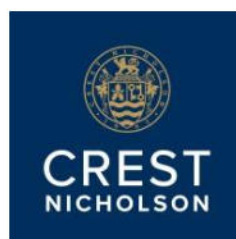




FORMER ARBORFIELD STUDIOS (PARCELS W, Y AND Z), ARBORFIELD GREEN

SHADOW HABITATS REGULATIONS ASSESSMENT



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CONTENTS

1	INTRODUCTION	1
2	ECOLOGICAL BASELINE	4
3	DESIGNATED SITES - SUMMARY OF RESULTS AND REASONS FOR DESIGNATION	10
4	DESIGNATED SITES - ASSESSMENT OF EFFECTS	12
5	CONCLUSIONS	20
APPENDIX 1 LOCATION IN RELATION TO THAMES BASIN HEATHS SPA		20

1 INTRODUCTION

- 1.1. In February 2026, ACD Environmental Ltd commenced ecology inputs at former Arborfield Studios (Parcels W, Y and Z), Arborfield Green.
- 1.2. The Application Site is part of a hybrid planning application (O/2014/2280) comprising:
- 1.3. Full planning application for the demolition of existing buildings and construction of new homes, together with creation of accesses, parking, green infrastructure (including landscaping, public open space, play areas), associated drainage, roads, substations, plant, bin and cycle storage and other related infrastructure works.
- 1.4. Outline planning application (all matters reserved except for access) for the construction of up to 2 new homes including through the retention (of whole or part) and conversion of the existing Langley Common Farmhouse.
- 1.5. The Application Site lies within the 5km zone of influence for major developments of the Thames Basin Heaths Special Protection Area (SPA).
- 1.6. A Habitats Regulations Assessment (HRA) is required to be carried out by the competent authority, which in this case is anticipated to be Wokingham Borough Council, to test if the proposal could significantly harm the designated features of the European designated site. Furthermore, it is a requirement that Natural England are consulted on the application.
- 1.7. This report is a Shadow Habitats Regulations Assessment (SHRA) in relation to this European designated site in order to inform this process.
- 1.8. The Application Site is located within 500m of Longmoor Bog Site of Special Scientific Interest (SSSI) and falls within the SSSI Impact Risk Zone (IRZ) for this designated site. Natural England should therefore be consulted on potential impacts to this SSSI.
- 1.9. The Site is a linear parcel of land bounded by Langley Common Road to the north-east and fields (also allocated for housing in the emerging Local Plan) to the north. To the south and east lie existing residential neighbourhoods and Farley Hill Primary School to the south, within the Arborfield Garrison SDL.
- 1.10. The Site forms the northern extent of Arborfield Green, an existing development site of around 167 hectares, which forms part of the wider Arborfield Garrison Strategic Development

Location (SDL). This SDL is allocated within Wokingham Borough Council's adopted Core Strategy 2010) and also benefits from an emerging allocation in the Council's emerging Local Plan.

- 1.11. The Site was originally used in 1904 as part of a Remount Depot in Arborfield Garrison, supplying the military with horses for operational use. After the closure of the Depot, the Garrison became home to a number of army technical schools. With the turn of the century, the Arborfield Garrison was deemed by the MoD as surplus to requirements and in 2015, planning permission was granted for 2,000 new homes (ref O/2014/2280) and is now a thriving residential neighbourhood.
- 1.12. As one of the final remaining development parcels to come forward, this land is currently being used as a film studio under a temporary planning permission.
- 1.13. The Application Site comprises predominantly developed land with surrounding green space comprising areas of grassland, woodland and scrub of a varying degree of ecological value.
- 1.14. The Application Site is located within the village of Arborfield Green and includes three large filming stages, office buildings, workshops and backlots; additional buildings, hardstanding, and areas of greenspaces are also present across the Application Site. Two parcels of Ancient & Semi-natural Woodland were identified adjacent to the Application Site; additionally, a large section of the woodland on-site was identified as a 'deciduous woodland' Habitat of Principal Importance.
- 1.15. Separate reports to inform the planning application have been prepared comprising:
 - Preliminary Roost Assessment prepared by Pioneer Environment Group Ltd.¹
 - Preliminary Ecological Appraisal prepared by Ecosupport Ltd.²
 - Environmental Statement (ES) Chapter 8 Ecology prepared by ACD Environmental Ltd.³

Competence

¹ Pioneer Environment Group Ltd (25/11/2025). *Arborfield Studios Preliminary Roost Assessment*.

