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Habitats Regulations Assessment (Shadow)

Site Name

Land North of Sun Lane, Riseley

Client

Wellington Estate and
3West Group

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This report has been authored by Kate Priestman, who is a Principal Ecologist with over twenty years' experience. Kate has undertaken extensive survey work and reporting, encompassing a breadth of deliverables, and prepared European Protected Species licences for numerous schemes. As a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and a Chartered Environmentalist (CEnv), she is bound by CIEEM's code of professional conduct.

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Report Summary

Purpose	The Ecology Co-op was commissioned by the Wellington Estate and 3West Group to prepare a Habitats Regulations Assessment (HRA) in relation to inform an outline application with all matters reserved except for access for the construction of up to 44 dwellings. This assessment has been completed due to the proximity of the site to a National Site Network site: Thames Basin Heath Special Protection Area (SPA).
Context	A Preliminary Ecological Appraisal undertaken by The Ecology Co-op in July 2025 identified the presence of Thames Basin Heath SPA within the zone of influence of the site. Consequently, a HRA was recommended to determine any likely significant effects of the proposed residential development on the internationally designated site and its qualifying features.
Site descriptions	The site measures approximately 2ha, comprising predominantly of two fields of neutral grassland, bordered by scrub along the eastern boundary and a small additional strip of neutral grassland in the south-east corner that leads to an access gate. Hedgerows are present along the north, west and south of the site, with a line of trees running north-east to south-west through the centre of the site, delineating the two fields. The site is bordered by residential housing to the north-east, south-east and south-west, and woodland to the north-west. Additional housing, woodland and arable farmland is present in the wider landscape. The Thames Basin Heath SPA is located approximately 2.3km east of the proposed development site at its nearest point. The SPA supports three qualifying species of bird: nightjar, Dartford warbler and woodlark.
Key findings	The Stage 1 screening assessment identified the potential for significant effects to arise in relation to the conservation objectives of the designated site, associated with recreational impacts, in the absence of mitigation. This triggered the requirement for Stage 2 Appropriate Assessment, which with the implementation of mitigation in the form of a financial contribution to the Local Authority's Suitable Alternative Natural Greenspace (SANG) scheme and/or Strategic Access Management and Monitoring (SAMM) measures, concluded no likely significant effects.
Are further stages required?	No.



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1 INTRODUCTION

1.1 Purpose of the Report

The Ecology Co-operation Ltd (hereafter The Ecology Co-op) was commissioned by the Wellington Estate and 3West Group to prepare a Habitats Regulations Assessment (HRA) in relation to a proposed residential development at land north of Sun Lane, Riseley, Berkshire RG7 1QR. This report has been completed due to the proximity of the site to the Thames Basin Heath Special Protection Area (SPA).

This document represents the results of a Stage 1: formal screening assessment for any likely significant effects (either alone or in combination with other plans or projects) and Stage 2: Appropriate Assessment.

1.2 The Application Site

The site is located at Sun Lane, Riseley. The central grid reference for the site is SU 71939 63031.

The existing site measures approximately 2ha in area and comprises predominantly of two fields of neutral grassland, bordered by scrub along the eastern boundary; a small strip of neutral grassland is also present in the south-east corner that leads to an access gate. Hedgerows are present along the north, west and south of the site, with a line of trees running north-east to south-west through the centre of the site, delineating the two fields. The site is bordered by residential housing to the north-east, south-east and south-west, and woodland to the north-west. The A33 is located approximately 50m west of the site. Additional housing, woodland and arable farmland is present in the wider landscape. Figure 1 shows the approximate boundary of the site and local context.

This report will be used in relation to an outline application with all matters reserved except for access for the construction of up to 44 dwellings, including affordable housing together with access, landscaping and associated infrastructure (see Figure 2).

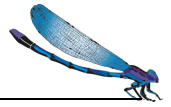


Figure 1. An aerial image showing the location of the site. The approximate site boundary is outlined in red. Image produced courtesy of Google maps (map data ©2025 Google).



Figure 2. Proposed scheme layout for the development at land north of Sun Lane, provided courtesy of Ashby Design (January 2026, drawing no. 713/25/OUT/PL1006).

1.3 Survey Background

The Ecology Co-op undertook a Preliminary Ecological Appraisal (PEA) in June 2025¹. This recorded the site to comprise two fields of neutral grassland.

