero to 400m Exclusion Zone, where impacts may be able to be mitigated.</p> <p><b>Section 4.4. Delivery of SANG</b>  Paragraphs 4.4.11 &amp; 4.4.12 state that where SANG land is not owned by the Council, Natural England may require the Council to agree ‘step-in rights’ for itself or an approved organisation ensuring mitigation is secured. Broadly support this approach but it is vital that SANG setup and in-perpetuity maintenance costs are sufficient as lack of adequate funding is a potential reason SANG could fail to fulfil its function and potentially result in the Council being burdened with providing the additional finance required to rectify any problems with the SANG.</p>	<p>strategy set out in Policy SD1 and the allocations in Policy SD2 to dictate the location of development in the Borough. As such, the framework for development to occur within 5km of the SPA has already been adopted through the 2030 Local Plan.</p> <p>Agree that the text of 2.2.3 – 2.2.6 could be expanded, but the text is in line with the guidance set out in the Thames Basin Heaths Joint Delivery Framework reflecting the presumption against net additional residential dwellings within 400m of the SPA. The reason for not explicitly ruling out all net additional dwellings in the 400m zone is that this will ultimately be a matter for individual Appropriate Assessments (AA) as indicated in the SPD. Para 175 of the NPPF is noted, but the SPD does not need to repeat national planning policy. In any event para 175 of the NPPF does not include the IROPI (Imperative Reasons of Overriding Public Interest) test and is therefore less restrictive than the Habitats Regulations which require an AA.</p> <p>Noted, however any third party SANG will need to be accompanied by a SANG Management Plan which clearly shows the costs of SANG set up and management in perpetuity which is then divided by SANG capacity (discounted if necessary). This will form the basis for SANG payment per occupant. Sign off of the Management Plan will be required from Natural England and the Council to ensure costs are realistic and can fully fund set up and management in perpetuity.</p>	<p>Yes. Text to be expanded but not the general thrust.</p> <p>No</p>



Name	Response	Comment	Amend SPD?
	<p><b>Third Party Private SANGs</b> Must be sufficient certainty that the SANG will be provided in-perpetuity and appropriate safeguards in place to avoid risk of land being removed from its mitigation function. Although Runnymede BC does not contain any Third Party Private SANGs, appropriate guidance on their provision must be in place to ensure mitigation requirements are fulfilled.</p> <p><b>Section 6. SMM Contributions</b> Paragraph 6.1.8 highlights timing of payment for developments. RSPB is pleased to see reference to the requirement for payments to be made no later than prior to occupation of the first dwelling. However, RSPB recommends amending the paragraph in relation to instalments to provide enough clarity to developers in their requirements to provide SMM funding prior to any additional impacts via the occupation of further dwellings in a new phase of development. We have underlined suggested text that has been added to paragraph 6.1.8:</p> <p><i>'6.1.8 Any s106 contribution payments to be made to the Council are to be secured by planning obligations and paid no later than prior to occupation of the first dwelling. If a large development is likely to be built in phases, payment by instalment may be considered. <u>If paying in instalments, each instalment should be paid no later than prior to occupation of the first dwelling for each phase of the development.</u></i></p>	<p>SPD sets out the principle of third party SANG, but it will be the SANG management plan and/or S106 agreement which will detail safeguards to ensure SANG is retained and managed in perpetuity through step in rights where appropriate. This will be through discussions with Natural England with safeguards considered on a case-by-case basis. This is outlined in para 4.4.12 of the draft SPD.</p> <p>Noted and agreed that further guidance can be given for phased permissions.</p>	<p>No</p> <p>Yes. Amend Para 6.1.8</p>
Stride Treglown obo Royal Holloway University of London (RHUL)	Whilst the SPD clarifies and updates the previous document the university does not consider that the approach to the impact of additional student accommodation has been considered fairly for the reasons set out below.	Noted.	N/A

