

Date: 24 February 2026
Application: 250517



**WOKINGHAM
BOROUGH COUNCIL**

WBC Green Infrastructure

Development Management &
Compliance

P.O. Box 157

Shute End, Wokingham

Berkshire, RG40 1BN

Tel: (0118) 974 6000

Minicom No: (0118) 974 6991

Dear WBC Green Infrastructure,

Outline Planning Approval Consultation

Application Number: 250517

Applicant: Mr Marc Wilson

Site Address: Land Off Basingstoke Road, To the south and west of Spencers W

Parish: Swallowfield

Grid Reference: Easting - 471901, Northing - 166069

Type of Development: Major All other developments

Proposal: Hybrid planning application (part outline/ part detailed) comprising: Outline planning permission is sought with all matters reserved for future determination, save for the means of access via Basingstoke Road, for: up to 420 dwellings (Use Class C3), an 80 bed care home (Use Class C2), 1ha of employment land (Use Class E(g), primary school (Use Class F1), local centre (Use Classes E(a), (b), (c), (f)), sports pitch and changing facility, public open space and a full application for the proposed Suitable Alternative Natural Greenspace (SANG), associated landscaping/car park.

Case Officer: Helen Maynard

Development Management has received the above application, and we require your comments on the proposal using the recommended memorandum below. The documents associated with this are available to view in NEC DM using the application number 250517. Alternatively, public documents are available to view on the Council's planning application search page: [Wokingham Borough Council Online Planning](#).

Please index your response into NEC DM against the application. If you are recommending conditions, you should give a reason with reference to relevant policies. A list of standard conditions can be requested from the case officer.

Your observations are required in respect of this application by **17 March 2026**.

Yours sincerely,
Development Management & Compliance

MEMORANDUM

From:	Doug Godfrey Green Infrastructure Officer		
Service	WBC Green Infrastructure	App No:	250517
Address:	Land Off Basingstoke Road, To the south and west of Spencers W.		
Proposal:	Hybrid planning application (part outline/ part detailed) comprising: Outline planning permission is sought with all matters reserved for future determination, save for the means of access via Basingstoke Road, for: up to 420 dwellings (Use Class C3), an 80 bed care home (Use Class C2), 1ha of employment land (Use Class E(g), primary school (Use Class F1), local centre (Use Classes E(a), (b), (c), (f)), sports pitch and changing facility, public open space and a full application for the proposed Suitable Alternative Natural Greenspace (SANG), associated landscaping/car park.		
Type of Development:	Major All other developments		
Site Visit Made:	No		

Summary Of Recommendations

- ☐ No comment
☐ No objection
☐ No objection subject to conditions (and reasons) **stated below**
☒ Request further information before determination as **stated below**
☒ Objection due to the reason(s) **stated below**

Comments On Proposal

I have reviewed the Land Off Basingstoke Road planning application with a focus on the following documents:

- Heights Parameter Plan P23-2449_DE_015_A_1
- Illustrative Landscape plan P23-2449_EN_0009_C_ILMP
- Land use parameter plan P23-2449_DE_012_B_1
- SANG Layout P23-2449_EN_0008_C_ILMP SANG
- Sections A through E P23-2449_EN_0014 through 16_-_0001
- Site Plan P23-2449_DE_001-2X
- RACE Drainage Note
- Initial Design and Access Statement
- Revised Design and Access Statement
- SANG Management Plan

- Natural England Design Advice Service comments and consultation responses
- Sports and Leisure Strategy

My review is informed the following documents and policies:

- Wokingham Borough Core Strategy Policy CP1, CP3, and CP4
- MDD DPD Policy CC03 Green Infrastructure, Trees and Landscaping
- MDD DPD Policy TB08: Open Space, Sport, and Recreational Facilities Standards for Residential Development
- Wokingham Borough Council Open Space Sports and Recreation Strategy, November 2013
- Wokingham Borough Council Play Space Design Guide Technical Note
- Natural England Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG), August 2021

Green Infrastructure Public Open Space Provision

With respect to the drawings and reports that have been provided, the following have been reviewed from a Green Infrastructure perspective:

- Public open space provision
- Public open space design, access, and scale
- Play space provision and design
- Civic space
- Allotments
- Outdoor sports field provision

1) Public Open Space Provision

- a) MDD DPD Policy TB08 establishes standards and for the delivery of public open space for residential developments.

The WBC Open Space, Sport and Recreation Strategy establishes the Council's guidance whether each of the typologies listed is to be provided on- or off-site. It further establishes guidance for the minimum site size for each open space typology.

Table 2: Summary guidance on when off site or on site provision of POS is required.

Typology	MDD DPD Standard (ha or m ² /1000)	Minimum site size guidance (ha or m ²)	Off-site contribution required (net dwellings)	On site provision or off site contribution depending on site circumstances (net dwellings)	On site provision required (net dwellings)
Outdoor facilities					
Parks and gardens	1.1ha	2ha	non SDL developments	N/A	SDL and Wokingham Town Centre (WTC) only
Natural/semi natural greenspace (excluding country parks)	2.84ha	0.4ha ^{*1}	N/A	1-99	100+
Amenity greenspace	0.98ha	0.4ha ^{*1}	N/A	1-99	100+
Provision for children and young people	0.25ha	0.06ha [*]	1-79	80-99	100+
Civic space	0.01ha	0.4ha ^{*1}	N/A	N/A	SDL and WTC only
Outdoor sports facilities	1.65ha	N/A	non SDL developments	N/A	SDL only
Cemeteries/ Burial grounds	14.4 grave plots per 1,000 ^{*2}	0.2ha	SDL and non SDL developments	N/A	N/A
Allotments	0.52ha	0.4ha ^{*1}	non SDL developments	N/A	SDL only

- b) Based on MDD TB08 and the Open Space, Sports and Recreation Strategy, the following table outlines required open space provision for the 420 dwelling units stated in this application and which should be provided on- and off-site.

