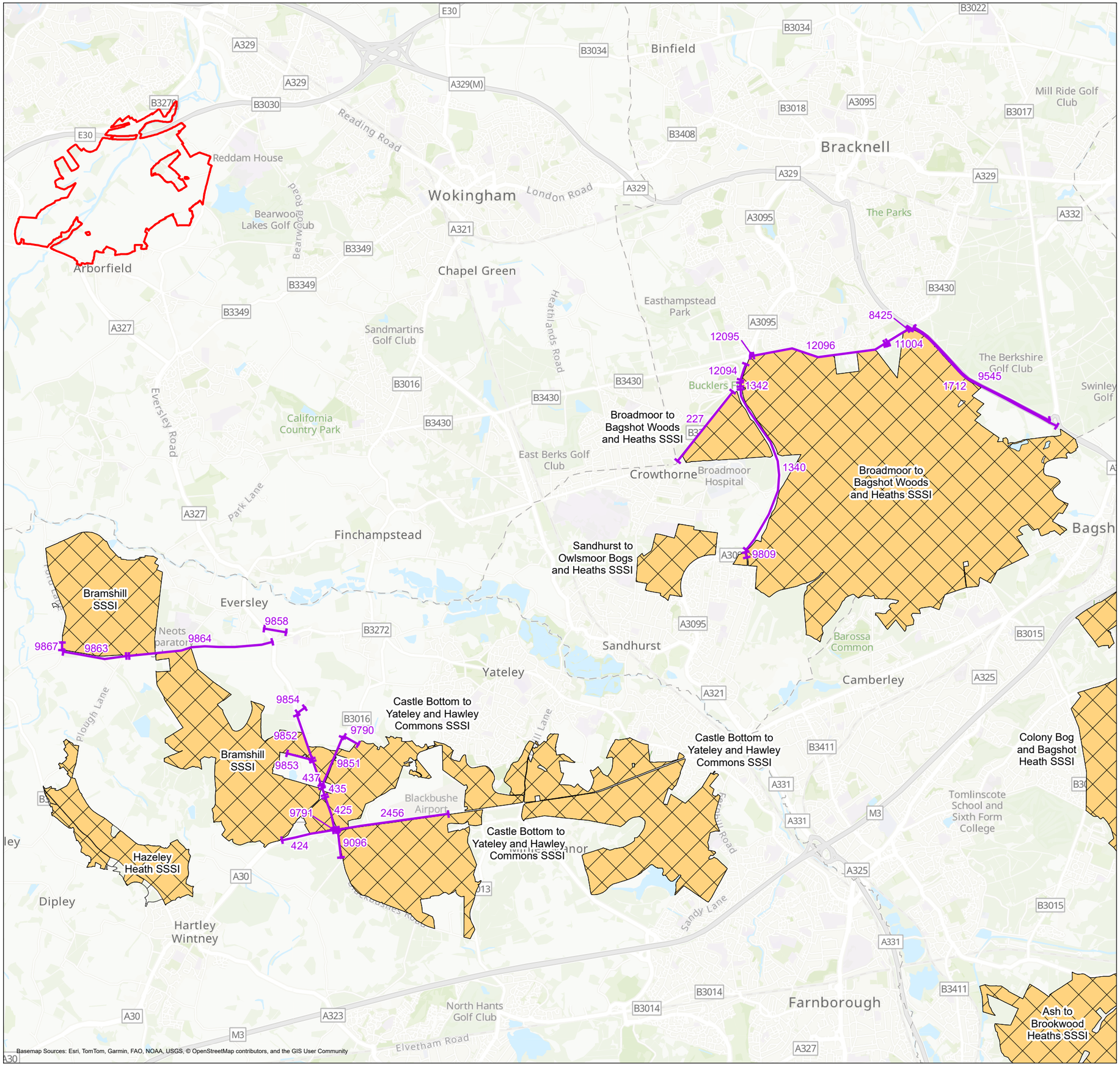


Map 11.17.5 Road Links

KEY

- Site boundary
- Road Links
- Thames Basin Heaths Special Protection Area (SPA)
- Sites of Special Scientific Interest (SSSI)

SCALE: 1:60,000 at A3

0 1,000 2,000 3,000 4,000 Metres

N

EPR

CLIENT: University of Reading

PROJECT: Loddon Garden Village

DATE: 18 September 2025

Y:\Loddon Garden Village, Shinfield 2201\GIS\IHRA\Map11.17.5_RoadLinks_P2342_4095_180925.aprx

P23/42

Annex 1
Relevant Legislation, Policy, Guidance and Case Law

Legislation

The Conservation of Habitats and Species Regulations 2017 (as amended) (known as the "Habitats Regulations") were originally drawn up to transpose the European Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") into UK legislation. Following the UK's exit from the European Union, the Habitats Regulations – as amended by Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – remain in force until such a time as they are superseded by new or updated domestic legislation.

The key sections of relevance to projects appear from Regulation 63 onwards. Regulation 63 states that:

> *"(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."* **[our emphasis]**

The above legislation thus requires that a sequential approach be adopted when addressing potential impacts upon International Sites. Guidance for doing this in practice has been published by the European Commission and others, and is discussed below.

The requirement for HRA under the Habitats Regulations applies to Special Areas of Conservation (SACs) designated under for certain Internationally important habitat types and animal populations under the aforementioned Habitats Directive, and Special Protection Areas (SPAs) classified under the earlier Birds Directive (now codified under Directive 2009/147/EC).

SACs and SPAs are collectively referred to as either European Sites or Natura 2000 sites in Europe, and are now part of the UK's "National Sites Network". However, as the National Planning Policy Framework (2019) also applies the protection afforded to these sites to Ramsar Sites (which are wetlands of International Importance designated under the separate Ramsar Convention in Iran in 1979) as a matter of National Planning Policy, these three types of site are collectively referred to as 'International Sites' for expediency.

Policy

National Planning Policy Framework 2024 (NPPF)

Section 15 ('Conserving and enhancing the natural environment') of the NPPF sets out expectations and principles regarding the protection of designated sites of importance for biodiversity, including international or 'habitats' sites. Paragraph 195 states:

> *"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site."* [our emphasis]

Wokingham Borough Council Adopted Core Strategy (January 2010)

The Wokingham Borough Council Adopted Core Strategy: Development Plan Document (January 2010) sets out the framework for the development of the borough, through a series of policies and strategies.

Policy CP8 – Thames Basin Heaths Special Protection Area states:

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

Wokingham Borough Local Plan Update 2023-2040

The Wokingham Borough Local Plan Update 2023-2040 was submitted to the Secretary of State for examination by an independent Planning Inspector in February 2025. Whilst not currently enforced, consideration has been given to these emerging policies during the course of the impact assessment, and design of mitigation, compensation and enhancement strategies.

Policy NE1: Biodiversity and Geodiversity, sets out the expectations of development in respect of local biodiversity and states:

> *"[…] Internationally Designated Sites*
>
> *4. Development proposals likely to result in a significant effect on internationally designated sites either alone or in combination with other plans or projects, will not be supported unless it can be demonstrated that the adverse effects on the integrity of the designated site can be fully avoided, mitigated and/or compensated."*

Guidance

The Habitats Regulations Assessment Process

Although the UK has now left the European Union, as the HRA process originates from the European Habitats Directive and must still (at time of writing) be interpreted in accordance with rulings from the CJEU, reference has been made to European Commission guidance on Habitats Regulations Assessment (EC, 2000, 2001, 2018). This guidance provides advice on meeting the correct stepwise approach required by Article 6 of the Habitats Directive. The whole process is usually referred to in the

UK as “Habitats Regulations Assessment” (HRA) and is split into the following stages that are undertaken in sequence:

- Screening the need for an Appropriate Assessment;
- The “Appropriate Assessment” (AA);
- The Assessment of Alternative Solutions; and
- Assessment where no alternative solutions exist and where adverse impacts remain (also known as the test for ‘’Imperative Reasons of Overriding Public Interest’’ or IROPI).

Each of the stages determines the requirement for the next one in the sequence to be carried out. For example, if it is concluded at the Screening stage that the plan or project is unlikely to generate significant adverse effects upon the International site in question, there is no need to proceed to the Appropriate Assessment stage, and so on.

Undertaking the Habitats Regulations Assessment process is the responsibility of the decision maker as the Competent Authority for the purposes of the Habitats Regulations (in this case Wokingham Borough Council as the Local Planning Authority); although it is the responsibility of the proponent of a plan or project to provide the Competent Authority with the information that they require for this purpose.

