

Date: 28 January 2025
Application: 243114



**WOKINGHAM
BOROUGH COUNCIL**

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Scoping Response Letter

Application Number: 243114

Site Address: Barkham Square, Barkham Square, Arborfield, Wokingham,
RG41 4TJ

Expiry Date: 29 January 2025 (EoT agreed with applicant)

Proposal: Scoping Opinion application to determine the content of an Environmental Impact Assessment for Barkham Square.

Dear Sarah

I refer to your request for a scoping opinion, submitted under Regulation 15 of the EIA Regulations. This letter forms the Council's scoping opinion.

1. Site Description

The site comprises of 61.3ha of undeveloped agricultural land and is located adjacent to the northern boundary of Arborfield Green, south and east of Langley Common Road and west of Commonfield Lane and Barkham Street. Wokingham (town) (c.2km) and Barkham village (c.1 km) are located to the north west. The majority of the site lies within flood zone 1; a valley corridor bisecting the site and corresponding to the Barkham Brook falls within Zone 3. The site includes a range of mature trees including veteran trees, parcels of ancient woodland and native hedgerow.

2. Proposal Description

The scoping opinion request relates to a proposed development of up to 660 C3 residential dwellings, up to 50 elderley care dwellings (C2), public open space, green/blue infrastructure including new wetlands and SUDS, 18.63ha SANG with access from Langley Common Road (primary) and Commonfield Lane (allotments /

SANG car park only). The development would form an north-eastern urban extension to the Arborfield Green Strategic Development Location.

3. Screening Opinion

A Screening Opinion has not been requested. An applicant may decide that an Environmental Impact Assessment will be required and submit an Environmental Statement with an application without having obtained a screening opinion. If an applicant expressly states they are submitting a statement which they refer to as an Environmental Statement, then, for the purposes of the 2017 Regulations, the application is classified as an Environmental Impact Assessment application and must be treated as such by the local planning authority.

4. Scoping Opinion

The Council is required to provide a written opinion about the scope and content of an Environmental Statement to accompany a future planning application. Before adopting a scoping opinion, the local planning authority shall consider the specific characteristics of the development, of the type concerned and environmental features likely to be affected.

Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 outlines selection criteria for screening Schedule 2 development. These include the characteristics of the development (size, pollution and risks), environmental sensitivity (land uses, natural resources, absorption of the natural environment, natural features and landscapes) and the potential impact (magnitude and spatial extent, nature, intensity, probability, duration, frequency, permanence and mitigation).

Section 18(3) and Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 outlines what is required in the EIA. This includes but is not limited to:

- a) Description of the proposed development, including phases
- b) Description of the likely significant effects on the environment
- c) An estimate, by type and quantity, of expected residues and emissions
- d) Description of measures to avoid/reduce adverse effects on the environment
- e) Description of the reasonable alternatives studied and reasons for the option chosen
- f) Non-technical summary
- g) Reference list of sources
- h) Preparation by competent experts with details of their relevant qualifications

Case law and guidance has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission.

Each topic within the Environmental Statement should include an assessment of the baseline conditions, predicted direct and indirect impacts, mitigation measures (where

necessary), residual impacts and conclusions in accordance with Schedule 4 to the regulations referred to above and as explained in the NPPF.

This letter provides that scoping opinion based on the information provided in the report titled *Environmental Impact Assessment Scoping Opinion Report - Barkham Square, Arborfield Green, Wokingham (SRS/24-02200/EIASco, Rapleys, 06/12/2024)*. The Local Planning Authority has consulted on the Scoping Report and the responses received have been considered as part of this opinion.

4.1 Matters to be scoped out of an EIA

The submitted information to Support a Scoping Opinion Request report (submitted with the request) scopes out the following factors:

- Historic Environment (built heritage and archaeology)
- Noise
- Vibration
- Ground Conditions
- Climate Change (note: only those areas of potential effects the report identifies as “non-significant”)
- Society, Economy and Population
- Major accidents and natural disasters
- Human Health

The LPA agrees that the above factors can be scoped out. Notwithstanding the EIA process, additional consultee commentary has been provided to assist in the preparation of (non-ES) material that will be required to support a future planning application.

4.2 Additional observations on matters to be scoped out

Historic Environment – Built Heritage

With respect to the section headed ‘Historic Environment- Built Heritage and Archaeology’ (paragraphs 6.39 to 6.56), the assessment of the potential impact on designated heritage assets is considered to be a fair.

In terms of the proposal under paragraph 6.59 – 6.60 (that the built heritage be scoped out of the EIA) this is also considered reasonable.

However, it should be noted identification and assessment does not include non-designated heritage assessments directly adjacent to the site such as the former Langley Common Farmhouse and those ‘sick line buildings’ that had been part of the Army Remount service.

It should also be noted that the photograph labelled figure 45 on page 11 of the Historic Statement would appear not that of the listed Langley Pond Farmhouse.

Historic Environment – Archaeology

Berkshire Archaeology comment as follows:

We have reviewed the documents submitted with this application, including the EIA Scoping report, and welcome the statement (6.57-6.58) that an archaeological Desk-based Assessment (DBA) and geophysics have been completed on this site as an initial phase of investigation.

It is likely more than one phase of archaeological works will be required, which is also recognised in the EIA scoping report (6.58), and therefore we urge the applicant's archaeological consultant to contact us at an early stage to discuss our requirements. We also request that the DBA and geophysics reports be forwarded to us by the archaeological consultant as soon as possible.

We are happy to deal with the archaeology outside the EIA process, but this should be pre-determination so that the results of any investigations may be used to inform the development design.

Noise, Vibration and Ground Conditions

The WBC Environmental Health consultee comments as follows:

A good phase I site investigation has been presented, this recommends a phase 2 intrusive site investigation and soil testing as outlined below.

A Phase II ground investigation is recommended to determine more accurately the effect of the identified hazards on the development. Initially, this should include:

A ground investigation designed to BS10175:2011 and BS5930:2015 and comprising window sampling, trial pitting, and potentially deeper boreholes (such as cable percussive) will be required to confirm ground conditions and collect samples for analysis. Based on a site area of 58 Ha and an investigation on a 50m grid, 210No. exploratory holes are envisaged.

The LPA will need to review the phase 2 report and comment on that in due course.

The Scoping Opinion Report as presented does show a thorough consideration of the env impact of the proposal in my opinion. My view is that to achieve the proposed development some disturbance to wildlife and the ground is inevitable, having said that, the proposal does show adequate opportunity for recovery and a long term sustainable future, in particular with the development of a SANG. Our wider environment team are yet to comment. In my opinion from a public health perspective, I can see no objections at this stage in the proposal (subject to review of the Phase 2 site investigation report).

