

[COMMENT]

12/0546/PGS

Jane Luker

From: Paul Sherman
Sent: 11 March 2013 14:06
To: development.control
Subject: FW: 12/0546 Deepcut
Attachments: 906573Deepcut08Mar13.doc

Paul Sherman
BA (Hons) MSc MRTPI
Senior Planning Officer
Surrey Heath Borough Council
Surrey Heath House
Knoll Road
Camberley
Surrey
GU15 3HD
www.surreyheath.gov.uk

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From: Ken Anckorn [<mailto:Ken.Anckorn@surreywt.org.uk>]
Sent: 11 March 2013 14:01
To: Paul Sherman
Subject: 12/0546 Deepcut

Dear Mr Sherman,

Please find attached comments from the Trust.

Yours sincerely,

Ken Anckorn
Conservation Officer, Planning.



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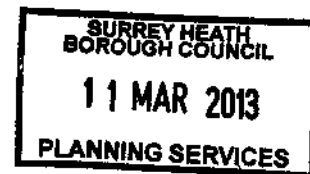
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School Lane . Pirbright .
Woking . Surrey . GU24 0JN
Tel: 01483 795449
Fax: 01483 486505
Email: ken.anckorn@surreywt.org.uk
www.surreywildlifetrust.org



Date: 08 March 2013

Ref: 12/0546

Hybrid planning application for major residential-led development totalling 1,200 new dwellings. The hybrid application seeks full planning permission for: Conversion of the Officers' and Sergeants' Messes and Head Quarters of the Director of Logistics to 81 flats (Class C3). Creation of a new access, secondary road and new footpath and cycle paths. The hybrid application seeks outline planning permission for the proposed demolition of all other buildings, except St Barbara's Church and two existing dwellings (Huntspiel Cottages), and residential-led redevelopment comprising: 1,119 new build dwellings (Class C3). A 2 form entry primary school, together with a nursery facility (Class D1). An enhanced village centre, with improved retail and other local centre uses, comprising: - A foodstore of 2,000sqm gross (1,400sqm net retail) floorspace (Class A1). - Space for medical facilities to accommodate GPs/dentists (Class D1). - A library, and ancillary uses such as police desk and SANGs visitor centre, of 150sqm combined total gross floorspace (Class D1). - Three local shops (e.g. non-food retail/café/takeaway/bookmakers/estate agent/bank) each of around 60sqm gross floorspace (Class A1 / A2 / A3 / A5). - A site for a public house of 0.12ha (Class A4). - Retention of the Church of St Barbara as a religious facility, with a replacement church hall of up to 125sqm gross floorspace (Class D1). Provision of 69.12ha of public open space, comprising: - SANGs totalling 35ha. - A SANGs link totalling 1.07ha. - Semi natural open space (ANGSt) totalling 19.85ha. - A village green of 2ha, in addition to amenity space within new residential areas. - Allotments of 1.16ha. - A sports hub, including built facilities (e.g. changing rooms) of 7ha. - Parkland of 2.54ha. - Dedicated play facilities of 0.50ha, in addition to neighbourhood facilities within new residential areas. A site for a care home of 1.27ha (Class C2). New services infrastructure, including a Sustainable Urban Drainage System. (Amended plans recv'd 22/11/12 - plan reference change only) (Additional plans recv'd 18/1/13 and 24/1/13 - as at 16/2/13 part available for public viewing/in progress).

Princess Royal Barracks, Brunswick Road, Deepcut, Camberley. GU16 6RN
Our ref: 906573/9021/KA

Dear Mr Sherman,,

Thank you for your e-mail requesting our observations on the above planning application. The advice provided is an officer view, under the terms of your subscription to our planning consultancy service. The advice is restricted to biodiversity/nature conservation/ecological issues, and does not prejudice further representation the Trust may make as a non-statutory consultee on related or other issues.

Having reviewed the application documents and studied our records, we have the following comments and recommendations.