The northern field is dominated by Yorkshire fog *Holcus lanatus*, with sweet vernal-grass *Anthoxanthum odoratum* and meadow foxtail *Alopecurus pratensis* frequent. Chamomile *Chamaemelum nobile*, curled dock *Rumex crispus*, timothy *Phleum pratense*, perennial rye-grass *Lolium perenne*, cock's-foot *Dactylis glomerata*, creeping buttercup *Ranunculus repens*, creeping bent *Agrostis stolonifera*, creeping thistle *Cirsium arvense*, lesser stitchwort *Stellaria graminea*, false oat-grass *Arrhenatherum elatius*, bird's-foot trefoil *Lotus corniculatus*, red clover *Trifolium pratense*, blackthorn *Prunus spinosa*, fescue *Festuca* sp., knapweed *Centaurea* sp. and tansy *Tanacetum vulgare* were also identified. A walnut *Juglans regia* tree is present in the north-eastern corner of this field.

The southern field is also dominated by Yorkshire fog as well as sweet vernal-grass, with knapweed and creeping bent frequent. Other species identified include meadow buttercup *Ranunculus acris*, creeping buttercup, red clover, cock's-foot, blackthorn, white clover *Trifolium repens*, false oatgrass, ragwort *Jacobaea* sp., creeping

¹ The Ecology Co-op (2026). *Land North of Sun Lane Preliminary Ecological Appraisal Issue Rev01*.



thistle, lesser stitchwort, dwarf spurge *Euphorbia exigua*, bird's-foot trefoil, creeping cinquefoil *Potentilla reptans* and chamomile. At the southern corner of the southern field, a small strip of recently mown grassland leads to an access gate on the southern boundary. In this section, false oat grass, common nettle *Urtica dioica*, bush vetch *Vicia sepium*, curled dock, fern *Dryopsida* sp., Yorkshire fog, herb-robert *Geranium robertianum*, cock's-foot, creeping buttercup, cleavers *Galium aparine* and creeping bent were all identified.

A band of scrub extends along the eastern boundary immediately adjacent to the two fields and contains blackthorn, bramble *Rubus fruticosus*, bindweed *Convolvulus* sp., common nettle and remote sedge *Carex remota*. A line of trees extends from the scrub and runs north-east to south-west through the centre of the site, separating the two fields. The canopy layer comprises a mix of ash *Fraxinus excelsior*, horse chestnut *Aesculus hippocastanum*, pedunculate oak *Quercus robur* and field maple *Acer campestre*. Blackthorn dominates the understorey with hawthorn *Crataegus monogyna*, bramble and hazel *Corylus avellana* additionally present.

A hedgerow runs along the northern and western boundaries of the site; bramble dominates in the northern section with elm *Ulmus procera* abundant but later dominating in the western section, with hazel frequent throughout. Also present is holly *Ilex aquifolium*, black bryony *Talis communis*, dogwood *Cornus sanguinea*, blackthorn, pedunculate oak, elder *Sambucus nigra*, wild privet *Ligustratum vulgare*, fern *Dryopsida* sp. and box *Buxus sempiverens*. Two smaller sections of hedgerow are present on the southern boundary, which form part of larger connected hedgerow that runs along the southern boundary immediately off-site. These sections comprise bramble, blackthorn, hazel, dogwood, field maple, dogrose *Rosa canina*, common nettle and ground-ivy *Glechoma hederacea* as well as non-native Persian ivy *Hedera colchica*.

The site is immediately bordered by a parcel of ancient woodland to the north, and a parcel of priority habitat deciduous woodland to the south-west. Further parcels of ancient and priority woodland are present in the wider landscape in all directions.

There are no buildings on site. The trees on site have potential to support roosting bats. The grassland and scrub on site provide foraging and commuting habitat. Foraging and commuting bats may frequently cross the site, utilising the hedgerows and line of trees as wildlife corridors, to reach woodland habitats elsewhere in the wider landscape.

The grassland fields on site are highly suitable for ground-nesting birds. The hedgerows, scrub and line of trees also have potential to support nesting birds. Several red kites *Milvus milvus* were observed foraging on site during the survey.

The hedgerows, line of trees and scrub on site have potential to support dormice *Muscardinus avellanarius*, with the presence of hazel within these habitats and connectivity to off-site woodland parcels to the north, south, and west further improving suitability for this species.