² Ecosupport Ltd (07/2026). *Preliminary Ecological Appraisal*.

³ ACD Environmental Ltd (04/2026). *Former Arborfield Studios (Parcels W, Y and Z). Arborfield Green) Environmental Statement- Chapter 8 Ecology*.

- 1.16. This report has been prepared by Matthew Simmons. Matthew is an Assistant Ecologist at ACD Environmental Ltd. Matthew has undertaken a wide variety of surveys for habitats and protected species and is an Associate Member of the Chartered Institute of Ecology and Environmental Management (ACIEEM).
- 1.17. A Technical Review of this report has been carried out in line with ACD Environmental Ltd's Quality Assurance procedures. The review was carried out by Nicholas Jones, Head of Ecology at ACD Environmental Ltd. He has 18 years' experience working for commercial consultancy and specialises in European Protected Species (EPS) legislation and mitigation, holding class licences for barn owl, bats (Level 2) and great crested newt and is one of a small number of ecologists who is a Registered Consultant under the 'low impact' Bat Mitigation Class Licence (BMCL). He has significant experience of Ecological Impact Assessments (EclAs) and post-consent ecology reports and has represented ecology at a Hearing. Nicholas is a Full Member of CIEEM (MCIEEM).

2 ECOLOGICAL BASELINE

Summary of methodology

- 2.1. A desk study was carried out by Pioneer Environment Group Ltd in December 2025 which included the request of records within 1km of the centre of the Application Site from Thames Valley Environmental Records Centre (TVERC).
- 2.2. The MAGIC website was used to carry out a 2km data search for designated sites including SPAs, Special Areas of Conservation (SACs), Ramsar sites, SSSIs and Local Nature Reserves (LNRs) with searches in March 2026.
- 2.3. The MAGIC website was also used to carry out a data search of 1km for granted EPS licences and data from the Ancient Woodland Inventory and Priority Habitat Inventory.
- 2.4. A summary of surveys that have been carried out is shown in **Table 1**.

Table 1: Summary of surveys carried out.

Survey	Survey carried	Survey date/s	Study Area
Previous bat surveys 2006-2012			
Unknown - likely building assessment and dusk/dawn building and transect surveys	GVA Grimley/ WSP Environmental ⁴	2006	Arborfield Garrison including red line boundary
Initial building assessment	Entec	2008	Arborfield Garrison including red line boundary
Bat detector transects and emergence/re-entry surveys	Entec	2008	Arborfield Garrison including red line boundary

⁴ GVA Grimley/ WSP Environmental (2006). *Bat Surveys*.
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Initial internal building inspections (buildings with roof voids where accessible)	Entec	2008	Arborfield Garrison including red line boundary
Update internal building inspections (buildings with roof voids where accessible)	Amec (now includes Entec) ⁵	2012	Arborfield Garrison including red line boundary
AECOM bat surveys 2014			
Building re-assessment for roosting bats	AECOM	2014	Arborfield Garrison including red line boundary
Building dusk and dawn (emergence/re-entry surveys)	AECOM	June to August 2014	Arborfield Garrison including red line boundary
Transect and automatic detector surveys	AECOM	June to August 2014	Arborfield Garrison including red line boundary
Previous reptile surveys 2008 - 2014			
Population class assessment	Entec	2008 20 visits (April to September)	Arborfield Garrison including red line boundary
Population class assessment	AMEC (now includes Entec)	2012 13 visits (September to October)	Arborfield Garrison including red line boundary

