

MEMORANDUM

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

Summary Of Recommendations

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

Comments On Proposal

This response is focused on the elements relevant to Appropriate Assessment under the Habitat Regulations. A separate response in relation to other ecology/biodiversity matters is given elsewhere.

Thames Basin Heaths SPA

The proposed development is entirely within the 400m to 5km linear mitigation zone for likely significant effects via the recreational pathway to the Thames Basin Heaths Special Protection Area (TBH SPA). The proposed development would result in a net increase in dwellings within the linear mitigation zone and therefore it is scoped in for appropriate assessment under the Habitat Regulations 2017 (as amended).

The development proposes to mitigate the impact of additional residential units on the TBH SPA by delivering its own bespoke SANG, in line with the Joint Strategic Partnership TBH

SPA delivery framework. This standard mitigation requirement is also set out in retained regional policy NRM6 and local plan policy CP8.

An illustrative SANG Layout has been submitted and the SANG is also shown in the context of an Illustrative Landscape Masterplan. A supporting SANG Creation and Management Plan (EPR, ref 3336-1C, May 2025) has also been submitted to compare the proposed SANG design to the Natural England guidance for SANG creation and aid appropriate assessment.

A net increase of 420 dwellings (class C3) is expected to require a minimum of 8.06ha of SANG at the standard SANG consumption rate accepted by Natural England. A standalone SANG of 8.13ha is proposed. This would not be directly connected to a wider network of public rights of way. Neither would it be connected by a safe and secured route to any other SANG, allowing it to be considered within a wider context of a suite of delivery.

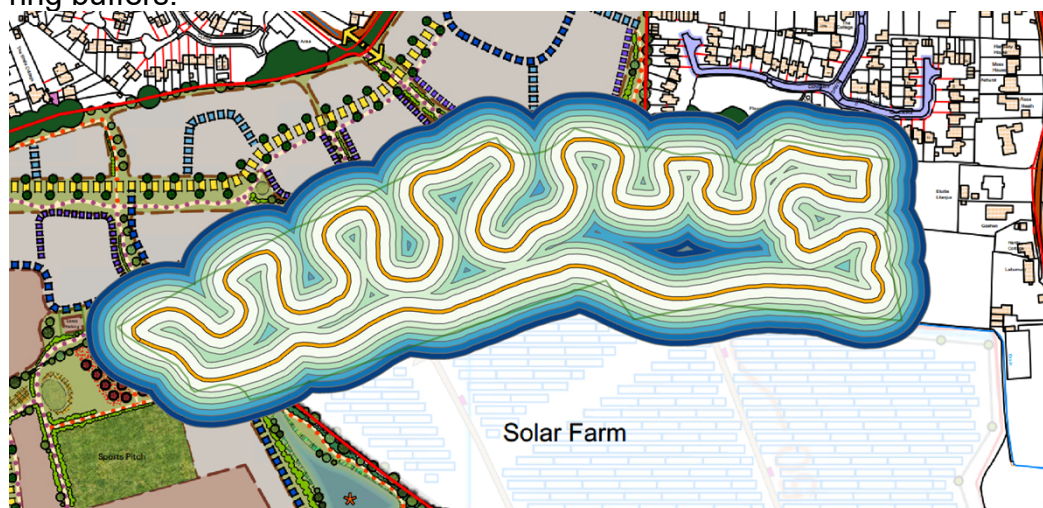
The development proposal is of an extent where not all net new residential units are within 400m of the proposed SANG boundary. Therefore, to be effective as SANG a dedicated car park of at least 8 spaces needs to be included within the design. A separate car park, not shown in the Illustrative SANG layout but indicated in the Illustrative Landscape Masterplan, is proposed within the wider green infrastructure.

