

Land at Duck's Nest Habitats Regulations Assessment (HRA) Addendum

Purpose of Document

Wokingham Borough Council has provided ecological comments regarding the Habitats Regulations Assessment (HRA) which state:

Thames Basin Heaths SPA

Natural England have referred the local planning authority to their standing advice on assessment of the air pollution pathway (as given here: standing advice). The applicant has followed a significant proportion of the steps set out in the standing advice. We are now at the stage where we need to consider direct and indirect effects and, in order to pass appropriate assessment, confirm there will be no adverse effect alone or in combination.

The supporting report for Habitats Regulation Assessment (SLR, ref: 403.06551.00023, October 2022) asserts in section 6.2 that:

"The Wokingham Borough Local Plan HRA37 notes that "The nature and distribution of habitat, in other words the ecological context, is particularly relevant to interpreting effects on the integrity of Thames Basin Heaths SPA because this site is designated for breeding nightjar, woodlark, and Dartford warbler rather than for its vegetation or habitats. Nightjar and woodlark will nest in rotationally managed commercial forestry but not in mature permanent woodland and, in this SPA, they nest primarily in areas of heathland. This is relevant because much roadside habitat within this SPA constitutes permanent woodland".

Further to this Paragraph 6.46 of the HRA 38, notes that on transects where forecast nitrogen exceeded the threshold, there was no heathland habitat (the habitat that supports the designated species) where nitrogen exceeded the threshold, and instead there was only woodland.

On this basis, it is concluded that, as the roadside habitat along the A327 (south of Bramshill Road) comprises woodland, and there is no heathland to impact, that there would be no significant effect as a result of air pollution either in isolation or in-combination."

For this project, in order to have confidence in this line of argument, it would be helpful if the applicant can join the dots a bit more - particularly in the absence of site specific advice from Natural England.

With reference to transects undertaken for the local plan HRA, can the applicant show how these cover the parts of the TBH SPA adjacent to the A327 which are

relevant to this project? If not, can the applicant show through other means that the relevant locations are wooded habitat unsuitable for breeding of the three bird species relevant to the SPA designation?

What is the evidence that this habitat is to remain permanently wooded (is there a Forest Enterprise management plan that identifies roadside buffers to be permanently wooded?)? If not to be retained as permanently wooded habitat, are the stands of coniferous trees of an age that they not expected to be harvested until after 2040?

If the applicant is able to provide a bit more information to support the assertion made, the local planning authority will have greater confidence in the conclusion that the report reaches when making the appropriate assessment.

AND

Thames Basin Heaths SPA

A supporting document to aid Habitats Regulations Assessment (SLR, ref: 403.06551.00023, October 2022) has been submitted. This follows on from the Air Quality Assessment (SLR, ref: 410.065723.00001 revision 1.0, October 2024) which screened in the need to consider the impact of the development on the Thames Basin Heaths SPA in relation to the air quality pathway to likely significant effects.

The particular road that needed to be considered is the A327 where it passes Bramshill Plantation. This is a part of the SPA owned and managed by Forest Enterprise.

The supporting document does not provide an in-depth assessment of the habitats within the SPA within 200m of the A327. Section 6.2 states that there is no heathland habitat which will be impacted although the statement is not evidenced in any surveys or mapping. It might be true that at this point in time the habitat is coniferous plantation unsuited to the bird species for which the SPA is designated. However, this is a somewhat naïve snapshot

Please find attached updated Ecology comments. All is satisfactory, other than the Air Quality matter in relation to the TBH SPA which is required to be resolved in order to be confident the proposal can pass the Appropriate Assessment.

This addendum supports the existing HRA and provides a response to the Wokingham Borough Council comments that there is no suitable habitat mapping to show there is no scrub along the A327 (Fisher, D. (18th May), 2026). Figure 1 and Figure 2 overleaf show that there are no scrub parcels directly adjacent to the A327.