4.3 Matters to be scoped into an EIA

Transport

The Highways Development Control consultee comments as follows:

1. It is welcome that highways and transport assessment will be included in the EIA.
2. It is welcome that the assessment would be carried out under IEMA Guidelines.
3. It is also welcome that classified surveys will be undertaken in the vicinity of the site to collect baseline traffic information. Highways would need to see a scoping note on the data collected for approval.
4. It is proposed that these will be growth up using Temprow growth factors.
5. As this proposed development would need to be modelled through the updated Local Plan model which should be available in 2025, then the future year flows can be provided in suitable formats for this assessment. The modelling would also determine the study area to match with the distribution of the traffic. The study area would need to be agreed with WBC before the assessment can be undertaken.
6. It is welcome that severance has been included, and this would also need to include walking and cycling.
7. It is welcome that no specific areas of the standard TA have been scoped out.

Ecology

The LPA ecology consultee comments as follows:

Paragraphs 6.16 to 6.38 of the submitted Environmental Impact Assessment Scoping Opinion Report focus on ecological elements of the site and whether they are proposed to be covered within the EIA. Broadly, I agree with what has been scoped in at this stage. The survey evidence to demonstrate likely absence of species will need to be submitted in supporting documentation. A few specific comments:

Biodiversity Net Gain

The application will need to provide full baseline information for the entire red line area. The strategy by which the general biodiversity net gain condition will be satisfied should be covered within the submission as this will have relevance to understanding the need for conditions and obligations.

The biodiversity net gain baseline assessment will need to consider whether the watercourse on site is 'over-deep', according to the MoRPh survey method. This should be understood prior to fixing the surface water drainage strategy as remedial measures to achieve biodiversity net gain may be relevant to design.

Irreplaceable habitats will need to be identified in the biodiversity net gain baseline – although assessment of harm and the requirement and detail of mitigation and compensation strategies will need to be considered within the EIA. The 'supporting rare species' pathway to recognising a tree as veteran needs to be adequately investigated within chapter 8 (Ecology/Conservation). The need for a tree survey appears to have been missed but will need to be included (to support BNG baseline assessment and to consider irreplaceable habitat).

White-clawed Crayfish

The zone of influence of this development in relation to this species is likely to stretch well beyond the site boundary, especially when considering the risk of operational pollution of surface water. As the EIA needs to consider in-combination impacts, I am inclined to think that the whole of the Barkham Brook downstream is relevant, with Hall Farm SDL proposals and Thames Water sewage works modifications and capacity upgrades being relevant to consider in-combination.

Great Crested Newt

The option of the application being covered by district licensing is available. If this option is to be taken up and used within the EIA then the applicant needs to have the proposal assessed by NatureSpace Partnership prior to application.

It is worth noting that the site is entirely within a strategic opportunity area for Great Crested Newt pond creation. It would be appropriate for proposals to include new ponds that have viable connectivity and terrestrial supporting habitat for this species.

Thames Basin Heaths SPA

Strictly speaking the need for a Habitats Regulation Assessment (HRA) sits outside the remit of the EIA and shadow HRA information should be considered separately, although I have no objection to it being covered within the Environmental Assessment. There will be a degree of cross-reference to supporting documents for the EA anyway.

The HRA needs to consider the air pollution pathway as well as the recreational pathway to likely significant effects on the Thames Basin Heaths SPA. Reliance on the local plan update HRA on the air pollution pathway will not be possible if the net increase in dwellings proposed is greater than that proposed to be allocated (and therefore assessed) in the local plan update.

If the development is proposing to deliver a bespoke SANG solution then this will need to be reviewed by Natural England using their Discretionary Advice Service (DAS). The detail of the proposal (SANG design version, etc.) considered using the DAS should be provided alongside the DAS response in order to understand its relevance.

Landscape Scale Connectivity

The site is within a dark corridor that wraps around the north-east of Arborfield Garrison, providing connectivity between the Loddon valley and some of important sites on the higher ground of Finchampstead. Sensitive lighting strategies will be very important to design into the proposal and an overarching dark corridor strategy that can show how this connectivity is retained would be helpful.

Enhancements

The NPPF and the enhanced biodiversity duty on local authorities require the local planning authority to seek ecological enhancement through development. It is appropriate to consider what can be delivered complementary to the mandatory biodiversity net gain requirement. This could take the form of species enhancements, particularly where they are locally relevant to enhancing the conservation status of a protected species or species of principal importance.

Landscape & Visual

The Scoping Report outlines the various technical assessments that will be included in the EIA. This will include a chapter on Landscape and Visual (the details of which are outlined in the document) but further detailed in the attached Appendices 2, 3 & 4.

The Scoping Report indicates that this application is to agree the scope of the assessment for each technical report, however with regards the scope of the LVIA the following additional information is required:

- The LVIA Methodology refers to two ZTV's (Zone of Theoretical Visibility) which have been undertaken as part of the initial studies to identify the possible visibility of the proposed development from various locations. It is important we have sight of the ZTV modelling.
- The Data Sources indicated in paragraph A.4.4 will need to include reference to the Valued Landscape Assessment (by WBC (September 2024), as part of the site is included within Barkham and Bearwood Valued Landscape.
- The LVIA will also need to consider the impacts of the proposed development on the Valued Landscape and how these to be addressed and mitigated in the development proposals.
- Appendix 3 contains viewpoint photos however a plan showing viewpoint locations in relation to the ZTV is missing. Although I can work out where the majority of the viewpoints are taken from we will need a definitive location plan in order that we can assess if an alternative location may be more suitable.
- To understand the landscape resource in full, the LVIA will need to refer to an up-to-date tree survey and arboricultural impact assessment in accordance with BS 5837:2012 for trees within and adjacent to the site boundary.

Water, Drainage & Flood Risk

The Lead Local Flood Authority (LLFA) comments as follows:

Baseline Conditions

- **Hydrology and Hydrogeology:**

The EIA should thoroughly assess the site's hydrological and hydrogeological characteristics, including the catchment of Barkham Brook, its connectivity to the River Loddon, and existing ditches and ponds. A clear understanding of the water flow regime, seasonal variations, and any historical flooding events is crucial.

- **Flood Zones:**

Given that most of the site is in Flood Zone 1, but part lies in Flood Zone 3 (associated with Barkham Brook), the EIA should define these zones in detail and analyse potential impacts on both fluvial and pluvial flooding.

- **Groundwater Conditions:**

The site overlays impermeable London Clay with localized Bagshot Beds and a principal bedrock aquifer (Lower Greensand Group). Groundwater flooding risks should be quantified, especially considering potential disruptions from construction activities.

2. Potential Impacts

- **Construction Phase:**

- **Surface Water Pollution:** Risks of siltation, chemical spills, and debris entering watercourses during construction must be assessed.
- **Groundwater Contamination:** Evaluate how excavation and groundworks might affect the aquifer or groundwater flow.
- **Increased Runoff:** Temporary surfaces and compacted soils could alter runoff dynamics, increasing the risk of localized flooding.