Name	Response	Comment	Amend SPD?
	<p>Up until now, proposals for additional student accommodation within the 5km and 5-7km zones has been dealt with on a case-by-case basis from a consistent base amount. Draft SPD, however, uses as a starting point, a formula for dealing with contributions to avoid and mitigate the impact of student accommodation on the SPA, which on the face of it requires an amount 40% higher than that for ordinary dwellings.</p> <p>Draft SPD gives no indication as to how the lower impact of student accommodation on the TBHSPA will be considered and therefore level of planning obligations required for SANGS and SAMM is likely to be higher and therefore unreasonable.</p> <p>Fundamental that planning obligations must only be sought where they are  a) Necessary to make development acceptable in planning terms;  b) Directly related to the development; and  c) Fairly and reasonably related in scale and kind to the development.  It is element c) of the requirement as it is set out in the draft SPD to which the university objects.</p> <p><b>Background</b>  Land owned by RHUL principally comprises four sites:  • Land north of Egham Hill;  • Kingswood Halls;  • Main university campus south of Egham Hill; and  • Former Proctor &amp; Gamble site at Rusham Park.  With exception of Kingswood Halls in the 5-7km zone, these sites are partly within the 5km zone and partly the 5-7km zone. Existing and proposed buildings already straddle this boundary. This situation alone creates a difficulty in applying the guidance. This situation is likely to apply elsewhere and the SPD should address this.</p>	<p>Noted.</p> <p>Noted. This is not the intention of the SPD and will be amended accordingly.</p> <p>Noted.</p> <p>Noted, however Table 2 on p18 of the draft SPD sets out the SANG standards for development arising within the different zones of influence with a clear distinction between the 400m-5km and 5-7km zones. This does not need to be repeated in other sections of the SPD as it is applicable to all forms of development affected by the SPA and is in any event clarified in paragraph 5.1.12.</p>	<p>N/A</p> <p>Yes, amend para 3.1.8</p> <p>N/A</p> <p>No</p>

Name	Response	Comment	Amend SPD?
	<p>Rationale behind the draft SPD seeks to address impacts arising from use of the Surrey Heaths for recreational purposes by those occupying new residential developments within 5kms (and larger ones in the 5-7km zone). Such impacts need to address avoidance and mitigation measures. Key issues are identified in respect of the rare bird species that nest there - predation by cats, rats and crows and disturbance by informal recreational use. The most recent survey information of the use of the Heaths for recreational purposes of which we are aware is the 2012/13 survey in the Natural England Commissioned Report NECR 136. This found that 80% of visitors were accompanied by a dog, 83% visited once a week and 38% visited daily. Of the visitors 75% came by car and only 2% by bike.</p>	<p>Noted.</p>	<p>N/A</p>
	<p>University students are not allowed to have cats and dogs in purpose-built accommodation. University does not allow students in new accommodation to have a car with them, so access by car will rarely be possible. The recent outline planning application (RU.20/ 0098) with resolution to grant permission, the university has committed to provide funding for a residents Controlled Parking Zone (CPZ), which would control any abuse of the university's regulations in this respect.</p>	<p>Noted.</p>	<p>N/A</p>
	<p>No reasonable public transport access to Chobham Common from the campus, so students cycling there will be the most likely impact from RHUL. Given the closer proximity of Windsor Great Park, with its network of cycle routes, it seems unlikely that more than very occasional use will be made by the university's students of the sensitive area of Chobham Common.</p>	<p>Noted.</p>	<p>N/A</p>
	<p>Nevertheless, university accepts in line with the precautionary principle, harm cannot be ruled out. During previous negotiations regarding SANG and</p>	<p>Noted. It is not the intention of the SPD to charge student accommodation a higher proportion of SANG/SAMM and this will be amended in the SPD.</p>	<p>Yes, amend para 3.1.8.</p>