The proposed application site is in a very sensitive location, adjacent to the Thames Basin Heaths (TBH) Special Protection Area (SPA). Underlying this designation is the Colony Bog and Bagshot Heath Site of Special Scientific Interest (SSSI). These sites are designated for the heathland birds they support, which are listed on Annex 1 of the Birds Directive (Directive 2009/147/EC on the Conservation of Wild Birds). The Annex 1 birds are Nightjar *Caprimulgus europaeus*, Woodlark *Lullula arborea* and Dartford warbler *Sylvia undata*.

School Lane, Pirbright,
Woking, Surrey, GU24 0JN
Tel: 01483 795449
Fax: 01483 486505
Email: ken.ancorn@surreywt.org.uk
www.surreywildlifetrust.org



Colony Bog and Bagshott Heath SSSI is also designated as part of Thursley, Ash, Pirbright and Chobham Commons Special Area of Conservation (SAC) for its important heathland habitats and their important assemblages of heathland specialist flora and fauna.

The Conservation of Habitats and Species Regulations 2010 (as amended) (known as the "Habitats Regulations") transpose Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") into UK legislation. These Regulations consolidate all the various amendments made to the preceding "Habitats Regulations" 1994 for England and Wales.

The Habitat Regulations provide for the designation of both Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) in the UK, which form part of the Natura 2000 network of protected areas across Europe.

The Planning Authority should be seriously concerned about the potential for additional recreational pressure on the SPA and the SAC associated with the proposed development and particularly with the proposed 1200 dwellings.

The approach to the protection of the SPA from the effects of new residential development is set out in the Thames Basin Heaths SPA Delivery Framework (Thames Basin Heaths Joint Strategic Partnership Board, 2009) and Policy NRM6 of the South East Plan. This establishes the principle that all net new development within 5km of the SPA, whether alone or in combination with other development, is likely to have a significant effect on the SPA and should, therefore, provide avoidance measures. The Delivery Framework advocates the provision of Suitable Alternative Natural Greenspace (SANG) and access management as the most appropriate avoidance measures. To avoid an adverse impact on the SPA, the avoidance measures must achieve no net increase in visitors to the SPA.

The Trust is concerned that any housing development does not have an adverse affect on the Thames Basin Heaths and the three ground nesting birds for which it is designated as a Special Protection Area (SPA). The Trust has therefore been generally supportive of the TBH Delivery Framework Strategy to protect this important habitat from the potential effect of housing development within 5km of the boundaries of the SPA.

The Strategy has a number of policies which come into effect as a consequence of the proximity of the proposed development site to the SPA, the type of development and the number of housing units involved.

The Trust as a first principle would wish to see no housing development which may result in adverse affect to the SPA from increased human activity, in the vicinity of the SPA. This is supported by the Delivery Framework Policy to object to any new housing development within 400m, within which it is considered that adverse effect to the SPA from additional housing is likely to cause adverse effects which could not be mitigated. Between 400m and 5km from the SPA boundary, the Strategy has a number of policies to protect the SPA, including the provision of Suitable Accessible Natural Green Space (SANGS), funded in part or in total by developers, to provide alternative recreational space for people living in the area, who might otherwise use the SPA for dog walking and other activities previously proven by various studies to adversely affect the three SPA bird species.

School Lane . Pirbright .
Woking . Surrey . GU24 0JN
Tel: 01483 795449
Fax: 01483 486505
Email: ken.anckorn@surreywt.org.uk
www.surreywildlifetrust.org



When considering the proposed Deepcut Development, the Trust must advise on the potential effects of a development of this size (1200 homes) on the SPA and on the SNCIs on and adjacent to the site, which may be affected by the development either directly by the development process or by disturbance from human and pet activity post development.,

Potential Impact on the SPA.

Any new housing in the area of Deepcut is likely to have an impact on the SPA, which in places is immediately adjacent to the development site, although along much of its boundary protected by a security RDA fence. However, other parts of the SPA in the area do not have the protection of the RDA including Brentmoor Heath and Folly Bog. The SPA sites offer a unique 'wild' experience for the public, preserving as they do the last remnants of Surrey's once extensive lowland heath habitat. Even the provision of alternative green spaces will not completely stop the growing public use of these 'open to the public' SPA sites, with their unrivalled open spaces, whose limited car parking facilities are already insufficient for growing visitor numbers, even without this development. Deepcut although a major housing project, is not the only new housing proposal for Surrey Heath and it is likely that due to the limited availability of open spaces in the Local Authority's area even with the creation of new recreational habitat, there is going to be additional human pressure on the SPA.