In the first instance, this report is intended to provide the Competent Authority under the Habitats Regulations with the information that is required in order to determine whether or not the proposals are likely to have a significant effect on an International Site either alone or in combination with other plans and projects, and consequently whether or not an Appropriate Assessment is required. Should it be considered that an Appropriate Assessment is required, then this report also aims to supply the information that will be necessary in determining whether or not there will be an adverse effect on the integrity of the International Site(s) concerned.

Other HRA guidance that has been taken into account during the preparation of this document includes:

- The European Commission’s ‘Managing Natura 2000 Sites’ document (2018) that provides guidance on some of the key concepts enshrined in Article 6 of the Habitats Directive);
- The European Commission’s 'Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites’ (Revised Version, 2021) that outlines the key steps and principles of the HRA process;
- The 'Communication from the Commission on the Precautionary Principle’ (2000) which provides guidance on the correct application of the precautionary principle, stating that it should be applied with proportionality and should not aim at zero risk;
- Circular 06/05 ‘Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System’; and
- ‘Planning for the Protection of European Sites’ (DCLG, 2006); and
- PINS NOTE 05/2018 ‘Consideration of avoidance and reduction measures in Habitats Regulations Assessment: People over Wind, Peter Sweetman v Coillte Teoranta’ (Planning Inspectorate 9 May 2018).

The National Planning Policy Framework (NPPF) (2024) also contains sections of relevance to HRA and International Sites, and this has been taken into account.

The Chartered Institute of Ecology and Environmental Assessment's Guidelines for Ecological Impact Assessment in the United Kingdom (CIEEM, 2018)

Whilst the key guidance documents for the HRA process are those produced by the European Commission (EC, 2000, 2001, 2018), the approach taken in this document has also been carried out in accordance with the broad process advocated in Version 1.3 of the Chartered Institute of Ecology and Environmental Management's 'Guidelines for Ecological Impact Assessment' (the "EcIA Guidelines").

These guidelines are endorsed by the main stakeholders in the UK planning system that have a specific responsibility for wildlife and nature conservation, including Natural England, the Environment Agency and the Wildlife Trusts.

Broadly, the EcIA Guidelines prescribe an approach that can be summarised as the following sequential process:

- Establishing the spatial extent of the Zone of Influence (ZoI) within which the proposed development is likely to exert biophysical changes upon the environment during either the site clearance, construction or operational phase;
- The identification, description and valuation (where possible) of ecological features and resources of value within that ZoI (note that in this case the ecological features of relevance will be those for which the relevant International Sites were designated, and consequently of International nature conservation value);
- The assessment of the likely magnitude and significance of potential impacts and effects that might be exerted upon those features and resources in the absence of any impact avoidance or mitigation measures;
- The development of impact avoidance and/or mitigation measures to avoid and/or minimise potentially significant effects;
- The assessment of any residual effects (positive or negative) that would remain following the application of any impact avoidance and/or mitigation measures, and the development of appropriate compensation measures where significant residual negative effects remain;
- The development of ecological enhancement measures to be incorporated into the project proposals to deliver net gains; and
- Advice on the consequent potential implications of relevant nature conservation related legislation or planning policy.

Other subject-specific guidance is referred to in the relevant assessment sections in this document.

Relevant Case Law

There is a wide body of case law pertaining to the HRA process that provides insight into the correct interpretation of the Habitats Regulations, from both domestic UK Courts and the Court of Justice of the European Union (CJEU). Details of the most relevant articles of case law are given below (organised according to points of relevance for ease of reading, rather than chronology, and with some relevant interpretation from Planning Inquiry decisions presented), and include the following:

- CJEU Case C-127/02 (2002) – The 'Waddenzee' Case;
- The Supreme Court ruling of R. (Champion) v North Norfolk DC [2015] 1 WLR 3710;

- UK Court of Appeal judgement in R (on the application of Boggis) v Natural England (2009) EWCA Civ 1061;
- The UK High Court, in the judgement of J Sullivan in Hart DC v Secretary of State for Communities and Local Government (referred to as 'Dilly Lane') (2008);
- CJEU Case C-323/17 in 2018 (referred to as 'People over Wind');
- Eco Advocacy CLG and An Bord Pleanála (Case C-721/21) (June 2023);
- Administrative Court ruling on R (on the application of Christopher Prideaux) v Buckinghamshire County Council [2013] EWHC 1054 (Admin)

Case C-127/02 of the European Court of Justice (ECJ) – The 'Waddenzee' Case

The ECJ Waddenzee Case clarified a number of important points in relation to the correct interpretation of Article 6(3) of the Habitats Directive in particular. This clarification has been helpfully set out in Government Circular 06/05 *'Biodiversity and Geological Conservation'*.

In particular, one of the key messages from the ECJ was that, where a plan or project has the potential to affect a Natura 2000 site, an 'Appropriate Assessment' is necessary:

> *"….if it cannot be excluded, on the basis of **objective information**, that it will have a significant effect on that site, either alone or in combination with other plans and projects"* [our emphasis]
>
> [Paragraph 13 of Circular 06/05 or paragraph 44 of the Waddenzee Judgment]

The ECJ expanded upon this by saying that:

> *''…where such a plan or project has an effect on that site but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned.''*
>
> [Paragraph 47 of the Waddenzee Judgement]

Further to the above the ECJ clarified that, once an Appropriate Assessment has been triggered, except in the circumstances outlined in Article 6(4) of the Directive, a plan or project can only be authorised where it will not have an adverse effect on the integrity of the Natura 2000 site, and that:

> *''That is the case where no reasonable scientific doubt remains as to the absence of such effects''.*
>
> [Paragraph 21 of Circular 06/05, or paragraph 59 of the Waddenzee Judgement]

Champion in the Supreme Court

The Supreme Court ruling of R. (Champion) v North Norfolk DC [2015] 1 WLR 3710 considers the "Screening" stage in HRA and clarifies the level of certainty required in an Appropriate Assessment, further building on the Waddenzee Judgment.

This case related to an earlier Court of Appeal decision which upheld the consenting of a proposed development by North Norfolk District Council for the Crisp Malting Group to erect two silos and construct a lorry park near the river Newsum, an SAC, without the need for an EIA, or an Appropriate

Assessment under the Habitats Regulations. After the developer produced a report that recommended pollution prevention strategies and mitigation measures and bodies such as Natural England and the Environment Agency withdrew their objections, NNDC approved the development with planning conditions attached.

The Supreme Court said that first stage of Article 6(3) was to consider whether there "may" be a significant effect, until Champion it was common to call this first stage a "Screening" stage, and much of the guidance and case-law pre-dating (and indeed post-dating) this case uses this language. Lord Carnwath said:

> *"the Habitats Directive and Regulations contain no equivalent to "screening" under the EIA Regulations. Mr Buxton relies on the opinion of Advocate General Sharpston in the Sweetman case [2014] PTSR 1092 itself. She was principally concerned to dispel confusion created by different terminology used in some of the cases to describe the test under article 6(3) . In her view all that was needed at what she called "the first stage" of article 6(3) was to show that there "may" be a significant effect …*
>
> *However, there is nothing in the language of the Habitats Directive to support a separate stage of "screening" in any formal sense. Nor is it reflected in the reasoning of the CJEU [Court of Justice of the European Union] itself. In Sweetman the first stage was the appropriate assessment, the second the decision whether in the light of its conclusions the project could be permitted. "Triggering" was simply the word the CJEU used to set the threshold for the first stage. The same approach is also found in the European Commission's guidance Managing Natura 2000 Sites …*
>
> *… At least in this country the use of the term "screening" in relation to the Habitats Directive is potentially confusing, because of the technical meaning it has under the EIA Regulations. The formal procedures prescribed for EIA purposes, including "screening", preparation of an environmental statement, and mandatory public consultation, have no counterpart in the Habitats legislation" [our addition]*

Champion therefore clarified that there is no prescribed filtering process at the Screening Stage of the Directive, but that does not mean that a Competent Authority must ignore information in front of them when deciding whether or not to carry out an Appropriate Assessment. This is supported by the Dilly Lane Case (discussed further below).

The process for, and certainty required in an Appropriate Assessment is also considered:

> *"All that is required is that, in a case where the authority has found there to be a risk of significant adverse effects to a protected site, there should be an appropriate assessment. Appropriate is not a technical term. It indicates no more than that the assessment should be appropriate to the task in hand: that task being to satisfy the responsible authority that the project will not adversely affect the integrity of the site concerned taking account of the matters set in the article. As the court itself indicated in Waddenzee the context implies a high standard of investigation. However, as Advocate General Kokott said in Waddenzee [2005] All ER (EC) 353, para 107:*
>
> *"the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead, it is clear from the second sentence of article 6(3) of the Habitats Directive that the competent authorities must take a decision having*

assessed all the relevant information which is set out in particular in the appropriate assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty."