⁵ AMEC *Environmental Statement and Appendices* (AMEC 2013).
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Population class assessment	AECOM ⁶	2014 7 visits (July to October)	Arborfield Garrison including red line boundary
2025			
Preliminary Ecological Appraisal (PEA)	Pioneer Environment Ltd	8/12/2025	Red line boundary
Preliminary roost assessment	Pioneer Environment Ltd	25/12/2025	Red line boundary
Great crested newt <i>Triturus cristatus</i> Habitat Suitability Index (HSI) Assessment	Pioneer Environment Ltd	2025	Ponds within 500m of red line boundary
2026			
Reptile presence/absence surveys	ACD Environmental Ltd	Mats deployed 17/03/2026 (surveys not yet completed)	Red line boundary
Bats - visual assessment of trees	ACD Environmental Ltd	18/03/2026	Red line boundary
Bat dusk emergence survey	ACD Environmental Ltd	Surveys undertaken May - July 2026	Red line boundary
eDNA great crested newt surveys 12 ponds	ACD Environmental Ltd	Surveys due to be undertaken April 2026	Red line boundary

⁶ AECOM (2014). *Arborfield Garrison - Reptile Mitigation Strategy*.
ACD Environmental

Preliminary Ecological Appraisal	Ecosupport Ltd	10 th July 2026	Red line boundary
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2.5. All surveys will provide an opportunity to update the baseline for [REDACTED] and a search for evidence/potential for nesting birds will be carried out in combination with the other site visits.

Summary of results - habitats and protected species

Habitats

2.6. The Application Site comprises predominantly developed land with surrounding green space comprising areas of grassland, woodland and scrub of a varying degree of ecological value.

2.7. A summary of protected species onsite is as follows:

- Amphibians - HSI Assessments of 17 ponds within 500m of the Application Site Boundary were undertaken by Pioneer Environment Ltd in 2025. eDNA surveys of suitable ponds are due to be undertaken in April 2026. The Application Site offers suitable habitat for amphibians to utilise, namely two vegetated log/rubble piles located near the residential building in the northern corner of the Application Site multiple piles of steel/rubble with vegetation and scrub surrounding the water tower in the north of the Application Site and multiple dead wood piles located within the woodland to the east of the Application Site. These piles offer shaded, damp areas that are suitable for terrestrial-stage amphibians. Boundary scrub and woodland habitats also provide connectivity with the wider environment and act as corridors for individuals to migrate to/from the Application Site.
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
- [REDACTED]
- Bats - previous bat survey work was completed in 2006 and 2008 by AMEC and GVA Grimley/WSP Environmental in 2012 with updated surveys being completed by AMEC covering roosting and bat activity across Arborfield Garrison, which consists of multiple parcels of land, including the Application Site. AECOM in 2014 updated bat surveys to inform a Bat Mitigation Strategy⁷ for Arborfield Garrison, and during these surveys assessed the suitability of the Application Site for roosting bats and confirmed one common pipistrelle *Pipistrellus pipistrellus* roost (B27), one high suitability building (B9), three moderate suitability buildings (B10, B11 and B28), with the rest being low suitability. As part of the Bat Mitigation Strategy the woodland to the north of the Application Site is proposed to be retained to provide a commuting feature for bats as part of a dark corridor. During the visual assessment of trees for roosting bats carried out by Pioneer Environmental Group Ltd (2025), a number of trees were identified as offering potential to support roosting bats. ACD Environmental Ltd completed a bat tree visual assessment on the 18th of March 2026 to inspect an ash *Fraxinus excelsior* tree (TN6), with ivy *Hedera* sp. cover being a potential roosting feature and a pedunculate oak *Quercus robur* (TN16), a dead monolith with holes, as both of these trees are located close to the development. Both trees were assessed further with the ash being recorded as being negligible and the pedunculate oak requiring an additional check if being felled.
 - Birds - nesting material and droppings consistent with those from pigeon *Columba* sp. were identified in building B16 during the Preliminary Roost Assessment by Pioneer Environmental Group Ltd (2025). A disused bird's nest was nestled amongst some ivy within an ash tree (TN4). An active wood pigeon *Columba palumbus* nest was also recorded (TN2). Overall, the Application Site offered suitable habitat for nesting birds in trees, scrub, grassland, woodland, and hedgerow habitats, as well as within on-site buildings.
 - Reptiles - the Application Site still contains suitable habitat for reptiles. The tussocky, southwest-facing grassland, with scrub edge, located to the north of the Application