Name	Response	Comment	Amend SPD?
	<p>SAMM payments the case has been made and accepted that the impact of student accommodation will be much lower than that of ordinary residential development. The draft SPD makes no such statement and seeks a contribution as if students were likely to have the same impact as ordinary residents. As we shall show below the base payments for contributions, is actually higher for students than for the rest of the population.</p> <p><b>Previous Means of Dealing with the Impact of Student Accommodation on the TBHSPA</b></p> <p><u>Outline Planning Permission RU.14/0099: RHUL Development Plan</u></p> <p>Outline permission granted for development in 2015 including up to 2,650 student bedspaces. For that proportion of new student accommodation to be built in the 5km zone, agreed SANGS would be provided on campus through an agreed bespoke Greenspace and Visitor Management Strategy. In respect of SAMM, agreed to calculate an appropriate contribution, 5 students were equivalent to a dwelling. This ratio (larger than current average household size of 2.4) made some allowance for the limited impact that students will have on the SPA.</p> <p>Planning Permission RU.18/1122: Harvest Road. In the 5-7km zone. A bespoke contribution towards SANG and SAMM agreed with the developer. Recognised lesser impact of student accommodation on the SPA. Contribution was calculated on an equivalent number of dwellings based of 2.4 students per dwelling, but with 75% discount as acknowledged that impact of students, on a development where there would be very few car owners, would be much less than with the general population. In view of the additional distance from the TBHSPA above the 5km threshold, a further</p>	<p>Noted, however this would not now meet Natural England advice to use average household size of 2.4 as the representation acknowledges below.</p> <p>Noted, however the 75% reduction in SANG &amp; SAMM contributions applies to all developments of 50 or more units in the 5-7km zone not just student accommodation. Natural England's advice to convert student accommodation from occupants to dwellings by dividing student units by 2.4 to obtain a dwellings equivalent was due to Runnymede SANG/SAMM contribution being dwelling based. Change to occupancy-based contributions means this will no longer be necessary. As such, contributions to SANG/SAMM from student accommodation will be</p>	<p>N/A</p> <p>Yes, amend para 3.1.8.</p>

Name	Response	Comment	Amend SPD?
	<p>75% reduction was applied. This approach was considered by the Planning Inspector who agreed it was 'sufficient to prevent harmful effects on the integrity of the Thames Basin Heaths SPA'.</p> <p>Only two universities within the TBHSPA zones of influence, the University of Surrey at Guildford and Royal Holloway University of London. Guildford Borough Council's Thames Basin Heaths Special Protection Area Avoidance Strategy SPD 2017 para 2.16 states: Self-contained units of student accommodation may be counted as single dwellings in accordance with the strategy and should contribute an appropriate level of avoidance and mitigation measures, to be decided on a case-by-case basis under advice from NE. This clearly makes reference to the need for flexibility, which the university considers to be a more appropriate way of dealing with student accommodation.</p> <p><b>RBCs Guidance in respect of Student Accommodation</b></p> <p>Para. 3.1 8 advises that 'each room meeting the criteria listed in paragraphs 4.3.2 and 4.3.3 will be treated as a separate one-bedroom dwelling'. When referring to the criteria in paras 4.3.2 and 4.3.3 and table 4 – 'SANGs Occupancy Rates', it is apparent that each student bedspace will be treated as a 1 bedroom/ studio unit. The average occupancy rate for this is considered to be 1.4 persons.</p> <p>It will be clear from all the student accommodation applications submitted to the council in recent years, whether studios or cluster flats, that each bedroom only accommodates 1 student. Any payment for student</p>	<p>based on number of occupants if within the 5km zone, discounted by 75% if within the 5-7km zone unless agreed otherwise with Natural England. A further discount may be agreed with Natural England for student accommodation with no or few car owners but this will be on a case-by-case basis. This will be clarified in the SPD.</p> <p>Approach to student accommodation to be clarified in the SPD. Guildford's approach is noted but does not take account of cluster units which may have a higher occupancy than a single dwelling unit. As such, occupancy of all accommodation should be considered on an individual basis taking advice from Natural England.</p> <p>See comment above.</p> <p>See comment above.</p>	<p>Yes, amend para 3.1.8.</p> <p>See above.</p> <p>See above.</p>