In short, no special procedure is prescribed, and, while a high standard of investigation is demanded, the issue ultimately rests on the judgment of the authority."

R (on the application of Boggis) v Natural England

The Court of Appeal (Civil Division) ruling on R (on the application of Boggis) v Natural England [2009] EWCA Civ 1061, concerned a dispute over the extension of a SSSI on the Suffolk Coast to include an area subject to cliff erosion, as this could prevent affected residents from creating sea defences to protect their properties.

The case is of interest as it reiterates the earlier ruling in Waddenzee 2004 that the requirement for an appropriate assessment is conditional on there being "a probability or a risk that the [plan or project] will have significant effects on the site concerned."

The Appeal Court found that "a claimant who alleges that there was a risk which should have been considered by the authorising authority so that it could decide whether that risk could be "excluded on the basis of objective information", must produce credible evidence that there was a **real, rather than a hypothetical, risk** which should have been considered." (para 37). [Our emphasis].

The 'Dilly Lane' and 'People over Wind' Judgments

The High Court, in the judgment of J Sullivan in Hart DC v Secretary of State for Communities and Local Government (2008), has for some time formed the basis of established HRA Practice pertaining to the Thames Basin Heaths SPA, insofar as it has determined the approach to the Screening and Appropriate Assessment stages of the HRA process.

Up until recently the established approach derived from the Dilly Lane Case meant that where impact avoidance and mitigation measures (such as SANG) were put forward as integral parts of a plan or project, and where the Competent Authority was also satisfied that those measures would both be effective, deliverable and could be secured, then there was no need for an Appropriate Assessment to be carried out.

This was because in such circumstances it was considered that the information pertaining to the efficacy of those impact avoidance and mitigation measures represented the 'objective information' referred to by the European Court of Justice (ECJ) in the Waddenzee case (above)

More recently however, in case C-323/17 of the ECJ (referred to as 'People over Wind'), the ECJ concluded that it was not appropriate to take account of *"…measures intended to avoid or reduce the harmful effects of the plan or project…"* at the Screening stage of the HRA process. Although there appear to be some inconsistences between this judgment and previous ECJ case law, until such time as the ECJ may provide further clarification, it will be necessary to consider the efficacy of impact avoidance and mitigation measures such as SANG and SAMM through the medium of an Appropriate Assessment in order to ensure compliance with the findings of the judgment.

A further more recent ECJ case, known as the *Grace and Sweetman* case (July 2018)(Case C-164/17) appears to have reiterated the approach taken in *'People over Wind'* with respect to measures intended to avoid or reduce the harmful effects of a plan or project, as well as outlining that compensatory measures should only be taken into consideration in the circumstances laid out by Article 6(4) of the Habitats Directive (i.e. where there are imperative reasons of overriding public interest).

Eco Advocacy CLG and An Bord Pleanála (Case C-721/21) (June 2023)

This case from June 2023 followed on from the People over Wind' (POW) ruling in 2018 (C-323/17) outlined above, which ruled that "…it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that [The European designated] site…"

The Eco Advocacy CLG case clarified that the CJEU considers features to be 'measures intended to avoid or reduce the harmful effects of the plan or project' if they have been deliberately introduced into the project for that purpose alone, and otherwise the project could proceed without it. If however projects of that type are always required to incorporate those features regardless of the potential of the project to affect a European site, then such features can be considered as 'standard features, inherent in such a plan or project' and can be taken into account at the Screening stage of HRA, regardless of whether or not the feature has the effect of reducing harm to a European protected site.

R (on the Application of Prideaux) v Buckinghamshire CC

The Administrative Court ruling on R (on the application of Christopher Prideaux) v Buckinghamshire County Council [2013] EWHC 1054 (Admin) is notable in that it discusses the weight that should be given to Natural England's expert opinion in planning decisions.

In this case, the claimant (Prideaux) challenged a planning permission granted by the defendant (Buckinghamshire CC) for an energy from waste facility, on nature conservation related grounds. Natural England had initially objected to the proposals due to likely negative impacts on the interest features of nearby SSSIs. Following continued consultation with the applicant, and the provision of the further information by the applicant's ecologist regarding the mitigation and compensation proposed, Natural England withdrew their objection.

Mr Justice Lindblom considers the weight that should be given to Natural England's opinion at paragraph 116:

> *"(…) It is clear that the committee gave considerable weight to the conclusions reached by Natural England. This is hardly surprising. It is exactly what one would expect. Natural England is the "appropriate nature conservation body" under the regulations. Its views on issues relating to nature conservation deserve great weight. An authority may sensibly rely on those views. It is not bound to agree with them, but it would need cogent reasons for departing from them."*

At paragraph 133 he goes on to underline the importance of making a decision based on the sum of information provided, including any extra material submitted following the initial application:

> *"It is important, I think, to view the relevant ecological material as a whole, as it was after a process of consultation, the submission of further information, the refinement of FCC's proposals, the evolution of the intended measures for avoiding harmful impacts on the*

species potentially affected by the development, SLR's correspondence [SLR were the developer's ecological consultants] and dialogue with Natural England, and the withdrawal of Natural England's objection." [our addition]

Annex 2

Natural England DAS Response (April 2025)

Date: 18 March 2025
Our ref: DAS/ A017452/498484
Your ref: Loddon Garden Village

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

0300 060 3900

BY EMAIL ONLY

Dear Katie Cammack,

Discretionary Advice Service (Charged Advice): DAS A017452/498484
Development proposal and location: Loddon Garden Village, Reading Road, Shinfield, Reading, RG2 9HY

This advice is being provided as part of Natural England's Discretionary Advice Service. Ecological Planning & Research Ltd has asked Natural England to provide advice upon:

- Suitability of parcels of land as SANG, to provide mitigation for the development's impact on Thames Basin Heaths Special Protection Area

This advice is provided in accordance with the Quotation and Agreement dated 20th January 2025.

The following advice is based upon the information within:

1. 498048 - MF02LGV - Strategic Masterplan. April 2024.
2. Loddon Garden Village Briefing Note for Natural England. EPR. March 2025.
3. Map1_SiteLocation_080125. January 2025.
4. Map2_LocalSANG_090124. January 2025.
5. Information provided during a site meeting on 10 March 2025 between Natural England officers Miranda Petty and Eleanor Oborne, representatives from Ecological Planning & Research, representatives from the University of Reading and a representative from Savills.

It is our opinion that the proposed areas of SANG have the potential to deliver the mitigation for the Loddon Garden Village's impact on the Thames Basin Heaths Special Protection Area (TBH SPA). However, this is dependent on the associated network of greenspace ('Eco Valley'/Country Park) coming forward as part of the development. Standalone, the 10.5 SANG 01 is too small and the 16.74 SANG 02A and the 10.35 SANG 02B are likely too narrow to be able to comply with the SANG guidelines.

A condition will be required to ensure that the Eco Valley/Country Park will always be open and accessible greenspace and that it will be maintained as such in perpetuity.

Further details and information are provided in the advice note below.

General Advice for both SANG 01 and SANGs 02A and 02B

SANG and Country Park/Eco Valley Phasing

At application stage, we would expect to see information submitted regarding the proposed phasing of the development and SANG. At occupation of each parcel of development, there must be fully open and functioning SANG available which mitigates for their impact on Thames Basin Heaths SPA. It would also be preferred that most of the Country Park would be accessible early in the development occupation. This is to build habits of people moving in and utilising their most convenient natural greenspace. The network of SANG and greenspace is then better able to all function together, along with the links to existing SANGs in the area. In the wider greenspace, paths and primary infrastructure should be built first, with less crucial elements such as benches added later.

SANG Management Plan

Natural England would expect the full SANG Management Plan and detailed landscape plan to be provided at outline application stage. The Management Plan should 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.
- Appropriate management body identified – preferred to be the LPA, otherwise Parish Council or charitable organisation e.g. the Land Trust. If the intention is for a private management company, step-in-rights need to be agreed in writing with the LPA.

Grazing

It is noted that the intention is for the SANGs to be at least partially managed via grazing. This should be at a very low density, to be specified, with a docile breed. Only one part of the SANG should be grazed at any one time and the paths should be routed so that people can avoid this area if desired. Signage is important to make visitors aware and flexibility in the management plan so that if there are conflict with users then the cattle can be removed, and the area mown or managed differently instead.

Biodiversity Net Gain (BNG)

BNG can be implemented on SANGs. However, this can only be calculated after the SANG has secured the necessary uplifts to reach the required SANG guidelines. Additional biodiversity and habitat improvements can then have the potential to qualify for BNG.

