



**Guildford Borough Council Development Plan  
Thames Basin Heaths Special Protection Area Avoidance Strategy  
Supplementary Planning Document**

**Consultation Statement  
(Regulation 12(a))**

**August 26 2016**

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## **Introduction**

### ***The Purpose of this Consultation Statement***

This statement has been prepared by Guildford Borough Council to accompany the Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document 2016 (the strategy) in accordance with Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Regulation 12(a) states that prior to a local authority adopting a Supplementary Planning Document, it must prepare a statement setting out:

- the persons the local planning authority consulted when preparing the supplementary planning document;
- a summary of the main issues raised by those persons; and
- how those issues have been addressed in the supplementary planning document;

This statement is therefore a record of the consultation undertaken during the preparation stages of the Thames Basin Heath Special Protection Area Avoidance Strategy Supplementary Planning Document.

### ***Background to the strategy***

The consultation draft strategy has been produced to supersede the Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-2016. The 2009-2016 strategy needs to be replaced to reflect changes in national policy and legislation regarding infrastructure funding, to ensure the tariffs required by the approach within continue to adequately fund measures that protect the Thames Basin Heaths Special Protection Area and to support work on the new Local Plan. The basic approach set out in the consultation strategy has been in place since 2006 and it has also been updated to take on board the lessons learned since the last strategy was adopted in 2010.

## **Initial consultation on the strategy**

### ***Who was consulted?***

To aid the preparation of the strategy, early engagement including informal consultation on an initial draft was undertaken with a number of consultees seeking their comments prior to its formal publication. The following Council officers were engaged and consulted at this stage:

- Development Management manager and principal officers
- SANG officer in the Parks and Countryside team
- Parks and Landscape manager
- Planning Solicitor
- Director of Community Services
- Director of the Environment
- Senior accountant, Financial Services

The following organisations were consulted at this stage:

- Natural England

### **Summary of the main issues raised and how they have been addressed**

Main issues raised	How they have been addressed
The way the strategy applies to houses in multiple occupation and care homes needs to be clarified	Additional clarification has been added to the section "Types of development covered".
The guidance on provision of SANG for Houses in Multiple Occupation does not adequately reflect the impact on the SPA in terms of building occupancy, or seek enough funding to mitigate the impact.	The guidance has been updated to make it clear that the tariff sought will be closely aligned with the expected occupancy of the building.
The occupancy figures used for different sizes of dwelling are out of date.	The tariffs have been recalculated using occupancy data from the 2011 census (the most recent available). The previous strategy used data from the 2001 census.
The existing SANG tariff does not allocate costs proportionately based on dwelling occupancy and therefore is not linked to potential impact on the SPA. The SANG tariff also does not take account of rooms that are not described as bedrooms but could be used as such.	<p>The method for working out the SANG tariff has been clarified so that costs are set per predicted occupant, as opposed to the previous tariff which was based around a charge for a one bed home (£3110.73 in 2009), with an additional fee for each additional bedroom (£500 in 2009).</p> <p>The Council generally takes a common sense approach to identifying bedrooms in planning applications. Text has been added to set out what type of rooms will be considered as bedrooms.</p>
The SANG tariff does not adequately fund the delivery and maintenance of SANG based on the known costs of maintaining existing SANGs.	The new SANG tariff has been set at a level that delivers sufficient funds to deliver and maintain SANGs, based on updated costings.
The strategy should provide guidance on what constitutes "Appropriate Assessment" (AA) as referred to in the Habitats Regulations.	There is little published guidance regarding Appropriate Assessment. Text has been added referring to commonly used guidance (DCLG, 2006), requiring those undertaking AA to follow established practice, and setting out the basic structure of an assessment as per that guidance.
The strategy should make it clear that the spending of funds collected through the SANG tariff includes management costs, as	The "Spending" section has been amended to make this clear.

well as infrastructure and maintenance.	
The strategy needs to include guidance on the planning process for providing SANGs on agricultural land.	Text has been added which sets out that a planning application for change of use may be needed for SANGs on agricultural land.
The strategy needs to include guidance for developers and landowners promoting SANG on land outside the Council's ownership, particularly where they would like the Council to own or manage the land, or the Council will need Step-in Rights. The guidance should set out the process for the Council taking on land.	Guidance covering these points has been added.
The strategy needs to set out that SANGs on private land will need to be monitored by the Council to ensure that SANGs are not over-allocated.	Text has been added to address this.
The Council implements best practice in terms of access standards (e.g. for wheelchairs) on SANGs. Guidance should be provided for private and bespoke SANG providers.	Guidance on accessibility for new SANGs has been added.