I am concerned that the proposed SANG design is not effective for the following reasons:

1. The 2.3km circular path is contrived – needing seven loops wiggling across its northern route to get sufficient length. The Natural England guidance recommends to:

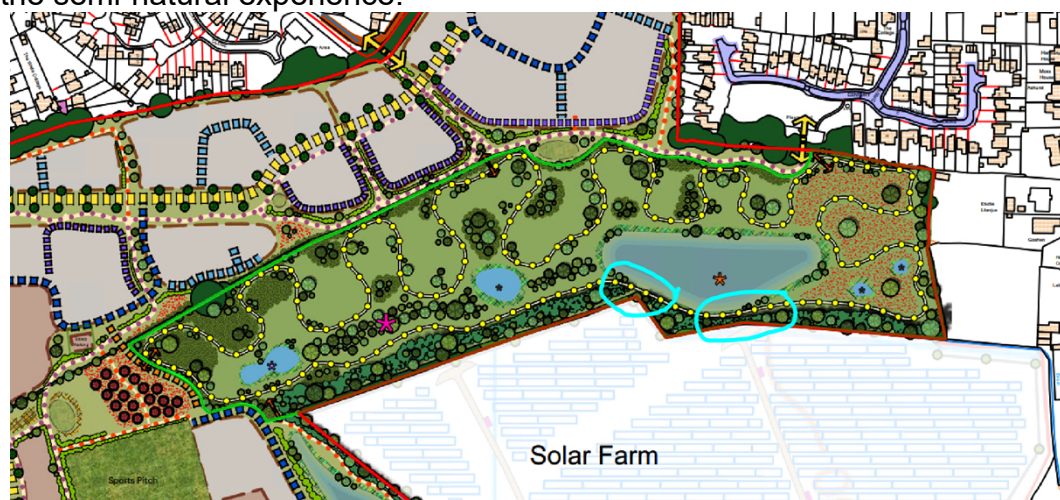
“Avoid convoluted paths and pinch points in SANG design. By maintaining a minimum width between paths of 100 m in open ground and 50 m in dense woodland.”

The vast majority of the SANG circular walk is well within 50m of other sections of itself and the SANG is not dense woodland. The image snip below shows a buffer analysis of the circular walk (orange) and 10m, 15m, 20m, 25m, 30m, 35m, and 40m ring buffers.