Figure 1

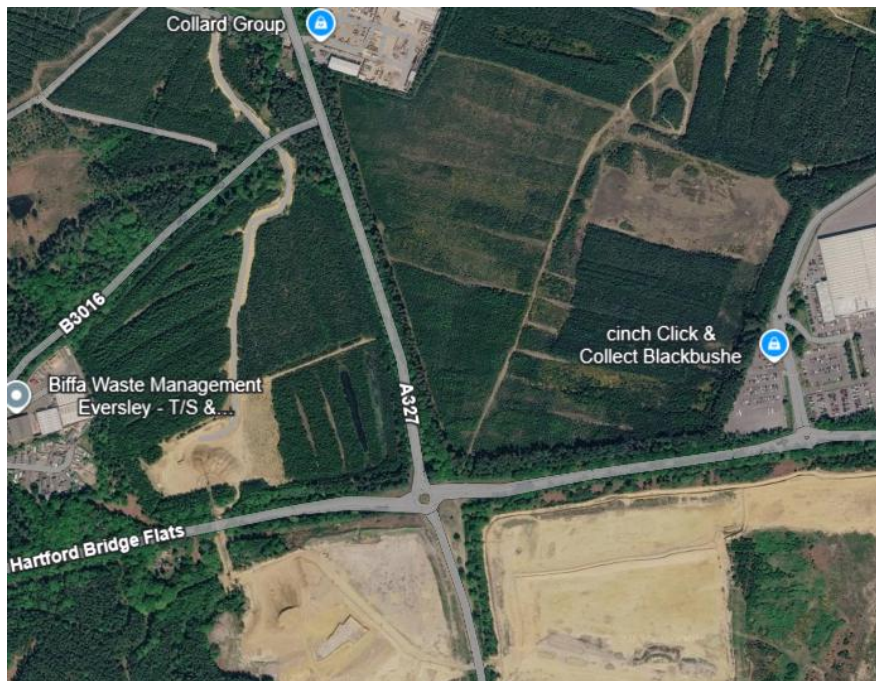
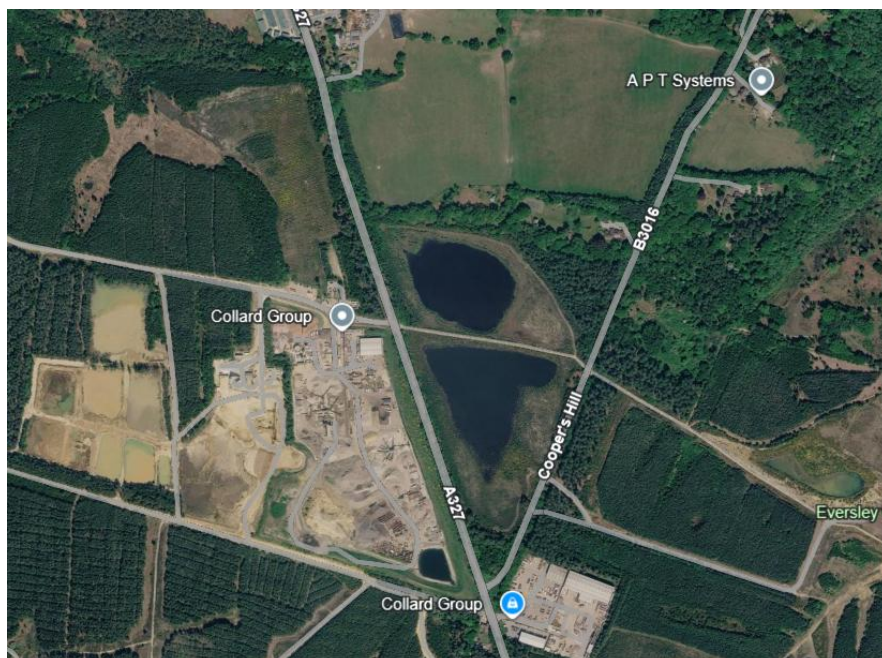


Figure 2



Figures 1 and 2 show the areas of woodland around the A327, which in parts form the Thames Basin Heath Special Protection Area (SPA). The figures also show that these areas

of woodland are mainly coniferous. The woodland areas are owned by the Forestry Commission¹:

The woods covering the Thames Basin Heath are located to the North of the M3 motorway, on the Hampshire/Berkshire county border. The woods cover 1,274 hectares and forms part of the wider Thames Basin Heaths Special Protection Area (SPA). The woods are managed by the Forestry Commission, with 536 hectares under a freehold agreement and 738 under a leasehold agreement.

The sites included under this forest plan are:

- *Bramshill Plantation*
- *Eversley Quarry and Busta Triangle*
- *Yately Heath Wood*
- *Gorrick Plantation*
- *Warren Heath*

The main species found in this woodland area are Corsican and Scots Pine, while birch and oak can also be found in small groupings. The majority of the forest was planted in the 1920s and 1930s, with a significant increase in replanting in the 1990s.

