

Date: 01 October 2024
Our ref: DAS A013348/463579
Your ref: Spencers Wood, Wokingham/Grovelands Country Park SANG



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BY EMAIL ONLY

Dear Steven Weber,

Discretionary Advice Service (Charged Advice): DAS A013348/463579

Development proposal and location: Spencers Wood, Wokingham/Grovelands Country Park SANG

This advice is being provided as part of Natural England's Discretionary Advice Service. Ramm Sanderson has asked Natural England to provide advice upon:

- Suitability of land as SANG at Spencers Wood

This advice is provided in accordance with the Quotation and Agreement dated 11/03/2024.

The following advice is based upon the information viewed and acquired on a site visit on 23/09/2024 alongside the below documents provided by the customer.

- P23-2449_DE_001-1O Development Framework Plan (September 2024)

Please refer to the annotated plan below in reference to my comments.

SANG shape and size

The proposed SANG in the most recent masterplan is 9.95ha, which is of a suitable size for the quantum of housing proposed (circa 450). However, the shape of the SANG should be reconfigured within the red line boundary of the site in order to fulfil the SANG criteria. The 'lobe' to the south west of the proposed SANG, which is marked as 'A' below, is disconnected from the rest of the SANG. A desire line will likely form. With connections beyond to other areas of greenspace such as the community orchard, and the inclusion of a secondary path, this area could function as SANG. However, the primary walking route should not be included within this area. Alternatively and preferably, the area directly to the east of the SANG could be further explored in order fulfil the SANG criteria.

Primary walk

Whilst the primary walk on the plan is of the required length (at 2.3km), it is overly convoluted with a pinch point at point 'B', as well as the area in area 'A' which should be discounted. The current primary route hugs the boundary of the SANG quite closely. If this is brought away from the edge in more places in a meandering manner, especially along the boundary with the proposed solar farm, it could provide a more suitable route. A limited number of secondary paths should also be included, cutting across the site to provide a variety of walking routes for SANG users. Paths and any

structures e.g. discreet way markers should be in-keeping with the semi-natural feel. Hoggin paths and natural-looking resin bound are acceptable, but anything too urban should be avoided.

Screening

Using vegetation, trees and scrub as screening will be very important along certain boundaries of the SANG. In particular along the boundary with the proposed associated housing, existing housing and with the proposed solar farm. Native and locally appropriate trees and shrubs should be used to provide adequate screening so the SANG users do not feel overlooked by the houses or find themselves in close proximity to solar panels and their associated infrastructure. SANGs should feel semi natural with little to no artificial intrusions detracting from the experience.

Car park

The current location of the SANG car park is not considered suitable. It is disconnected from the SANG with other elements of the proposed development in between. The primary walking route should start and finish at the SANG car park. In addition, whilst there could be opportunities for shared parking, it should be ensured that there is always adequate space for SANG users. If it is shared between the allotments and 3G sports pitch, there could be peak times where SANG users are unable to park.

If the long term intention of the applicant is to sell the remaining capacity of the SANG, a car park must be provided. However, if this is not the intention and if the proposed associated housing is within 400 metres of the SANG, a car park is not necessarily required. Strategic SANG car parks should have at least 1 space per hectare of SANG.

Fencing

An important consideration of a SANG is that it should be largely freely accessible for dogs off lead. Dog proof fencing should therefore be specified for the boundaries.

Accessibility of route

Areas of the proposed SANG are marked on the plan as '15 - low areas of the site utilised for 'sustainable drainage systems'. It will be important to ensure that the primary walking route is accessible year round. If areas of the path would become boggy and/or flooded during the winter, it must be either raised up in those areas, or made accessible with the addition of a boardwalk (not across the whole site). Parts of the site on the day I visited were quite wet, with small areas of standing water – it is very important therefore that this is fully considered within the design.

Entry from housing development

It is unclear from the plan where access to the SANG is proposed for the residents of the associated housing. Access should be easy and shouldn't necessarily go via the car park. The entrance should include a gate to cater for dogs off lead and safety – a large (disabled/pushchair friendly) kissing gate or similar would be suitable.

Solar Farm – recommended for approval

The proposed solar farm marked on the plan is currently recommended for approval by the Local Planning Authority. Due to the sloping away lie of the land and existing and planning screening, it is not considered that this will detract from the semi-natural feeling of the SANG. However, as discussed above, the paths should not abut right up to the boundary with the solar farm and sufficient screening should be in place prior to the housing occupation.

SANG Management Plan

The SANG should be secured, fully funded and managed in perpetuity. It should be accompanied by a SANG Management Plan to include:

- Costs set out for both capital works and full in perpetuity (minimum 80 years) management.
- Secure funding mechanisms set out for capital works and in perpetuity management (mainly full endowment fund or developer pays for initial works then dwellings have ongoing service charge).
- Suitable habitat management proposed for the site. This may need to show what is the

minimum requirement for a SANG, then what could be additional for biodiversity net gain separately.

- Appropriate management body identified and agreed – preferred to be the LPA.
- Set out clearly how the SANG will meet with NE Guidelines criteria
- Whether any capacity will be available for strategic use with calculations to support that intended use.



For clarification of any points in this letter, please contact Eleanor Osborne by return email.

This letter concludes Natural England's Advice within the Quotation and Agreement dated 11/03/2024.

☒ The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours Sincerely,
Eleanor Osborne
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Annex 1

European Protected Species

A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development. Further information can be found in Natural England's ['How to get a licence'](#) publication.

If the application requires planning permission, it is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice Natural England provides at formal consultation on the likely impacts on favourable conservation status and Natural England's [guidance](#) on how the three tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) are applied when considering licence applications.

Natural England's pre-submission Screening Service can screen application drafts prior to formal submission, whether or not the relevant planning permission is already in place. Screening will help applicants by making an assessment of whether the draft application is likely to meet licensing requirements, and, if necessary, provide specific guidance on how to address any shortfalls. The advice should help developers and ecological consultants to better manage the risks or costs they may face in having to wait until the formal submission stage after planning permission is secured, or in responding to requests for further information following an initial formal application.

The service will be available for new applications, resubmissions or modifications – depending on customer requirements. More information can be found on [Natural England's website](#).