Name	Response	Comment	Amend SPD?
	<p>accommodation should be based on the amount per occupant not per 1 bedroom house/studio. The latter inflates the base amount payable on student accommodation.</p> <p>The calculation for SAMM payments for student accommodation is also inflated using this method.</p> <p>Both amounts should be subject to further discounts which, in the absence of further guidance in the SPD, should be negotiated on a case-by-case basis.</p> <p>Para 3.1 8 goes on to say 'but where areas of shared living space are supplied, and are considered to be proportionate to the number of students they are anticipated to serve, these areas will not be subject to the strategy set out in this document.' It is not clear what is being referred to here. It suggests that in addition to the number of bedspaces, there could be an additional base level charge if the council considers that more students could be accommodated in the development than shown. If that is a correct interpretation of this statement, how will this be determined?</p> <p>Section 4.7 deals with 'Third Party Private SANGs'. It says at 4.7.5 that Runnymede does not contain any third party SANGs. Cond 22 of the university's outline permission RU.14/0099, requires the 'Greenspace and Visitor Management Strategy to be implemented, and thereafter retained, maintained and developed in accordance with the approved details including phasing and timescales described within the document'. The reason for the condition was to avoid likely significant effects on the TBHSPA. The Greenspace and Visitor Management Strategy (GSVMS) creates a series of SANGs to mitigate the impacts of the additional student accommodation development which the outline planning</p>	<p>See comment above.</p> <p>See comment above. Agreed that any further discounts will need to be agreed with Natural England on a case-by-case basis.</p> <p>Noted and to be clarified.</p> <p>Whilst reference to Cond 22 of RU.14/0099 is noted, the space referred to is not a third party SANG. A third party SANG is one owned and managed by an organisation other than the Borough Council and which is available for other developments to buy into to mitigate impact. As far as the Council is aware, the land at RHUL is not available for other developments to utilise.</p>	<p>See above.</p> <p>See above.</p> <p>Yes</p> <p>No</p>

Name	Response	Comment	Amend SPD?
	<p>permission granted within the 5km zone at RHUL. We attach a copy of the document for your information. The works to area 2 (the arboretum) have been duly completed by RHUL in accordance with the timescale set out in the GSVMS, prior to the occupation of the 101st additional student accommodation unit north of Egham Hill. These have created new paths and a circular walk including a boardwalk.</p> <p><b>Conclusions</b> SPD should be amended to make the starting point for contributions towards SANGs and SAMM from student accommodation to be £903.50 and £360 respectively per occupant.</p> <p>There should be a recognition (as with the section on care homes) that student accommodation which provides no more than minimal parking for occupants should be subject to a reduced payment, as has been applied hitherto.</p> <p>The second part of para 3.1.8 is unclear. The guidance should give more clarity as to what this means. It would be helpful if the guidance also addressed how developments which straddle the 5km zone boundary should be considered.</p> <p>The reference to there being no third party private SANGs should be amended to refer to the private SANGs being created at Royal Holloway University of London.</p>	<p>Noted and will be clarified.</p> <p>This will need to be agreed with Natural England on an individual basis, rather than the SPD setting out a blanket approach.</p> <p>Noted, however other sections of the SPD set out the approach to development falling within the 400m-5km zone and the 5-7km zone. This applies to sites which straddle zone boundaries.</p> <p>Considered that land at RHUL is not a third party SANG.</p>	<p>Yes, amend para 3.1.8</p> <p>Yes, amend para 3.1.8.</p> <p>No.</p> <p>No.</p>
Surrey County Council	No comments.	Noted	N/A
Transport for London	No comments.	Noted.	N/A
Private Individual	Good to see local authorities in the region treating the issue of protecting the Thames Basin Heaths seriously. These are precious and rare sites that contain unusual	Noted.	N/A