The Bramshill Forest Plan (2018²) runs from 2018 to 2028 and provides the following objectives for Bramshill Wood:

- *Provide a regular supply of quality timber to support the forestry sector and wider economic development;*
- *Maintain the conservation value of wooded and open habitats seeking to improve ecological connectivity across the Forest Blocks Safeguard the European listed birds for which the site is internationally designated;*
- *Maintain and increase the species and age diversity of the wood land;*
- *Provide, maintain and enhance where possible the recreational experience of the woodland;*
- *Control invasive plant and animal species and reduce their impact across the forest blocks;*
- *Contribute to water storage and flood alleviation in the wider catchment through wetland habitat restoration and maintenance at a forest-scale.*

The plan provides maps which categorise the age of the woodland, see Figure 3. Figure 3 shows the Heath Warren/Warren Heath and Eversley Quarry Indicative Age Diversity³, which shows the age of woodland within 200m of the A327. The figure indicates that the majority of

¹ <https://www.forestryengland.uk/forest-planning/thames-basin-heaths-forest-plan>

² https://www.forestryengland.uk/sites/default/files/documents/Thames%20Basin%20Heaths%20Introduction_0.pdf

³ <https://www.forestryengland.uk/sites/default/files/documents/Thames%20Basin%20Heaths%20Maps%20from%20Publisher.pdf>

the woodland has a diverse age bracket, but leans towards the 1981-1998 and 1999-2016 bracket.

Further investigation of the Forestry Commission maps shows that the long term vision for the Heath Warren/Warren Heath and Eversley Quarry will be to retain the areas around the road as coniferous woodland, see Figure 4¹.