Six ponds are situated within 500m of the site. The site has suitability to support great crested newts *Triturus cristatus* during their terrestrial phase. However, access to the site from ponds within 250m (the typical maximum range that newts disperse from their breeding ponds) is obstructed by residential development and major roads, and as there are no ponds on site it is unlikely that great crested newts are present.

The long grassland in the fields is highly suitable for reptiles. The scrub and hedgerow on site have potential to support hedgehogs *Erinaceus europaeus*, while the grassland has potential to support brown hare *Lepus*



europaeus.

The proposed development has not yet been finalised, but is likely to include the removal of the grassland on site as well as some sections of scrub, hedgerow and the line of trees.

The proposal to construct new residential dwellings has the potential to directly impact roosting and foraging bats, nesting birds, dormice, great crested newts and reptiles. As such, the following surveys have been recommended:

- ground level tree assessment of all trees to be removed;
- bat activity surveys, consisting of:
 - three walked transect surveys (once per spring, summer and autumn)
 - seven static logger deployments using two loggers (deployed monthly from April to mid-October);
- six breeding bird surveys between April and July;
- a dormouse presence/absence survey (using 50 nest tubes), with monthly checks from April to October;
- a reptile presence/absence survey, undertaken between April to October.

Precautionary mitigation has also been recommended with regards to badgers *Meles meles*, great crested newts, invasive species and hedgehogs.

1.4 Legal Basis

Habitats Regulations Assessment (HRA) refers to the requirement for plans and projects to be assessed in relation to European sites under the Conservation of Habitats and Species Regulations 2017². As of the 1st January 2021, the Regulations have been amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019³ under exercise of the powers conferred to the European Withdrawal Act 2018 (1)⁴.

Under Regulation 63:

“1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of that site,

must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives.

(2) A person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.”

² UK Gov (2017). The Conservation of Habitats and Species Regulations 2017. Available at: <https://www.legislation.gov.uk/ukxi/2017/1012/contents/made>

³ UK Gov (2019). The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111179512>.

⁴ UK Gov (2018) European Union (Withdrawal) Act 2018. Available at: <https://www.legislation.gov.uk/ukpga/2018/16/contents/enacted>.



As such, within England and UK inshore and offshore marine areas, the Habitats Regulations 2017⁵ now amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019³, requires that any plan or project that may have a 'likely significant effect' on a site within the National Site Network (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) (in addition to Ramsar sites)) either individually or in combination with other plans or projects), must be made subject to an 'appropriate assessment' of its implications for the site in view of the Network Objectives for the site, and can only proceed if it can be shown that they will not adversely affect the integrity of the site.

1.5 Habitats Regulations Assessment

There are three stages in a full HRA⁶:

Stage 1 – Screening: Initially, the proposal is screened to see whether it is directly connected with (or necessary) to the conservation management of a European designated site. The potential impact pathways (direct and indirect) of a project are identified. These are then assessed for their potential to result in 'likely significant effects' upon the integrity of sites within the National Site Network and the conservation objectives of their qualifying features, both alone and in-combination with other plans and projects. Mitigation measures are not considered at this stage⁷. Where no likely significant effects are identified, it is not necessary to take the project any further through HRA.

Stage 2 – Appropriate Assessment: Where it is not possible to conclude that there are no likely significant effects, an appropriate assessment is undertaken. This stage assesses in detail the likely significant effects of a proposal on the site integrity and conservation objectives (alone and in combination). Mitigation can be considered at this stage to avoid or reduce any significant adverse effects. Where significant adverse effects on the integrity of the designated site cannot be ruled out the third stage is triggered.

Stage 3 – Derogations: Where the 'integrity test' has failed, a proposal may qualify for a derogation to allow a proposal to go ahead. In order for a derogation to be granted, three legal tests must be passed:

- **Assessment of Alternative Solutions:** This process looks at feasible alternative solutions that would be less damaging or avoid damage to the site and its qualifying features (conservation objectives and site integrity).
- **Imperative Reasons of Overriding public interest (IROPI):** Where no alternative solutions exist and where adverse impacts remain despite mitigation, the plan or project may still be permitted if there are imperative reasons of overriding public interest. For this to happen, the project must satisfy a set of strict tests.
- **Compensatory Measures will be taken and secured:** Where no alternative solutions exist and there are IROPI, compensatory measures must be secured. The measures must fully offset the remaining significant adverse effects to the designated site's integrity and qualifying features.