Name	Response	Comment	Amend SPD?
	<p>biodiversity and are of important scientific interest. They are also very important open spaces for the local population (and others) to enjoy, and provide an important rural “lung” in an ever more densely populated area.</p> <p>Recognise the difficult challenges that councils face in trying to deliver externally imposed building targets, whilst wishing to maintain the richness of the environment. Nevertheless, you are seeking to combine two incompatible objectives. Especially given the UK government’s current rethink about allocating spending for regional development, and apparent aspiration to spread this more widely, I urge you to give your current proposals a radical rethink to preserve and maintain Chobham Common in particular, but also working with other councils in the region that you shift your collective focus away from inappropriate property development and towards environmental care and nurture. Put simply, there is no local need for additional housing adjacent to these heathland areas.</p> <p>Please be brave, and resist the temptation to allow property developers to maximise their profits at the irrevocable expense of the environment and current local citizens. To be sure, this will generate less revenue for you, but as our Council you should surely be serving the interests of the people of Runnymede rather than those from outside, who have little real care for our environment.</p> <p>I note the following with respect to the Nov 2020 TBHSPD document  Para 2.1.3:  400 m buffer exclusion zone around the SPA is already far too short. Recent building near Chobham Common has already increased footfall on the Common, and more development will in effect destroy it.</p>	<p>The quantum of housing within the zones of influence around the SPA including Chobham Common is set out in the 2030 Local Plan, specifically the spatial strategy in Policy SD1 and sites allocated for development in SD2. These were tested through a Habitats Regulations Assessment (HRA) in support of the Runnymede 2030 Local Plan at an Examination in Public (EiP) overseen by an independent inspector appointed by government. The spatial strategy and site allocations, including Longcross Garden Village were found sound by the inspector and the 2030 Local Plan adopted in July 2020. As such, the framework for development within the zones of influence has been set through the 2030 Local Plan and the SPD cannot change this.</p> <p>400m buffer was established and agreed through joint working between all authorities affected by the SPA and Natural England and is set out within the Thames Basin Heaths Delivery Framework published</p>	<p>No</p> <p>No</p>



Name	Response	Comment	Amend SPD?
		<p>in 2009. This is confirmed in Policy EE10 of the 2030 Local Plan and the SPD must be consistent with this.</p> <p>In terms of why the 400m buffer is considered suitable, regarding recreational risk, it was considered that development within easy walking distance of the SPA was more likely to be of risk to the heaths, unrestricted by accessibility factors such as car park provision. It is highly likely that residents living within easy walking distance would use the SPA and unlikely that they would be diverted to use suitable alternative natural green space in preference to the SPA for many recreational facilities.</p> <p>There are a range of potential figures for walking distances to the heaths, ranging from the generally accepted 300 metre ANGst model<sup>1</sup> and the 400 metre GLA figure<sup>2</sup>, to 700m or less for 75% of walkers in the Liley <i>et al</i> (2005) study. In the latter survey, 40% of walkers came from 400m or less. For other similar heathland sites, the figures were between 500 and 600m or less for the majority of walkers<sup>3</sup>. The results do not include any analysis of the amount of urban development adjacent to the access points surveyed. Of these potential figures for walking distances, it was considered that the selection of 400m would provide a reasonable generic figure that captures a significant proportion of</p>	

<sup>1</sup> Harrison, C., Burgess, C., Millward, A. & Dawe, G. 1995. *Accessible natural greenspace in towns and cities: A review of appropriate size and distance criteria*. English Nature Research Reports Number 153. English Nature. Peterborough. (report now revised by Handley J *et al* (2003) *Accessible Natural Greenspace standards in towns and cities: a review and toolkit for their implementation*. English Nature Research Report 526. English Nature, Peterborough.)

<sup>2</sup> Greater London Authority. 2005. *The GLA guide to open space strategies*. GLA. London

<sup>3</sup> Clarke, R., Liley, D. Underhill-Day, J. & Rose, R. (2005). *Visitor access patterns on the Dorset heathlands*. English Nature. Wareham. Dorset.

Name	Response	Comment	Amend SPD?
		<p>potential visitors on foot and is generally accepted within open space design as representing an easy walking distance.</p> <p>In terms of predation risk from cats, there are a number of studies that have investigated the hunting ranges of cats<sup>4</sup>, and it is clear that distances vary considerably. The review by Underhill-Day (2005) indicated ranges up to 1600 metres, with two studies referenced by Terence O'Rourke (2004)<sup>5</sup> suggesting a mean range of approximately 400m. It is a reasonable supposition that the closer dwellings are to the heaths, the more likely it would be that cats originating from those dwellings would include the SPA in their hunting range. Restrictions applied in a 400m Zone around the SPA would be expected therefore to reduce the number of cats although it may not eliminate the risk entirely. It is considered likely that the increasing number of impediments and alternative hunting areas cats would probably encounter with increasing distance from the SPA would also reduce the risk from cats over 400m although again is unlikely to fully remove it.</p> <p>A range of other urban impacts including garden extensions, garden waste dumping, fly-tipping and fires are likely to be more prevalent when the urban area is within 500 metres of the heathland boundary (Liley, 2004; Liley, 2005; Underhill-Day, 2005).</p> <p>It is therefore considered that 400 metres represents a reasonable boundary for the first Zone around the SPA; this represents the zone of highest potential</p>	

<sup>4</sup> See Underhill-Day, J.C. 2005. *A literature review of urban effects on lowland heaths and their wildlife*. English Nature Research Report 623. English Nature, Peterborough.