- **Operational Phase:**

- **Drainage and Runoff:** Changes in impervious areas could significantly affect surface water runoff, requiring a robust drainage system to manage both quantity and quality.
- **Floodplain Impact:** Development in proximity to Flood Zone 3 must ensure that floodplain storage and flow paths are preserved.

3. Mitigation Measures

- **Drainage Strategy:**

- Design a comprehensive drainage system to manage 1:30-year and 1:100-year events, including a 40% allowance for climate change.
- Propose SuDS features such as attenuation basins, permeable paving, green roofs, and rainwater harvesting to minimize runoff and enhance water quality.
- Provide an outline plan for integrating drainage measures into the site masterplan to ensure no net increase in surface water runoff.
- **Flood Risk Mitigation:**
 - Position buildings and critical infrastructure outside of Flood Zone 3 areas, utilizing the masterplan's flexibility to mitigate flood risks.
 - Consider floodplain compensation for any unavoidable encroachments.
- **Construction Management:**
 - Implement a robust Construction Environmental Management Plan (CEMP) to control runoff and prevent pollution during construction.

4. Assessment Methodology

- **Flood Risk Assessment (FRA):**
The FRA must comply with the National Planning Policy Framework (NPPF) and include:
 - Review of flood maps and historical data, Site-specific hydrological modelling to predict flood extents and depths, Consideration of cumulative impacts from the development and surrounding areas.
- **Groundwater Risk Assessment:**
Analyse the likelihood of groundwater flooding and propose measures to mitigate any identified risks.
- **Runoff and Drainage Analysis:**
Provide pre- and post-development runoff calculations, demonstrating that greenfield runoff rates will be maintained.
- **Climate Change Impacts:**
Address future risks by incorporating climate change allowances into all hydrological and hydraulic assessments.

5. Engagement

- Environment Agency (EA) / Thames Water
Consult the EA for guidance on flood risk mitigation and environmental protections for Barkham Brook and the River Loddon.

- Coordinate with Thames Water regarding sewer capacity and potential infrastructure upgrades for foul water management.

Conclusion

The EIA must thoroughly address the complex hydrological, drainage, and flood risk challenges at Barkham Square. By integrating a robust FRA, innovative drainage strategies, and effective mitigation measures, the development can be made resilient to both current and future water-related risks while complying with relevant planning policies and guidance.

Climate Change (*greenhouse gas emissions, risk of summer overheating*)

The WBC Sustainability officer comments as follows:

1. General comments.

1.1. Since Scoping Opinion application 243114 relates to major development as defined by the NPPF, a detailed Sustainability Statement and Energy Statement are therefore required at planning application stage per the Wokingham Borough Council Sustainable Design and Construction Supplementary pre-application 243040 Planning Document 2010.

1.2. These supporting documents must demonstrate how the following sustainability planning policies will be complied with: Policy CP1 of the Core Strategy 2010 and in particular Part 12 of this policy; Policy CC04 of the MDD Local Plan 2014 as clarified by the Climate Change Interim Policy Position Statement 2022 and Policy CC05 of the MDD Local Plan 2014 as clarified by the Climate Change Interim Policy Position Statement 2022.

1.3. To comply with Policy CP1 of the Core Strategy, proposals must demonstrate that durable and adaptable homes are to be delivered, with appropriate on-site renewables and a design-led approach to reducing whole-life carbon emissions through high standards of fabric performance and consideration of construction materials and methods. Evidence of how the energy hierarchy has been followed should be provided, along with details of emissions reductions and other benefits achieved at each stage (Be Lean, Be Clean, Be Green, Be Seen).

1.4. To comply with Policy CC04 of the MDD Local Plan, proposals must demonstrate that no more than 110L per person per day (including 5L allowance for external use) of water will be used by the development as modelled. Specifications for fixtures with flow rates and water efficiency calculations should be submitted. For further details please refer to the Climate Change Interim Policy Position Statement.

1.5. To comply with Policy CC05 of the MDD Local Plan, proposals must demonstrate that they deliver at least a 10% reduction in carbon emissions over the minimum standard set by the version of Part L of the Building Regulations extant at the time of either submission of the full planning application or, if an outline

application is intended, the time of the submission of each of the reserved matters applications for respective parcels. This reduction should be delivered through the use of on-site renewable energy generation. For further details please refer to the Climate Change Interim Policy Position Statement.

2. Comments on Climate Change issues in respect of EIA Scoping Opinion Report authored by Rapleys on behalf of Crest, December 2024.

2.1. The use of RCP 8.5 for assessment of impact significance is supported.

2.2. In respect of Table 6.2 local projections (rather than UK averages) should be used wherever possible. Wokingham is in an area where increasing summer temperatures present a more acute climate hazard than the UK average, with the Borough expected to see maximum summer temperatures around 3 degrees higher than the UK average as the projection pathway progresses.

2.3. Recommended sources for local climate projections include the Local Climate Adaptation Tool published by the University of Exeter with the European Centre for Human Health, and the Met Office's Local Climate Adaptation Tool. Both of these are available online and are free to use.

2.4. Applicants are also welcome to refer to local climate information available in the evidence base for the emerging WBC Local Plan Update, available on the WBC website.

2.5. It may be necessary to reassess the significance of some impacts with reference to local climate hazards and projections.

2.6. The assessment of summer overheating on vulnerable residents as potentially significant is appropriate and supported.

2.7. The use of TM59 methodology for homes is strongly supported. Please clarify whether TM52 will also be used on other buildings.

2.8. Wording around use of the cooling hierarchy is noted. It is important that this and other passive design measures are embedded from the earliest design stages, including masterplanning, to ensure the most effective outcome. Iterations of design revisions would be most welcome, to illustrate how passive design methodologies have influenced the decision-making process.

2.9. Paragraph 6.170 mentions the potential for reduced demand for heating in winter due to changing climate, in the same point as increased need for cooling in summer. These issues should be mentioned separately reduced demand for heating does not mitigate increased risk of overheating in summer.

2.10. A non-significant impact is identified in relation to increased winter rainfall, we know that Wokingham is in an area of significant water stress so reduced rainfall in Summer should also be covered separately – as an impact on supply, with reference to local data and projections wherever possible.

2.11. The use of Whole Life Carbon Assessment is strongly supported.

2.12. Please clarify: 1. The scope to be used (which modules); 2. Benchmarks set; 3. Targets set, either for whole life or upfront embodied carbon, and how they relate to industry standards such as the LETI target alignment bands; 4. Monitoring framework to be used – where are the key output points and how will progress towards targets be measured? Where does responsibility sit for compliance? 5. Most importantly – how have WLCA outputs influenced design decision making, again this can be illustrated by illustrative snapshots of design revisions.

2.13. Any future planning applications must address both mitigation and adaptation to climate change adequately, proposals will be assessed with a local viewpoint and in respect of local climate hazards and vulnerabilities as well as site specific opportunities for mitigation and adaptation.