⁵ UK Gov (2017). The Conservation of Habitats and Species Regulations 2017. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

⁶ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

⁷ Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta ('People over Wind')



2 METHODOLOGY

2.1 Screening Assessment Approach

Stage 1 (screening) determines whether the proposed development is likely to have any significant effects upon the conservation objectives of the nearby National Site Network site alone or in combination with other proposals (in the absence of mitigation).

The process is as follows:

1. Identify and characterise sites which fall within the National Site Network within the zone of impact⁸;
2. Review and screen the proposed development plan to identify potential impacts and likely effects on these sites;
3. Consider any other plans and projects (and combined project impacts) that may result in 'in-combination' effects to these sites; and
4. Produce a Screening Assessment recording the analysis and supporting information.

The following information sources have been reviewed as part of the Screening Assessment:

- www.magic.gov.uk and its links to SAC and SPA citations
- JNCC website
- objectives for SAC and SPA sites, available on the Natural England website
- the UK Air Pollution Information System (www.apis.ac.uk)

In order to determine that there will be no significant effects upon the National Site Network sites, the following criteria must be met:

- there must not be any reduction in the area of the Annex I habitats (or composite features);
- there must not be any changes to the composition of the habitats for which the site was designated (such as the abundance and diversity that compromises the habitat over time);
- there must not be any direct effect upon the species for which this site was designated or classified beyond any existing baselines;
- there must not be any indirect effects upon the population of species for which the site was designated or classified due to loss or degradation of their habitat (quality and/or quantity), and;
- there must not be any interruption or degradation of the physical, chemical or biological processes that support habitats and species for which the site was designated or classified.

2.2 Appropriate Assessment Approach

Where Stage 1 (screening) has identified likely significant effects on the nearby National Site Network sites, Stage 2 (Appropriate Assessment) is undertaken. Stage 2 assesses further whether effects are likely to be adverse to the integrity of the European site or designated interest feature(s), looking in detail at recorded sensitivities and/or

⁸ The zone of impact used here is a 5km buffer zone.



vulnerabilities and the conservation objectives of the designated site. Mitigation measures are considered at this stage in addition to in-combination effects (intra and inter).

2.3 Approach to Scoping in Potential Impact Pathways

Potential impact pathways associated with the proposed development have been determined using professional judgement in accordance with the following factors:

- whether the potential impact pathway could directly affect the designated site or qualifying features;
- whether the potential impact pathway could indirectly affect the designated site or qualifying features by virtue of being within the zone of influence (e.g., changes to hydrology);
- whether the proposed development site is functionally linked to the European site and, therefore, whether potential impacts could affect 'mobile' qualifying features of the designated site (e.g., birds).

The conservation objectives of the European site and cited threats/pressures and vulnerabilities have been taken into account.

2.4 Precautionary Approach

At each stage of the HRA process, a precautionary approach has been followed, i.e. stage 2 appropriate assessment is triggered where the risk of a proposal resulting in likely significant effects on the conservation objectives of a designated site cannot be ruled out at the screening stage (stage 1); and, where 'all reasonable scientific doubt' of an adverse effect on the integrity of a designated site cannot be ruled out, stage 3 derogation is triggered.

2.5 Relevant Legislation and Guidance

The following legislation and guidance documents have been consulted in the preparation of this HRA:

- ECLI:EU:C:2018:244, Judgment of the Court (Seventh Chamber), 12 April 2018, Reference for a preliminary ruling — Environment — Directive 92/43/EEC — Conservation of natural habitats — Special areas of conservation — Article 6(3), available online at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>
- High Court judgment of Wyatt, R. (On the Application of) v Fareham Borough Council [2021] EWHC 1434 (Admin) (28 May 2021) relating to Habitats Regulations Assessments ("HRAs")
- European Commission (2000), Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC;
- European Commission (2001), Assessment of plans and projects significantly affecting Natura 2000 sites;
- European Commission (2007), Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC;
- The Design Manual for Roads and Bridges (DMRB). Sustainability & Environment Appraisal: LA 115 Habitats Regulations Assessment. January 2020.
- The Design Manual for Roads and Bridges (DMRB). Sustainability & Environment Appraisal: LA 105 Air quality. November 2019.
- Holman et al (2020). A guide to the assessment of air quality impacts on designated nature conservation



sites. v1.1. Institute of Air Quality Management, London.

- CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK.
- Chapman, C. & Kite, B. (2021). Guidance on Decision-Making Thresholds for Air Pollution. JNCC Report No.696 (Main Report), JNCC, Peterborough, ISSN 0963-8091.