<sup>5</sup>Terence O'Rourke, 2004a. *Queen Elizabeth II Barracks and Wakefords Copse: information for appropriate assessment*. Terence O'Rourke, Bournemouth.

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	<p>Please supply evidence that you have that SANG actually attract people away from the SPA. Having seen the plans for Longcross, and participated in their briefings, I cannot believe that the SANG will have much positive impact when people have the Common nearby for walking/running/cycling/dog-walking/cat-exploration</p> <p>Para 2.1.5: Remain unconvinced that developers of Longcross have shown that their proposals will not adversely affect the integrity of Chobham Common.</p>	<p>impact on the SPA from new residential development in terms of recreational pressures, cat predation and other edge effects such as garden waste dumping, and garden extensions. Development within 400m would also be considered highly likely to increase the risk of fly tipping and both accidental and malicious fires; restrictions within this Zone may therefore help to lower the risk of additional incidents, but will not remove the risk entirely as some may be generated from additional population increases further from the SPA. The remaining risk is managed through on-site access management measures.</p> <p>SANG is not a unique measure on its own and works in tandem with SAMM as it is the package of measures as a whole that is working. Evidence of the efficacy of SANG can be found in a 2018 SANG visitor survey undertaken by Footprint Ecology<sup>6</sup>. This demonstrates that dwelling numbers within 5km of the SPA have risen by 12% but at the same time visits to the SPA have not increased. Last survey measuring number of visitors to SPA undertaken in 2012/13 by Natural England and available on their website<sup>7</sup> (Results of the 2012/13 Visitor Survey on the Thames Basin Heaths Special Protection Area (SPA) (NERC136).</p> <p>Site at Longcross is allocated for development within the adopted 2030 Local Plan and was subject to Habitats Regulations Assessment (HRA). The HRA concluded no likely significant effect on the SPA (including Chobham Common) based on Policy SD9</p>	<p>N/A</p> <p>N/A</p>

<sup>6</sup> See Annex A to: <https://surreyheath.moderngov.co.uk/documents/g3273/Public%20reports%20pack%2019th-Sep-2019%2010.00%20Thames%20Basin%20Heaths%20Joint%20Strategic%20Partnership%20Board.pdf?T=10>

<sup>7</sup> <http://publications.naturalengland.org.uk/publication/4514481614880768>

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	<p>Para 2.2: More realistic exclusion zone would be c. 1.5 kms rather than 400 m. On what basis do you use 400m? People will easily go beyond this to walk nearby to enjoy the neighbouring Common from their homes. The distance needs to be much greater so as to act as a real deterrent. Welcome the proposals for measures to be taken in the zone of influence (although would suggest that this should be 1.5-5 kms) and the 5 km to 7km zone.</p> <p>Para 2.3: Please provide evidence that SANGs make any real difference in general, and in the case of Longcross in particular.</p> <p>Para 2.4: Unclear that SAMM will have much real impact. People determined to damage the environment will do so anyway. There is already an increase in cycling on Chobham Common (and I am sure also on other areas in the TBHs).</p>	<p>of the 2030 Local Plan and its supporting text which requires SANG mitigation at a higher standard than 8ha per 1,000 population for the Longcross site and no residential development within the 400m exclusion zone. This approach was found sound by the Local Plan inspector.</p> <p>See comment above regarding 400m exclusion zone.</p> <p>See comment above about effectiveness of SANG. SANG and SAMM are the agreed approach to mitigate direct and indirect impacts on the SPA from urbanisation and recreation as set out in the Thames Basin Heaths Joint Delivery Framework. The approach of using SANG and SAMM as mitigation have passed through numerous Habitats Regulations Assessment at Local Plan and individual application level to demonstrate no likely significant effect on the SPA. This includes the site at Longcross.</p> <p>SAMM project is part of a two-pronged approach to mitigating impacts on the SPA from residential development. The SAMM project is run by the Thames Basin Heaths Joint Strategic Partnership and involves increased wardening and educating users of the SPA and SANG. Further details on the</p>	<p>No.</p> <p>N/A</p> <p>No</p>