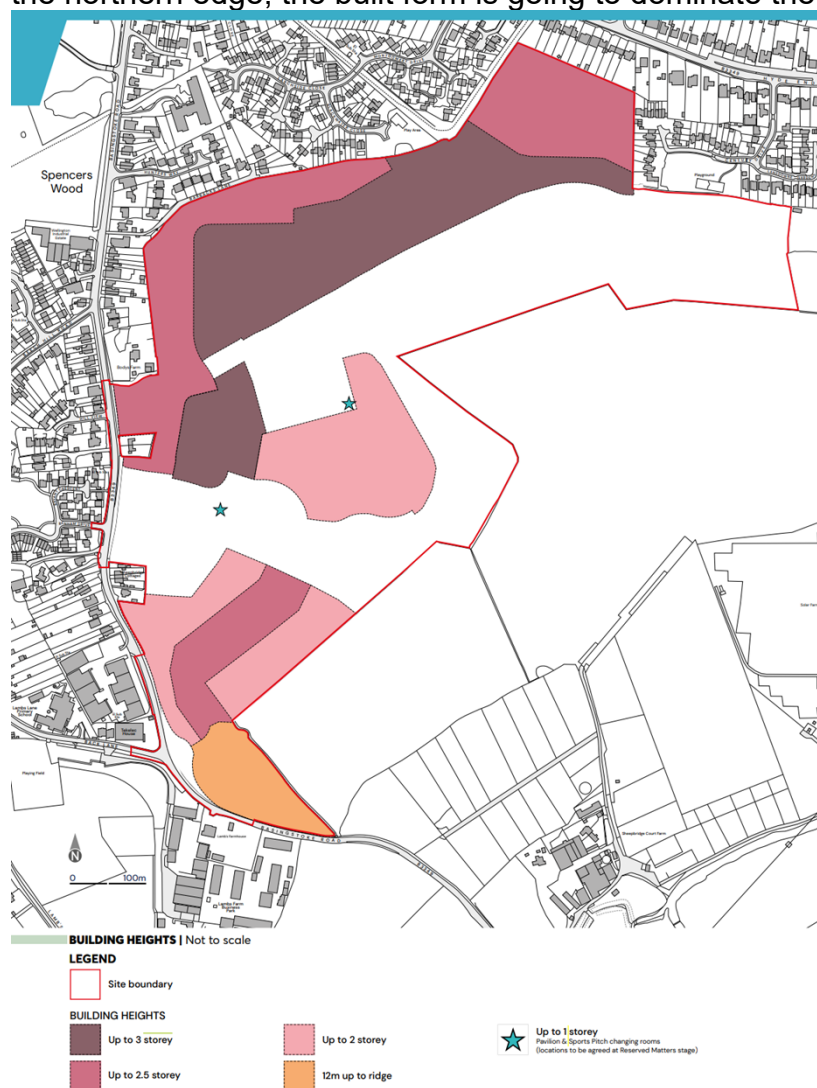


2. The proposed woodland planting along the southern edge – to screen the solar farm – is very thin with locations where it is less than 10m across as the circular walk is pinched between the SuDS basin and the boundary (see the locations highlighted in

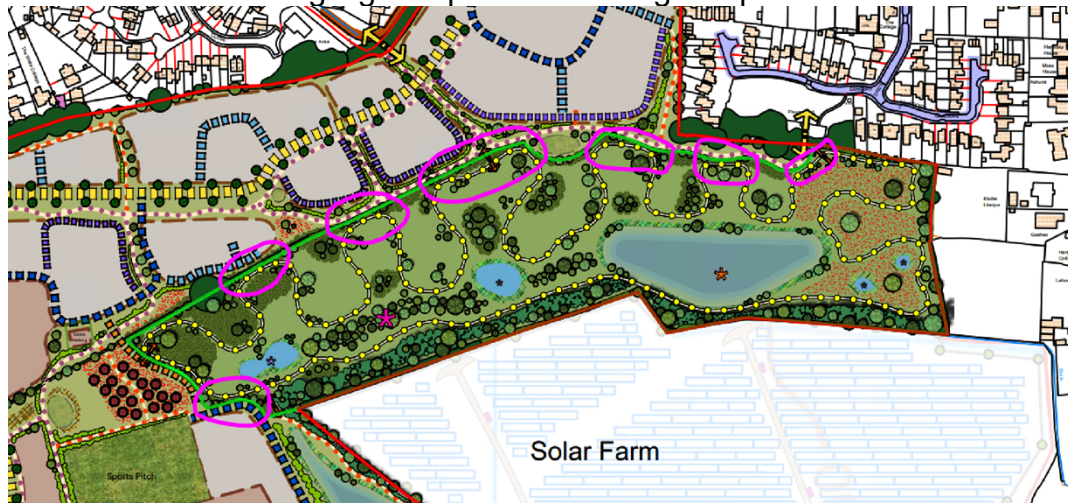
light blue in the image snip below). This will result in an ineffective screen reducing the semi-natural experience.



3. Also adding to the urbanisation, it is proposed that the development blocks to the immediate north of the SANG are up to 3 storeys high. Given that there are significant parts of the circular walk that run close to the perimeter of the site along the northern edge, the built form is going to dominate the visitor experience.



4. The submitted Lighting Strategy indicates that the secondary movement routes, tertiary streets and primary cycle routes would be lit. Whilst there is no proposal to light within the SANG itself, the lighting will have an urbanising impact on the circular walk because the circular walk is forced to be so close to the perimeter of the SANG – see the locations highlighted pink in the image snip below.



5. It is not yet clear how the SANG car park and connecting path will be secured as part of the SANG delivery. As mentioned above a car park is required in the design for the SANG to be able to serve the whole of the proposed development. At the moment, the car park and route to the SANG are not worked up in enough detail to be able to confirm they are viable.
6. The submitted Drainage Strategy Note (Residential & Commercial Engineering, March 2025) shows that there are a number of design constraints within the area proposed for SANG – the strategic oil pipeline, an existing TBC culvert route, and existing foul water sewers run through it – it is not clear that these have been taken into account when working up the soft landscaping proposals. No mention of these constraints is made within the SANG Creation and Management Plan.
7. Further to this, the same Drainage Strategy Note shows within the high level engineering strategy that the SANG would be the preferred route for more foul water sewers. I am concerned that this will greatly limit the landscaping, preventing the landscaping from addressing some of the other issues mentioned above.
8. The high level engineering strategy is also showing a piped solution to convey surface water to the attenuation basin within the SANG. This introduces more underground infrastructure with required easements. I recommend that the general arrangement of the SANG should show a design that allows for this water to be conveyed at the surface in a naturalistic way so it can form an attractive part of the design rather than a further constraint. At this stage, I am concerned that the proposal does not show how the design of the SANG can accommodate the drainage strategy.
9. No detail has been provided for the practicalities of how the site will be managed. For example, whilst paragraph 6.12 of the SANG Creation and Management Plan proposes frequent cutting of the short sward grassland (making up 4/5ths of the grassland in the SANG), there is no information about the access points for machinery, what will happen to the cut material (is there somewhere in the design to allow retention on site?). Further, what machinery access requirements are there for maintenance of the attenuation basin? How is this accommodated within the design?