POS Typology	Standard (ha per 1,000 population)	Application Requirement (ha)	On-Site Provision (ha)
Proposed Dwelling Units: 420			
Parks and public gardens *	1.1	1.109	No information provided
Amenity greenspace	0.98	0.988	
Provision for children and young people	0.25	0.252	
Civic space *	0.01	n/a	
Allotments *	0.52	0.524	

Natural/semi-natural green space	2.84	2.863	
Outdoor sports facilities *	1.66	1.673	
Cemeteries (in plots) *	14.4	14.515	
SANG (400m to 5km zone)	8.0	8.064	

* To be provided Off-site Provision, per WBC Open Space, Sport and Recreation Strategy unless exceptional circumstances

With respect to this application, Parks and Gardens, Civic Space, Outdoor Sports facilities, and allotments, while not required to be provided on-site, are welcomed and will be considered assuming they meet minimum size standards as established within TB08 and the WBC Open Space, Sports and Recreation Strategy and are demonstrated to be usable or valuable in the local context.

In circumstances where open space typologies and facilities are required and not provided on-site, the Council will seek a financial contribution to fund off-site provision or enhancement at existing facilities.

- c) Based on the information that has been provided, it is unclear how much area is being allocated for each of the required public open space typologies. The land use parameter plan (P23-2449_DE_012) illustrates the location of all 'Proposed Open Space' (including amenity green space, children's play provision, SANG, sports, changing facilities, car park, allotments, landscaping, footpaths, drainage and other associated infrastructure) combined as one. This drawing does not show the exact location or area of open space typologies.

I note that there is an indicative open space typology plan that was included in the original Design and Access Statement that was originally submitted in March of 2025. The revised DAS that was provided did not, however, include any updated typology plan.

To determine if the application meets policy requirements, and more generally to understand how they relate to one another and adjacent uses, an open space drawing that illustrates the location of the required open space types as well as their respective areas will be required at Reserved Matters. Where a certain open space typology is required to be provided on-site, but is not, please provide a justification as to why it cannot be accommodated on-site.

- d) With respect to the provision of open space, Section 13.25 of the emerging local plan requires that new public open space be transferred to the Council, or by agreement to the relevant parish/ town council for adoption. Only in exceptional circumstances will Private Management Companies be considered. Financial contributions will be secured from developers through a Section 106 agreement towards the maintenance of public open spaces for up to a 30-year time period.

Please indicate which, if any, open space areas are proposed to not be adopted.

2) Public open space design, access, and scale

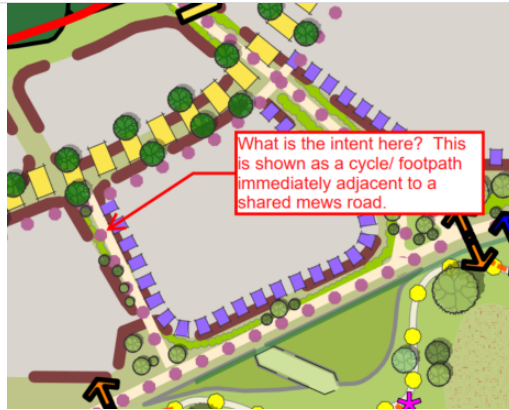
- a) The proposed development application positively incorporates and addresses many of the criteria of Policy CC03: Green Infrastructure, Trees and Landscaping.

The scheme provides a substantial amount of new green infrastructure widely across the whole of the site to mitigate the impacts of the proposed development. This green infrastructure takes the form of public open space including amenity greenspace, parks and gardens, allotments and orchards, civic space play spaces for children and youth, SANG, outdoor sports fields, multi-functional fields, and SuDS features. It is unclear to me where natural/ semi-natural greenspace is proposed. This must be made clear on an updated open space plan.

- b) While it should be confirmed and substantiated with ecology and landscape officers, in outline, it appears that efforts have been made to retain and integrate existing trees, tree groups, and hedges within the site and along the site's boundary. From a green infrastructure perspective this will help ensure that the scheme integrates into the surrounding landscape and create a sense of place internal to the site while also preserving existing habitats.

Existing trees and hedges that are retained also appear to be enhanced and/ or protected. For example, a 5m wide landscape buffer has been included along the northern boundary. In some areas this will enhance and provide protection for existing, established trees and vegetation. It will be important to review these areas at Reserved Matters to ensure that root protection areas are honoured and that proposed features and levels changes do not impact retained vegetation and that proposed enhancements are realised.