3 NATIONAL SITE NETWORK SITES UNDER CONSIDERATION

3.1 Proximity of the Application Site to the National Site Network Site

A Habitats Regulations Screening Assessment with regards to the Thames Basin Heath SPA has been undertaken as development within the zone of influence of sites within the National Site Network in the UK have the potential to result in likely significant effects on the integrity of the designated site and its qualifying features.

The application site lies approximately 2.3km east of the boundary of the designated site at the closest point. Bramshill Site of Special Scientific Interest (SSSI) is a component site of the SPA. Figure 3 shows the location of the development in relation to the designated site.

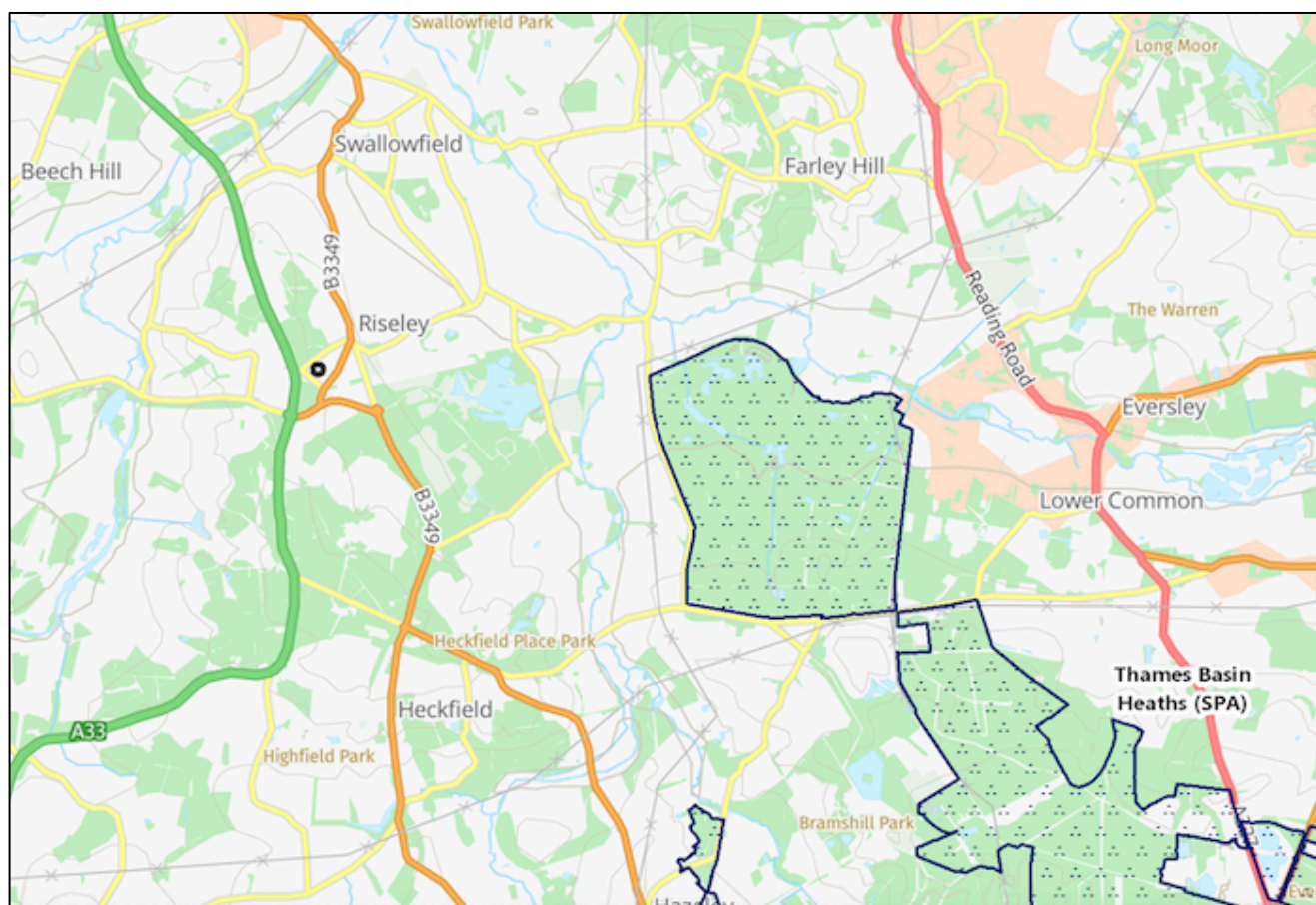


Figure 3. Location of the application site (black circle) in relation to the designated site. Image produced courtesy of Magic maps (<http://www.magic.gov.uk/>, contains public sector information licensed under the Open Government Licence v3.0).