Looking at the design of the SANG shown in Map 2 of the submitted SANG Creation and Management Plan, I have the following concerns about the design:

- a) The main entrance from the car park should not be straight into mixed scrub (proposed to be managed as dense vigorous scrub). This is not a good welcome to the type of user the SANG is trying to attract. Visitors are forced to take one of two routes, both of which are narrow and hemmed in by scrub.



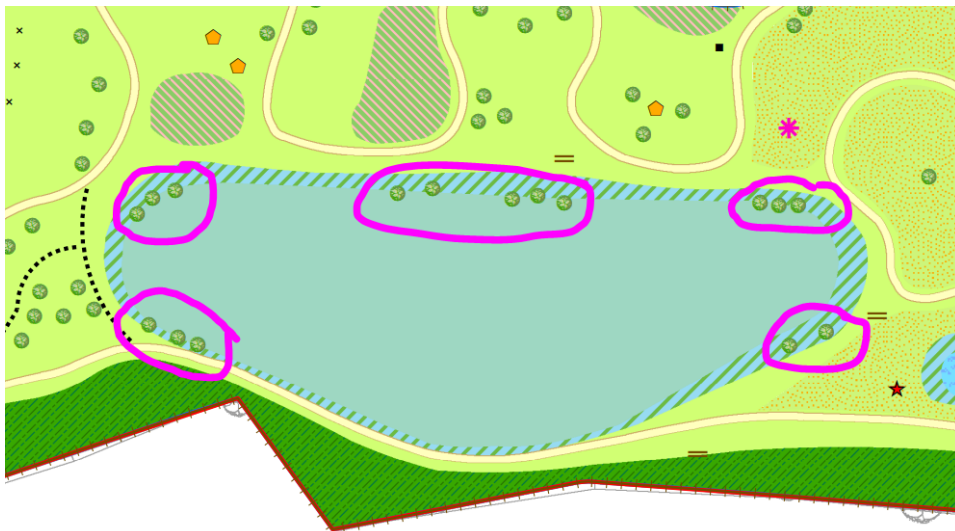
- b) The doggy trim trail is a good idea but its location undermines the circular walk by creating a shortcut desire line:



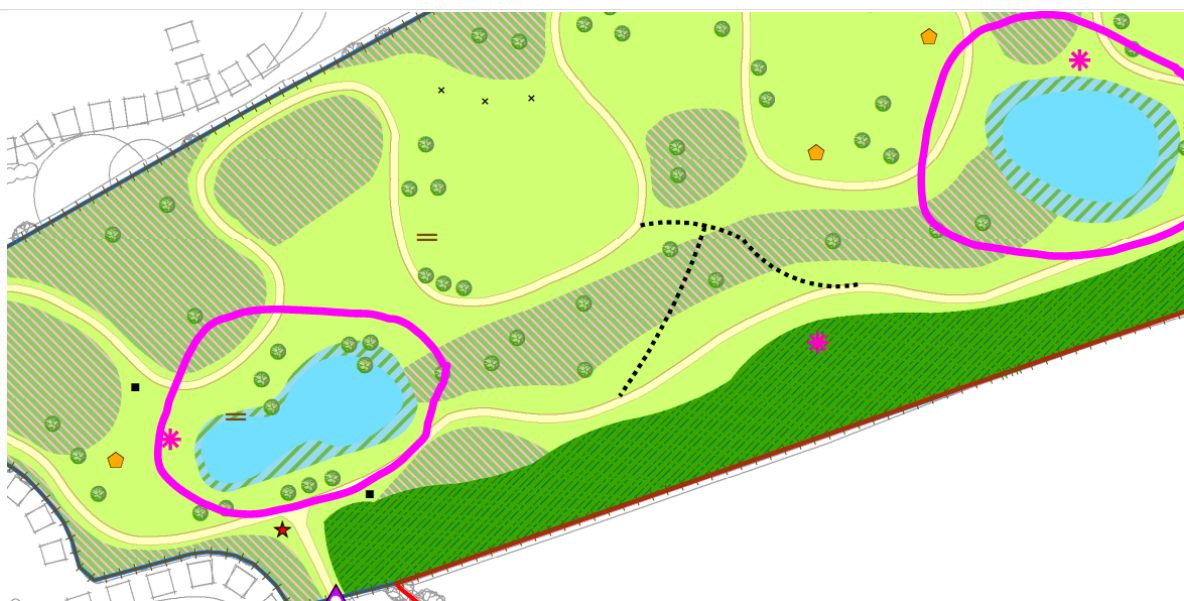
- c) I am not convinced that enough gated access points are currently provided along the northern edge of the SANG – there being at least two more natural access points in relation to the surrounding infrastructure proposed.