SANG 01

Overview

This site does not have the draw to function as a standalone SANG due to its smaller size and lack of the required length of circular walk (1.35 km). SANGs are required to be managed in perpetuity (minimum of 80 years). We will need assurances at application stage that the ‘eco valley’ would be similarly secured and managed. This also applies to the approximately 140m SANG link between SANG 01 and the linear SANG. This route should be created in a SANG-like semi natural way and managed in perpetuity.

SANG 01 is currently a field in grazing use. It is wide open with no differences in habitat, topography or features, except for the River Loddon running alongside. It is a blank canvas which has potential to be improved for both visitors and wildlife. It is proposed to create areas of wood pasture habitat, which is supported. We would also advise the inclusion of some features of interest, to provide more of a draw for visitors. This could be in the form of a dog pond.

Public Rights of Way (PROW)

There is well used PROW which runs alongside the boundary outside of SANG 01. This boundary and the walking route around the SANG would therefore need to be carefully considered to avoid parallel paths inside and outside of the SANG, and visual intrusion into the SANG. Having the walking route within the SANG screened from the PROW by an undulating planted woodland boundary, and bringing the route away from the SANG's boundary could help with this.
There is also a PROW within the proposed SANG parcel. Visitor surveys would be required, to determine the existing level of use on the site. These should be undertaken for a minimum of two weekdays and two weekend days. The Bracknell SPD calculations (table 15) can then be used to work out the remaining site capacity

Pylons

The site has a line of large pylons crossing it. These should be screened with vegetation where possible, to detract from the visit intrusion as much as possible. The footprint of each pylon tower should have its capacity discounted from the overall SANG calculation, as those areas are not able to function as SANG.

SANG 02A and SANG 02B (Linear SANG)

Overview

The proposed linear SANG has the potential to create an interesting and varied SANG. There are a variety of existing habitats already on-site including floodplain grazing marsh, ancient woodland, open grassland, marshy areas, rivers and streams. These can be further enhanced and/or expanded, and other habitats e.g. wood pasture and wildlife ponds created to further provide areas of interest for visitors and wildlife.

M4 Motorway

The M4 motorway runs to the north of the linear SANG, running particularly close to SANG 02B. This is currently an obvious eyesore from areas within the SANG. Significant screening through tree and scrub planting would be required to shield the road, and the circular walk should avoid passing too close to the boundary. It would be pertinent to undertake some noise surveys and acoustic modelling here, to determine the level of noise within the SANG. If the amount of noise from the road exceeds 60 decibels within the SANG, bunds or barriers to reduce the noise intrusion should be considered or these areas excluded from the formal SANG capacity area.

Development parcels and association with SANG

Due to the gradient of the land in places, there are parts of the linear SANG which look as though they will be substantially overlooked by development parcels. The land slopes up from the SANG towards the housing in areas such as this:

The boundary with the housing here would be expected to be carefully designed to reduce the feeling of being overlooked within the SANG. This could be via screening from tree and hedge planting and/or landscaping work to create mounds and a more varied topography, which will help filter the views of the housing from the SANG. The housing heights and numbers here should also be carefully considered and designed, to reduce the feeling of being overlooked.

The location of the current Hall Farm agricultural buildings is also on a significant slope above the thinner area of the linear SANG. The aspiration is for this site to be a light industry/vet/wildlife hospital type of use. Due to the overlooked nature of the proposed SANG in this location, we would advise that this area will need to be developed sensitively and well screened from the SANG.
It is noted that, in some locations, the SANG directly abuts the development parcels, with very little to no buffer. It is our view that the primary walking route should be largely avoided in these areas, whilst ensuring the most logical and enjoyable route is created.

There was some discussion over which areas might qualify as appropriate SANG. Some areas that don't qualify (e.g. have too much visual/audible urban intrusion) do have potential to be included within the SANG management, but could be removed from the associated mitigation capacity calculations.

Paths

The primary walking route within the linear SANG doesn't currently look to meet the SANG guidelines in providing a truly circular route. There are multiple single track paths which would require doubling back on in order to complete the entire walk length, as illustrated in the below screenshot which also shows a figure-8 where the route goes underneath the development main access road.

It is recognised that it is the intention to provide a wider 'eco valley' country park which would provide strong green infrastructure links and other areas of green open space, as well as links to nearby existing SANG. It may therefore be that we would be able to be slightly more flexible with the usual guidelines if this site could function as part of a wider SANG network. However, all possible avenues should be explored in terms of creating a proper circular walk with no doubling back, not overly convoluted, no figure-8 sections and no pinch points between paths. The rule of thumb in open areas is that pathways should be a minimum of 100m distance from each other, this can be reduced if the area is densely wooded or has varied topography.

On site, the proposed long distance Loddon Footpath route was discussed. If this is intended to pass within the SANG, it should be ensured that there is sufficient space for it, to avoid the above undesirable route characteristics. The area designated as SANG should also be kept as natural as possible. Wide open multi-use pathways with a non-natural specification surface material and/or lighting should be provided outside of the SANG boundary.

Parts of the site, especially towards the River Loddon and its back channels and adjacent wet/marshy habitats will likely require boardwalk to ensure that the circular walk will be accessible all year round, in all weathers. In other areas, the paths and any other structures should be in-keeping with the semi-natural feel. Hoggin paths and natural-looking resin bound are acceptable, but an urban feel should be avoided.

Access Road

SANG 02A and SANG 02B is bisected by the main access road to the development, with a large bridge spanning the SANG and an underpass providing unrestricted access for dogs off leads. It would be helpful have more details at pre-/application stage on what the bridge would look like and how it is proposed to be screened and softened into the SANG landscape. There is only one path going under the road, which results in a section of walk which is a figure-8 (as discussed in *Paths* section above), which we generally wouldn't accept. It will be necessary to get some more details on the paths and their proposed routes.

Habitats

There are various parcels of ancient woodland and established woodland habitat dotted around the proposed SANG sites. These would benefit from active management to further improve biodiversity, and to manage the invasive Himalayan Balsam. Walking routes should, where possible, be located to avoid negative impacts on the sensitive ancient woodland and established non-designated woodland from recreation. Our standing advice on ancient woodland can be found here.

There is a lot of potential to improve the habitats within the linear SANG. There are areas of floodplain grazing marsh, important river and riverside habitats, woodland and open grassland, all of which could be managed more effectively for people and wildlife.

Angling Club

The existing angling club is quite small scale and, although well used, shouldn't pose a significant impact on the wider SANG landscape. Within the SANG Management Plan, it should be emphasised that the SANG should always feel welcoming and safe to all users. Provision should be made within the plan in case there are ever any conflicts between anglers and SANG visitors, with the priority within the SANG going to the SANG visitors.

This letter concludes Natural England's Advice within the Quotation and Agreement dated 20th January 2025.

☒ 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 Oborne
Higher Officer – Sustainable Development
Thames Solent Team

Annex 3

Natural England Meeting Follow Up (May 2025)

From:	Eleanor Oborne
To:	Katie Cammack
Subject:	RE: LGV SANG Plans
Date:	12 May 2025 13:14:39
Attachments:	image001.png image013.png image014.png image015.png image016.png image017.png image018.png image019.png image020.png image021.png image022.jpg image023.png image024.png

---

Hi Katie,

Thanks for providing the further information and the photos corresponding to the Western SANG.

Western SANG (SANG 01)

- Since the site visit, this SANG area has been increased in size from 10.5 to 26.7 hectares
- The original part is dry, but the newer (westerly) part floods seasonally. The intention is therefore to do areas of boardwalk on the primary walking route. There should also be non-boardwalked areas on secondary routes, to give more choice on route when there is no water there. We would also advise exploring if there are other ways of building up paths or improving drainage so boardwalks are not needed across the whole site area.
- There should be screening to the roads to the south and west – through planting trees (those suited to seasonal flooding such as alder, willow). This is especially important where the road is raised up.
- There should also be screening to hide any visual intrusions such as the white mobile home shown in photo EV03.
- The PROW and pylon advice given in my letter of 18/3/25 still applies.
- I am of the opinion that this site has the potential to function as a standalone SANG. It is therefore less important that the country park is phased in line with the development as was previously advised in my letter dated 18/3/25.