2.14. It should be noted that WBC's policy requirement for 10% reduction in emissions relative to Building Regulations, requirements relate to whichever version of Part L is extant at the time of receipt of reserved matters applications, as this ensures that it is measured against the same version of Part L which is used for the building control process on each parcel.

2.15. Please refer to the WBC Climate Change Interim Policy Position Statement for more details on how current policies should be addressed.

5. Cumulative Effects of Development

The Environmental Statement should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a) Existing completed projects
- b) Approved but uncompleted projects
- c) Ongoing activities
- d) Plans or projects for which an application has been made and which are under consideration by the consenting authorities
- e) Plans and projects which are reasonably foreseeable i.e. projects for which an application has not yet been submitted and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

The Scoping Opinion report seeks to establish a zone of influence incorporating south of the M4 SDL and a 4KM radius of the site. Paragraph 6.199 identifies that it will be necessary to undertake a desk study of planning applications, as well as existing and proposed Local Plan allocations.

4km is considered to be a reasonable starting point for the ES. In terms of the transport chapter, this distance may extend further depending on the distribution of traffic and sensitive receptors (in relation to noise/ air quality & habitats). It is expected

that transport scoping would follow IEMA Guidelines. Under rules 1 / 2 a larger radius (or specific area) may subsequently be incorporated within the analysis, pending the outcome of detailed assessment (i.e. traffic modelling).

The LPA agrees that it will be necessary for the applicant to undertake a desk study to identify all relevant development (both consented and foreseeable), as set out in bullet points a) – e) above. The two sites identified in paragraph 6.200 are not comprehensive in this regard. Particular attention is drawn to the need to consider foreseeable development such as that proposed at Hall Farm / Loddon Garden Village (LGV) site and South Wokingham SDL (including South Wokingham extension). A detailed description of the proposed LGV development is set out in chapter 3 of an EIA Scoping Report recently submitted by the applicant [ref: 243188 – [see link](#); LPA response pending].

Further information is set out in the WBC Local Plan Update Regulation 19 proposed submission plan [[see link](#)]. The applicant is advised that the Council is likely to submit the Local Plan Update for examination in February 2025.

6. External consultees

Natural England –see appended letter dated 07.01.2025).

Thames Water Utilities - comment as follows:

Thames Water are the statutory water and sewerage undertaker for the area and would like to make the following comments:

The EIA Regulations 2017 set out in Schedule 4 that water and wastewater issues may need to be covered in an EIA. Thames Water considers the following issues should be considered and covered in either the EIA or planning application submission:

1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met.
2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met.
3. The developments demand for water supply and network infrastructure both on and off site and can it be met.
4. Build – out/ phasing details to ensure infrastructure can be delivered ahead of occupation.
5. Any piling methodology and will it adversely affect neighbouring utility services. The developer can obtain information to support the EIA by visiting the Thames Water website [[see link](#)]

Environment Agency - were consulted on this application but have not yet provided a substantive response. The LPA has been advised to expect EA comments within 8-10 weeks – these will forward to the applicant upon receipt.

Sport England – the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently, do not wish to comment on the Screening or Scoping Opinion consultation.

However, any subsequent planning application should consider the implications for sport in the context of NPPF Paragraph 104, local plan policy, and any strategic evidence set out in local playing pitch and/or built facilities strategies.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003, Reference ID: 37-003-20140306).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Royal Berkshire Fire & Rescue –see appended letter dated 09.01.2025).

Active Travel England - does not currently provide detailed advice at pre-application stage. However, see standing advice note that summaries some of the key active travel criteria that ATE will assess when consulted on a formal application:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Loddon Valley Ramblers - pleased to see the references in paragraph 6.87 to mitigation measures to protect the visual amenity from the surrounding rights of way. However, consider that the scope of the Environmental Impact Assessment should be widened to cover greater mitigation measures, through the provision of additional walking routes and open access areas within any development. In particular, new route(s) from Barkham Footpath 7 to Princess Marina Drive and the footpath and cycle network off Biggs Lane would be very valuable for walkers, with a potential route to Bohunt School, the Sainsbury supermarket etc via Hazebrouck Meadow SANG.

The following statutory authorities, bodies or groups were consulted but did not provide a response:

- Open Spaces Society
- SSE Power Distribution
- Southern Gas Networks
- Woodland Trust

- National Grid
- Historic England

7. Parish Council

Barkham Parish Council comment as follows:

Barkham Parish Council (BPC) understands from Section 1.8 of this EIA Scoping Opinion Report that Crest Nicholson (CN) are seeking to influence Wokingham Borough Council (WBC) as to the scope of Environmental Impact Assessment (EIA) in advance of any such plan being required.

BPC has many concerns about the development of Barkham Square and has already voiced these in its response to the Local Plan Update (LPU) consultations submitted on Tue 12 Nov 2024. These will be expanded upon in response to any formal planning application that may follow for the development of this location. BPC would highlight – but not exclusively:

1) There is variance in the number of dwellings proposed in the scoping document submitted (660) vs that included in the LPU (600). It is also not clear whether the 50 Elderly Care Class C2 dwellings are included or are additional to these numbers.

2) The LPU does not confirm the sustainability of the proposed development at Barkham Square with particular emphasis on public transport, medical facilities and proximity to other population centres where crucial services may be available. This suggests a high use of private cars will be required that would be detrimental to the overall environment. This draft scoping exercise does not give confidence that these will be fully addressed.

3) CN have a poor record of delivering social infrastructure across the Arborfield Green Development, most of which lies within the parish of Barkham. This exacerbates the points made under section 2) above and will undermine any good intentions to mitigate the negative impact on the environment.

4) The performance of the Arborfield Sewerage Treatment plant has deteriorated over many years with respect to pollution and that is before many planned residential and commercial developments have been completed or even approved. There needs to be a clear and enforceable plan to correct this before commencing the development of Barkham Square.

5) A third-party assessment of the impact of additional traffic from any future development of Barkham Square and, indeed, other developments in the immediate area highlighted the woeful lack of specific traffic assessments using relevant data relating to Barkham's recently updated road layout and junctions. This does not only raise the question of congestion but also the associated noise, pollution and stress of travelling through the parish.

6) The Landscape and Visual Impact Assessment is not complete. For example, the viewpoint from the elevated section of the B3349 from 'Greenacres' to Barkham Bridge has not been discussed. It should also be noted that the screening from BA7

(PROW from Barkham Street to junction of Barkham Road/School Road/Langley Common Road) comprises an artificial frieze attached to an existing fence which is not attractive nor a viable long-term solution. Any other omissions should be identified by reference to the Joint Arborfield and Barkham Neighbourhood Plan.

7) The EIA asserts that the majority of the Barkham Square site is not agricultural land of productive value although the source of this finding is not apparent. This statement does not reflect the reported historical use of the land - the Local Planning Authority should require CN to substantiate commission a third party report to support this statement.