⁷ AECOM (2014). *Bat Mitigation Strategy* (ES Appendix 13.4).
ACD Environmental

Site offers suitable habitat for sheltering, foraging and commuting reptiles; brash piles within Application Site also offered areas of refuge. To the west of the Application Site, the open grassland with scrub edges was also identified to offer suitable foraging and basking habitats, with the Sustainable Drainage System (SuDS) pond to the south of this area offering additional foraging habitat.

- Other species - habitats present at the Application Site are of foraging and sheltering value to a variety of small mammals such as hedgehog *Erinaceus europaeus* as well as a variety of invertebrates. There are also numerous records of notable plant species within the wider area. No impacts are anticipated on these species providing appropriate mitigation measures are in place during development.

3 DESIGNATED SITES - SUMMARY OF RESULTS AND REASONS FOR DESIGNATION

- 3.1. The desk study identified two statutory designated sites within 5km, these are Thames Basin Heath SPA and Longmoor Bog SSSI.
- 3.2. Longmoor Bog is designated for its base-poor valley mire, carr woodland, and wet heathland and is situated 500m south east of the Application Site.
- 3.3. Thames Basin Heath SPA is a European Designated Site and lies 3.5km south west of the Application Site. The Application Site lies within the 5km zone of influence for major developments for this designated site.
- 3.4. Thames Basin Heath SPA contains lowland heath supporting important populations of Dartford Warbler *Sylvia undata*, European nightjar *Caprimulgus europaeus* and woodlark *Lullula arborea* all of which are vulnerable ground-nesting birds of European importance.
- 3.5. SPAs are legally protected under The Conservation of Habitats and Species Regulations 2017.⁸ Dartford warbler and European nightjar are listed as Birds of Conservation Concern on the Red and Amber lists respectively.⁹ Furthermore, European nightjar and woodlark are listed on Section 41 of the Natural Environment Research Council (NERC) Act 2006.
- 3.6. The criteria for designation of Thames Basin Heath SPA are as follows:
- Annex I species that are a primary reason for selection of this site - Dartford warbler, European nightjar and woodlark.
 - Annex I species present as a species of interest but not a qualifying feature are hen harrier *Circus cyaneus*, merlin *Falco columbarius*, short eared owl *Asio flammeus* and kingfisher *Alcedo atthis*.
- 3.7. The reasons for designation of the SPA relates to a number of individual qualifying species, which includes Dartford warbler, European nightjar and woodlark. These species are listed

⁸ HM Government. *The Conservation of Habitats and Species Regulations 2017*. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents>

⁹ Royal Society for the Protection of Birds (RSPB). *Birds of Conservation Concern 5*. Available at: <https://www.bto.org/sites/default/files/publications/bocc-5-a5-4pp-single-pages.pdf>

under Annex 1 of the Habitats Directive.¹⁰

¹⁰ European Union (EU). *Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (Codified version)*. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32009L0147>