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	<p>Para 3.16: Concerns over increasing housing occupation are welcomed. Likewise 3.1.8 on student accommodation makes much sense.</p> <p>Para 3.1.16 Councils might strengthen this to ensure permitted development (etc.) does indeed abode by the Habitats Regulations.</p> <p>Para 4.1.4 Mentions that SANGs will be at least 8 hectares per 1000 head of population. On what basis is this figure calculated? In the case of Longcross, and given Chobham Common's considerable importance, it would be good to see the size of the SANGs considerable increased to the east. As a general principle, SANGs are only of value if they are contiguous to a development, so please change 4.1.5 to emphasise this. Surely, no developments should be permitted unless SANGs are indeed contiguous with the housing.</p> <p>Para 4.4.9 Good to see the 125-year requirement. What mechanisms are you putting in place to ensure this is adhered to? In many cases, develops for a few years, but it seems likely that in practice they will not commit for perpetuity.</p>	<p>project and how it is progressing can be found in the minutes of Partnership Board meetings<sup>8</sup>.</p> <p>Noted.</p> <p>The Council does place an informative on decisions which grant dwellings under permitted development informing applicants of the need to satisfy the requirements of the Habitats Regulations.</p> <p>8ha per 1,000 population standard is set out with the Thames Basin Heaths Joint Delivery Framework. The requirements for SANG at Longcross are required to go beyond this as set out in para 5.99 of the adopted 2030 Local Plan.</p> <p>Whilst bespoke SANG are normally delivered on or contiguous with the development they serve, this does not always need to be the case and rather than take a blanket approach, the SPD makes clear bespoke SANG will need to be agreed with Natural England. The Borough's strategic SANG do not need to be contiguous with development.</p> <p>SANG management plans (whether strategic, bespoke or third party) include the costs of SANG set up and maintaining SANG in-perpetuity and SANG contributions reflect this. For bespoke SANG the management plan should set out how the SANG will be managed in perpetuity and be agreed with Natural England.</p>	<p>N/A</p> <p>No</p> <p>No.</p> <p>N/A</p>

<sup>8</sup> <https://surreyheath.moderngov.co.uk/ieListMeetings.aspx?Committeeld=316>

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	<p>Para 4.4.10 “The provision of SANG means that increased local pressure on the Thames Basin Heaths SPA will be offset in perpetuity. “ It is hard to accept this statement without any evidence to support it.</p> <p>Para 4.6.8 As implied above the capacity of the Longcross SANG appears far too low. Please also specify more clearly how and why 5.1 ha has been discounted. how SANGs will be surveyed and monitored, and what actions will be taken if numbers do increase adversely, and damage is caused to the environment.</p> <p>Para 5.1.11 Please specify how and on what basis the actual base level costs of the SANG tariff are calculated (5.1.13 merely shows a worked example, not the basis of the actual figures)</p> <p>6 - likewise, it is unclear what the original basis of the SAMM tariff is, and on what these calculations are based.</p>	<p>Noted, but see comments above regarding effectiveness of SANG.</p> <p>Further SANG to support the development at Longcross is expected. Discounting to SANG is made where the land used for SANG is already accessible to the public to some degree and capacity is subsequently reduced to account for this as identified through visitor surveys. The SAMM project carries out surveys and monitors visitor numbers to the SPA and SANG and the SAMM project board will advise if further actions are required in light of this.</p> <p>SANG contribution is based on the costs of SANG set up and management in perpetuity. This is outlined in the current Thames Basin Heaths SPG on the Council’s website<sup>9</sup> and has been converted from £2,000 per dwelling into an occupancy-based contribution for the new SPD. This could be explained in the SPD. Contributions may be reviewed if future SANG management plans indicate this is necessary.</p> <p>Basis for the SAMM contribution was set out in 2011<sup>10</sup> with an uplift recently agreed by the Joint</p>	<p>N/A</p> <p>N/A</p> <p>Yes, explain basis for SANG contribution.</p> <p>No</p>