3.2 Qualifying Features and Network Objectives

3.2.1 Thames Basin Heath SPA

Qualifying Features

General site character:

- inland water bodies (standing water, running water): 0.6%
- coniferous woodland: 34.2%
- bogs, marshes, water fringed vegetation, fens: 4.9%
- broad-leaved deciduous woodland: 7%
- mixed woodland: 3.6%
- other land (including towns, villages, roads, waste places, mines, industrial sites): 5.7%
- heath, scrub, Maquis and Garrigue, Phygrana: 44%.

Total area = 8311.06ha.

Species referred to in Article 4 of Directive 2009/147/EC and listed in Annex II of Directive 92/43/EEC:

- nightjar *Caprimulgus europaeus* (breeding); 7.8% of the GB breeding population;
- woodlark *Lullula arborea* (breeding); 9.9% of the GB breeding population;
- Dartford warbler *Sylvia undata* (breeding); 27.8% of the GB breeding population.

Network/Conservation Objectives

The Network Objectives set out by Natural England⁹ are as follows:

“Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- *The extent and distribution of the habitats of the qualifying features*
- *The structure and function of the habitats of the qualifying features*
- *The supporting processes on which the habitats of the qualifying features rely*
- *The population of each of the qualifying features, and,*
- *The distribution of the qualifying features within the site.”*

⁹ Natural England (2019) European Site Conservation Objectives for Thames Basin Heaths Special Protection Area Site Code: UK9012141.



Threats and Pressures

The following negative impacts have been highlighted on the data form in relation to the SPA¹⁰:

- air pollution, air-borne pollutants
- other human intrusions and disturbances
- forest and plantation management & use
- biocenotic evolution, succession
- outdoor sports and leisure activities, recreational activities.

3.2.2 Vulnerability of the Thames Basin Heaths SPA

Natural England's Site Improvement Plan (SIP)¹¹, lists the following as current threats or pressures on the qualifying features (bird species, assemblage and habitats) supported by the site:

- *public access/disturbance* (pressure/threat); features affected: European nightjar, woodlark, Dartford warbler;
- *undergrazing* (pressure); features affected: European nightjar, woodlark, Dartford warbler, wet heathland with cross-leaved heath, European dry heaths and depressions on peat substrates;
- *forestry and woodland management* (pressure); features affected: European nightjar, woodlark, Dartford warbler, wet heathland with cross-leaved heath and European dry heaths;
- *hydrological changes* (threat); features affected: wet heathland with cross-leaved heath, and depressions on peat substrates;
- *inappropriate scrub control* (pressure); features affected: European nightjar, woodlark, Dartford warbler, wet heathland with cross-leaved heath and European dry heaths;
- *invasive species* (pressure/threat); features affected: wet heathland with cross-leaved heath and European dry heaths
- *air pollution: impact of atmospheric nitrogen deposition* (pressure); features affected: European nightjar, woodlark, Dartford warbler, wet heathland with cross-leaved heath, European dry heaths and depressions on peat substrates;
- *wildfire/arson* (pressure); features affected: European nightjar, woodlark, Dartford warbler, wet heathland with cross-leaved heath, European dry heaths and depressions on peat substrates;
- *feature location/extent/condition unknown* (threat); features affected: European nightjar, woodlark and Dartford warbler;
- *military* (threat); features affected: European nightjar, woodlark, Dartford warbler, wet heathland with cross-leaved heath, European dry heaths and depressions on peat substrates;
- *habitat fragmentation* (pressure); features affected: European nightjar, woodlark, Dartford warbler, wet heathland with cross-leaved heath, European dry heaths and depressions on peat substrates.

¹⁰ <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012141.pdf>

¹¹ Natural England (2014) Site Improvement plan (SIP): Thames Basin; Improvement Programme for England's Natura 2000 Sites (IPENS). Available online.



4 SCREENING ASSESSMENT

The development proposals are not directly connected with or necessary to the management of the internationally designated site.

4.1 Assessment of Likely Significant Effects

Only those potential impact pathways associated with the proposed development and with potential relevance to the European site and its qualifying features have been scoped into the assessment.