Figure 3

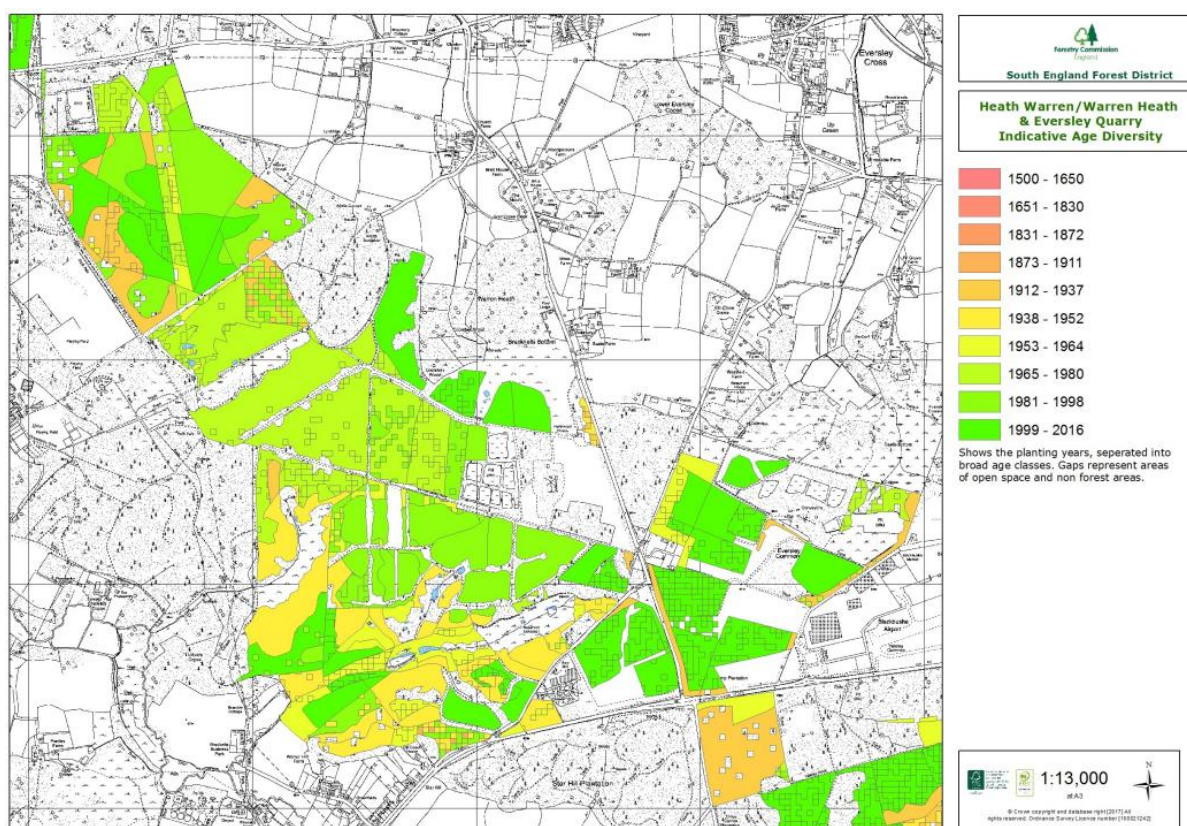
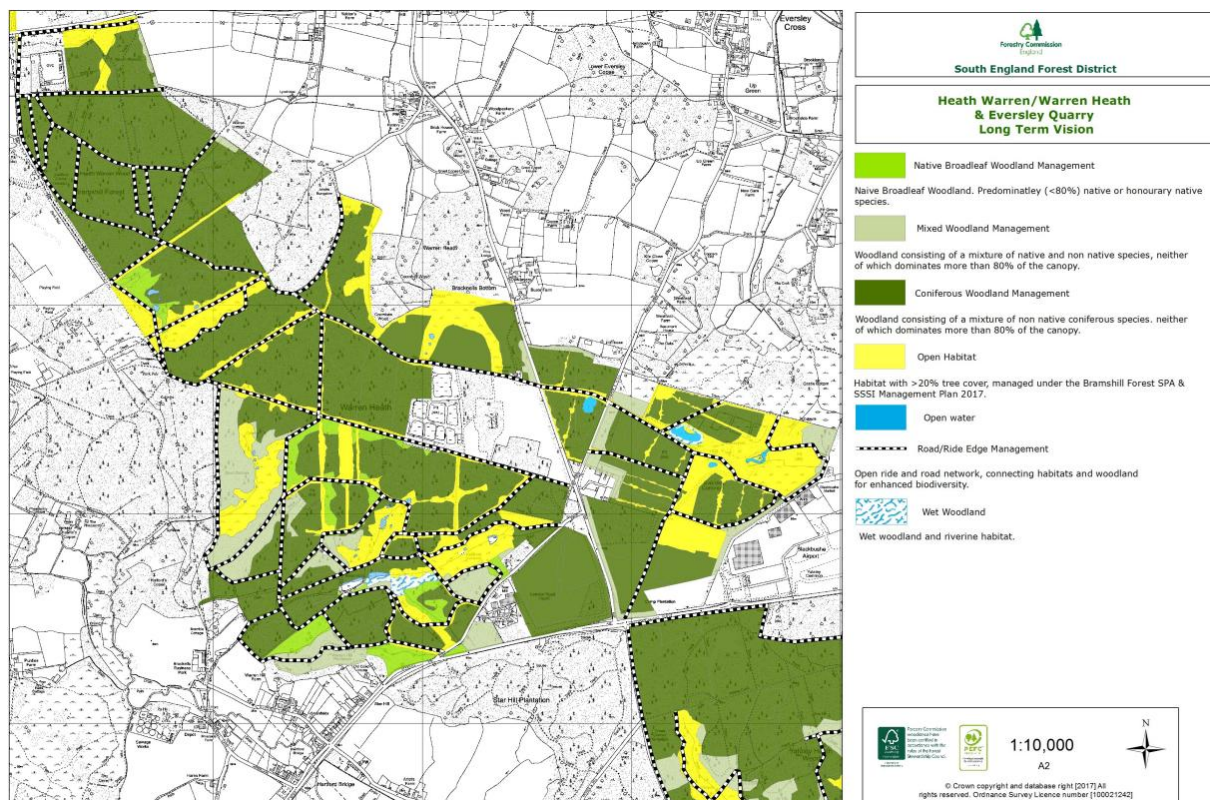