Hopefully any future revision of the EIA scope will seek to address these concerns.

8. Summary of third-party comments (local residents)

Objections were raised based on the following matters:

- Need to consider Barkham Brook / priority habitat as a receptor for site-derived contamination and siltation
- Flood Risk Assessment required
- Questions agricultural land classification - the definitive MAGIC Map published by DEFRA does not show the site or adjacent areas to have been surveyed for ALC and the alternative official source of ALC mapping (Natural England) provides the caveat that those it publishes are intended for strategic planning purposes only and are not suitable for use below scale 1:250K or for the definitive classification of any local area or site. Description of the site as being of poor agricultural value does not correlate with observed experience of it supporting the cultivation of a wide variety of crops.
- Disagree with LVIA – selection of viewpoints is contentious, different locations would have been more appropriate in some instances.
- Disagree that heritage and archaeology should be scoped out – impact of development goes beyond inter-visibility.
- Some of the proposed landscaping will not mature until 2050, local character eroded in the intervening period
- “Human Health”, “Society, Economic and Population” should not be scoped out
- Vibration during operational phases should be considered
- Range of services in Barkham Village is inaccurate.
- “Hedging” line not consistent along boundary with Langley Common Road properties – some have open fencing.
- Consultation feedback not included from local residents
- Recommend using existing farm access off Commonfield Lane
- Allotments and SANG car park are inappropriately located
- 18.63ha SANG insufficient
- Adjacent Solar Farm should be included in Cumulative Effects
- Alternative locations for access, allotments and parking not considered.
- Land east of Barkham Brook excluded from application site boundary
- New access not appropriate along Commonfield Lane.
- Consider impact on wildlife

Yours sincerely



Connor Corrigan
Head of Strategic Development
Planning & Delivery

Enc:

- WBC Climate Change Interim Policy Position Statement
- Natural England comments
- Royal Berkshire Fire & Rescue comments

**Climate Change Interim Policy Position
Statement
Wokingham Borough Council**

December 2022



**WOKINGHAM
BOROUGH COUNCIL**

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1. Introduction

- 1.1 This Interim Planning Policy Position Statement sets out the position of Wokingham Borough Council (WBC) on the issue of climate change when assessing planning applications. The Statement is not in itself planning policy and is not part of the statutory Development Plan. It is an explanatory document, emphasising that the Climate Emergency is a key material consideration when assessing planning applications.
- 1.2 The adopted local plans – namely the Core Strategy (2010) and Managing Development Delivery Local Plan (MDD) (2014) – were prepared with the intention of promoting the sustainable use, conservation and disposal of resources while mitigating and adapting to climate change. At this time there was a national expectation that all new homes built after 2016 and new non-domestic buildings built after 2019 would be zero carbon. The Government subsequently decided to abandon these plans.
- 1.3 WBC is in the process of producing a new local plan, known as the Local Plan Update (LPU). The LPU is still in a consultative stage of preparation and adoption is not expected before 2024. It will, therefore, be some time before the emerging LPU carries significant weight when assessing planning applications.
- 1.4 Notwithstanding, WBC is aware that the decisions made now will have long term consequences for our communities and the environment. The Climate Crisis is undoubtedly one of the biggest challenges that humanity has ever faced and the planning process is an important mechanism to help deal with the causes and impacts of climate change.
- 1.5 The aim of this Statement is to confirm that the Climate Emergency will be material when assessing planning applications. This statement makes clear that WBC will expect, as a minimum, that development proposals contribute to climate change mitigation and adaptation by applying adopted policies to their best effect. It is also an expectation that development proposals play their part and go beyond current requirements to be more aligned with emerging local and national policy. Where development proposals demonstrably go above and beyond adopted policy requirements, this will be weighed positively in the balance when assessing a development proposal. Applicants will be expected to demonstrate compliance with these aims through their Sustainability Assessment (or Energy Statement) as required by our [Local List](#).
- 1.6 This Statement will apply until the LPU is adopted. The contents will be kept under review and amendments and clarifications made if necessary.

- 1.7 The following sections summarise the Climate Emergency position within Wokingham Borough; introduce the national legislation and policy context; outline the policy position in the existing development plan; consider the emerging local planning policy position; before concluding on what is expected of development proposals.

2. Climate Emergency

- 2.1 WBC declared a Climate Emergency on 18th July 2019. The declaration set out the commitment to play as full a role as possible, leading by example as well as by exhortation, in achieving a carbon neutral Wokingham Borough by 2030. Amongst other things, the motion committed the council to produce a Climate Emergency Action Plan.
- 2.2 The [Climate Emergency Action Plan](#) (CEAP) sets out baseline emissions data for the borough and lays out activities that WBC intend to take towards the aim of net zero carbon by 2030. Since the initial CEAP was published, three Climate Emergency Action Plan Progress Reports have been produced, detailing updates on each action and refining the specific targets. The CEAP has evolved, and will continue to, as work progresses.
- 2.3 The CEAP identifies the roles that the planning system can play in responding to the climate emergency in relation to both mitigation of, and adaptation to, ongoing and future climate change.
- 2.4 WBC's declaration of a Climate Emergency has led to an increased appreciation of the importance of prioritising the sustainability of development. It is recognised that 2030 is fast approaching, and therefore action must be taken in the short term.
- 2.5 The CEAP sets out the following eight key priorities:
 - Reduce carbon dioxide emissions from transport
 - Reduce carbon dioxide emissions from domestic and business property
 - Generate more renewable energy in the borough
 - Create a local plan that specifies net zero construction and infrastructure
 - Increase the levels of carbon sequestration in the borough through greening the environment
 - Engage with young people and support sustainable schools
 - Reduce waste sent to landfill
 - Encouraging behaviour change
- 2.6 Planning decisions have a role to play in addressing all of these priorities, to varying degrees. For example, a contribution to sequestration through greening the environment will be made through the approval of appropriate landscaping schemes associated with planning applications, including the retention of existing mature trees which sequester a much higher amount of carbon than young trees.
- 2.7 The declaration of a Climate Emergency and the CEAP (and supporting documents) are both material considerations for planning purposes. They should be recognised

as such by both applicants / developers and decision makers through the planning application process.

3. National legislative and policy context

- 3.1 National legislation and policy set out how plan-making and decision-taking in the planning system should contribute to mitigation of, and adaptation to climate change. Key legislation and policy is summarised below, but this should not be considered exhaustive.

Planning and Compulsory Purchase Act 2004

- 3.2 Planning and Compulsory Purchase Act (2004)¹ sets out duties for plan-making in England. Section 19(1A) of the act (as amended by Section 182 of the Planning Act 2008) states:

“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”

- 3.3 This duty clearly demonstrates the priority that local planning authorities must give to climate change in plan-making.