<sup>9</sup> <https://www.runnymede.gov.uk/article/15568/Thames-Basin-Heaths-Special-Protection-Area-TBH-SPA-policy-documents-and-guidance>

<sup>10</sup> <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/supplementary-planning-documents/thames-basin-heaths-spa-supplementary-planning-document>

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	<p>Appendix 5 - Please clarify why SANGS should have car parks? These would surely have the potential to attract people from outside? Surely, their purpose should be to enable people to walk to and on them from their homes, rather than them going to existing precious environments. It also seems strange that the SANGs are not to have tree or shrub cover, when that is just the landscape nearby.</p> <p>Linked to this, will it be possible to limit/prevent people living in the new properties at Longcross (N and S) from exiting by foot directly to Chobham Common in the west?</p> <p>Once again, I welcome the measures you are trying to take to mitigate the harm caused by planned urban expansion, and I hope the above comments will help to strengthen your proposals.</p> <p>I continue to urge you to shift the balance of the Council's planning policy and practice away from what is widely perceived as being a "friend of the developers" to being a true "friend of the environment".</p>	<p>Strategic Partnership Board<sup>11</sup>. This is referenced in paragraph 6.1.2.</p> <p>Appendix 5 repeats Natural England's guidelines for SANG creation and a car park is a 'must have' for SANG of 10ha or more. It is also desirable for SANG to have areas of tree and shrub cover.</p> <p>No net additional residential units will be permitted within the 400m exclusion zone at Longcross and Natural England will continue to be consulted on remaining planning applications for new development at Longcross as they are received by the Council.</p> <p>Noted.</p> <p>Noted, however a balance has to be struck between the need to provide additional housing and protecting/enhancing the natural environment. It is considered that the adopted 2030 Local Plan does this including protection of the Thames Basin Heaths SPA in line with the Joint Delivery Framework.</p>	<p>No</p> <p>No</p> <p>N/A</p> <p>N/A</p>
Waverley Borough Council	<p>Waverley supports the SPD in that it seeks to align Runnymede's approach to development that is proposed in the SPA buffer zones with the approach that other Thames Basin Heaths' local planning authorities take.</p> <p>With this in mind Waverley notes that para 3.1.9 of your SPD states:</p>	<p>Noted.</p> <p>Noted. The SPD will be amended to ensure it is in line with the Joint Delivery Framework.</p>	<p>N/A</p> <p>Yes</p>

<sup>11</sup> <https://surreyheath.moderngov.co.uk/ieListDocuments.aspx?CId=316&MId=3398&Ver=4>

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	<p>Replacement dwellings, annexes, extensions and loft conversions - Where an application for development results in an increase in potential occupancy levels, it is possible that this will also lead to increased recreational pressure during the lifespan of the development. It is therefore considered that the development is likely to have a significant effect on the SPA and will be required to provide avoidance and mitigation measures. For details of the criteria used to determine occupancy levels, see paragraphs 4.3.2 and 4.3.3.</p> <p>This does not accord with the Joint Strategic Partnership Board's Thames Basin Heaths SPA Delivery Framework which states: The recommendations within this Delivery Framework apply only to net new residential development. It is considered that replacement dwellings will not generally lead to increased recreational pressure and therefore will have no likely significant effect on the SPA.</p> <p>and Waverley's Thames Basin Heaths SPA Avoidance Strategy:</p> <p>1.4 The Strategy relates only to proposals for residential development, i.e., Use Class C3 [Dwellinghouses] (excluding householder development), as well as staff accommodation in Classes C1 [Hotels] and C2 [Residential Institutions].</p> <p>2.4 All net new residential development - when considered alone or in combination with other plans and projects - is likely to have a significant effect on the SPA and should therefore provide or contribute to the provision of avoidance measures.</p>		