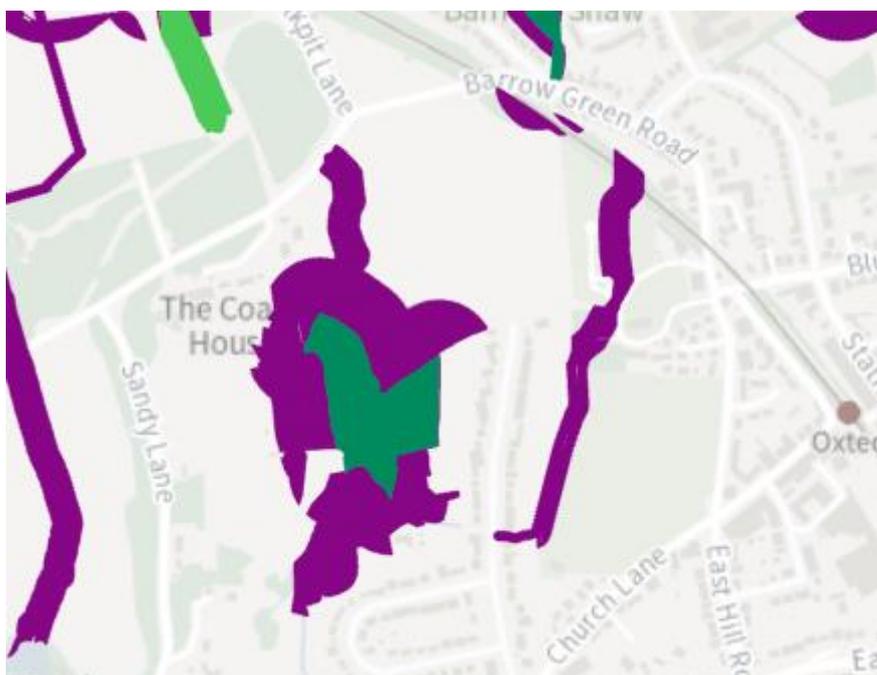


The Bogs and the Local Nature Recovery Strategy

1. The Environment Act 2021 introduces a statutory duty for responsible authorities to prepare and adopt a Local Nature Recovery Strategy (LNRS), which are a system of spatial strategies for nature and environmental improvement.
2. The LNRS will set out priorities for nature's recovery, map the most valuable existing areas for nature and map specific measures for creating and improving habitat for nature and wider environmental goals. LNRS' will play an important role in land use planning for an area to help restore create and connect habitats alongside new development.
3. Surrey County Council is the responsible authority for producing the LNRS for the county and has got to the stage where it is ready to finalise and publish it including the relevant maps during 2026.
4. The Bogs has long been identified for its ecological significance. For example, it is identified in the Tandridge development plan as a potential Site of Nature Conservation Importance (SNCI); this designation is expected to be confirmed by Surrey County Council through its related programme in due course.
5. For this reason, The Bogs has been identified in the draft LNRS as an Area that could become of Particular Importance for Biodiversity (ACIB). This is shown on the extract from the draft LNRS in purple below:



6. ACIB are areas, such as The Bogs, that have ecological importance but not yet subject to a statutory designation such as a SSSI or SNCI. The LNRS identifies ACIBs

as those areas that have the potential to deliver the greatest benefits for nature if targeted potential measures are implemented helping expand and connect existing high-value habitats.

7. While the purpose of the LNRS is not to prevent development, those areas identified as ACIBs are clearly important in biodiversity terms and should not be undermined in the development process if it can be avoided. The starting point is that they should be protected and enhanced to deliver the LNRS aims and objectives.
8. The Bogs forms part of the Woodlands and Parklands priority habitat in the LNRS where under Priority W2 new areas of woodland are established to enhance biodiversity, buffer and connect existing sites and deliver wider environmental benefits.
9. For the reasons already set out in evidence, the proposed development is contended to result in material harm to the environmental status of The Bogs. This harm would also now undermine the emerging statutory LNRS and identification of The Bogs as an important ACIB, which the LNRS actively seeks to protect and enhance to deliver on its various priorities.
10. As the final LNRS is expected to be published by Surrey County Council before the end of March 2026, it is requested that the identification of The Bogs as a ACIB in the draft is a material consideration in the determination of this appeal. The final version will be submitted for the Inspector's consideration once it is published.