Accordingly, the following threats/pressures on the qualifying features identified in the SIP, in addition to those relevant to the proposed development, have been scoped in:

- air pollution: impact of atmospheric nitrogen deposition (pressure) – operational phase of the proposed development; and
- public access/disturbance (threat) – operational phase of the proposed development.

A number of the key threats/pressures listed within the SIP relate to site management issues and are not related to potential impact pathways from the proposed development.

The following potential impact pathways associated with the proposed development have been scoped out:

- dust emissions (construction)
- water pollution – wastewater and drainage (construction and operation)
- water abstraction (operation)
- disturbance – lighting, vibration, noise, site personnel/residents (construction and operation)
- habitat loss – functionally linked land (construction and operation).

The rationale for scoping out the above impacts includes distance (the designated site is outside of the zone of influence relating to the impact), absence of recorded threat to the designated site, and absence of connectivity to the designated site.

The potential impact mechanisms that have been scoped in and the assessment of likely significant effects are presented in Table 1 below. It is established case law that an effect is only 'significant' in this context if it undermines the conservation objectives.

Table 1. Assessment of likely significant effects: screening.

Impact pathway	Assessment of likely significant effects	Significance of effects (alone or in combination)
Air pollution – nitrogen deposition	An increase in traffic movements can increase nitrogen deposition. Air pollution can result in significant effects for those habitats and species that serve as qualifying features for the SPA, and has the potential to undermine the site's conservation objectives by affecting the integrity of the site and the favourable conservation status of its qualifying features. Indeed, nitrogen deposition is listed in the SIP as a pressure affecting European nightjar, woodlark, Dartford warbler, wet heathland with cross-leaved heath, European dry heaths and	No likely significant effects alone or in combination.



Impact pathway	Assessment of likely significant effects	Significance of effects (alone or in combination)
	depressions on peat substrates. Roads under consideration The Design Manual for Roads and Bridges (DMRB) (2019)¹² guidance relating to designated sites and the assessment of traffic and air pollution, advises that beyond 200m of a road the effects of emissions are reduced to background levels. There are a number of roads within the locality of the site that pass within 200m of the boundary of the SPA, and it is reasonable to assume that vehicles involved in the proposed redevelopment of the site in addition to future residents of the proposed dwellings will utilise the local road network. Thresholds JNCC guidance (2021)¹³ relating to decision-making thresholds for air pollution provides the AADT (Annual Average Daily Traffic) change which is required to trigger an exceedance of 1% of the critical levels and critical loads as a function of distance from the edge of a road. In relation to nitrogen deposition for short vegetation, an AADT increase of 717 is needed to trigger exceedance of 1% of critical loads (10 kg-N/ha/yr as a function of distance from the edge of a road (25m in this instance). The 1% threshold is taken from the Natural England guidance document on the assessment of traffic emissions as the threshold to be applied as part of an in-combination assessment. Assessment of likely significant effects Given the relatively small-scale nature of the proposed development and predicted increase in residents and associated vehicle usage, it is considered that changes in AADT would not trigger an exceedance of 1% of critical loads in relation to the qualifying habitat of the SPA. Therefore, no likely significant effects have been identified in relation to the conservation objectives of the designated sites with regards to the proposed development and air pollution, either alone or in combination with other plans and projects.	
Public access/recreational pressure	The qualifying species, assemblage and habitats of the SPA are sensitive to increased recreational pressure, as highlighted in the citation and SIP. Public access/disturbance is listed as a major threat/pressure on the qualifying bird populations supported by the Thames Basin Heath SPA. Excessive recreational pressure causes direct disturbance to birds that can lead to increased stress levels (flight initiation response) and reduced fitness/breeding success. Ground nesting	Likely significant effects alone or in combination.

¹² The Design Manual for Roads and Bridges (DMRB). Sustainability & Environment Appraisal: LA 105 Air quality. November 2019.

¹³ Chapman, C. & Kite, B. (2021). Guidance on Decision-Making Thresholds for Air Pollution. JNCC Report No.696 (Main Report), JNCC, Peterborough, ISSN 0963-8091.



