

Wokingham Borough Council

# **Topic Paper: Suitable Alternative Natural Greenspace (SANG)**

Wokingham Borough Local Plan Update:  
Proposed Submission Plan (Regulation 19)

September 2024



**WOKINGHAM  
BOROUGH COUNCIL**

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# 1. Introduction and background

## Introduction

- 2.1 The purpose of this paper is to explain the strategy to avoid adverse impacts on the integrity of the Thames Basin Heaths Special Protection Area (SPA) from additional housing enabled by the Local Plan Update (LPU): Proposed Submission Plan.

## Background

- 2.2 The LPU sets out the strategy for managing development to 2040 and so provides an appropriate basis for housing, employment and infrastructure provision over that period.
- 2.3 Policy NE3: Thames Basin Heaths Special Protection Area sets out the council's approach to mitigating the impact of development on the Thames Basin Heaths SPA.
- 2.4 The Habitat Regulations Assessment (HRA) which accompanies the Proposed Submission Plan considers these matters in more detail, including the in combination impacts of plans and projects on important nature conservation sites.

## 2. Thames Basin Heaths Special Protection Area (TBHSPA)

- 2.1 The Thames Basin Heaths (SPA) is designated under European Directive 79/409/EEC because the heathland habitat supports the important species of ground nesting birds: Dartford warbler, nightjar and woodlark.
- 2.2 Classified in March 2005 it covers a total area of 8,274.72 hectares across a number of separate sites in counties of Surrey, Hampshire and Berkshire. Together with the nearby Wealden Heaths SPA and Thursley, Hankley and Frensham Commons SPA, the Thames Basin Heaths SPA form part of a complex of heathlands in southern England that support important breeding bird populations.
- 2.3 In 2009, a Thames Basin Heaths Special Protection Area Delivery Framework was prepared as a non-statutory document within the context of the South East Plan. It was endorsed by the Thames Basin Heaths Joint Strategic Partnership (JSP). The JSP was established by the local authorities that surround the Thames Basin Heaths SPA, along with the Regional Assembly (now disbanded) and other partners, to plan for its long-term protection in a consistent and co-ordinated way. The JSP Board (JSPB) is advised by a number of bodies including Natural England.
- 2.4 Natural England has advised that residential development around the SPA boundary is likely to have a significant effect (alone or in combination with other plans or projects) on the integrity of the Thames Basin Heaths SPA through associated recreation activity of the heaths and air pollution. Whilst none of the Thames Basin Heaths SPA is situated within Wokingham Borough, Natural England advise that all residential developments within 5km, and larger residential developments proposing 50 dwellings or more within 7km, may impact on its integrity. The zone of influence therefore extends into the southern half of Wokingham Borough.
- 2.5 Appendix A shows a map of the zones of influence in relation to Wokingham Borough.
- 2.6 The available evidence indicates that beyond the immediate area around the Thames Basin Heaths SPA, effective mitigation can be achieved by a combination of providing additional suitable areas for recreation (Suitable Alternative Natural Greenspace or SANG) together with access management of the heaths themselves through the Thames Basin Heaths SPA Access Management and Monitoring Project (Strategic Access Management and Monitoring or SAMM).

### Sustainable Alternative Natural Greenspace (SANG)

- 2.7 The Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy establishes the necessary proximity of SANG to a proposed development.
- 2.8 Development proposals for less than a net increase of 10 dwellings do not need to fall within a certain distance, provided that sufficient SANG is in place to mitigate the increase in resident population. Proposals involving a net increase of 10 or more dwellings will need to be located within the catchment of a specified SANG that has sufficient capacity.
- 2.9 Larger developments of 50 or more dwellings will normally be expected to provide their own SANG as part of the development proposal. Within Wokingham Borough all strategic scale allocations are required to provide SANG as a key aspect of their masterplan.
- 2.10 The SANG standards are set out in Policy NE3, but in summary require that within the 400-5km zone of influence a minimum of 8 hectares of SANG land to be provided per 1,000 new occupants. Development

proposals with a net increase of more than 50 dwellings within the 5-7km zone may be required to provide suitable mitigation measures, including SANG, but to a lower standard than within the 400m-5km zone.

## Rooks Nest Wood SANG

- 2.11 Rooks Nest Wood is located on Barkham Ride, Barkham. The site was provided by the council in 2011 and includes 3.2km of footpaths and a small car park. The SANG was delivered to help mitigate the impact of the new development proposed in the Core Strategy local plan (2010).
- 2.12 The Core Strategy local plan period looked towards 2026, and as a result of planned and anticipated development, the remaining capacity of the Rooks Nest Wood is decreasing. Monitoring data from September 2024 shows remaining capacity is about 4.6 hectares, which equates to around 239 dwelling capacity remaining.<sup>1</sup>
- 2.13 To ensure a continuing ability to mitigate the impact of new development, an extension to the existing Rooks Nest Wood has been agreed, to incorporate adjacent land owned by the council. This would increase the existing area by 33 hectares additional SANG capacity. The use of land was agreed by the council's Executive in September 2023, and with its delivery supported by the councils Medium Term Financial Plan (2024/25) which identifies the associated capital budget.<sup>2</sup>
- 2.14 A map of the proposed extension to Rooks Nest Wood is included in Appendix B.
- 2.15 The council will work with Natural England as plans for the delivery of the SANG develop, to ensure the extension meets all necessary requirements. The timing of the delivery of the extension will be reviewed to ensure sufficient ongoing SANG capacity.