Protecting the SPA

The Planning Authority should be seriously concerned about the potential for additional recreational pressure on the SPA and the SAC associated with the proposed development and particularly with the proposed 1200 dwellings.

To help protect the SPA from the adverse effect of additional human and pet pressure, the TBH Delivery Framework Strategy must be fully utilized to help reduce the use by the public of the SPA. SANGs will only form one part of this strategy, which should also include further protection measures for the SPA, including financial help through the Framework's Strategic Access Management and Monitoring (SAMM) funding system. We would also wish to see improvement to SPA habitat included in the package of SPA protection provision provided with this development (Part of the Framework's three pronged approach).

SANG

In Surrey, locating sufficient areas of land for potential SANG sites is not easy due to the considerable pressure on land imposed by many requirements for land use from, industry, transport, housing, forces training, public recreation and nature conservation. This has resulted in some areas of land selected by Local Authorities as Sites of Nature Conservation Importance (SNCI) being considered as suitable candidates for inclusion within SANG sites. An obvious conflict of interest immediately arises. SNCIs are selected for their ecological value and this may be adversely affected by the increase in human activity selection as a SANG would entail.

We are concerned that in sub-section 3.1.13 of the Section 3 (proposed development description) it states that Deepcut Barracks North SNCI will be "largely" retained. We would strongly advise the planning authority to seek further information from the applicant concerning this matter, as loss of

School Lane . Pirbright .
Woking . Surrey . GU24 0JN
Tel: 01483 795449
Fax: 01483 436505
Email: ken.anckorn@surreywt.org.uk
www.surreywildlifetrust.org



SNCI land would be adverse to the Local Authority's biodiversity requirement under NERC and the NPPF.

The National Planning Policy Framework (NPPF) (paragraph 109), requires the planning system to aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged

The Natural Environment and Rural Communities (NERC) Act (2006)(Section 40) states, "*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*".

We would advise that the use of SNCI sites as SANG should be approved by the Surrey Nature Conservation Liaison Group (SNCLG) which confirms the selection of SNCIs. The Group may consider allowing SNCIs to be used for SANG, if they are in unfavourable and declining condition, there was no perceived alternative method of funding restoration work and the biodiversity of the SNCI would not be damaged by its use as a SANG and preferably enhanced. Notwithstanding the above, the Trust would advise that SNCIs be used as SANG only when all other suitable areas had been included in the land requirement for SANG.

Should the development be allowed, and the mitigation and compensation strategy for the SPA agreed, The Trust would advise that all suitable habitats on site be restored, particularly if within the SNCI, to heathland, after all appropriate survey work had been undertaken. Any other habitat creation should compliment the SPA habitat with Surrey Biodiversity Action Plan (BAP) Priority habitat given first consideration.

Deepcut Barracks North Site of Nature Conservation Importance (SNCI) was selected for its heath and acid grassland habitats (BAP Priority Habitats) with the potential for woodland areas to be restored to heath. It was also selected for the presence of Allseed (*Radiola linoides*), a species rare in Surrey.

We would therefore advise that use of the SNCI as part of the SANG should only be considered if the management of the SANG is designed to ensure the conservation and enhancement of these important habitats and the specialist species they support.

- Biodiversity Opportunity Area (BOA)

To help protect the SPA and the biodiversity of the area, off-site improvement works to adjacent SNCIs and the SPA should be undertaken as part of any development agreement.

The proposed development site is largely within the Thames Basin Heath (TBH03) Biodiversity Opportunity Area (BOA) (Colony Bog, Bagshot Heath and Deepcut Heaths). The ecological provision for this proposed development site should therefore seek to enhance the biodiversity opportunities of the BOA area by taking into account adjacent habitats and using the opportunity of the development to improve ecological linkages across the site and with adjacent habitats to help deliver a 'living landscape' approach to development as supported by the NPPF..