4 DESIGNATED SITES - ASSESSMENT OF EFFECTS

Longmoor Bog SSSI

- 4.1. The creation of residential dwellings within the Application Site will result in a larger residential population within the Arborfield area. This has the potential to result in an increase in visitor numbers to the nearby Longmoor Bog SSSI (and Thames Basin Heaths SPA) creating increased human disturbance to this designated site.
- 4.2. The development is also situated within 500m of Longmoor Bog SSSI and triggers the IRZ for this site; the SSSI IRZ specifies that new housing projects require an evaluation of potential recreational pressure on adjacent SSSIs, alongside measures to mitigate any negative impacts.
- 4.3. Longmoor Bog SSSI is in closer proximity to the Application Site than Thames Basin Heath SPA although it is not easily accessible by foot or car and contains a pre-existing network of public footpaths linking to a public right of way.
- 4.4. The mitigation measures as below for Thames Basin Heaths SPA are suitable to mitigate impacts on Longmoor Bog SSSI.

Thames Basin Heath SPA

- 4.5. The Application Site is within the 5km buffer zone for major developments of Thames Basin Heath SPA. This zone has been established so that recreational impacts to the species listed as qualifying species (Dartford warbler, European nightjar and woodlark) can be avoided.
- 4.6. An HRA is required to be carried out by the competent authority, which in this case is anticipated to be Wokingham Borough Council, to test likely significant effects on the designated features of European sites. Furthermore, it is a requirement that Natural England are consulted on the application.
- 4.7. The Wokingham Borough Council Core Strategy 2010¹¹ provides a guide to development decisions in the district until 2026.

¹¹Wokingham Borough Council. *Wokingham Borough Core Strategy 2010 Adopted January 2010*. Available at: <https://www.wokingham.gov.uk/sites/wokingham/files/2023-06/Final%20adopted%20Core%20Strategy%20inc.%20cover.pdf>

4.8. Policy CP7 relates to 'Biodiversity' and states the following:

"Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance.

Development:

a) Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or

b) Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, or

c) That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:

- Mitigation measures can be put in place to prevent damaging impacts; or*
- Appropriate compensation measures to offset the scale and kind of losses are provided.*

SEP Policy NRM5 (criterion iii) recognises that the need to protect European sites from likely significant effects could mean that housing targets in Policy H1 are not achievable. The Habitats Regulations Assessment (see paragraph 2.67) indicates that the development currently envisaged through the Core Strategy can be delivered without likely significant harm upon any European sites (either on their own or in-combination with other plans or projects). However, the Council will assess each plan or project in line with NRM5 to confirm that they can be delivered without likely significant harm (either on their own or in-combination with other plans or projects).

The need for a development that affects a Site of Special Scientific Interest will be deemed to outweigh the need to safeguard the nature conservation interest where the development has clear social or economic benefits of national importance. The need for a development that

affects Local Wildlife Sites, habitats or, species of principal importance in England for nature conservation, ancient woodland, veteran trees or features of the landscape that are of major importance for wild flora and fauna will be deemed to outweigh the need to safeguard the nature conservation interest where the development has clear social or economic benefits of regional or national importance.

The conservation of sites designated as important to nature conservation, habitats or species of principal importance in England for nature conservation and features of the landscape that are of major importance for wild flora and fauna are essential for the maintenance of the area's biodiversity and the quality of life of the borough's residents. All developments should take account of the biodiversity, and where possible developments should contribute to the enhancement of the borough's biodiversity. The Wokingham District Biodiversity Action Plan⁴⁸ highlights targets where proposals can contribute towards their achievement and the Council has identified a number of Biodiversity Opportunity Areas (in line with SEP Policy NRM5) that are priorities for the maintenance, restoration and creation of priority habitats. Biodiversity Opportunity Areas have the highest concentration of existing ecological sites e.g. Local Wildlife Sites. Consequently, in these areas, measures to support and enhance biodiversity are most likely to deliver benefits. Thames Valley Environmental Records Centre surveyed the borough for potential Biodiversity Opportunity Areas during the 2007/08 financial year. Information on biodiversity within the Borough can be obtained from the Thames Valley Environmental Records Centre (TVERC)⁴⁹. Further details on the level of protection appropriate to international, national and local sites are detailed in PPS9 (including the accompanying Good Practice Guide), ODPM Circular 06/2005 and SEP Policies NRM5 and NRM7. Where a proposal is likely to have a significant effect upon a Natura 2000 site, the authority will expect the applicant to supply it with sufficient information to demonstrate how these impacts will be avoided.

