

(NO OBJECTION)

12/0546 [PES] vlogh.

**Sarah Brady**

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**From:** Twizell, Heather (NE) <Heather.Twizell@naturalengland.org.uk>  
**Sent:** 04 March 2013 17:10  
**To:** development.control; Paul Sherman; Kirby, Jon; Stephenie.Hawkins@gva.co.uk  
**Subject:** Natural England's response to planning application 12/0546 - Deepcut  
**Attachments:** 72775-12\_0546-major mixed dev, PRB Deepcut.pdf

Dear Paul

Apologies for the delay – thought I had already sent this to you and then realised not. There shouldn't be any surprises in it but please feel free to give me a ring if you would like to discuss.

<<72775-12\_0546-major mixed dev, PRB Deepcut.pdf>>

Kind regards

Heather

Heather Twizell

Lead Adviser

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**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Nothing in the email amounts to a legal commitment on our part unless confirmed by a signed communication. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Date: 04 March 2013  
Our ref: 72775  
Your ref: 12/0546



Mr Paul Sherman  
Development Control  
Surrey Heath Borough Council

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**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Sherman

**Planning consultation:** Hybrid planning application for major residential-led development totalling 1,200 new dwellings.

**Location:** Princess Royal Barracks site, Deepcut, Surrey.

Thank you for your consultation on the above dated 11 December 2012 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Conservation of Habitats and Species Regulations 2010 (as amended)**  
**Wildlife and Countryside Act 1981 (as amended)**

Based upon the information provided in support of the hybrid planning application, subject to the recommendations provided below, **Natural England raises no objection** to this application. Natural England's detailed comments in relation to this application are provided in Annex One appended to this letter.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Heather Twizell on 0300 060 1711 or [heather.twizell@naturalengland.org.uk](mailto:heather.twizell@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

**Heather Twizell**  
**Lead Adviser**  
**Land Use Operations**

## **Annex 1 - Natural England's detailed comments in relation to application reference 12/0546**

### **Natura 2000 site – No objection**

The application site lies close to the Colony Bog & Bagshot Heath Site of Special Scientific Interest (SSSI) and the Ash to Brookwood Heaths SSSI. These SSSIs form part of the Thames Basin Heaths Special Protection Area (SPA) and the Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC).

Natural England has **no objection** to the proposed development. This is subject to the following avoidance measures included in the application and detailed below being fully implemented:

- An appropriate contribution towards the Thames Basin Heaths SPA Strategic Access Management & Monitoring (SAMM) Project must be made prior to the commencement of each phase of development.
- Prior to the submission of the first reserved matters application a detailed SANG Management Plan covering both the Southern and Central SANGs must be submitted and agreed by the local planning authority in consultation with Natural England. The SANG Management Plan must adhere to the principles set out in ES Appendix 12C – SANGs Allocation and Implementation Strategy and Figures 3.7 (Southern SANGS) and 3.8 (Central SANGS).

Subject to the above avoidance measures being fully implemented, with appropriately worded conditions or a Section 106 agreement prepared to secure their delivery, and provided that the proposal is undertaken in strict accordance with the details submitted, Natural England advises your Authority that it is not likely to have a significant effect on the interest features for which the Thames Basin Heaths SPA and the Thursley, Ash, Pirbright & Chobham SAC have been classified. Natural England therefore advises that your Authority is not required to undertake an Appropriate Assessment to assess the implications of this proposal on the site's conservation objectives.<sup>1</sup>

Natural England's comments above also apply to the SSSIs which form part of the Natura 2000 sites in question. Natural England has no additional comments to make in respect of these SSSIs. Should the details of this application change, Natural England draws your attention to Section 28(1) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.

### **Basingstoke Canal SSSI – No objection**

This application is in close proximity to the Basingstoke Canal SSSI. Natural England is satisfied that the proposed development being carried out in strict accordance with the details of the application, as submitted, will not damage or destroy the interest features for which the site has been notified. We therefore advise your Authority that this SSSI does not represent a constraint in determining this application. Should the details of this application change, Natural England draws your attention to Section 28(1) of the *Wildlife and Countryside Act 1981* (as amended), requiring your authority to re-consult Natural England.

### **Protected species – No objection**

From the information provided in support of the outline application, it appears that both bats and widespread reptiles will be directly or indirectly impacted and in general Natural England supports the mitigation proposed for each species. Whilst we have provided species specific comments in the sections below, we would also expect the following recommendations to be applied to all species

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<sup>1</sup> This reply comprises our statutory consultation response under provisions of Article 20 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 Regulation 61 (3) of the *Conservation of Habitats and Species Regulations 2010* (The Conservation Regulations) and Section 28(1) of the *Wildlife and Countryside Act 1981* (as amended).

impacted by the development:

1. Given the build out time for this site, Natural England recommends that at the first reserved matters stage a site wide masterplan detailing the habitat and species mitigation for all phases is submitted for approval. This is required to ensure that each phase of the development contributes to the delivery of a joined up, coherent ecological mitigation network. In developing the masterplan, the permeability of the site to species movements should be an integral consideration. Corridors to facilitate movement and the use of under/overpasses should be fully explored to allow unhindered movement of wildlife.
2. We would also recommend that at each reserved matters stage a detailed mitigation strategy for each protected species is submitted for approval and this should be based on up to date species surveys, following good practice guidelines which are current at the time of the submission.
3. Where habitats are created as mitigation or enhancement for a development, these habitats should be subject to long term management and monitoring to ensure that the habitats and populations of species affected are conserved, and wherever possible enhanced. Therefore Natural England recommends that a management plan and monitoring programme should be produced for all habitats and species affected by this application and recommends that should your Authority be minded to grant permission for this application, such a strategy is secured from the applicant through an appropriately worded condition. In addition, funding should be secured for the implementation of the management plan in perpetuity.
4. Details of how urbanising effects upon species and habitats will be managed to ensure that the nature conservation value of the site is maintained and wherever possible enhanced.

### **Bats**

From the information provided, there appear to be fourteen buildings on site with bat roost potential with three roosts confirmed in 2009, all containing brown long-eared bats along with either common or soprano pipistrelles. All three confirmed roosts are proposed for retention through sympathetic conversion of the buildings in question. In general the application site is not considered to provide a good resource for foraging or commuting bats, being comprised largely of buildings, hard-standing and amenity grassland. However the woodland habitats on site (which are largely to be retained) are considered likely to be used extensively by a range of bat species.

The outline mitigation proposals appear appropriate to mitigate the potential impacts on bats but we recommend that at the reserved matters stage, the proposed Ecological Management Strategy should give full details of the following:

- The location, design and layout (including habitat type, width and details of the maximum gaps that bats are likely to cross) of foraging/commuting corridors across the site. The location of these should mirror, wherever possible, existing key foraging/commuting corridors identified during the bat surveys;
- Details of the lighting strategies for all foraging and commuting corridors (ideally with light contour plans) to ensure that dark corridors are maintained across the site for bats to use;
- Details of how habitat connectivity across roads will be maintained;
- How the location(s) of any replacement or roosts installed as enhancement will be connected to the network of corridors.

Due to the age of the bat survey work provided in support of this outline application further update surveys must be carried out to support any future reserved matters application incorporating the conversion or demolition of any of the buildings deemed to have bat roost potential.

All bats are European Protected Species. A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided through avoidance (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development.

Natural England's view on this application relates to this application only and does not represent confirmation that a species licence (should one be sought) will be issued. It is for the developer to decide, in conjunction with their ecological consultant, whether a species licence is needed. It is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice we have provided on likely impacts on favourable conservation status and Natural England's guidance on how we apply the 3 tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) when considering licence applications.

#### **Widespread reptiles**

From the surveys undertaken, the site supports good populations of common lizard and slow worm and low populations of grass snake and adder with the majority of individuals of all species being located within grassland and ruderal vegetation along the woodland edges. Natural England notes that only small areas of suitable habitat are to be affected by the development and that it is proposed to capture and translocate any individuals in these areas to suitable receptor areas within the new on-site SANGs. This outline mitigation appears reasonable but we would recommend that at the reserved matters stage, full details should be provided of the specific reptile mitigation and enhancement measures. These should be clearly cross-referenced between the Ecological Management Strategy and the detailed SANG Management Plan and should include the following:

- The location, design and layout of any habitat creation areas for reptiles. This should include details of the timing of the works to ensure habitats are sufficiently established to accommodate any translocated animals;
- For the more wide ranging grass snake, details should also be provided of how habitat connectivity will be maintained/enhanced across the development site.

#### **Green infrastructure and biodiversity enhancements**

Natural England welcomes the significant amount of publicly accessible open space that will be delivered as part of this development. Of total amount of 68.98ha we are pleased to see that much of this will be informal and semi-natural in character (55.92ha combined SANGs & ANGSt).

While the two SANG areas will be covered by a detailed SANG Management Plan to be prepared at the reserved matters stage we would also encourage the applicant to think about what biodiversity enhancements can be incorporated into the other areas of publicly accessible greenspace on site such as roosting opportunities for birds and planting with native species.

We recommend that should your Authority be minded to grant planning permission, measures to enhance the biodiversity of the wider site are secured from the applicant (to be covered in detail at the reserved matters stage). This is in accordance with Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the

planning process.

#### **Other advice**

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity)
- local landscape character
- local or national biodiversity priority habitats and species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at [Wildlife and Countryside link](#).

If the LPA is aware of, or representations from other parties highlight the possible presence of a protected or Biodiversity Action Plan (BAP) species on the site, the authority should request survey information from the applicant before determining the application. The Government has provided advice<sup>2</sup> on BAP and protected species and their consideration in the planning system.

[Natural England Standing Advice for Protected Species](#) is available on our website to help local planning authorities better understand the impact of development on protected or BAP species should they be identified as an issue at particular developments. This also sets out when, following receipt of survey information, the authority should undertake further consultation with Natural England.

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<sup>2</sup> Paragraph 98 and 99 of ODPM Circular 06/2005