School Lane . Pirbright .
Woking . Surrey . GU24 0JN
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Fax: 01483 486505
Email: ken.anckorn@surreywt.org.uk
www.surreywildlifetrust.org



Having studied the Environmental Statement (ES) submitted by the applicant in support of the proposed development The Wildlife Trust has the following areas of concern which it would advise the Local Authority to consider and determine if the applicant's Environmental Statement adequately addresses these issues as we would advise that if these issues are not further considered the proposed development is likely to have adverse effect on the legally protected species currently on the proposed development site and on the biodiversity value of the adjacent designated habitat.

- **Impact on The adjacent SPA and SAC.**

The Trust would advise that the ES does not fully address the potential for the proposed development to impact adversely on the designated habitat and the species it supports. While we acknowledge the applicants statement to fully contribute to the TBH SPA Avoidance and Mitigation Strategy through the provision of an appropriately sized SANG and full contribution to the Strategic Access Management and Monitoring (SAMM) Strategy, little detail is given on what site-specific actions will be taken to minimize the impacts of a development of this size on the adjacent SPA and SAC which despite the provision of a SANG and contribution to the SAMM strategy is very likely to suffer disturbance and impact from the development process and the increased human activity the development will generate.

No reference is made to any discussions having taken place with the SAC/SPA owners and managers regarding their particular areas of concern and where potential areas of significant impact are likely to occur.

The Trust is also aware of other large housing proposals in the locality at Brookwood Farm and the former DERA site at Longcross. Has the likely in-combination effect of those developments with the proposed development for this site been considered? The additional vehicle movements and human activity generated by a number of major developments in the locality of the TBH SPA is likely to be greater than one large development.

- **The Development Process.**

The Trust is not technically qualified to comment on the potential of the proposed development to impact the adjacent SPA/SAC by increased pollution effect including noise, dust, lighting and fumes resulting from both the development process, including vehicle movements and the end use of the site and additional vehicle movements generated.

We are also aware of other major developments in the area, including housing development proposals at Brookwood Farm and Deepcut Barracks which will have additional traffic implications on roads and junctions (including Junction 3 on the M3), in the locality which could in combination with the DERA proposal increase traffic impact on designated habitat and important species.

We would therefore advise that the sections of the ES covering these aspects are subject to independent expert scrutiny to help satisfy the planning authority that these matters have been adequately addressed.

- **Construction Environmental Management Plan. (CEMP).**

We advise the planning authority to require the applicant to submit for approval a site specific CEMP to identify and provide mitigation for potential adverse effects from the proposed development process on the habitats and species including the adjacent SAC/SPA.

School Lane . Pirbright .
Woking . Surrey . GU24 0JN
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The planning authority should also be satisfied that the completed development will not pollute adjacent habitats through for example, polluted run-off entering the Basingstoke Canal which is designated an SSSI for its aquatic wildlife which could easily be adversely affected by pollution.

Species and Habitat Issues.

We would advise that it appears that the applicant has undertaken sufficient ecological survey work to be able to identify the species and habitats which would be impacted by the development process and has assessed the level of impact. We would advise however that to help prevent adverse effect to species and habitats, the following additional measures should be implemented. We have the following particular concerns;

a) Badgers.

As badgers are an active species, we would advise that a further survey is advisable immediately prior to development work commencing to ensure that their current status on site is taken into consideration when undertaking development works and any necessary mitigation undertaken.

b) Reptiles.

Four species of reptile were found on the proposed development site during survey work, which could make the site a suitable subject for selection by the Local Authority as a Site of Nature Conservation Importance (SNCI). The site can therefore be concluded as being important for reptiles and consequently, should development works proceed, the required mitigation should be suitable for an important reptile site.

Reptiles from the proposed development footprint are to be translocated to the SANG site. As the SANG will take some time to be developed and mature to the extent that it is capable of supporting reptiles, how will reptiles affected by building and demolition activity be protected from adverse effect?

Does the SANG with its intended use as a dog exercise site with animals off the leash provide a suitable translocation site?

c) Bats.

We would advise the planning authority, should the proposed development proceed, that prior to works commencing which may affect known bat roosts, further survey work is undertaken to assess the need to amend any of the proposed mitigation works, to address current bat status on the site.

d) Birds.