The Managing Development Delivery DPD will provide further details on the application of this policy. The Berkshire Nature Conservation Forum advises on the boundaries of Local Wildlife Sites (formerly Wildlife Heritage Sites), including deletions, additions and amendments. Consequently, they may change from the current ones defined in WDLP Policy WNC5 (as amended by the Council decision on 27 July 2006). Details of international, national, regional and county biodiversity sites are available on the Council's website."

- 4.9. Core Policy CP8 of Wokingham Borough Council Core Strategy, which relates to the Thames Basin Heath SPA states the following:

“Development which alone or in combination is likely to have a significant effects on the Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered.

Within 400m (linear) of the TBH SPA, the authority and Natural England do not consider it is generally possible to avoid impact from development. Therefore, no proposal for residential development will be allowed due to the risks of fires, fly-tipping, cat predation and other impacts. This view has been accepted by the Assessor who considered the validity of Natural England’s evidence on the matter as part of the examination into the SEP. This approach is also consistent with the Appropriate Assessment and SEP Policy NRM6.

Having regard to the findings of Natural England’s visitor surveys, SEP Policy NRM6 and the Delivery Framework, the authority (in the Appropriate Assessment) concludes that residential proposals involving increases of one or more net additional dwelling within 5km (linear) of the SPA will need to be assessed for whether there is likely to be significant impacts. This distance covers 70% of all visitors. Furthermore, within the area from which 80% of visitors come (equates to 7km linear), the Appropriate Assessment recognises that proposals of 50 dwellings or more dwellings will need to be assessed for whether they are likely to generate significant impacts. The Appropriate Assessment indicates that as all of the SDL (policies CP18-21) propose at least 50 dwellings within 7km of the TBH SPA, they are likely to have a significant affect upon the site. Where residential schemes include avoidance and mitigation measures, the likely significant effects upon the TBH SPA will have been addressed.

Whilst each SDL will include their own measures to avoid the significant impacts upon the TBH SPA, the Council recognises that other schemes for residential development will come forward before 2026 on sites where a likely significant impact without avoidance measures would occur. The Council is working with the National Trust to deliver an impact avoidance site at Simons Wood, Wellingtonia Avenue, Crowthorne. This site will function as part of a suite of Suitable Alternative Natural Greenspaces (SANG) within the borough, alongside those of the SDL. The Simons Wood SANG will be complimented by other sites identified in the Managing Development Delivery DPD to avoid the impacts of development on the TBH SPA.

The Council recognises that Gorrick Plantation, Nine Mile Ride, Crowthorne contains populations of Woodlarks and Nightjars. The density of nightjars in every year from 1999 to at least 2004 has been higher than any part of the SPA. In the review of Natura 2000 sites expected between 2008 and 2010, the Joint Nature Conservation Committee may conclude

that Gorrick Plantation should be included within a Special Protection Area. Whilst its potential inclusion may affect the ability to deliver residential schemes on sites to be identified in the Managing Development Delivery DPD, it will however not affect the SDL around Wokingham as the impact avoidance measures to address the issues associated with the TBH SPA, will also apply in the event that Gorrick Plantation is designated. Pending the Joint Nature Conservation Committee's review of Natura 2000 sites, the Council in line with the requirements of the Wildlife and Countryside Act 1981 will consider the impacts of development on the Habitats Directive Annex 1 birds (Nightjar and Woodlark) at Gorrick Plantation under policy CP7 and SEP Policy NRM5.