Linear SANG

- This is now proposed to include a single linear path broadly following the course of the River Loddon, with access paths into the housing development.
- Natural England put significant weight on creating a more traditional SANG, unless significant assurance and evidence shows that a particular linear SANG provides a comparable experience.
- In this instance, we do not currently have the assurance and/or evidence that the narrower parts of the Linear SANG can provide an avoidance experience similar to that of a traditional SANG. The narrower parts (SANG 2A and the narrower section of SANG 2B) are overlooked and the ‘there and back’ element of the walk is not considered to be SANG compliant in this instance. It is my opinion that the narrower parts of the linear SANG should be secured and managed as a ‘SANG link’, connecting the Western SANG to wider green infrastructure. However, it would not be able to contribute towards the capacity of the SANG as it does not fulfil the necessary SANG criteria.
- If it is 10 hectares +, in SANG 2B where it widens out, there may be the potential for just this section to contribute towards capacity of the SANG. The path would be needed to be made more interesting and a circular loop more varied, and as long as the development can be sufficiently screened. This would also provide a reason to visit and use the SANG link for those

seeking a longer walk.

- Both SANG and SANG link would have to be managed in perpetuity and as a 'SANG-like' environment.

I hope this helps with progression of plans. We have now concluded our advice to you via our previously signed DAS service quote. If you require any further advice, please could you submit a new DAS request.

With kind regards,

Eleanor Oborne | Higher Officer
Sustainable Development |Thames Solent Team
Natural England

Please note I work part time Monday to Wednesday

https://www.gov.uk/natural-england

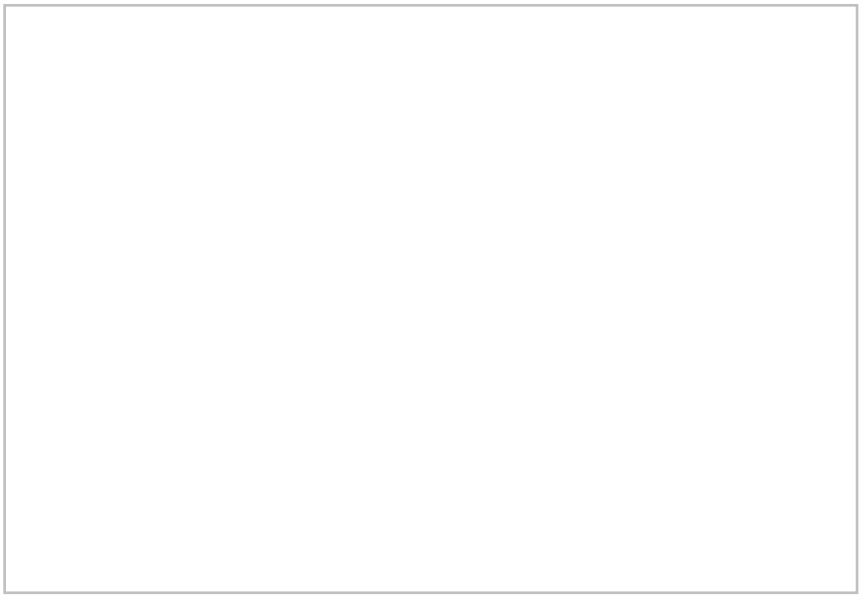
From: Katie Cammack <katiecammack@epr.uk.com>
Sent: 08 May 2025 09:18
To: Eleanor Oborne <eleanor.oborne@naturalengland.org.uk>
Subject: RE: LGV SANG Plans

Morning Eleanor,

Please see photos attached which align with the parcel ID's in the screenshot below.

At the moment all the fields are used for grazing, so are largely comprised of species-poor nutrient enriched grasslands.

Do let me know if you need anything else.



Kind regards
Katie

Katie Cammack **BSc (Hons) MSc MCIEEM**

Principal Ecological Consultant

Ecological Planning & Research Ltd

07940 369294
01962 794720
katiecammack@epr.uk.com
www.epr.uk.com
The Barn, Micheldever Station, Winchester, Hampshire, SO21 3AR

From: Eleanor Oborne <eleanor.oborne@naturalengland.org.uk>
Sent: 07 May 2025 16:37
To: Katie Cammack <katiecammack@epr.uk.com>
Subject: RE: LGV SANG Plans

Hi Katie,

Thanks very much for sending. We wondered if you had any photos/aerial photos of the extended Western SANG area?

Many thanks,

Eleanor Oborne | Higher Officer
Sustainable Development |Thames Solent Team
Natural England

Please note I work part time Monday to Wednesday

https://www.gov.uk/natural-england

From: Katie Cammack <katiecammack@epr.uk.com>
Sent: 06 May 2025 09:26
To: Eleanor Oborne <eleanor.oborne@naturalengland.org.uk>
Subject: RE: LGV SANG Plans

Hi Eleanor,

Thanks for your time last week. Please see attached the most up to date plans for the SANGs.

If you have any questions do let me know.

Kind regards
Katie

Katie Cammack **BSc (Hons) MSc MCIEEM**

Principal Ecological Consultant

Ecological Planning & Research Ltd

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www.epr.uk.com
The Barn, Micheldever Station, Winchester, Hampshire, SO21 3AR

From: Katie Cammack
Sent: 29 April 2025 11:51
To: Oborne, Eleanor <eleanor.oborne@naturalengland.org.uk>

Subject: LGV SANG Plans

Hi Eleanor,

Ahead of our meeting this afternoon please see attached an updated layout for the western SANG at Loddon Garden Village for discussion. We do have some amendments to the Linear SANG as well but the plans are still being updated. If they are available before the meeting I will send them over.

Kind regards
Katie

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Annex 4

Thames Basin Heaths Special Protection Area Supplementary Information

EC Directive 79/409 on the Conservation of Wild Birds
Special Protection Area (SPA)

Name: Thames Basin Heaths

Unitary Authority/County: Bracknell Forest; Hampshire; Surrey; Windsor and Maidenhead.

Site description: The Thames Basin Heaths SPA is a composite site that is located across the counties of Surrey, Hampshire and Berkshire in southern England. It encompasses all or parts of Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI), Bourley and Long Valley SSSI, Bramshill SSSI, Broadmoor to Bagshot Woods and Heaths SSSI, Castle Bottom to Yateley and Hawley Commons SSSI, Chobham Common SSSI, Colony Bog and Bagshot Heaths SSSI, Eelmoor Marsh SSSI, Hazeley Heath SSSI, Horsell Common SSSI, Ockham and Wisley Commons SSSI, Sandhurst to Owlsmoor Bogs and Heaths SSSI and Whitmoor Common SSSI.

The open heathland habitats overlie sand and gravel sediments which give rise to sandy or peaty acidic soils, supporting dry heathy vegetation on well-drained slopes, wet heath on low-lying shallow slopes and bogs in valleys. The site consists of tracts of heathland, scrub and woodland, once almost continuous, but now fragmented into separate blocks by roads, urban development and farmland. Less open habitats of scrub, acidic woodland and conifer plantations dominate, within which are scattered areas of open heath and mire. The site supports important breeding populations of a number of birds of lowland heathland, especially nightjar *Caprimulgus europaeus* and woodlark *Lullula arborea*, both of which nest on the ground, often at the woodland/heathland edge, and Dartford warbler *Sylvia undata*, which often nests in gorse *Ulex* sp. Scattered trees and scrub are used for roosting.

Together with the nearby Ashdown Forest and Wealden Heaths SPAs, the Thames Basin Heaths form part of a complex of heathlands in southern England that support important breeding bird populations.

Size of SPA: The SPA covers an area of 8274.72 ha.

Qualifying species:
The site qualifies under **article 4.1** of the Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain populations of the following species listed in Annex I in any season:

Annex 1 species	Count and season	Period	% of GB population
Nightjar *Caprimulgus europaeus*	264 churring males – breeding	1998/99	7.8%
Woodlark *Lullula arborea*	149 pairs – breeding	1997	9.9%
Dartford warbler *Sylvia undata*	445 pairs – breeding	1999	27.8%

Non-qualifying species of interest: Hen harrier *Circus cyaneus*, merlin *Falco columbarius*, short-eared owl *Asio flammeus* and kingfisher *Alcedo atthis* (all Annex I species) occur in non-breeding numbers of less than European importance (less than 1% of the GB population).

Status of SPA:
Thames Basin Heaths was classified as a Special Protection Area on 9 March 2005.

STANDARD DATA FORM for sites within the ‘UK national site network of European sites’

Special Protection Areas (SPAs) are classified and Special Areas of Conservation (SACs) are designated under:

- the Conservation of Habitats and Species Regulations 2017 (as amended) in England and Wales (including the adjacent territorial sea) and to a limited extent in Scotland (reserved matters) and Northern Ireland (excepted matters);
- the Conservation (Natural Habitats &c.) Regulations 1994 (as amended) in Scotland;
- the Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) in Northern Ireland; and
- the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) in the UK offshore area.

