

Planning Policy,
Woking Borough Council,
Civic Offices, Gloucester Square,
Woking,
Surrey, GU21 6YL

By email: [REDACTED]

30 July 2015

Dear Sir/Madam,

Woking Borough Council Site Allocations Development Plan Document (DPD) (July 2015) – Regulation 18 Consultation

Thank you for your consultation on the above document. Please find below the comments of the Surrey Wildlife Trust, which are confined to issues concerning the protection of the natural environment, including the conservation of Surrey’s biodiversity.

You will be aware that national planning policy in the NPPF has a central tenet to plan only for *sustainable* future development and economic growth. That sustainability is defined, in part, as the ability to clearly demonstrate a **contribution to protecting and enhancing the natural environment**; including to “*improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change.*” Clearly, this aspiration would be achieved through rigorous pursuit of the Objective 9 of your Sustainability Appraisal Framework.

Whilst achieving the above may appear less appropriate for a proportion of your allocated sites, particularly those within “*the Urban Area/Village*”, there is nevertheless a great deal that can be achieved to enhance biodiversity through the development process; via approaches to the design of landscaping and drainage schemes as Green Infrastructure for example, as well as by incorporating specialised architectural features into buildings.

There are some sites in the Development Plan Document where protecting the natural environment could prove challenging under any proposed development scenario and we expand on this in respect of those individual sites listed in the table below. In most cases however, our intention is to highlight where extra attention to safeguarding the natural environment would always be necessary, and where significant opportunities exist for contributing to strategic biodiversity conservation objectives.

Your ref.	Site Name	Comment
UA35	Monument Way West Industrial Estate	These sites are adjacent to the Basingstoke Canal, which are in part designated as either Site of Special Scientific Interest (SSSI) or Site of Nature

UA32	Land within Sheerwater Priority Place	Conservation Importance (SNCI). This is obviously therefore a sensitive feature for biodiversity, where for example water quality is at distinct risk from pollution. Natural England must be consulted here.
UA49	Camphill Tip	Although essentially beyond the Borough at this point, the Basingstoke Canal is extremely close. The above issues are relevant here also.
Intended removal from Green Belt		
GB6	Six Crossroads roundabout	This site abuts both the Horsell Common SSSI (part of the Thames Basin Heaths SPA) and its contiguous SNCI to the south (Horsell Common South); also within the Woking Commons Biodiversity Opportunity Area (BOA). Extreme sensitivity will therefore be required, in full consultation with Natural England. Opportunities may exist for assisting achievement of relevant BOA objectives here (including restoration/creation of Heathland and Acid grassland).
GB5	Land to the south of Murray's Lane, Byfleet	Partly within the River Wey & tributaries BOA. Any development here should assist achievement of relevant BOA objectives (including the protection, restoration & creation of Priority habitats, esp. Floodplain grazing marsh and Wet woodland).
GB7	Ten Acre Farm, Smarts Heath Road	This site is adjacent to Smarts & Prey Heaths SSSI, as well as the Ash, Brookwood & Whitmoor Heaths BOA. Any development here therefore requires extreme sensitivity and consultation with Natural England. Opportunities may exist for assisting achievement of relevant BOA objectives (including restoration & creation of Heathland and Acid grassland).
GB8, 10, 11, 14	Sites at Mayford and Hook Heath	Although unrecognised through formal site designations, we are aware that these sites support various features of ecological merit, including the presence of Priority habitats (Mixed deciduous woodland, Hedgerows etc.), which we would anticipate being fully considered under any development scenarios here. There would also appear to be some wildlife/green corridor function supported by this chain of sites, which we would

		expect to be maintained.
GB12	Land rear of 79-95 Lovelace Drive, Teggs Lane, Pyrford	This site is adjacent (to the east of) the Pyrford Common SNCI. Development must be sensitive to adjacent land uses and seek to protect and enhance the biodiversity interest both there and on-site.
GB15	Land surrounding West Hall, Parvis Road, West Byfleet	Partly within the River Wey & tributaries BOA. Any development here should serve to assist achievement of relevant BOA objectives (including the protection, restoration & creation of Priority habitats, esp. Floodplain grazing marsh and Wet woodland).
Intended SANG within Green Belt		
GB20-21	Gresham Mill, High Street, Old Woking	These sites include parts of the Mill Moor, Hoe Stream Valley and other SNCIs; they are all also within the River Wey & tributaries Biodiversity Opportunity Area. We would welcome their provision as SANG (or as a Country Park in respect of GB22) conditional to the following: (i) this is managed so as not to compromise the existing ecological interest, and (ii) their future management directly assists achievement of relevant BOA objectives (broadly including the protection, restoration & creation of Priority habitats, esp. Floodplain grazing marsh, Wet woodland and Reedbeds).
GB22	Woking Palace, Carters Lane, Old Woking	
GB17	Byfleet SANG, land to the south of Parvis Road, Byfleet	
GB18	Brookwood Farm SANG	This site includes the Brookwood Farm Stream SNCI and is also within the Colony Bog, Bagshot Heath & Deepcut Heaths BOA. We would welcome its provision as SANG conditional to the following: (i) this would not compromise the existing ecological interest, and (ii) future management directly assists achievement of relevant BOA objectives (including the protection, restoration & creation of Priority habitats, esp. Heathland, Acid grassland and Fen.
GB19	Mayford SANG, land to the south of Moor Lane, Mayford	This site wholly incorporates the Westfield Common SNCI. We welcome its provision as SANG provided that management is directed to ensure that the existing ecological interest is not impacted, and all opportunities for biodiversity enhancements are maximised.

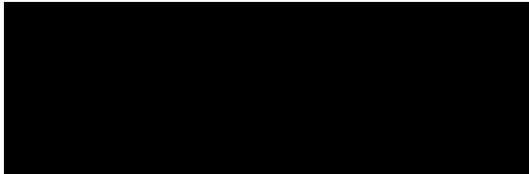
We acknowledge and welcome where appropriate your stated recognition of a great many of these issues already under the detailed Proposed Sites descriptions in sections A-C of the DPD.

Habitats Regulations Assessment

We note and endorse the recommendations of the Habitats Regulations Assessment commissioned for the Sites Allocations DPD, especially that requiring confirmation of the availability of sufficient SANG land to support the proposed sites allocations for new housing across the Borough. The specific recommendation regarding site GB6 is also noted.

I hope these comments are useful to you.

Yours faithfully,



Mike Waite

Living Landscapes Manager