In line with the findings of the Appropriate Assessment, it is recognised that non-residential development could also have a significant effect upon the SPA. This could either be from linked trips including a recreational use of the SPA53 or from workers employed close to the SPA using the area during breaks (especially lunch time). Consequently, proposals for non-residential development will also need assessing for whether they are likely to have a significant effect upon the SPA. Where non-residential schemes include avoidance and mitigation measures, the likely significant effects upon the TBH SPA will have been addressed.

The Appropriate Assessment indicates that to ensure that development avoids its likely significant impact upon the SPA, the following principles will apply:

Dwellinghouses and other residential development (including staff accommodation in use class C2) will need to provide avoidance and mitigation measures where:

A) The proposal involves the provision of one or more net additional residential unit and is within 5km (linear) of the SPA. Contributions to on site SPA access management measures and monitoring in line with the Delivery Framework will be required together with provision of SANG at a minimum of 8ha/1,000 population (calculated at a rate of 2.4 persons per household). This monitoring includes the effectiveness of the SANG;

B) The proposal provides 50 or more residential units within 7km (linear). In this case, the proposal will be individually assessed for whether a significant effect upon the SPA is likely either on its own or in combination with other plans or projects around the site. Where avoidance and mitigation measures are required to address likely significant effects, this is likely to involve SANG together with funding towards monitoring the effectiveness of the solution agreed;

C) There is a 400m exclusion zone from the SPA for any net additional dwellings due to the inability to avoid likely significant effects upon the SPA.

SANG to be provided and maintained in perpetuity in line with the quality and quantity standards advocated by Natural England. The size and location of SANG contributes towards the delivery of healthy communities in line with advice from the Department of Health and NICE. In order to ensure access to avoidance sites in perpetuity, the Council's preference is for the authority to own any SANG. Where SANG also meets the definition of open space (see Appendix 4), it can also count towards this provision i.e. at least 1 ha/1,000 of the SANG could also contribute towards the Natural Greenspace requirement and vice versa; and

Non-residential development will be individually assessed for their likely significant effects. Where avoidance and mitigation measures are required, monitoring of their effectiveness will be necessary."

- 4.10. The creation of residential dwellings within the Application Site will result in a larger residential population within the Arborfield area. This has the potential to result in an increase in visitor numbers to the nearby Thames Basin Heaths SPA, creating increased human disturbance to this internationally designated site.
- 4.11. Increased human disturbance upon the Thames Basin Heaths SPA could negatively affect the breeding success of the bird species for which the SPA is designated; Dartford Warbler, European nightjar and woodlark. This would occur through disturbance from increased human presence from walkers or through the direct disturbance of nesting birds by dog walkers, leading to reduced nesting success of the SPA designated bird species. Increased recreational pressure may also result in an increased risk of fires from dropped cigarettes or barbeques. Habitat degradation may also occur through trampling of vegetation and enrichment of soil by dog fouling negatively effecting heath habitat.
- 4.12. Natural England and other stakeholders have created the Thames Basin Heath Special Protection Area Delivery Framework.⁹ The Delivery Framework guidance determined that the Application Site prior to mitigation was likely to have negative effects resulting from increased recreational visitor pressure on the SPA would result in a near certain, long, term, local effect on a designated site of international value and would be a legislative infringement.
- 4.13. However, due to the increase in the residential population, it is still vulnerable to increased recreation pressure. The mire and heath vegetation within the SSSI is vulnerable to habitat

degradation due to increased visitor footfall trampling the SSSIs vegetation (its designated feature) and dog walkers causing increased disturbance to faunal species such as reptiles and breeding birds. As heathland is dependent on soil having low-nutrient; enrichment by dog fouling would degrade the designated habitats within the SSSI.

Proposed Mitigation Strategy

4.14. In terms of potential impacts in terms of recreational pressures from the proposed development and given the net increase in the number of dwellings within the 5km radius, a commitment towards Suitable Alternative Natural Greenspace (SANGs) has been agreed and will be secured by a subsequent Section 106 agreement.

