



CHOBHAM PARISH COUNCIL

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Planning Policy & Conservation
Surrey Heath Borough Council
Surrey Heath House
Knoll Road
Camberley
Surrey GU15 3HD

By email: policy.consult@surreyheath.gov.uk

Dear Sir/Madam

Surrey Heath Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document 2018 Consultation

Thank you for inviting the Parish Council to comment on the above draft document. The Council strongly supports having a robust policy designed to safeguard the Special Protection Area (SPA) and welcomes the updated and expanded supplementary planning document (SPD).

The Parish Council would like to make the following comments:

1. It is noted that no specific reference is made to the new emerging Surrey Heath Borough Council (SHBC) Local Plan amongst the policies that are listed as relevant to the SPD. For policy context looking forward, it is felt that this would be an important policy for mention/inclusion.
2. The additional clarification of how measurements are taken for the 400 metre buffer is welcomed. Measuring from the closest point of access on the curtilage appears to be practical. SHBC may wish to consider further clarifying whether this relates to vehicular or pedestrian accesses, or both.
3. The Parish Council has previously objected to development proposals that seek to utilise Common land with existing public access rights as Suitable Alternative Natural Greenspace (SANG). Common land has its own special character, significance and nature conservation importance and should not be used as an offset for commercial gain elsewhere. The conversion of Common land to SANG

changes its character, gives the public no new access as a result of the development and causes a natural and unspoiled open space to become urbanised and busier.

4. The SPD appears to be almost exclusively focused on the risks associated with residential (and quasi-residential) development. While the Council has not seen the evidence, it seems curious that a single new residential dwelling would not be permitted within the 400 metre buffer zone, but (for example) a large business development with many hundreds of employees may be judged to have no adverse effect on the SPA. Has the possibility of employees and visitors using the SPA for recreation been fully considered, with the associated risks of littering and fires from cigarette butts etc.?
5. It is stated that the standard for SANG provision is at least 8 hectares per 1,000 head of population, but that a higher level of provision may be required in some cases. It would be useful to include examples of the circumstances which may give rise to the requirement for provision above the 8ha/1000 standard, and/or a table setting out the formula for additional provision.
6. It appears that the threshold for developments to take up capacity at Council-provided SANGs rather than provide on-site SANG has risen from 100 to 136 units (and those between 100-136 are now only “recommended” to provide bespoke SANG). The Parish Council would appreciate an understanding of what has informed this increase.
7. Table 3 on page 15 sets out occupancy rates by number of bedrooms, with the rates including rooms capable of realistic conversion to bedrooms. From the accompanying text, it is not clear whether this calculation includes potential new bedrooms created as a result of loft conversions. If potential loft conversions are not included, this would appear to be a significant omission.
8. The term “significant effect” is used throughout the document, but a clear definition of what constitutes a “significant effect” is not given. While individual developments may not cause a likely significant effect on the integrity of the SPA, the cumulative effect may be significant when considered in combination with other proposals.
9. The Parish Council supports Natural England’s preference for SANGs to be handed over to local authorities to ensure that management is carried out fairly and effectively and funding is secured in perpetuity. SANG land should be accessible for all and not de-facto restricted to communities of the development to which it relates.
10. It is noted that the Strategic Access Management and Monitoring (SAMM) contribution tariff remains unchanged over the January 2012 version, suggesting that there has been no increase in project costs or works in the interim. Is this correct, or is there another explanation for the unchanged contribution figures?
11. Within the guidelines for the creation of SANGs, should there be any special considerations for SANGs which are themselves proposed to be within the 400 metre buffer zone, or that have the potential to link into longer walks onto the SPA itself? It is possible that SANGs located close to the SPA or with easy links

to its paths may have the effect of increasing visits to the SPA rather than mitigating against them.

12. It is noted that there is no expectation for provision of parking for visitors when a SANG is intended for local use (within easy walking distance). Chobham Parish Council believes that in order for maximum community benefit to be gained from creation of new SANG, it should be accessible to all, and therefore adequate parking should be provided for each new SANG. Any parking for a new SANG should be provided in addition to existing parking arrangements in order to not create a reduction of parking facilities for existing needs. A table giving figures or formulae for what is considered to be 'adequate' parking would also be helpful.

Thank you for taking these points into consideration and as always if the Parish Council can provide any clarification or further information please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to be 'CLC' or similar, written in a cursive style.

C L Cooper
Planning Administrator