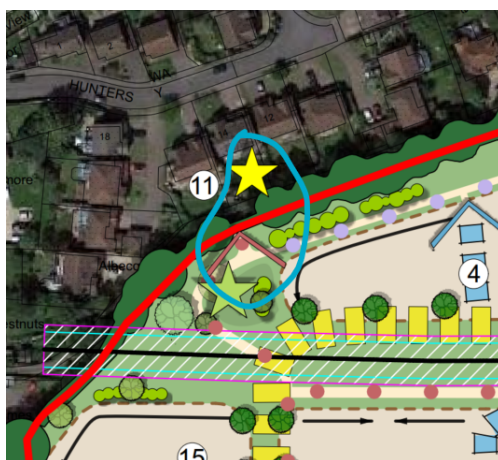
- c) In general, I find that the open space areas and facilities within the scheme are well-connected through a comprehensive network of footpath and cycle/ pedestrian routes. The drawings have been updated to provide more access points to the SANG, which is appreciated. As seen in my comments on the SANG, I would like to see several of the access points to the SANG changed from mown paths to a bound surface material. This does not need to occur at all entrances, but I believe that it makes sense to strategically locate hard surface entrance paths where there may be more used to address accessibility and maintenance concerns.
- d) While this is a well-connected system, I would advise that, depending on design intent and more detailed design, the duplication of cycle routes, footpaths, and shared surfaces should be minimised.



- e) With respect to connectivity and providing accessibility and links to external PRoWs and other footpaths, my comments below should be reviewed against those being made from Highways, Landscape, Ecology, and PRoW consultees.

Policy CC03 indicates that new developments should promote links and connections to PRoWs, footpaths, and bridleways external to the site. I appreciate that this scheme attempts to do so, however, more detail needs to be provided on how this will be accomplished safely and without impacts to existing trees and ecology.

- i) From a green infrastructure perspective, the connection to PRoW Shin33 is a desirable link and should be pursued in line with Policy CC03. If this is an acceptable connection from a PRoW and Highways perspective, details of the connection will need to be provided.
- ii) I question the proposed pedestrian/ cycle connection to Barracks Lane shown at the northwest corner of the scheme. I appreciate the attempt to increase permeability and links to points outside of the development. I defer to Highways to comment if this can be accomplished safely considering Barracks Lane appears to be a very narrow lane that is fenced on the north side except where it connects to adjacent dwellings.



- iii) I again appreciate the attempt to increase links and permeability to points outside of the site. The proposed access point at the northeast edge of

the scheme is meant to provide connection to an off-site playground and Century Drive. Century Drive then provides further access to Hyde End Road. However, details of the access will need to be considered as there will likely be landscape and possibly ecology impacts with the removal of G59 vegetation to accommodate the footpath.



- f) A substantial quantum of open space which, at least in outline, appears to have been provided across the scheme. While I have not independently confirmed the areas, the Design and Access Statement indicates that the amount of POS that is proposed meets and/ or exceeds the TB08 requirements. As stated above, an updated open space plan showing the location and areas of all proposed POS will need to be provided.

In outline, I am satisfied that the provision of amenity greenspace, parks and gardens, children and youth, civic space allotments, and outdoor sports facilities can be accommodated on site.

It will, however, be critical to understand how these areas will differentiate from one another and not read as one. This has implications from a place-making perspective as well as a long-term maintenance and management perspective. In my opinion, this is most relevant for the parks and gardens, amenity green space, natural and semi-natural greenspaces, and to a certain extent play spaces.

While the Design and Access Statement references Fields in Trust, Natural England's Accessible Natural Greenspace Standards, and WBC TB08 policy requirements, little information is provided in the application material as to how each of these open space typologies will be tailored to support a specific vision, principles, and sense of place for the larger community/ development.

Though I do not have any specific objections as to the quantum, general layout and design of the public open spaces, I expect that a Landscape Strategy or Design Statement will be provided at the Reserved Matters stage. At a minimum, the Landscape Strategy or Design Statement should provide a detailed open space strategy discussing the function of the open spaces, a tree and planting strategy, a play strategy, hard landscape strategy, street furniture strategy, a SuDS strategy, and other information necessary to identify and support the look and character of these public open spaces and for the larger development.

3) Play space provision and design

- a) In outline, I am satisfied that the development can meet policy requirements for CC03 and TB08 – the impacts of the development can be mitigated by the provision of the required quantum of play facilities for children and youth. The outline information that has been provided shows that the play facilities will be well connected to the entirety of the development, and, if designed appropriately, help establish a sense of place and well-being for the community while also providing access to high-quality recreation opportunities.

While in outline, the application has shown that CC03 and TB08 can be met, the application must further demonstrate compliance with the WBC Play Space Design Guide Technical Note.

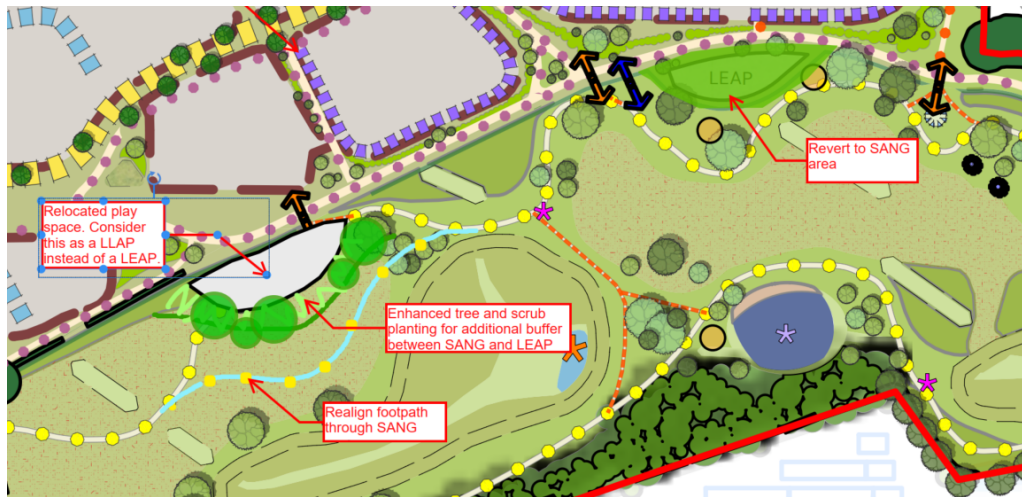
- b) My comments below are items that must be addressed at Reserved Matters to ensure that the play facilities for children and youth will be fully policy compliant. As I have not been part of previous conversations with respect to proposed locations of play facilities, I apologise they have previously been discussed.