Impact pathway	Assessment of likely significant effects	Significance of effects (alone or in combination)
	species (nightjar and woodlark) are particularly sensitive to dog walking, and there is a risk of direct attacks by dogs on wildlife. Uncontrolled recreational pressure also leads to habitat degradation through damage to vegetation, soil compaction, eutrophication through dog waste deposition, litter accumulation, fly-tipping or other antisocial behaviours, and increased risk of fires, which can indirectly impact on these species. Thames Basin Heath SPA The Thames Basin Heath SPA is located within the 5km mitigation zone, as demarcated by Wokingham Borough Council¹⁴, whereby any new housing within 5km of the SPA may harm the rare bird populations of the SPA. Assessment of likely significant effects In accordance with the LPA and Natural England guidance, there is considered to be potential for likely significant effects to occur as a result of recreational impacts associated with new residential development, in combination with other plans and projects in the absence of mitigation.	
Is the project likely to have a significant effect alone or in combination?		
Yes – based on the nature and location of the proposed development, which is predicted to see an increase of residents within 5km of the SPA, there is considered to be the potential for significant effects to arise in combination with other plans and projects associated with recreational impacts.		
Conclusion of the test of Likely Significant Effects		
Outcome of screening stage: Significant effects are likely.		
Is an Appropriate Assessment required: Yes – Stage 2 Appropriate Assessment is required.		
Are the appropriate statutory environmental bodies in agreement with this conclusion? To be consulted.		

¹⁴ Wokingham Borough Council (2025). Advice for Developers – Thames Basin Heath Special Protection Area (SPA). Available online at: <https://www.wokingham.gov.uk/planning-policy/advice-developers/thames-basin-heath-special-protection-area>



5 IMPACT APPRAISAL

The HRA Stage 1 screening assessment identified the potential for likely significant effects to arise in relation to the conservation objectives of the designated site as a result of recreational impacts. Stage 2 Appropriate Assessment (Table 2) will further assess this impact pathway in order to determine whether the scale or magnitude is likely to cause significant adverse effects on the integrity of the European site and the favourable conservation status of its qualifying features.

Table 1. Appropriate Assessment.

European site: Thames Basin Heath SPA				
Qualifying features	Impact pathway	Likely significant effects on the integrity of the site and its conservation objectives	Mitigation for any potential adverse effects on the integrity of the site	Significance of effects (integrity test)
Nightjar, woodlark and Dartford warbler	Public access/recreation	The qualifying bird species of the SPA are sensitive to increased recreational pressure, as highlighted in the SIP. Disturbance of breeding birds can lead to increased stress levels and reduced fitness/breeding success. Ground nesting bird species are particularly sensitive to dog walking, and there is a risk of direct attacks by dogs on wildlife. Uncontrolled recreational pressure also leads to habitat degradation through erosion, compaction and damage to vegetation and water bodies, increased trampling, eutrophication of soils by dog faeces, increased risk of fire, littering and fly-tipping, which can indirectly impact on species and the integrity of the habitat. In the absence of mitigation there remains the potential for the proposed development to lead to significant adverse effects on the designated site and the qualifying species and habitats in relation to recreation.	In order to ensure that new homes will not lead to an increase in pressure on the SPA, the proposed development can mitigate for potential significant adverse recreational effects by contributing to the Local Authority's Suitable Alternative Natural Greenspace (SANG) scheme and Strategic Access Management and/or Monitoring (SAMM) measures – coordinated visitor management across the whole of the publicly accessible SPA. With the securement of a financial contribution, no residual likely significant effects are anticipated in relation to the Thames Basin Heaths SPA and its qualifying features.	Not significant – no likely significant adverse effects identified alone or in combination after proposed mitigation is implemented in the form of an appropriate financial contribution to the Local Authority's mitigation schemes.



European site: Thames Basin Heath SPA				
Qualifying features	Impact pathway	Likely significant effects on the integrity of the site and its conservation objectives	Mitigation for any potential adverse effects on the integrity of the site	Significance of effects (integrity test)
Is the project likely to have an adverse effect on the integrity of the designated site alone or in combination with other development?				
With the implementation of mitigation in the form of a financial contribution, no residual effects have been identified in relation to the proposed development and potential recreational impacts on the integrity of the designated Thames Basin Heath SPA and its qualifying features.				
Conclusion of the Site Integrity Test on the proposals				
With the inclusion of the mitigation measures outlined above and with the consideration of any residual effects, it is concluded that the proposed development is unlikely to give rise to significant adverse effects on the integrity of the Thames Basin Heath SPA and the favourable conservation status of its qualifying features.				

Should you need any further advice on the information provided above, please do not hesitate to contact The Ecology Co-op.