Each SAC or SPA (forming part of the UK national site network of European sites) has its own Standard Data Form containing site-specific information. The information provided here generally follows the same documenting format for SACs and SPAs, as set out in the Official Journal of the European Union recording the Commission Implementing Decision of 11 July 2011 (2011/484/EU).

Please note that these forms contain a number of codes, all of which are explained either within the data forms themselves or in the end notes.

More general information on SPAs and SACs in the UK is available from the SPA homepage and SAC homepage on the JNCC website. These webpages also provide links to Standard Data Forms for all SAC and SPA sites in the UK.

https://jncc.gov.uk/

NATURA 2000 - STANDARD DATA FORM

For Special Protection Areas (SPA),
Proposed Sites for Community Importance (pSCI),
Sites of Community Importance (SCI) and
for Special Areas of Conservation (SAC)

SITE **UK9012141**

SITENAME **Thames Basin Heaths**

TABLE OF CONTENTS

1. SITE IDENTIFICATION

Back to top

1.1 Type	1.2 Site code
A	UK9012141

1.3 Site name

Thames Basin Heaths

1.4 First Compilation date	1.5 Update date
2005-03	2015-12

1.6 Respondent:

Name/Organisation:	Joint Nature Conservation Committee
Address:	Joint Nature Conservation Committee Monkstone House City Road Peterborough PE1 1JY
Email:	

1.7 Site indication and designation / classification dates

Date site classified as SPA:	2005-03
National legal reference of SPA designation	Regulations 12A and 13-15 of the Conservation Habitats and Species Regulations 2010, (http://www.legislation.gov.uk/uksi/2010/490/contents/made) as amended by The Conservation of Habitats and Species (Amendment) Regulations 2011 (http://www.legislation.gov.uk/uksi/2011/625/contents/made).

2. SITE LOCATION

Back to top

2.1 Site-centre location [decimal degrees]:

Longitude	Latitude
-0.7383	51.3717

2.2 Area [ha]:

8311.06

2.3 Marine area [%]

0.0

2.4 Sitelength [km]:

0.0

2.5 Administrative region code and name

NUTS level 2 code	Region Name
UKJ2	Surrey, East and West Sussex
UKJ1	Berkshire, Buckinghamshire and Oxfordshire
UKJ3	Hampshire and Isle of Wight

2.6 Biogeographical Region(s)

Atlantic (100.0 %)

3. ECOLOGICAL INFORMATION

Back to top

3.2 Species referred to in Article 4 of Directive 2009/147/EC and listed in Annex II of Directive 92/43/EEC and site evaluation for them

Species					Population in the site						Site assessment			
G	Code	Scientific Name	S	NP	T	Size		Unit	Cat.	D.qual.	A|B|C|D	A|B|C		
						Min	Max				Pop.	Con.	Iso.	Glo.
B	A224	Caprimulgus europaeus			r	264	264	p	P	G	B		C	B
B	A246	Lullula arborea			r	149	149	p		G	B		C	B
B	A302	Sylvia undata			r	445	445	p		G	A		C	A

- **Group:** A = Amphibians, B = Birds, F = Fish, I = Invertebrates, M = Mammals, P = Plants, R = Reptiles
- **S:** in case that the data on species are sensitive and therefore have to be blocked for any public access enter: yes
- **NP:** in case that a species is no longer present in the site enter: x (optional)
- **Type:** p = permanent, r = reproducing, c = concentration, w = wintering (for plant and non-migratory species use permanent)
- **Unit:** i = individuals, p = pairs or other units according to the Standard list of population units and codes in accordance with Article 12 and 17 reporting (see reference portal)
- **Abundance categories (Cat.):** C = common, R = rare, V = very rare, P = present - to fill if data are deficient (DD) or in addition to population size information

- **Data quality:** G = 'Good' (e.g. based on surveys); M = 'Moderate' (e.g. based on partial data with some extrapolation); P = 'Poor' (e.g. rough estimation); VP = 'Very poor' (use this category only, if not even a rough estimation of the population size can be made, in this case the fields for population size can remain empty, but the field "Abundance categories" has to be filled in)

4. SITE DESCRIPTION

Back to top

4.1 General site character

Habitat class	% Cover
N06	0.6
N17	34.2
N07	4.9
N16	7.0
N19	3.6
N23	5.7
N08	44.0
Total Habitat Cover	100

Other Site Characteristics

1 Terrestrial: Soil & Geology: clay,alluvium,sedimentary,acidic,sand,nutrient-poor 2 Terrestrial: Geomorphology and landscape: lowland

4.2 Quality and importance

ARTICLE 4.1 QUALIFICATION (79/409/EEC) During the breeding season the area regularly supports: Caprimulgus europaeus 7.8% of the GB breeding population Count mean (RSPB 1998-99) Lullula arborea 9.9% of the GB breeding population Count as at 1997 (Wotton & Gillings 2000) Sylvia undata 27.8% of the GB breeding population Count as at 1999 (RSPB)

4.3 Threats, pressures and activities with impacts on the site

The most important impacts and activities with high effect on the site

Negative Impacts			
Rank	Threats and pressures [code]	Pollution (optional) [code]	inside/outside [i|o|b]
H	H04		B
H	G05		I
H	B02		I
H	K02		I
H	G01		I

Positive Impacts			
Rank	Activities, management [code]	Pollution (optional) [code]	inside/outside [i|o|b]
H	A02		I
H	B02		I
H	A04		I
H	D05		I

Rank: H = high, M = medium, L = low
Pollution: N = Nitrogen input, P = Phosphor/Phosphate input, A = Acid input/acidification,
T = toxic inorganic chemicals, O = toxic organic chemicals, X = Mixed pollutions
i = inside, o = outside, b = both

4.5 Documentation

Conservation Objectives - the Natural England links below provide access to the Conservation Objectives (and other site-related information) for its terrestrial and inshore Natura 2000 sites, including conservation advice packages and supporting documents for European Marine Sites within English waters and for cross-border sites. See also the 'UK Approach' document for more information (link via the JNCC website).

Link(s): http://publications.naturalengland.org.uk/category/6490068894089216

http://publications.naturalengland.org.uk/category/3212324
http://jncc.defra.gov.uk/pdf/Natura2000_StandardDataForm_UKApproach_Dec2015.pdf

5. SITE PROTECTION STATUS (optional)

Back to top

5.1 Designation types at national and regional level:

Code	Cover [%]	Code	Cover [%]	Code	Cover [%]
UK04	100.0				

6. SITE MANAGEMENT

Back to top

6.1 Body(ies) responsible for the site management:

Organisation:	Natural England
Address:	
Email:	

6.2 Management Plan(s):

An actual management plan does exist:

- [ ] Yes
- [ ] No, but in preparation
- [X] No

6.3 Conservation measures (optional)

For available information, including on Conservation Objectives, see Section 4.5.

7. MAP OF THE SITES

Back to top

INSPIRE ID:

Map delivered as PDF in electronic format (optional)

- [ ] Yes
- [X] No

Reference(s) to the original map used for the digitalisation of the electronic boundaries (optional).

EXPLANATION OF CODES USED IN THE SPECIAL AREA OF CONSERVATION (SAC) AND SPECIAL PROTECTION AREA (SPA) STANDARD DATA FORMS

The codes in the table below generally follow those explained in the official European Union guidelines for the Standard Data Form (also referencing the relevant page number).