- (1) For on 420 dwelling units, the development is responsible for providing 0.25 ha of play space for children and youth based on the TB08 policy standard of 0.25 ha per 1,000 population. The original Design and Access Statement that was provided in March of 2025 indicated that the scheme proposes to deliver 0.26 ha through a mix of 4 LAPs, 3 LEAPs, and 1 NEAP.

The current design provides 2 LEAPs and one NEAP. It is my understanding that this change was made to ensure that the play provision was in line with development standards provided in the WBC Open Space, Sport & Recreation Facilities Strategy (adopted November 2013) and Play Space Design Guide. Earlier comments asked that the play provision of 2,500m² be provided with two LEAPs sized at 600m² each and one NEAP sized at 1,300m². As stated above, an update open space plan that shows the location and areas of the proposed play spaces will need to be provided.

- (2) I have a concern that the LEAP in the northeast area of the scheme is very close to the footpath within the SANG and that this may have an urbanising impact on the SANG. Being mindful of the Exolum pipeline

and easement, can a new location for the LEAP be considered, as shown below? A LEAP in this location is somewhat more central to the northern residential plots and still within a comfortable walking distance. It also allows for more opportunities for a landscape buffer/screen to be provided between the LEAP and the footpath within the SANG. If the LEAP is not relocated, I would encourage more separation between the LEAP and the proposed footpath within the SANG.



- (3) The character of the individual play spaces is an extremely important component that needs to be considered in the play strategy that is presented in the Landscape Design Statement. The play areas will likely be in different POS typologies as well as neighbourhoods each having distinct characteristics. Every aspect of the play area design should reflect the varying landscape character where it is located. Careful consideration and thought must be given to the type of play equipment that is selected for each of the play spaces and the play experience for each. This should be reflected in the application documents.
- (4) With respect to my comments above about creating a sense of place and selecting equipment that will fit within the context of where it is located, I believe that the play space adjacent to the SANG should be designed as a LLAP which, in line with the WBC Play Space Design Guide, focuses on nature-based play opportunities and features designed for imaginative play, calm and sensory based experiences. The applicant should review the Play Space Design Guide to understand appropriate play space typologies and design code standards associated with a LLAP.
- (5) I believe that the play space in the southern portion of the scheme, adjacent to the informal kick-about space is more appropriately designed as a LEAP which allows for more modern equipment and aesthetic which is more appropriate for this space as it will be close to the school and local centre which will have a more urban feel and sense of place.

- (6) With respect to the NEAP, I would like to see this provision be more geared to older youth, teens, and girls and include features and equipment that encourage physical activity, swings for older youth and young women, pod style or sheltered seating, and other opportunities to socialise. We look forward to coordinating with the applicant on designing a NEAP space that will be an inclusive, accessible space for older youth, teens, and girls.
- (7) The updated FRA indicates areas of flooding with depths ranging from 0.1m to greater than 0.6m where the LEAP, NEAP, and pavilion are proposed. While some degree of flooding within open space areas may be considered, flooding within the play areas at the levels shown in the FRA are likely not acceptable unless it can be shown that it will not pose a safety risk or cause short and long-term maintenance issues. How flooding integrates into the wider open space landscape must be considered.



4) Civic Space

- a) Based on the Open Space, Sport and Recreation Facilities Strategy which sets out the delivery of open space, sport and recreation provision, the on-site provision of civic space is only required for SDL developments, unless in exceptional circumstances and it can be demonstrated to be usable or valuable in the local context. It further indicates that the minimum size for the provision of civic space is 0.4ha.

Given other facilities that are proposed within the application such as a local centre and school and how these and the proposed sports pitches are located

around one another, the inclusion of a civic space can generally be seen to have merit. However, little information has been provided describing the character and aesthetic of the space and how it is meant to integrate into the wider landscape context for the area.

Without further information about the character of the space and given that the size of the civic space falls below the Open Space, Sport and Recreation Facilities Strategy minimum site size, I cannot see how this fits an exceptional circumstance.