## Other SANGs

- 2.16 The development strategy set out in the Core Strategy local plan included the delivery of 4 Strategic Development Locations (SDL). Each SDL provides its own on site bespoke SANG solution to mitigate impacts on the Thames Basin Heaths SPA.
- 2.17 Given the scale of the SDLs, and the quantum of both new development and SANG provision, there remains some surplus SANG capacity at the SDLs.
- 2.18 This was recently considered as part of the planning appeal for 81 new homes at Land west of Trowes Lane and north of Charlton Lane, Swallowfield. The appeal was allowed in July 2024, and the appellant agreed via Section 106 agreement that the impact on the Thames Basin Heaths SPA would be mitigated through SANG capacity available at the University of Reading's landholdings, around the South of the M4 SDL.
- 2.19 In addition, further privately delivered SANGs are anticipated to be delivered. For example, the delivery of 57 homes at Land at Stanbury House, Basingstoke Road, Spencers Wood, includes provision of an on site SANG and a small car park.

## Local Plan Update Spatial Strategy

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<sup>1</sup> This is based on the consumption within the 400m-5km zone.

<sup>2</sup> Council Executive decision (2023): Promotion of WBC Assets.pdf ([modern.gov.co.uk](https://modern.gov.co.uk)); Medium Term Financial Plan: <https://wokingham.moderngov.co.uk/documents/s71266/Medium%20Term%20Financial%20Plan%202024-2025.pdf>

2.20 The Proposed Submission Plan proposes a spatial strategy to meet identified future needs. This includes extensions to the Arborfield Green and South Wokingham SDLs, and the creation of a new settlement – the Loddon Valley Garden Village. These SDLs and the garden village will provide their own on site bespoke SANG solutions as part of their masterplanning and mitigation packages. Further details will be set out as the sites progress, but similar to the South of the M4 SDL, additional SANG capacity may be available to serve other future developments.

2.21 As part of preparing the Proposed Submission Plan, a HRA has been published. The objective of the HRA is to identify any aspects of the Proposed Submission Plan that may result in Likely Significant Effects (LSEs) on the designated features of a European protected site, including alone, and in combination with other plans and projects. This includes areas like the Thames Basin Heaths SPA.

2.22 The HRA therefore assesses the number and location of residential allocations in the Proposed Submission Plan, their distance to the Thames Basin Heaths SPA and the mitigation requirements, which is set out in Table 5.2 of the report. For example, the HRA recognises that larger proposed allocations, including the aforementioned SDLs and garden village, and sites adjacent to existing SDLs, will be capable of being mitigated without reliance on the Rooks Nest Wood. This is set out further in paragraph 6.15 of the HRA:

*‘WBC have committed to extend the 18.3ha site by 33ha of council-owned land, which will increase its overall area to 51.3ha. With the proposed extension in place, the catchment of Rooks Nest Wood SANG will increase from 4ha to 5ha. Considering this increase in catchment area, the identified residential sites were further assessed regarding their distance to the SANG (see Table 5-3). Most sites requiring strategic SANG mitigation lie within the 5km catchment of Rooks Nest Wood SANG. The only residential allocation that falls outside the SANG’s catchment is 5WK011 (Land south of London Road [Western Field]), for which alternative strategic SANG would need to be identified.’*

2.23 The site referred to as ‘Land south of London Road’ is proposed for allocation in Policy SS14 of the Proposed Submission Plan, reference SS14.27, for approximately 12 dwellings. Whilst outside the catchment area for the Rooks Nest, there are several SANGs in proximity, including those being delivered as part of the SDLs, and within Bracknell Forest Borough where surplus capacity is understood to be available.

2.24 The HRA then concludes in paragraph 6.17 that:

*‘Overall, given the available evidence base, it is considered that WBC have an adequate inventory of strategic SANG in place to mitigate the residential growth delivered by the WBLPU, potential windfall development, both in terms of residual capacity and geographic siting of the SANGs.’*

2.25 As a result the council is confident that sufficient SANG capacity will be made available at the appropriate time to provide mitigation for the planned and anticipated development being enabled by the Proposed Submission Plan.

### 3. Summary and Conclusions

- 3.1 This topic paper has set out the background to SANG in the context of Wokingham Borough. Data shows that the council is able to demonstrate that the impacts of both planned and anticipated development on the Thames Basin Heaths SPA can be mitigated through SANG provision, in combination with continuing support for SAMM. Sufficient SANG capacity is available, or will be made available at the appropriate time, over the plan period.

**Legend**

TBH SPA mitigation zones

- 400m Linear Mitigation Zone
- 5km Linear Mitigation Zone
- 7km Linear Mitigation Zone

0 1,000 2,000 3,000 Meters

Map showing the Thames Valley region, including towns like Reading, Henley-on-Thames, Wokingham, and Bracknell. The map displays the River Thames and surrounding areas, with mitigation zones for the Thames Basin Heaths (TBH) Special Protection Area (SPA) indicated by colored dashed lines. The 400m Linear Mitigation Zone is shown in green, the 5km Linear Mitigation Zone in purple, and the 7km Linear Mitigation Zone in blue. The map also includes a scale bar (0 to 3,000 meters) and a north arrow.

Appendix B: Rooks Nest SANG extension

