



Technical Report

**An appraisal of the ecology of
Shagbrook, Reigate Heath, Surrey**

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1 Additional material on ecology and nature conservation

- 1.1 Reigate Heath lies immediately to the south and east of the area defined as PMZ60. It is designated nationally by Government as an SSSI, as an area of lowland heath, alder woodland and wet meadows. The County Council is therefore obliged to follow Government Guidance on planning relating to SSSIs as set out in its PPG9 (1994). The Heath is also a Local Nature Reserve designated by Reigate and Banstead District Council.

2 Planning Policy Guidance 9 (1994)

- 2.1 Government guidance makes it clear that planning authorities must identify SSSIs in Structure Plans and Annex A of PPG9 describes in detail the obligations, designations, and protection afforded them under the legislation. The Government's position is set out in Paragraph 12 stating that the Secretary of State wishes to ensure that these obligations are fully met, and that, as far as possible and consistent with the objectives of the designation, these sites are protected from damage and destruction.
- 2.2 Paragraph 40 of PPG9 refers specifically to drawing up policies for minerals in development plans and makes it clear that applications in or likely to affect SSSIs should be the subject of the most rigorous examination, and English Nature must be consulted on such applications.

3 Consultation Draft on PPS9 (2004)

- 3.1 With regard to SSSIs the recent consultation on a new draft planning policy statement states, " Where proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI, planning permission should not normally be granted.
- 3.2 Referring to Networks of Natural Habitats, the Draft states that "Local planning authorities should seek to conserve habitats of principal importance and consider opportunities to enhance and add to them. Local planning authorities should avoid increasing, and where possible seek to reduce, the fragmentation and isolation of natural habitats". This would apply to Reigate Heath, as lowland heathland is one of the priority habitats identified in the Government's England Biodiversity Strategy and also by the County in the Surrey Biodiversity Strategy.
- 3.3 The overall thrust of this revised guidance is to strengthen the protection given to SSSIs and to encourage opportunities to enhance and where possible increase the extent of important natural habitats. The identification of the area adjacent to Reigate Heath as a potential mineral extraction zone is incompatible with these policies.

4 The Surrey Structure Plan 2004

- 4.1 Policy SE6 states that “Biodiversity within Surrey should be conserved and enhanced and development will be expected to contribute to actions safeguarding and managing habitats identified as important through the UK and Surrey Biodiversity Action Plans, or where they are protected by wildlife legislation (i.e. SSSIs).
- 4.2 Policy SE7 makes it clear that areas designated as SSSIs will be conserved and enhanced and inappropriate development will be resisted. The Structure Plan states that the intention of the policy SE7 is that there should be a presumption against development, which directly affects such sites.
- 4.3 Identification of the area immediately adjacent to Reigate Heath SSSI as a Potential Mineral Zone is incompatible with these policies. The area of wet Alder woodland within the SSSI would undoubtedly be adversely affected by the drawdown of the water table, which is also likely to cause further drying out of heathland habitats within the main body of Reigate Heath. The heath has already suffered a progressive drying out as evidenced by the loss of patches of Sphagnum bog supporting wetland species such as sundew, bog pimpernel and bog asphodel, which no longer occur. However, areas of wet heath still exist and the alder carr supports important wetland species. These important elements of the SSSI would be adversely affected by lowering of the water table if the area of PMZ60 was excavated for sand.
- 4.4 In making its proposals for Potential Mineral Zones the County Council has apparently ignored the implications of its own strategic environmental policies. In reaching a strategic view on appropriate areas for designation as PMZ the Council should consider wider environmental factors. It is considered that the environmental implications for Reigate Heath SSSI should be the subject of a full investigation before any proposals are made. The area should not be identified as a PMZ. This should be a strategic planning decision by the County taking account of all the environmental issues involved. The County Council should consider the national strategic importance of the SSSI at this stage on a par with the strategic requirement for minerals. It should not be left for detailed consideration in relation to a possible planning application at some future date.

DG, 22/2/05