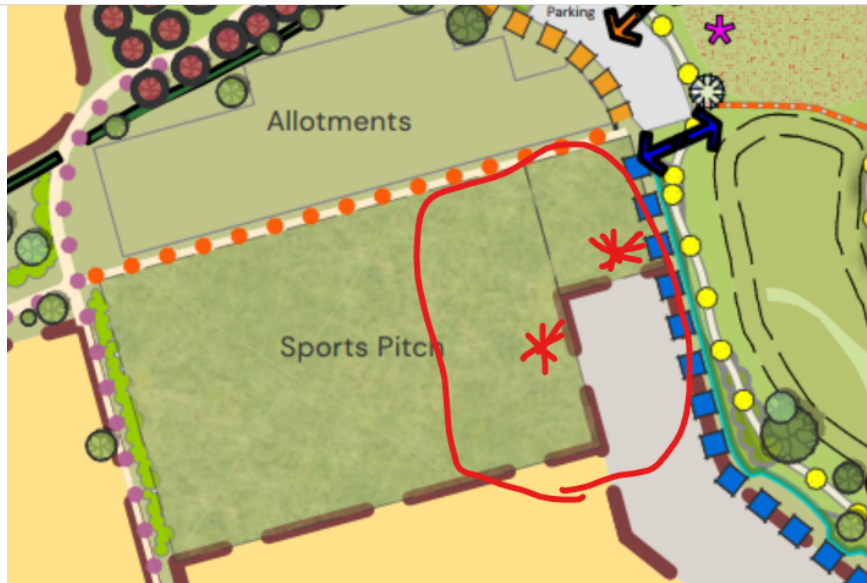
- b) Whether or not civic space is included, it will be important to incorporate features that will appeal to teens and in particular, teenage women/ girls. Referencing material and research from advocates like Making Space for Girls, if thoughtfully designed, many of the features such as seating, food, natural surveillance, access to restrooms, etc. that will naturally be incorporated into well-designed civic spaces will appeal to teens and specifically girls.

5) Allotments

- a) If allotments are to be provided on site, please be aware that the design and provision of amenities must meet requirements in the Open Space, Sport and Recreation Facility Strategy (November 2013). Further, the allotment design should follow the guidance set in the Wokingham Borough Council – Community Allotment Facility Design Guide.
- b) The design and layout of the allotments should be provided at Reserved Matters as this will be important given the close proximity of the allotments to the SANG. As commented on in the SANG section below, I am concerned about the layout of the allotment car park and how this relates to the SANG car park. Further, it must be shown that all of the facilities and amenities covered in the Open Space, Sport and Recreation Facility Strategy (November 2013) and the WBC Community Allotment Facility Design Guide can be accommodated.

6) Outdoor sports field provision

- a) In outline, I have no objection with the scheme with respect to the provision of on-site, outdoor sports facilities. However, should the scheme receive outline planning approval, more work will be needed to finalise the complete provision and mix of field types and any associated obligations.
- b) From a design perspective, I do have a concern about the proximity of dwelling units to the sports pitch. If the fields are to be lit, there is a conflict with the adjacent dwellings as these residences will inevitably be impacted by traffic, noise, and light spillage. More consideration should be given to the relationship of these different uses.



SANG Design and Thames Basin Heaths Special Protection Area

- 1) Based on the standard SANG provision rate of 8ha per 1,000 (2.4 residents per household) within 400m to 5km of the SPA, the proposed 420 dwelling unit development generates the need to 8.06ha of SANG. According to the EPR SANG Creation and Management Plan (3336-1E, dated 06 February 2026), the proposed development provides a total of 10.39ha of SANG. I have generally confirmed the 10.39ha area using in-house software. This is a welcomed increase as it appears that there will be wider accessibility to the SANG across the development.
- 2) There is a potential for a viable SANG based on the proposed design and scale. I appreciate that the applicant has taken steps to address many of the comments from previous consultations. There are, however, outstanding concerns that were previously raised by Natural England that have not been adequately addressed in the most recent submittal. These concerns have again been raised in their most recent consultation. Similarly, issues by WBC in October of 2025 still need to be addressed.
 - a) The items covered below have the potential to negatively impact the SANG and put its effectiveness into question. However, I recognize that these fall outside the limits of the SANG and are covered in the outline planning application. I suggest that the items below are addressed as conditions to be discharged as part of any Reserved Matters application.
 - i) Natural England, in their 4 March 2026 Planning Consultation response, has noted, and I concur, that there is the potential for an urbanised feel along the western portion of the SANG that needs to be addressed.

As seen in the screen grab taken from the most recently submitted Illustrative Landscape Master Plan (P23-2449_EN_C_ILMP), there will be two visitor parking bays with approx. 3 spaces each, a secondary route for vehicles, and a footpath before reaching the residential units. Within

this area, limited, if any, vegetation is shown for screening the vehicles from the SANG footpath. The road, visitor parking, footpath, and the 2-storey residential units and associated parking with limited screening will all contribute to this feeling like an urbanised edge, out of character with the objectives of a SANG.

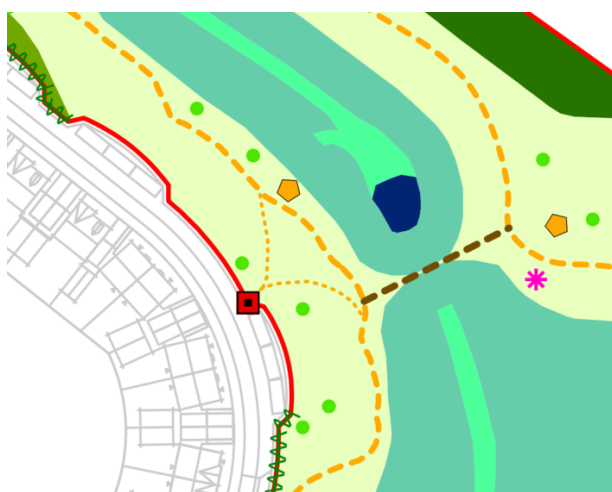


This is further illustrated in Figure 2b of the SANG General Arrangement Plan that area provided in the EPR SANG Creation and Management Plan (3336-1E, dated 06 February 2026) and the sections.