- d) It is not clear from the plan how the locations of some of the community art trail, benches, interpretation boards, and bins have been decided. It would be helpful if greater explanation was given within the SANG Creation and Management Plan as to what the design needs are for some of these locations.
- e) The level changes required to accommodate the attenuation basin need to be shown in detail. What are the proposed slopes on the basin? How is this designed to give a semi-natural experience? How do the paths relate to these levels? I note that the circular path approaches to within 10m of the edge of the basin five times – what makes this basin attractive to have the path so frequently visit it?
- f) Tree planting is proposed around the ponds and attenuation basin but the SANG Creation and Management Plan indicates that these may be lined which may act as a planting constraint. Detailed plans will need to show how tree planting can be accommodated in these locations.



- g) The area marked for wildflower meadow is too small and fragmented (by paths, ponds, and individual trees) for it to be viable for a traditional hay cut. The management proposals need to be rewritten to be viable or the design altered.
- h) The ratio of wildflower meadow to short sward grassland is not appropriate. There is too much area dedicated as short sward grassland – the Natural England SANG guidance saying:
“Avoid frequent mowing as a tool to manage grasslands, it is an expensive technique which produces little biodiversity benefit.”
- i) If the two western ponds are to be designed as amenity ponds (allowing dog dipping) then they need to be integrated with the path network and other hard infrastructure to facilitate this. Currently they are shown as having more separation from the path network than the wildlife ponds.



However, I accept that concerns a) to i) could be addressed via condition discharge – perhaps with the exception of concern c) where it would be appropriate to agree all the access points via a general arrangement plan at the point of determination.

Natural England DAS Response

The SANG Creation and Management Plan includes in Appendix 1 the Natural England discretionary advice service (DAS) advice letter from October 2024. I note from the image snip included in the advice letter that this response was in relation to a different layout of SANG to that being considered in this application. It will be essential for Natural England to comment on the current design prior to determining this application – in order to inform the appropriate assessment.

Looking at the issues raised in the advice letter in turn:

- i. SANG shape and size – it is relevant to note that the current proposal is for a smaller SANG compared to that reviewed earlier as part of the DAS.
- ii. Primary walk – Natural England raise concerns that the walk is overly convoluted and hugs the boundary of the SANG closely. **I am not convinced that these concerns have not been adequately addressed.**
- iii. Screening – Natural England recommended greater screening with trees and scrub along the northern and southern boundaries. Whilst there has been a little more screening included in the current design, **I am not convinced that sufficient screening has been proposed to mitigate the urban intrusion along these boundaries.**
- iv. Car park – Natural England considered the car parking proposals unsuitable, with the car park being disconnected from the SANG and primary walking route and the risk that it would not be available for SANG visitors due to competition with users of other elements of green infrastructure. Although the current illustrative masterplan moves the car park slightly closer it is still disconnected from the SANG and primary walking route. No further detail has been provided to address the concern regarding the car park being shared with other GI users and space not being available to SANG visitors. **I am not convinced that Natural England's concerns have been adequately addressed.**
- v. Fencing – Dog proof fencing can be provided within the detailed design. I can recommend that this concern is resolved.