Figure 4



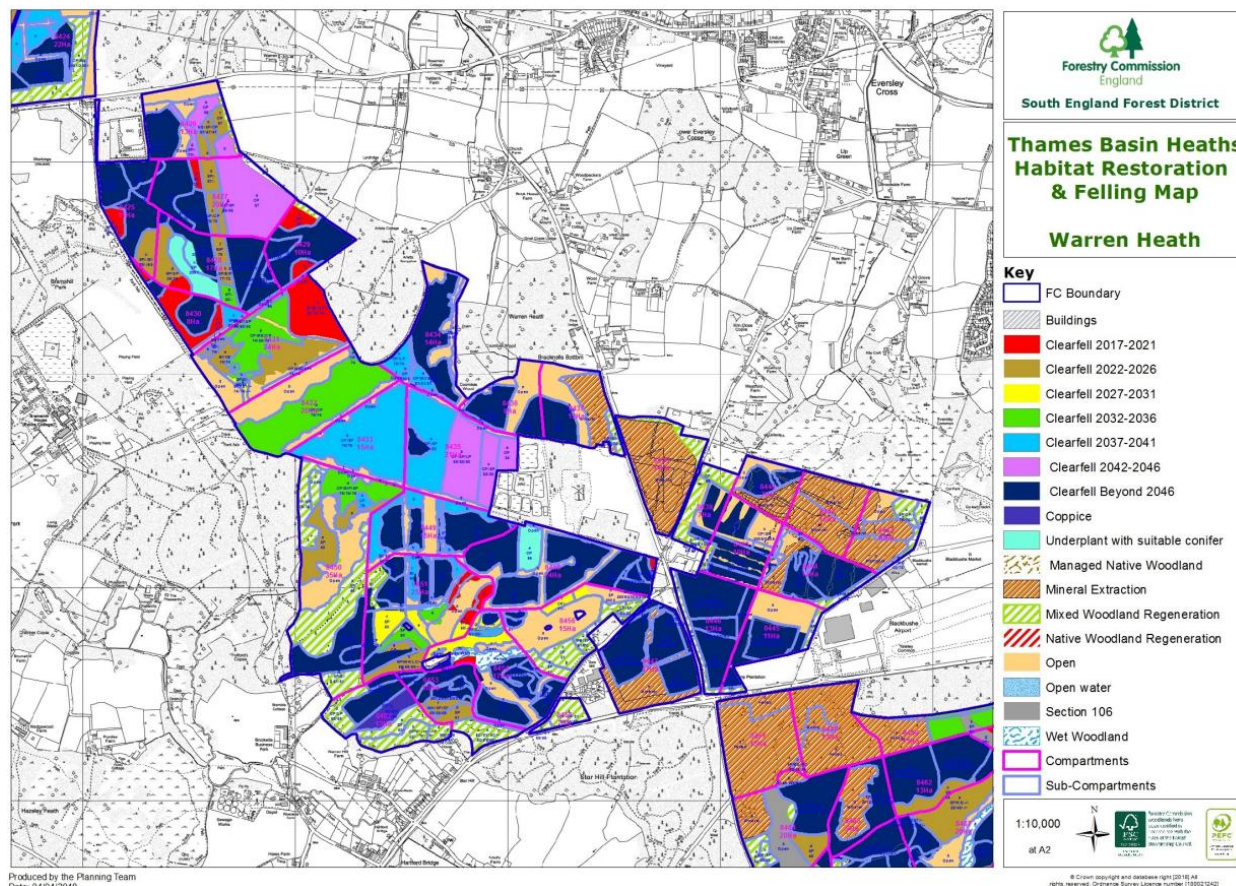
Of the question raised by Wokingham Borough Council:

What is the evidence that this habitat is to remain permanently wooded (is there a Forest Enterprise management plan that identifies roadside buffers to be permanently wooded?)? If not to be retained as permanently wooded habitat, are the stands of coniferous trees of an age that they not expected to be harvested until after 2040.

The areas of woodland which are within 200m of the A327 which are due to be cleared are shown on Figure 5⁴. Areas which are due to be cleared after 2046 are shown in dark blue. Figure 5 shows that the woodland surrounding the A327 is to be retained until at least 2040.

⁴ <https://www.forestryengland.uk/sites/default/files/documents/Thames%20Basin%20Heaths%20Maps%20from%20Publisher.pdf>

Figure 5

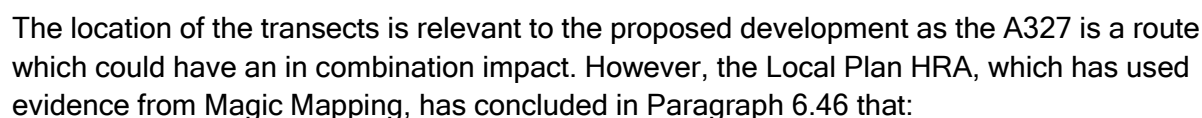


In addition to the diagrams above, Paragraph 6.46 of the Wokingham Borough Local Plan Habitats Regulations Assessment⁵ states that:

For the vast majority of the Thames Basin Heaths SPA transects the forecast nitrogen due to the WBLPU is effectively zero being between 0.00 and 0.05 kg N/ha/yr. This is almost too small to show in the model and is well within the limits of normal background variation in deposition rates. The exceptions are transects TBH13, TBH15, TBH16, TBH19, TBH20, TBH26, TBH29, TBH36, TBH38 and TBH39, where nitrogen deposition due to the WBLPU at 10m from the road ranges from 0.06 kg N/ha/yr (TBH13) to 0.15 kg N/ha/yr (TBH36). However, there is no heathland on any of these transects, with the habitat being entirely woodland. This is based upon examination of habitat mapping on MAGIC (www.magic.gov.uk), cross-referenced to aerial photography on MAGIC and Google Maps. In all instances, the area of woodland is extensive managed plantation, and there is no indication it is to be cleared and put to heathland.

⁵ AECOM (September 2024). Wokingham Local Plan Update, Regulation 19 HRA, Wokingham Borough Council: <https://wokingham.moderngov.co.uk/documents/s74011/Enclosure%207%20-%20Habitat%20Regulations%20Assessment.pdf>

Figure 6



... there is no heathland on any of these transects, with the habitat being entirely woodland. This is based upon examination of habitat mapping on MAGIC (www.magic.gov.uk), cross-referenced to aerial photography on MAGIC and Google Maps.

Coniferous Woodland and Nitrogen Deposition

According to APIS⁷ 'Nitrogen Deposition: coniferous woodland':

Overview: evidence, processes and main impacts

⁶ <https://www.wokingham.gov.uk/sites/wokingham/files/2024-09/Habitats%20Regulations%20Assessment%20Appendix%20D%20September%202024.pdf>

⁷ <https://apis.ac.uk/app>

N deposition is not believed to have a large effect on conifer growth in the UK although where conifers occupy soils with low nutrient availability, low levels of N deposition would be expected to increase growth.

The evidence above shows that coniferous woodland is not sensitive to nitrogen deposition.

Conclusion

The addendum provides evidence to support the conclusion of the SLR Land at Duck's Habitats Regulations Assessment⁸, which states:

It is also concluded that, as the roadside habitat along the A327 (south of Bramshill Road) comprises woodland, and there is no heathland to impact, there would be no significant effect as a result of air pollution either in isolation or in-combination.

To support this conclusion, the Wokingham Borough Council local plan air quality assessment (Appendix D) has been examined. Publicly available mapping has been also been used to investigate the assertion within the HRA.

Of the questions raised by Wokingham Borough Council:

The supporting document does not provide an in-depth assessment of the habitats within the SPA within 200m of the A327. Section 6.2 states that there is no heathland habitat which will be impacted although the statement is not evidenced in any surveys or mapping. It might be true that at this point in time the habitat is coniferous plantation unsuited to the bird species for which the SPA is designated.

The Wokingham Local Plan HRA states that there is no heathland within this area and therefore no adverse effect to the qualifying species can occur, either alone or in combination with any other plan or project. Figures 1 and 2 also show that habitats within 2000m of the A327 are mostly coniferous woodland.

With reference to transects undertaken for the local plan HRA, can the applicant show how these cover the parts of the TBH SPA adjacent to the A327 which are relevant to this project? If not, can the applicant show through other means that the relevant locations are wooded habitat unsuitable for breeding of the three bird species relevant to the SPA designation?

The location of the transects which effect the Thames Basin Heaths SPA are shown in the Local Plan HRA and these are relevant to the findings of the HRA. There are no qualifying habitats which would be affected by increase of AADT, therefore there can be no adverse effect to site integrity.

What is the evidence that this habitat is to remain permanently wooded (is there a Forest Enterprise management plan that identifies roadside buffers to be permanently wooded?)? If not to be retained as permanently wooded habitat, are the

⁸ SLR (2024) Ducks Nest Farm Air Quality Assessment.

stands of coniferous trees of an age that they not expected to be harvested until after 2040?

The Forestry Commission has published maps which show that the majority of the woodland which will be harvested along the A327 is going to be harvested after 2046 (see Figure 5).

Accordingly, it can be concluded that there will be no adverse effect on the integrity of the Thames Basin Heaths SPA, either alone or in combination with other plans or projects.