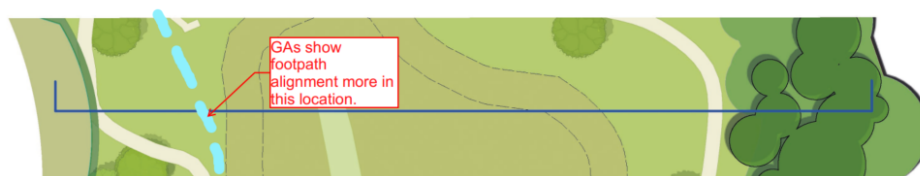
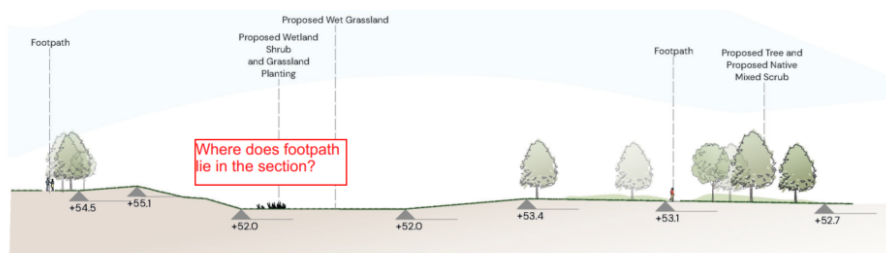


- ii) There are discrepancies between the SANG footpath alignment shown on the Illustrative Master Plan (P23-2449_EN_C_ILMP) and the SANG General Arrangement Plans in the EPR document. In the screen grab below from the GAs, the western footpath appears to be close to the attenuation pond whereas the alignment in the illustrative master plan shows the footpath closer to the western SANG boundary. This discrepancy is also shown in Section AA' of the sections that have been provided (P23-2449_EN_0014_0001).



I am interested to see where the footpath is located in this part of the SANG. A footpath location further to the east may lessen my concerns as it appears that this could allow for a

footpath that is further from an urbanised edge, potentially down slope, and with more options for a planting that could serve as a screen.



Please confirm the location of the footpath along the western boundary of the SANG. If the location of the footpath changes, please also confirm that length is still at least 2.3km.

b) I am content that the items below can be addressed by condition discharge associated with the Full SANG application:

i) I appreciate that the applicant has provided additional pedestrian access points into the SANG. The access points are logical and recognize where people will want to enter and exit.

I would recommend that some of the paths connecting the gated entry to the circular path be designed with the same hoggin or bound gravel path as the circular path. I think that it makes sense to retain some as mown paths, but where gated entries may see heavier use, I would expect these to be a more durable surfacing for maintenance and accessibility purposes.

ii) In general, I am satisfied that the examples of furniture and amenities that are proposed in the SANG Creation and Management Plan are headed in the right direction.

Some of the items that are not covered in the management plan, but will need to be provided include the items below as part of a discharge of condition.

- Details of kissing gates, field gates, maintenance gates, height restriction barriers, etc.;
- Dog waste bins (separate from regular rubbish/ recycling bins)
- Details for the bridge/ boardwalks;
- Specific information on what comprises the 'Community Art Nature Trail' and how it will be delivered;
- Specifications for the amenity pond with beach for dog dipping;

- Any other proposed site furniture, boundary treatments, etc. that are proposed within the SANG.

iii) I note that Objective 4 of the SANG Creation and Management Plan discusses the provision and creation of features such as hibernation refuges, hibernacula, and bee banks and posts. I can find no plans or reports that locate these items within the SANG.

From a Green Infrastructure perspective, these are all welcomed interventions. However, it will be important to understand where these features are located to ensure that they positively interact with where people and dogs are likely to be within the SANG. The selection of features and their ultimate location must be coordinated with any ecology reports and feedback from the WBC Ecology officer.

iv) Seating locations off the main circular footpath through the SANG is desirable. However, to ensure accessibility for all, please ensure that a percentage (at least 20%) of seating benches are located immediately adjacent to footpaths.

Following guidance from Active Travel England and the Department for Transport: Inclusive Mobility, the following should be accommodated in the layout and design of bench seating:

- Seating should not be located near moving vehicles, traffic noise and fumes.
- Seating should be located where natural shade is provided. Please review seating locations and consider bench seating near tree planting.
- Seats should be set back from the main route by at least 600mm to allow the free passage of through traffic.
- Provide a surfaced resting place of at least 900mm wide and at least as deep as the bench area next to the proposed bench so that a wheelchair/ motorized mobility devices have space adjacent.

c) The items covered below have the potential to negatively impact the SANG and put its viability and effectiveness into question. These items are specific to the Full application and are substantive enough to warrant an objection to the proposed development as it does not provide adequate mitigation to likely significant impacts on the Thames Basin Heaths Special Protection Area.