1.1 Site type

CODE	DESCRIPTION	PAGE NO
A	SPA (classified Special Protection Area)	53
B	cSAC, SCI or SAC (candidate Special Area of Conservation, Site of Community Importance, designated Special Area of Conservation)	53
C	SPA area/boundary is the same as the cSAC/SCI/SAC i.e. a co-classified/designated site (Note: this situation only occurs in Gibraltar)	53

3.1 Habitat code

CODE	DESCRIPTION	PAGE NO
1110	Sandbanks which are slightly covered by sea water all the time	57
1130	Estuaries	57
1140	Mudflats and sandflats not covered by seawater at low tide	57
1150	Coastal lagoons	57
1160	Large shallow inlets and bays	57
1170	Reefs	57
1180	Submarine structures made by leaking gases	57
1210	Annual vegetation of drift lines	57
1220	Perennial vegetation of stony banks	57
1230	Vegetated sea cliffs of the Atlantic and Baltic Coasts	57
1310	Salicornia and other annuals colonizing mud and sand	57
1320	Spartina swards (Spartinion maritimae)	57
1330	Atlantic salt meadows (Glauco-Puccinellietalia maritimae)	57
1340	Inland salt meadows	57
1420	Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi)	57
2110	Embryonic shifting dunes	57
2120	Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")	57
2130	Fixed coastal dunes with herbaceous vegetation ("grey dunes")	57
2140	Decalcified fixed dunes with Empetrum nigrum	57
2150	Atlantic decalcified fixed dunes (Calluno-Ulicetea)	57
2160	Dunes with Hippopha• rhamnoides	57
2170	Dunes with Salix repens ssp. argentea (Salicion arenariae)	57
2190	Humid dune slacks	57
21A0	Machairs (* in Ireland)	57
2250	Coastal dunes with Juniperus spp.	57
2330	Inland dunes with open Corynephorus and Agrostis grasslands	57
3110	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)	57
3130	Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea	57
3140	Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.	57
3150	Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation	57

CODE	DESCRIPTION	PAGE NO
3160	Natural dystrophic lakes and ponds	57
3170	Mediterranean temporary ponds	57
3180	Turloughs	57
3260	Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation	57
4010	Northern Atlantic wet heaths with Erica tetralix	57
4020	Temperate Atlantic wet heaths with Erica ciliaris and Erica tetralix	57
4030	European dry heaths	57
4040	Dry Atlantic coastal heaths with Erica vagans	57
4060	Alpine and Boreal heaths	57
4080	Sub-Arctic Salix spp. scrub	57
5110	Stable xerothermophilous formations with Buxus sempervirens on rock slopes (Berberidion p.p.)	57
5130	Juniperus communis formations on heaths or calcareous grasslands	57
6130	Calaminarian grasslands of the Violetalia calaminariae	57
6150	Siliceous alpine and boreal grasslands	57
6170	Alpine and subalpine calcareous grasslands	57
6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	57
6230	Species-rich Nardus grasslands, on silicious substrates in mountain areas (and submountain areas in Continental Europe)	57
6410	Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)	57
6430	Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels	57
6510	Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis)	57
6520	Mountain hay meadows	57
7110	Active raised bogs	57
7120	Degraded raised bogs still capable of natural regeneration	57
7130	Blanket bogs (* if active bog)	57
7140	Transition mires and quaking bogs	57
7150	Depressions on peat substrates of the Rhynchosporion	57
7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae	57
7220	Petrifying springs with tufa formation (Cratoneurion)	57
7230	Alkaline fens	57
7240	Alpine pioneer formations of the Caricion bicoloris-atrofuscae	57
8110	Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani)	57
8120	Calcareous and calcshist screes of the montane to alpine levels (Thlaspietea rotundifolii)	57
8210	Calcareous rocky slopes with chasmophytic vegetation	57
8220	Siliceous rocky slopes with chasmophytic vegetation	57
8240	Limestone pavements	57
8310	Caves not open to the public	57
8330	Submerged or partially submerged sea caves	57
9120	Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion)	57
9130	Asperulo-Fagetum beech forests	57
9160	Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli	57
9180	Tilio-Acerion forests of slopes, screes and ravines	57
9190	Old acidophilous oak woods with Quercus robur on sandy plains	57
91A0	Old sessile oak woods with Ilex and Blechnum in the British Isles	57
91C0	Caledonian forest	57
91D0	Bog woodland	57
91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)	57
91J0	Taxus baccata woods of the British Isles	57

3.1 Habitat representativity (abbreviated to 'Representativity' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent representatively	57
B	Good representatively	57
C	Significant representatively	57
D	Non-significant presence representatively	57

3.1 Relative surface

CODE	DESCRIPTION	PAGE NO
A	> 15%-100%	58
B	> 2%-15%	58
C	≤ 2%	58

3.1 Degree of conservation (abbreviated to 'Conservation' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent conservation	59
B	Good conservation	59
C	Average or reduced conservation	59

3.1 Global assessment (abbreviated to 'Global' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent value	59
B	Good value	59
C	Significant value	59

3.2 Population (abbreviated to 'Pop.' in data form)

CODE	DESCRIPTION	PAGE NO
A	> 15%-100%	62
B	> 2%-15%	62
C	≤ 2%	62
D	Non-significant population	62

3.2 Degree of conservation (abbreviated to 'Con.' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent conservation	63
B	Good conservation	63
C	Average or reduced conservation	63

3.2 Isolation (abbreviated to 'Iso.' in data form)

CODE	DESCRIPTION	PAGE NO
A	Population (almost) Isolated	63
B	Population not-isolated, but on margins of area of distribution	63
C	Population not-isolated within extended distribution range	63

3.2 Global Grade (abbreviated to 'Glo.' or 'G.' in data form)

CODE	DESCRIPTION	PAGE NO
A	Excellent value	63
B	Good value	63
C	Significant value	63

3.3 Other species – essentially covers bird assemblage types

CODE	DESCRIPTION	PAGE NO
WATR	Non-breeding waterbird assemblage	UK specific code
SBA	Breeding seabird assemblage	UK specific code

BBA	Breeding bird assemblage (applies only to sites classified pre 2000)	UK specific code

4.1 Habitat class code

CODE	DESCRIPTION	PAGE NO
N01	Marine areas, Sea inlets	65
N02	Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins)	65
N03	Salt marshes, Salt pastures, Salt steppes	65
N04	Coastal sand dunes, Sand beaches, Machair	65
N05	Shingle, Sea cliffs, Islets	65
N06	Inland water bodies (Standing water, Running water)	65
N07	Bogs, Marshes, Water fringed vegetation, Fens	65
N08	Heath, Scrub, Maquis and Garrigue, Phygrana	65
N09	Dry grassland, Steppes	65
N10	Humid grassland, Mesophile grassland	65
N11	Alpine and sub-Alpine grassland	65
N14	Improved grassland	65
N15	Other arable land	65
N16	Broad-leaved deciduous woodland	65
N17	Coniferous woodland	65
N19	Mixed woodland	65
N21	Non-forest areas cultivated with woody plants (including Orchards, groves, Vineyards, Dehesas)	65
N22	Inland rocks, Screes, Sands, Permanent Snow and ice	65
N23	Other land (including Towns, Villages, Roads, Waste places, Mines, Industrial sites)	65
N25	Grassland and scrub habitats (general)	65
N26	Woodland habitats (general)	65

4.3 Threats code

CODE	DESCRIPTION	PAGE NO
A01	Cultivation	65
A02	Modification of cultivation practices	65
A03	Mowing / cutting of grassland	65
A04	Grazing	65
A05	Livestock farming and animal breeding (without grazing)	65
A06	Annual and perennial non-timber crops	65
A07	Use of biocides, hormones and chemicals	65
A08	Fertilisation	65
A10	Restructuring agricultural land holding	65
A11	Agriculture activities not referred to above	65
B01	Forest planting on open ground	65
B02	Forest and Plantation management & use	65
B03	Forest exploitation without replanting or natural regrowth	65
B04	Use of biocides, hormones and chemicals (forestry)	65
B06	Grazing in forests/ woodland	65
B07	Forestry activities not referred to above	65
C01	Mining and quarrying	65
C02	Exploration and extraction of oil or gas	65
C03	Renewable abiotic energy use	65
D01	Roads, paths and railroads	65
D02	Utility and service lines	65
D03	Shipping lanes, ports, marine constructions	65
D04	Airports, flightpaths	65
D05	Improved access to site	65
E01	Urbanised areas, human habitation	65
E02	Industrial or commercial areas	65

CODE	DESCRIPTION	PAGE NO
E03	Discharges	65
E04	Structures, buildings in the landscape	65
E06	Other urbanisation, industrial and similar activities	65
F01	Marine and Freshwater Aquaculture	65
F02	Fishing and harvesting aquatic ressources	65
F03	Hunting and collection of wild animals (terrestrial), including damage caused by game (excessive density), and taking/removal of terrestrial animals (including collection of insects, reptiles, amphibians, birds of prey, etc., trapping, poisoning, poaching, predator control, accidental capture (e.g. due to fishing gear), etc.)	65
F04	Taking / Removal of terrestrial plants, general	65
F05	Illegal taking/ removal of marine fauna	65
F06	Hunting, fishing or collecting activities not referred to above	65
G01	Outdoor sports and leisure activities, recreational activities	65
G02	Sport and leisure structures	65
G03	Interpretative centres	65
G04	Military use and civil unrest	65
G05	Other human intrusions and disturbances	65
H01	Pollution to surface waters (limnic & terrestrial, marine & brackish)	65
H02	Pollution to groundwater (point sources and diffuse sources)	65
H03	Marine water pollution	65
H04	Air pollution, air-borne pollutants	65
H05	Soil pollution and solid waste (excluding discharges)	65
H06	Excess energy	65
H07	Other forms of pollution	65
I01	Invasive non-native species	65
I02	Problematic native species	65
I03	Introduced genetic material, GMO	65
J01	Fire and fire suppression	65
J02	Human induced changes in hydraulic conditions	65
J03	Other ecosystem modifications	65
K01	Abiotic (slow) natural processes	65
K02	Biocenotic evolution, succession	65
K03	Interspecific faunal relations	65
K04	Interspecific floral relations	65
K05	Reduced fecundity/ genetic depression	65
L05	Collapse of terrain, landslide	65
L07	Storm, cyclone	65
L08	Inundation (natural processes)	65
L10	Other natural catastrophes	65
M01	Changes in abiotic conditions	65
M02	Changes in biotic conditions	65
U	Unknown threat or pressure	65
XO	Threats and pressures from outside the Member State	65