- vi. Accessibility of route – Natural England expressed a concern that the site might be wet and boggy at some times of year – inhibiting the use of the site. Part of the site were wet during the site visit. This is consistent with the modelled surface water flooding risk – areas with a flood risk being shown within the SANG in the high level engineering strategy submitted with the Drainage Strategy Note. **I am not convinced that the SANG Creation and Management Plan and proposed design has adequately addressed the concern raised by Natural England.**
- vii. Entry from housing development – Natural England raised a concern that the entrance points were not clearly established. This is similar to my concern c) mentioned above. I think this is possible to resolve prior to determination.
- viii. Solar Farm – As point iii.
- ix. SANG Management Plan – Natural England have set out a list of bullet points for items that need to be covered within a SANG management plan. **The submitted SANG Creation and Management Plan has not addressed the entire list of items that Natural England required.**

Securing In-perpetuity Management of the SANG

A key point of the Natural England list mentioned in ix above is establishing the mechanism by which in-perpetuity management of the SANG is secured. Paragraph 7.6 of the SANG Creation and Management Plan lists options for the management body for the SANG. Of these, I recommend that a bespoke management company is not an option that gives the certainty to pass appropriate assessment. The management body that would provide the most certainty when it comes to appropriate assessment is the local authority.

Section 6 of the submitted Planning Statement includes draft heads of terms for a s106 agreement. Item c) in the draft heads of terms includes SANG design and management. It does not get into specifics as to the applicant's preferred management body. If a viable SANG design can be agreed, I recommend that in-perpetuity management is secured via a planning obligation. I recommend that this will need to be specific about the management body that is to take on the site. It is preferable if this is the local authority. Adoption of the SANG by the local authority will only be possible if it is accompanied by a contribution to cover the ongoing in-perpetuity management costs.

I note that the design of the SANG includes a surface water attenuation basin. This will have associated infrastructure that may require additional expenditure to maintain (over and above that for normal maintenance of semi-natural green space). I recommend that the s106 will need to clearly identify who is adopting the surface water drainage infrastructure and how ongoing maintenance is secured, potentially separate from maintenance of the SANG (but in-line with the objectives of the SANG).

SPA Access Monitoring and Management (SAMM)

The submitted Planning Statement does not mention the need for a SAMM contribution as part of the required mitigation (as agreed by Natural England with the TBH SPA Joint Strategic Partnership) for likely significant effects on the TBH SPA. This is a key mitigation measure that must be secured by planning obligation, if the project is to pass appropriate assessment.

If the local planning authority is minded to grant permission, it will need to secure SAMM mitigation via a planning obligation. The contribution is calculated at a proportionate rate dependent on the mix of housing delivered. Therefore the obligation will need to fix the

process for calculating the contribution rate pending reserved matters approvals with payment being made prior to first occupation (or, if phased, prior to occupation of a set of agreed trigger points).

The table for current contribution rates in Wokingham Borough can be found on our website: [Thames Basin Heath Special Protection Area](#)

Summary

I object to the proposed development on the grounds that it does not provide adequate mitigation to likely significant effects on the Thames Basin Heaths Special Protection Area.

This is principally due to the design of the proposed SANG not being suitable for it to be an effective alternative to visiting the TBH SPA. The applicant consulted Natural England regarding the SANG design using their discretionary advice service but does not appear to have addressed all their concerns.

It may be that this objection is overcome through revision of the SANG design and confirmation from Natural England that they consider it will be effective as SANG.

Without an effective SANG solution, the proposal does not pass appropriate assessment and must be refused planning permission. A reason for refusal on the grounds of not passing appropriate assessment is given at the end of the Wokingham Borough Council AA template.

Conditions & Reasons (if required)

Should the decision maker determine that the SANG is effective as a mitigation measure and the project does pass appropriate assessment, the following conditions will need to be applied in order to secure the detailed design and ongoing management plan for the SANG.

Detailed Hard and Soft Landscaping

As per standard condition wording CL5.

SANG Landscape Environmental Management Plan

As per British Standard 42020:2013 standard condition D.4.5 with wording adjusted to reflect condition refers specifically to the SANG.

NB – if the SANG is also required to deliver an overall biodiversity net gain for the development then this condition may need to be adapted to reflect the additional objectives and monitoring requirements.

Date:	2 July 2025	Signed:	D. Fisher
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