The objections may be overcome through revisions to the design, with clarifying information, and with confirmation from Natural England that they consider it to be an effective SANG.

i) The applicant has revised and updated the drawings based on comments from the LPA and Natural England with respect to the drainage strategy. This includes providing a natural drainage solution through the introduction of swales in the northern section of SANG, an addition of a

larger attenuation pond in the northern section and breaking up the basins in the southern section.

However, other comments from both Natural England and WBC have not been addressed and concerns remain with respect to the drainage strategy and potential impacts on the effectiveness of the SANG.

- (1) Natural England has previously commented highlighting concerns about how footpaths around the year-round accessibility of footpaths in low-lying areas of the site. As an updated FRA has been provided, Natural England should provide feedback on whether their concerns have been addressed.
- (2) It does not appear that an updated drainage note (RACE) has been provided. Previous comments have highlighted that there are existing foul water lines and associated easements that run through the SANG. It is unclear how these lines and easements are addressed with the current design and if there will be any impacts on planting and buffers within the SANG.

Similarly, it is unclear if any new drainage or foul water lines will be required to service the development.

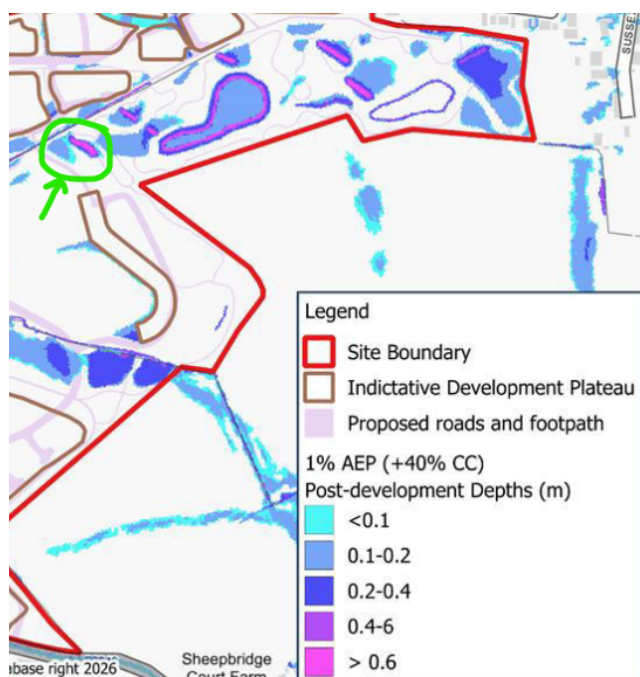
Please provide a plan showing proposed and existing drainage and foul water lines to remain which run through the proposed SANG. This should also show any associated easements.

- (3) Previous comments requested that the drainage strategy look beyond an end of pipe solution and to integrate more natural drainage solutions such as swales within the SANG design. Please confirm that the areas highlighted red in the screen grab below are intended to function as swales that convey surface water to the adjacent ponds within the SANG.



If these swales are designed to capture and convey water from areas within and outside of the SANG limits, please address if there is a risk of scouring and flooding to footpaths or if these areas will become overly wet and boggy. A boardwalk, footbridge, or other mitigation measure should be considered if the proposed footpaths will be compromised.

- (4) The screengrab below, taken from Figure 4-8 (Post-developed flood depths) indicates an area of flooding greater than 0.6m where the SANG car park is proposed.



As flooding within the SANG car park would not be acceptable, please clarify if this area of the car park will be subject to flooding.

- (5) It is quite common for service margins of approximately 3m to be needed around attenuation ponds for maintenance purposes. While footpaths can typically overlap these service margins, trees are generally not desirable for maintenance purposes. Please indicate if service margins will be needed around the attenuation ponds and how the landscaping plans will be impacted, if at all.
- (6) I appreciate that there is a more organic shape to the attenuation ponds that are located within the SANG. However, the drawings that have been provided indicate that the edges of the ponds will have a consistent side slope across the entire perimeter of the ponds. While the whole of the basin may have an organic shape, the consistent side slopes will conversely have a very engineered look. To promote a more naturalistic look to the ponds and to better blend and integrate into the SANG, the applicant is encouraged to maintain the natural and organic shape of the basins, but vary the side slopes on different edges, not exceeding 1:3 on any edge.

(7) While the car park has been presented illustratively, I am, in general, satisfied that the proposed car park meets the Natural England SANG guidelines.

- The design provides 1 space per 1ha of SANG.
- The car park is safely accessible by car and, according to the DAS, will be sign posted.
- The SANG is easily and safely accessible from the car park.
- The proposed circular footpath within the SANG begins and ends at the car park.
- Dog owners should be able to safely take their dog from the car park to the SANG. The car park is itself not secured by a fence. But as the car park is at the end of the road, this should be a relatively calm lot.

While the design appears to meet Natural England guidelines for the design of a SANG car park, I am concerned that it will not function for the sole purpose of serving visitors to the SANG.

As currently located, the SANG car park is immediately adjacent to the proposed allotments, sports fields, and associated sports field changing facilities. Without information to the contrary, it is difficult to see how the SANG car park spaces will not be lost due to uses from these other uses/facilities, even if signed. The SANG car park must at a minimum be designed to provide the 1 space per hectare minimum to accommodate SANG users. But the car park should be sized to accommodate additional parking spaces if other uses will conceivably use the lot.