5.1 Designation type codes

CODE	DESCRIPTION	PAGE NO
UK00	No Protection Status	67
UK01	National Nature Reserve	67
UK04	Site of Special Scientific Interest (GB)	67
UK05	Marine Conservation Zone	67
UK06	Nature Conservation Marine Protected Area	67
UK86	Special Area (Channel Islands)	67
UK98	Area of Special Scientific Interest (NI)	67
IN00	Ramsar Convention site	67
IN08	Special Protection Area	67
IN09	Special Area of Conservation	67

European Site Conservation Objectives for Thames Basin Heaths Special Protection Area Site Code: UK9012141

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

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.**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

A224 *Caprimulgus europaeus*; European nightjar (Breeding)

A246 *Lullula arborea*; Woodlark (Breeding)

A302 *Sylvia undata*; Dartford warbler (Breeding)

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations'). They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives, and the accompanying Supplementary Advice (where this is available), will also provide a framework to inform the management of the European Site and the prevention of deterioration of habitats and significant disturbance of its qualifying features

These Conservation Objectives are set for each bird feature for a Special Protection Area (SPA).

Where these objectives are being met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

Publication date: 21 February 2019 (version 3). This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.

Annex 5
Public Rights of Way Discounting

Introduction

Following feedback from Natural England in their Discretionary Advice Service (DAS) response (dated 18 March 2025) a visitor survey was undertaken of Footpaths 5 and 6 within the Proposed Western SANG to determine levels of current use so that sufficient capacity discounting may be taken into consideration when calculating the mitigation capacity of the proposed SANG.

Methodology

A visitor count and limited-scope questionnaire of both footpaths was undertaken on the below dates:

- Sunday 18th May
- Thursday 22nd May
- Saturday 24th May
- Tuesday 27th May

Survey sessions covered timings that have become standard for visitor surveys of open spaces, with four two-hour surveys completed on weekdays and weekends to gather representative data:

- Session 1: 7am to 9am
- Session 2: 10am to 12 noon
- Session 3: 1pm to 3pm
- Session 4: 5pm to 7pm

Across the four days this represents a total of 32 survey hours.

Visitors were asked a limited number of questions, comprising:

1) How often do you take this route?
    a. Daily
    b. 5-6 times a week
    c. 2-3 times a week
    d. Weekly
    e. Less than weekly
2) What time of year do you usually use this footpath?
    a. Spring
    b. Summer
    c. Autumn

d. Winter

e. Year round

Results

A total of 62 people were recorded using the footpaths during the course of the survey.

Thirty-nine people were recorded using Footpath 5 across the 32 hours of survey, equating to 1.22 people per hour. Twenty-three people were recorded using Footpath 6, equating to 0.72 people per hour. Taking both footpaths into consideration, this equates to 1.94 people per hour.

Responses to the limited-scope interview questions were not gathered during the course of the surveys undertaken on the 18th May, and the below figures are there based on the remaining three surveys only. Given that percentages are used during the course of the wider calculations this is not considered to be a significant constraint. The results are shown in **Tables 1 and 2** below.

Table 1: Results of limited scope questionnaire question 1.

Frequency of visits	Total
Daily	6.7%
5-6 times a week	13.3%
2-3 times a week	53.3%
Weekly	6.7%
Less than weekly	20.0%

Table 2: Results of limited scope questionnaire question 2.

Time of Year	Total
Spring	40.9%
Summer	45.5%
Autumn	0%
Winter	0%
Year round	13.6%

Given that the proposed SANG is known to be periodically inundated during the winter months, and therefore largely inaccessible, variations in seasonal access have been taken into account during the capacity calculation. The average number of visiting weeks per person per year is calculated in **Table 3** below.

Accounting for variations in seasonal access, the number of existing visits made to the PRoW within the Proposed SANG per year is estimated to be 2,999 (based on a 12-hour day, and an average of 18.4 visiting weeks per year (or 128.8 days), as calculated in **Table 3** below).

Table 3: Average number of visiting weeks per person per year.

Time of Year	% of respondents	Seasonality (weeks per year)	Visiting weeks per person per year
Spring	40.9%	13	5.3
Summer	45.5%	13	5.9
Autumn	0%	13	0
Winter	0%	13	0
Year round	13.6%	52	7.2
		Total	18.4

Table 4: Average number of visits per person, per week and per year.

Frequency of visits	% of respondents	Frequency (visits per week)	Visits per person per week	Visits per person per year (based on 18.4 weeks)
Daily	6.7%	7	0.47	8.63
5-6 times a week	13.3%	5.5	0.73	13.49
2-3 times a week	53.3%	2.5	1.33	24.53
Weekly	6.7%	1	0.07	1.23
Less than weekly	20.0%	0.3	0.06	1.10
			Total	48.99

SANG Discounting

As recommended by Natural England within their DAS response, the Bracknell Forest Council methodology to calculate SANG mitigation capacity discounts for open spaces proposed as SANG that have an existing level of public use has been used.

The method involves calculating the number of visits made to an area of open space per year, taking into account seasonal variations in visitation, then using frequency of visitation data to calculate the total number of visitors per year. The number of existing visitors to a site is then discounted from the available mitigation capacity, that being the number of people that could be ‘absorbed’ by an area of land based on a specific SANG provision rate.

The SANG capacity calculation for the publicly accessible parts of the proposed SANG, which as detailed above related to the legally accessible areas of PRoW rather than the entire proposed SANG area, is set out in **Table 5** below.

Table 5: SANG capacity discount for publicly accessible parts of proposed SANG

Total visits to PRoW per annum	Equivalent no. of visitors p.a.[1]	Accessible PRoW	Capacity to mitigate (number of people absorbed based on baseline SANG provision rate[2])	Residual mitigation capacity[3]	Residual area of SANG available for mitigation[4]
2999	62	0.11	14	0	40.29

[1]Calculated by dividing total visits p.a by average visits/person/year from Table 4 above

[2] Baseline SANG provision rate of 8ha per 1000 new residents

[3] Column 4 minus column 2, 14-62 = -48 therefore accessible PRoW area has no residual mitigation capacity

[4]Total proposed SANG area (40.40) minus accessible PRoW land that has no residual capacity (0.11ha

Annex 6

Noise Modelling Outputs

Annex 7

Proposed Western SANG Layout

Key

- Site boundary
- Proposed SANG boundary
- Existing woodland to be retained
- Existing trees and vegetation to be retained
- Existing watercourse to be retained
- Existing Public Rights of Way
- Existing overhead cables and pylons
- Proposed surfaced path with hoggin or equivalent finish
- Proposed mown grass path, exact alignment to be agreed
- Proposed sections of boardwalk
- Proposed car park
- Extent of proposed Eco valley
- Proposed specimen tree planting - refer to planting plans for details
- Proposed mixed species native scrub planting, refer to planting plans for details
- Existing grass swards to be enhanced to improve biodiversity
- Proposed scrape/shallow pond

Notes:

1. Details and location of street furniture to be agreed.
2. Street furniture anticipated to include the following elements:
   - Seating (with backrest)
   - Cycle parking (Sheffield type stands)
   - Wayfinding & information signage as appropriate
   - Dog waste bins
   - Litter bins
3. Details of paths and boardwalks to be agreed
4. Specimen trees to be protected by cattle proof fencing secured to timber stakes
5. Exact alignment of paths to be agreed

Rev.	Date	Note	By
G	02.07.25	Drawing and key updated	RA

LODDON GARDEN VILLAGE

on behalf of
University of Reading

LA200
LGV - Lourdes Meadow SANG
Strategy Plan

Drawn by	Checked by	Scale
RA	RB	1:2,000@A1
Drawn on	Revision	Job
11.02.25	G	498048

savills URBAN DESIGN STUDIO

0m 200m

Annex 8

Proposed Eastern SANG Layout