Six BAP priority species, including 5 species on the Red List of species of conservation concern and one schedule 1 species (Wildlife and Countryside Act 1981 (as amended)) were recorded on the development site. We would advise that as habitat suitable for many of these species will be lost as a result of the development process and species are likely to be disturbed as a result of development works, the ecological strategy for the site should include adequate provision for enhancing the site post development for these and other species. This is likely to require a significant provision of artificial nesting sites as new habitat develops.

Advice should be sought regarding the creation/restoration of heathland habitats and the possible attraction on site of the SPA ground nesting bird species. As these birds are particularly vulnerable to disturbance care will be required to ensure that these species are not adversely affected.

School Lane . Pirbright .
Woking . Surrey . GU24 0JN
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www.surreywildlifetrust.org



e) Invertebrates.

Suitable habitat should be provided for invertebrate assemblages currently on site including hymenoptera and aquatic invertebrates. This should be fully included in any Landscape and Ecological Management Plan for the site.

f) Planting Selection.

We would strongly advise the use of native species when planting new trees and shrubs, preferably of local provenance, suitable for site conditions and complimentary to surrounding natural habitat. Boundary planting is particularly important as native species hedgerows and tree lines can facilitate the movement of animals through a developed area.

Plantings of foreign species of invasive habit should be avoided adjacent to natural habitat. The use of peat-based composts, mulches and soil conditioners should be avoided due to the loss of important natural habitat.

g) Woodland.

Although the majority of the broadleaf and mixed woodland on site is to be retained within current development plans, 21% or 9.8ha of this habitat is to be lost as a consequence of development works. This is a BAP Priority Habitat and the loss of this much woodland in this locality will have a significant adverse effect to local biodiversity value unless suitably mitigated. We would therefore advise that improved management of remaining woodland and planting of new areas of native species deciduous woodland should be given priority in the ecological management plan for this site.

h) Plants.

We would wish to see more detail of how any rare plants, on site including Allseed will be protected from the prolonged development process and how the current population on the applicant's site will be enhanced.

We would also wish to see more attention given to protecting any other plants/plant communities of biodiversity interest on the site .

Landscape and Ecological Management Plan (LEMP).

We would advise the planning authority to require the applicant to provide for approval a LEMP providing an ecological management strategy for the site including detailed specifications of how the site will be landscaped and planted and how species and the biodiversity value of the site will be protected and enhanced. The Plan should include a Maintenance Plan for the public areas of the site including a monitoring regime in order that the establishment of habitat and species can be assessed for any required remedial action, informed by the level of success of development of habitat and species populations.

The Plan should take into account the likely development timescale and sequential nature of development and be applicable and enforceable on any development company working on the site.

The LEMP should include details of how biodiversity value will be maximised on all public spaces on the site, improving existing habitats and using new plantings to enhance existing habitat and improve connectivity across the site. Features such as use of the proposed SUDs system and the management of grassland areas for wildflower interest should be included.

The Trust will be pleased to advise further on this Plan and any other ecological matter for this site.

Public Involvement.

School Lane . Pirbright .
Woking . Surrey . GU24 0JN
Tel: 01483 795449
Fax: 01483 486505
Email: ken.cnckorn@surreywt.org.uk
www.surreywildlifetrust.org



To help ensure the long term viability of biodiversity in heavily used public sites, we would advise that it will be essential to involve the public, fostering a feeling of 'ownership' in their open spaces. Good quality information must be provided to help residents in the new housing appreciate the value of their environment. This can be done with features such as an information centre, discreet signboards, leaflets and a web page. Local residents may be formed into volunteer groups to help paid staff manage the SANGs. An 'Eco Group' could be set up to help carry out conservation tasks and create features for the community such as an 'easy access' footpath and benches. School children could also be involved with projects such as a wooden sculpture trail.

An Outreach education/community officer post for the SANGs could be based at Deepcut.

Surrey Wildlife Trust would therefore advise that if the above areas of concern are not adequately addressed we are likely to object to the application in its present outline form.

We hope these comments assist your determination of this planning application. Please do not hesitate to contact the Trust with regard to any other matter relating to this application.

Yours sincerely,

Ken Anckorn
Conservation Officer, Planning