With respect to the proposed allotments and how they will potentially impact the SANG car park, the WBC Allotment Design Guide requires that an agreed number of parking spaces be provided. Parking for the allotments will need to be lockable and designed with deer proof fencing. In looking at the relationship of the allotments, associated parking, and SANG car parking, please be sure to consider the following:

- How will secured allotment car parking (lockable pedestrian and vehicle entrance gate, etc.) function with the SANG car parking requirements (min. 11 spaces, safe access to SANG for people and dogs, height restricted vehicles, etc.)
- Maintenance access points and maintenance vehicle movements to SANG.
- Need to provide drop points with allotments for things such as manure and woodchips.

(8) A plan that addresses the delivery of the SANG car park must be provided. Without a delivery plan, it is difficult to know when the car park should be delivered. If areas of the development fall outside of the 400m distance, the car park should be delivered at the same time as the SANG, prior to first occupation.

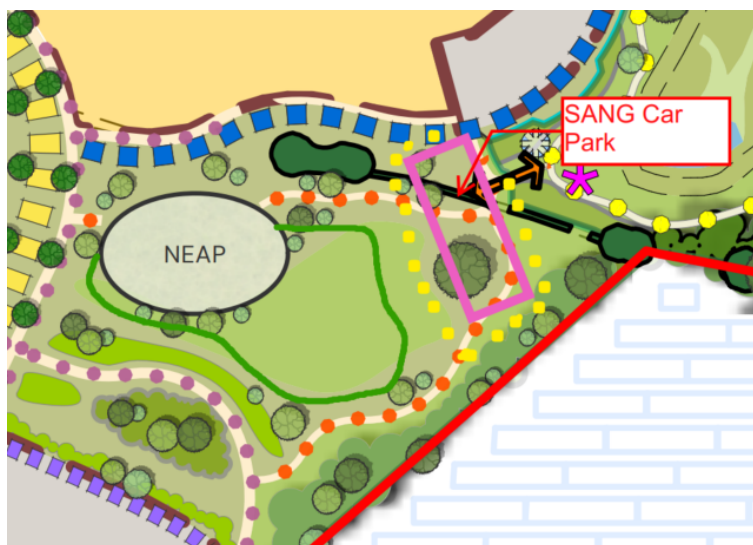
However, if the entirety of the development falls within the 400m area and the SANG is accessible by footpath, it is possible that the car park could be delivered at a later point.

- (9) Without background on how the location of the SANG car park has come about, I would like to offer my opinion on an alternative location.

As stated in points above, I have concerns about the location of the proposed SANG car park and how adjacent facilities will impact its use as well as the delivery of the car park.

Both these issues are potentially resolved by considering a car park location that is closer to the southern end of the SANG. In a more southerly location, there is possibly less of a concern of impacts from competing uses. Users of the NEAP are, for example, are likely to be from within the development and not depend on a car. Depending on delivery timing, there is also the potential that less road infrastructure may be needed at the outset, to provide access to the SANG car park.

Lastly, a more southerly location has the potential for more overlooking of the car park. The current proposed location is set back quite a bit into the development and not immediately overlooked which could compromise safe access to the SANG from the car park.



SANG Creation and Management Document

- 1) I have noted that the EPG SANG Creation and Management Plan document contains general arrangement drawings for the SANG. Please can these drawings be provided separately, outside of the document.
- 2) The applicant should review Figure 1: Site Location and SANG Context drawing within the EPR document. It appears that the figure does not capture the current location/ area of the SANG (cyan below).



- 3) It must be demonstrated that the proposed SANG will be accessible to the development prior to first occupation. While the SANG Creation and Management Plan, says that convenient, safe, and attractive walking routes will be provided between the development and SANG, it is not clear how this is accomplished.

To determine if the SANG will be accessible to the development prior to first occupation, a phased delivery plan or strategy is required. This must show a strategy as to how the SANG and SANG car park will be accessed phase by phase.

Summary

Green Infrastructure

In outline, I do not have any objections to the application from a Green Infrastructure perspective. Subject to my comments being addressed prior to or as part of Reserved Matters, I am satisfied that the development can comply with MDD DPD Policy TB08 and CC03 and the Wokingham Borough Council Open Space Sports and Recreation Strategy (November 2013). More information will be needed at Reserved Matters to determine compliance with the WBC Play Space Design Guide Technical Note.

SANG Design and Thames Basin Heaths Special Protection Area

With respect to the Full Planning application for the proposed Suitable Alternative Natural Greenspace (SANG), associated landscaping/car park I object to the proposed development on the grounds that has not been shown that adequate measures have been introduced to mitigate likely significant impacts on the Thames Basin Heaths Special Protection Area.

This is principally due to the design of the proposed SANG not being suitable for it to be an effective alternative to visiting the TBH SPA. There are outstanding concerns raised by Natural England and the LPA with respect to drainage and utilities that could compromise the integrity of the SANG.

Further, I have concerns that the SANG car park, in its current location at its current size, will not be able to function for the sole use of SANG visitors given

its proximity to other uses that will likely also require parking. Lastly, it has not been demonstrated that the proposed SANG will be accessible to the development prior to first occupation as no detailed delivery plan has been provided with the full application.

It may be that the above SANG objections are overcome through revision of the SANG design, with the provision of additional information, and confirmation from Natural England that they consider that the development has an effective SANG.

Without an effective SANG solution, the proposal does not pass appropriate assessment and must be refused planning permission.

Conditions & Reasons (if required)			
To be developed			
Date:	26.03.206	Signed:	D. Godfrey