Climate Change Act (2008)

- 3.4 The Climate Change Act (2008)² introduced a statutory target for the UK to reduce greenhouse gas emissions by 80% by 2050. This was updated in June 2019 under the Climate Change Act 2008 (2050 Target Amendment) Order³ to a 100% reduction (or net zero) by 2050.

- 3.5 In order to reach emissions targets, the Climate Change Act established carbon budgets within the UK. Carbon budgets are a cap on the amount of carbon the country can produce, set in 5-year periods. This is a stepped target where the budget gets progressively tighter. The UK has successfully met the first two budgets and is on track to meet the third budget set for 2018 – 2022 (a 37% reduction). In April 2021, the UK Government announced it will set in law the world’s most ambitious climate change target for its sixth carbon budget (2033 to 2037), cutting emissions by 78% by 2035 compared to 1990 levels. However, the Climate Change Committee advises that the UK is not on track to achieve this, and neither is it on track to meet the fourth budget set for 2023 – 2027 (51% reduction) nor fifth budget 2028 – 2032 (57% reduction). This reiterates the importance of ambitious actions being taken at all levels.

¹ UK Government (2004) Planning and Compulsory Purchase Act, <https://www.legislation.gov.uk/ukpga/2004/5/contents>

² UK Government (2008) The Climate Act, <https://www.legislation.gov.uk/ukpga/2008/27/contents>

³ UK Government (2019) The Climate Change Act 2008 (2050 Target Amendment) Order 2019, <https://www.legislation.gov.uk/ukpga/2008/27/contents>

Planning and Energy Act (2008)

- 3.6 The Planning and Energy Act (2008)⁴ sets out powers for local authorities to have development plan policies which impose reasonable requirements for a proportion of energy used by developments in their area to be energy from renewable sources and/or to be low carbon energy from sources in the locality of the development. As such, this allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the Part L Building Regulations.
- 3.7 Section 43 of the Deregulation Act 2015 would have withdrawn this power to set energy efficiency standards from local authorities, however this has not yet been enacted and government has since said that it does not intend to enact it. It was anticipated that Section 43 would be enacted at the same time that government introduced higher energy performance requirements nationally in 2016, through Building Regulations, which according to the Plan Making Written Ministerial Statement March 2015⁵ were to be “set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4” for residential buildings. However, after the General Election in 2015, government scrapped its plans for zero carbon homes and the planned Building Regulations uplift. The amendments to the 2008 Act, to date, have not been enacted.

Neighbourhood Planning Act 2017

- 3.8 This act predominantly relates to neighbourhood plans. However, it introduces a new legal duty on local planning authorities to set out their strategic priorities. The government has indicated that these priorities should be expressed in a strategic plan. This plan is focused on high level strategic issues set out in the National Planning Policy Framework, and these issues include action on climate change.
- 3.9 The emerging LPU contains climate change as a strategic priority as recognised through its policies (see section 5) and Vision and Objectives.

National Planning Policy Framework (NPPF)

- 3.10 The National Planning Policy Framework (NPPF) sets out the government’s planning priorities for England and how these relate to plan making and decision taking. The NPPF is a key material consideration in the development of policy, with local plans tested to ensure the consistency with national policy, and in the determination of applications.

⁴ UK Government (2008) Planning and Energy Act, <http://www.legislation.gov.uk/ukpga/2008/21/section/1>

⁵ UK Government (2015) Planning Update: written statement, <https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488>, accessed 26/04/21

- 3.11 Climate change is referenced throughout the NPPF, with numerous sections / paragraphs relevant to climate change and sustainability issues. This includes an acknowledgment from the outset that climate change adaptation and mitigation is one of the key pillars of sustainable development (Paragraph 8). Some key paragraphs are summarised below.
- 3.12 Paragraphs 104 supports the early consideration of transport issues to, among other things, recognise opportunities to promote walking, cycling and public transport. Paragraph 105 supports growth of places which are or can be made sustainable by limiting the need to travel and offering real choice of sustainable transport modes. Paragraph 106 sets out various matters that planning policies should consider, including providing multiple uses alongside one another (to effectively create walkable neighbourhoods), providing appropriate transport infrastructure, and delivering attractive, high quality walking and cycle networks.
- 3.13 Section 14 of the NPPF concerns 'Meeting the challenge of climate change, flooding and coastal change'. In this section, paragraph 152 emphasises the role of the planning system in supporting a shift to a low carbon future and contributing to 'radical' reductions in greenhouse gas emissions.
- 3.14 Paragraph 153 requires local plans to *"take a proactive approach to mitigating and adapting to climate change..."* which footnote 53 makes clear should be in line with the Climate Change Act 2008. In effect, this means the objective of a 100% reduction in carbon dioxide emissions by 2050 is a clear obligation for plan making, given compliance with national law and policy is fundamental to a plan being found 'sound' through Examination.
- 3.15 Paragraph 154 states that new development should be planned for in ways which avoid increased vulnerability to the impacts of climate change and reduce greenhouse gas emissions.
- 3.16 Paragraphs 155 – 156 require local planning authorities to maximise renewable and low carbon energy and heat through policies in local plans and neighbourhood plans.
- 3.17 Paragraphs 157 – 158 deal with individual development and emphasise the importance of energy efficient, low-carbon development.

Planning Practice Guidance

- 3.18 The Planning Practice Guidance (PPG) is a national online resource where the government provides additional detailed guidance to supplement the NPPF. It is a live resource that is updated periodically for reasons that include reflecting new legislation, interpreting Ministerial Statements relevant to planning, and incorporating emerging best practice.

3.19 Given its length, the key aspects of the PPG aren't summarised or replicated here, but key sections are as follows:

- [Climate change](#)
- [Renewable and low carbon energy](#)
- [Flood risk and coastal change](#)

LTN 1/20 Cycle infrastructure design

3.20 LTN 1/20 is national cycling design guidance introduced in July 2020 (superseding all previous LTNs on the subject) which sets out minimum requirements for cycle infrastructure, including but not limited to, cycle lanes and tracks, junctions and crossings, construction and maintenance, and cycle parking. The design options detailed in the LTN 1/20 include segregation from traffic, measures for cycling at junctions and roundabouts, and updated guidance on crossings, signal design and the associated traffic signs and road markings.

3.21 The design principle of LTN 1/20 represent best practice as regards cycling and walking provision and serve to encourage people out of their cars into active modes of travel. Compliance with LTN 1/20 is also a key requirement in securing funding for cycling schemes.

Future Homes Standard

3.22 In 2020, the government consulted on proposed updates to the Building Regulations and the introduction of the Future Homes Standard⁶. The intention was to make new homes more energy efficient and to future-proof them in readiness for low carbon heating systems. The consultation proposed amendments to uplift standards of Part L Building Regulations, in conjunction with more stringent transitional arrangements for these standards to encourage quicker implementation. It also sought to clarify the role of planning authorities in setting energy efficiency standards.