4.15. A commitment has been made to deliver c.60% of the required SANG provision for the Application Site within Linear Park Phase 3 SANG and additional area within this provision. Natural England has stated the following in a consultation response dated 12th January 2026¹²:

“Whilst I am concerned about the cumulative urbanising impact within this potential bolt-on SANG, the overall beneficial effect of joining up two areas of existing SANG and providing a green infrastructure corridor in this area is one which is worth proceeding with. Natural England assess all SANGs and SANG bolt-ons on a case-by-case basis and given the existing network of SANGs in this area and the proposed direct connectivity to Hazebrook Meadows SANG, it is not required for this bolt on to provide all the criteria on the SANG checklist.”

4.16. Cumulatively, this SANG includes allotments, wildflower grassland and retained trees, native tree planting, native hedgerow planting, a new pond and retained ditches. There will also be a bridleway link connecting to the Linear Park; SANG footway links connecting to SANG S2; strategic cycleway and footpath extending from the District Centre; a Neighbourhood Equipped Area for Play (NEAP) play area; and a skatepark.

4.17. The remaining c.40% of the required SANG provision for the Application Site will be provided off-site. An exact location is to be confirmed. However, this must be a consented SANG providing suitable recreational provision including a defined length of footpath and a range of habitats.

4.18. It is also important to note that there are additional mitigation measures as follows that will

¹² Osborne.E (2026) Email to Adrian Meurer, 12th January 2026
ACD Environmental

enhance the ecology on site but also make the development more attractive for residents:

- Open space/recreational provision onsite limiting the need for residents to venture offsite to the SPA.
- Information boards will be installed to educate and increase awareness of the Thames Basin Heath SPA and will highlight the SANGS and direct foot traffic away from sensitive areas.
- New gardens will provide ecological value, albeit that this value is limited.
- New scattered tree planting including native berry/flower/fruit/nut/seed bearing species.
- Enhancement to the pond through the safe removal of waste.
- New drainage features that will increase the aquatic/semi-aquatic resource and will be sown with suitable wetland wildflower seed mixes.
- The habitats will cohesively link with offsite habitats and additional local SANGs, providing green corridors. This includes the proposed boundary area; hedgerows intersecting the proposed development and linking with offsite hedgerow.
- SAMM payments will be made to mitigate the impact of new housing on protected nature sites. These funds pay for ranger services, site monitoring, and educational activities to manage increased visitor pressure, protecting biodiversity from recreational harm.
- Spatial separation of 3.5km for SPA with the following measures:
 - No direct habitat connections between the Application Site and the SPA.
 - Closer offsite open space/recreational provision limiting the need for residents to visit the SPA.
 - Invasive species must be removed in accordance with species-specific methodology.
- Nether Dartford Warbler, European nightjar or woodlark have been recorded at the Application Site across surveys undertaken since 2014.

5 CONCLUSIONS

- 5.1. The Application Site lies within the 5km zone of influence of one European designated site, namely Thames Basin Heath SPA.
- 5.2. An HRA is required to be carried out by the competent authority, which in this case is anticipated to be Wokingham Borough Council, to test if the proposal could significantly harm the designated features of the European sites. Furthermore, it is a requirement that Natural England are consulted on the application.
- 5.3. This report is an SHRA in relation this European designated site in order to inform this process.
- 5.4. A mitigation strategy has been developed, which contribution towards SANGs and secured by a Section 106 agreement as required.
- 5.5. Provided the measures in this report are followed, the proposed development will comply with Core Policies CP7 and CP8 of Wokingham Borough Council Core Strategy 2010 as relating to Biodiversity and Thames Basin Heath SPA respectively.

APPENDIX 1 APPLICATION SITE LOCATION IN RELATION TO THAMES BASIN HEATH SPA