3.23 In January 2021, government published the outcome of the Future Homes consultation⁷, outlining what changes will be made and at what pace. The new Standard will ensure that all new homes built from 2025 will produce 75-80% less carbon dioxide emissions than homes delivered to current Building Regulations

⁶ UKGBC (2019) The Policy Handbook, <https://www.ukgbc.org/wp-content/uploads/2020/03/The-Policy-Playbook-v.1.5-March-2020.pdf>, accessed 27/04/21

⁷ Ministry of Housing, Communities and Local Government (2021) The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956094/Government_response_to_Future_Homes_Standard_consultation.pdf, accessed 28/04/21 (p.10)

standards, with low carbon heating and high fabric standards. From 2025, all new homes will be 'zero-carbon ready', requiring no further energy efficiency retrofit work to enable the homes to become zero-carbon as the electricity grid decarbonises. There is expected to be a full technical consultation on what this means starting in 2023. Notwithstanding, the National Grid is currently decarbonising rapidly, and the Government has committed to a fully decarbonised power system by 2035. In order to bridge the gap to net zero in the interim, improved building efficiency and onsite renewables and low / zero carbon heat and power generation will likely be required locally.

- 3.24 For the interim period to 2025, updated Building Regulations – Part L (conservation of fuel and power) – introduced on 15 June 2022, ensure new homes built from that date⁸ produce 31% less carbon emissions compared to current standards.
- 3.25 The standard is a “floor” standard (rather than the ceiling) of what the government is seeking to achieve in a very near future. The national imposition of the interim standards demonstrates how crucial it is for the developments to start working towards achieving the 2025 standards now. Whilst there is currently no formal policy requirement to achieve the full Standard, WBC expects the requirements to already influence development proposals being devised and considered now.
- 3.26 In practical terms, to pass the new Part L Target Emission Rate, most new homes will need either heat pumps or gas boilers paired with onsite renewable energy generation such as solar panels. To pass the new Part L Target Fabric Energy Efficiency rate, new homes will need to have more insulation in their walls. These requirements will therefore have implications for planning applications e.g. thicker walls for additional insulation may influence building design and size, with implications for the number, size or type of homes that might be achieved across a site.

Future Buildings Standard

- 3.27 In January 2021, the government consulted on proposals for a Future Buildings Standard. This built on the Future Homes Standard, but focussed on non-residential buildings such as offices and shops. The consultation proposed changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations.
- 3.28 The outcome to this consultation was published by the government in December 2021. This proposed an interim uplift in energy efficiency, which entered into effect on 15 June 2022. For the interim period to 2025, updated Building Regulations – Part L (conservation of fuel and power) and Part F (ventilation) – ensure new non-residential buildings from that date (subject to transitional arrangements) produce

⁸ Subject to transitional arrangements as set out here:

<https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>

27% less operational carbon emissions compared to current standards through increased efficiency and fabric improvements.

- 3.29 From 2025, new non-residential buildings will need to be “zero-carbon ready”. A full technical consultation on what this means is expected to take place in 2023.

Summary

- 3.30 Overall, there exists a very strong legislative and policy basis for planning decisions to be taken with Climate Emergency considerations at their heart. WBC expects the above – and any other relevant legislation, policy and best practice not covered – to be appropriately considered and reflected in development proposals.
- 3.31 In particular, the Future Building and Future Homes Standards to be introduced in 2025 provide targets for development proposals to aim towards now. Where development proposals demonstrably go above and beyond the minimum mandatory requirements of the interim standard, this will be weighed positively in the balance.

4. Existing development plan

- 4.1 The principal policies within the Core Strategy (2010) (CS) and MDD (2014) local plans relating to climate change and sustainability are summarised in Table 1 below. This is provided as an aid and is not a substitute to reading the policies in full. A status column has been added against each policy, setting out whether or not further policy clarifications are required to take into account any material considerations which have arisen since the policy was originally adopted. In the majority of cases clarifications are not required. Where clarifications are indicated as being required in the status column, details of those changes or revisions are provided in Table 2.

Table 1 – Existing Local Plan climate change related policies		
Local Plan Adopted Policy	Summary	Status / notes
CS Policy CP1 – Sustainable development	All development proposals must conserve and enhance the natural environment.	Policy to be applied as written until superseded by the LPU
CS Policy CP2 – Inclusive communities	New developments should contribute to the provision of services and facilities to create a more sustainable and inclusive environment.	Policy to be applied as written until superseded by the LPU
CS Policy CP3 – General Principles for development	Proposals should seek to ensure improvements to a range of economic, social, and environmental conditions in the area.	Policy to be applied as written until superseded by the LPU
CS Policy CP4 – Infrastructure	New development should be supported by appropriate infrastructure, services, and facilities	Policy to be applied as written until superseded by the LPU
CS Policy CP6 – Managing Travel Demand	Development should be located where there are, or will be, available modal choices to minimise the distance people need to travel.	Policy to be applied as written until superseded by the LPU and supplemented by adopted Highways Design Guide to ensure the user hierarchy is followed in the design of new developments
CS Policy CP7 – Biodiversity	Seeks to protect sites of importance for ecology, geology and biodiversity.	Policy to be applied as written until superseded by the LPU
MDD Policy CC03 – Green Infrastructure, Trees and Landscaping	Seeks to protect and enhance existing landscaping, trees and hedgerows.	Policy to be applied as written until superseded by the LPU – consistent with the new support in the NPPF for new streets to be

		tree-lined. The CEAP's support for retaining existing trees, reflecting the fact that mature trees sequester a much higher amount of carbon than young trees which can take years to reach the same level of maturity, is also material to the application of CC03.
MDD Policy CC04 – Sustainable Design and Construction	New development should be built to the highest possible sustainable design and construction standards	Clarifications proposed – see Table 2 below
MDD Policy CC05 -	Renewable energy and decentralised energy networks	Clarifications proposed – see Table 2 below
MDD Policy CC09 – Development And Flood Risk (from all sources)	Planning applications must take into account all sources of flood risk and development guided to areas of lowest flood risk	Policy to be applied as written until superseded by the LPU
MDD Policy CC10 – Sustainable Drainage	All developments must ensure surface water is managed in a sustainable manner	Policy to be applied as written until superseded by the LPU – including reference to WBC's SuDs Strategy and Technical Guide (2017)
MDD Policy TB21 – Landscape Character	Seeks to conserve and enhance existing landscape character	Policy to be applied as written until superseded by the LPU
MDD Policy TB22 – Sites of Urban Landscape Value	Seeks to conserve and enhance existing landscape character and recreational value in urban areas	Policy to be applied as written until superseded by the LPU
MDD Policy TB23 – Biodiversity and Development	Seeks to build on policy CP7 and encourage developments to be designed to provide opportunities for new or enhanced biodiversity, protect existing assets, and increase ecological permeability	Clarifications proposed – see Table 2 below

4.2 Given the urgent need to ensure the introduction of measures to meet both government and local Climate Change commitments, the WBC considers it prudent and necessary through this position statement to clarify how WBC will interpret its existing development plan policies in the context of updated material considerations and circumstances until the new LPU is progressed to a stage where it can be afforded significant weight, and subsequently adopted.

- 4.3 As set out above, where clarifications are required in relation to policies set out in Table 1, these have been re-provided in Table 2 below. Column 1 sets out the relevant policy wording. Where elements of a particular policy require no clarification, this is not replicated below and should continue to be applied as adopted. The second column provides the clarification or interpretation required in light of the climate emergency and other material considerations in this statement that have arisen since adoption of the relevant policy. The final column provides the justification for the proposed clarification.
- 4.4 WBC is of the view that the original aim or intent of the adopted policies remains as is, even where clarifications are recommended. These policy clarifications provide a focus on those matters which will have the most impact in responding to the nature of the climate emergency since the current planning policy was adopted.
- 4.5 Some of the policy clarifications in Table 2 below are already requirements – for example compliance with national policy or existing Building Regulations, while others are targets which WBC will encourage developers to meet to accord with its wider climate change objectives. While the following clarifications are not adopted local plan policy, applicants are encouraged to strive for and work towards achieving the outcomes of these policy clarifications – and where possible exceed them given the nature of the climate emergency and its re-emphasis in both national and local priorities.

Table 2 – Proposed Clarifications to existing Local Plan climate change related policies

Existing Local Plan Policy	Policy Application	Justification
<p><i>CC04: Sustainable Design and Construction</i></p> <p><i>Planning permission will only be granted for proposals that seek to deliver high quality sustainably designed and constructed developments by:</i></p> <p><i>1. In respect of all new homes:</i></p> <p><i>a) Seeking to achieve the requirements of the full Code for Sustainable Homes Level 4;</i></p> <p><i>b) Meet internal potable water consumption targets of 105 litres or less per person per day (as part of the requirement to meet full Code for Sustainable Homes Level 4).</i></p>	<p>Given the Code for Sustainable Homes has been withdrawn, applicants must meet the interim Future Homes Standard (as required by Building Regulations) of a minimum 31% reduction in emissions and are encouraged to work towards the full Future Homes Standard of 75-80% less carbon emissions. Any uplift to minimum Building Regulations requirements is a material planning consideration which will be taken into account.</p> <p>The expectation will be that developments meet the optional building regulations standard of 110 litres per person per day as a minimum given CfSH has been revoked. Delivery beyond these standards is a material planning consideration which will be taken into account.</p>	<p>From 15 June 2022 the interim Future Homes Standard has been introduced into Building Regulations Part L and is therefore mandatory for all new applications. The full Future Homes Standard is expected to be introduced shortly (in 2025) and therefore development proposals are encouraged to aim towards this higher standard.</p> <p>Wokingham Borough is situated within part of the country classified as an area of serious water stress. In order to address this issue, and contribute towards wider climate change adaptability, the higher optional standard for water efficiency of 110 litres per person per day is justified.</p>
<p><i>CC04: Sustainable Design and Construction</i></p> <p><i>2. All new non-residential proposals of more than 100 sq m gross non-residential</i></p>	<p>Non-residential schemes will be expected to meet the interim Future Buildings Standard (as required by Building Regulations) of a minimum</p>	<p>A mandatory BREEAM requirement has not been set at the national level, as was the expectation when the policy was introduced. Best practice standards have generally been recognised as at least BREEAM ‘Very Good’ or ‘Excellent’ as is</p>

<p><i>floorspace shall at least:</i></p> <p><i>a) Achieve the necessary mandatory Building Research Establishment Assessment Method (BREEAM) requirements or any future national equivalent</i></p>	<p>27% reduction in emissions, as a minimum. In practice, this means meeting BREEAM ‘Excellent’ standard or higher. Delivery beyond these standards is a material planning consideration which will be taken into account.</p>	<p>reflected in WBC’s Sustainable Design and Construction SPD (2014).</p> <p>However, the Future Buildings Standard, requiring new non-residential buildings to achieve a 27% reduction in carbon emissions, came into force on 15 June 2022. It is noted that the current BREEAM ‘Very Good’ classification does not achieve the minimum 27% carbon reduction required. All schemes must comply with updated building regulations and achieve the interim Future Building Standard which means requiring BREEAM ‘Excellent’ is justified. Schemes that work to other standards (for example Passivhaus) will also be considered provided they deliver sustainability outcomes demonstrably equivalent to, or better than, BREEAM ‘Excellent’.</p>
<p><i>CC05: Renewable energy and decentralised energy networks</i></p> <p><i>2. Planning permission will only be granted for proposals that deliver a minimum 10% reduction in carbon emissions through renewable energy or low carbon technology where the development is for:</i></p> <p><i>a) Schemes of more than 10 dwellings (gross), or</i></p> <p><i>b) Non-residential proposals of more than 1,000 sq m gross floorspace.</i></p> <p><i>3. Proposals for renewable energy and decentralised energy works, including wind turbines, must demonstrate that:</i></p>	<p>For clarification, the policy requirement for 10% energy reduction through renewable / low carbon technologies is expected to be achieved in addition to the uplifted emissions improvements required through Building Regulations (as updated in June 2022).</p> <p>Renewable and low carbon energy schemes will be supported in appropriate locations and where</p>	<p>CC05 supporting text is clear <i>“The relevant standards in the assessment are those set by Building Regulations at the time of submission of a planning application.”</i> (paragraph 2.38). The uplifted building regulations introduced in June 2022 are the mandatory starting point. WBC expects fabric efficiency improvements, such as additional insulation, to be used to meet building regulations and for the additional 10% policy requirement to be sought in addition to these improvements.</p> <p>To accord with the NPPF, in particular paragraphs 152, 155, 156, and 158:</p>

<p>a) They are appropriate in scale, location and technology type;</p> <p>b) Are compatible with the surrounding area, including the impact of noise and odour;</p> <p>c) Do not have a damaging impact on the local topography and landscape;</p> <p>d) There is no significant impact upon heritage assets, including views important to their setting;</p> <p>e) In the case of wind turbines, take account of their cumulative effect and properly reflect their increasing impact on the landscape and on local amenity</p>	<p>consistent with other relevant policies.</p> <p>WBC will consider the climate change benefits of a proposal when assessing the acceptability of a renewable energy application and take a positive presumption, supporting schemes unless the harm is significant and not outweighed by the benefits.</p>	<p><i>“152. The planning system should support the transition to a low carbon future in a changing climate ... It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions... and support renewable and low carbon energy and associated infrastructure.”</i></p> <p><i>“155. To help increase the use and supply of renewable and low carbon energy and heat, plans should:</i></p> <p><i>a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts); ...”</i></p> <p><i>“156. Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.”</i></p> <p><i>“158. When determining planning applications for renewable and low carbon development, local planning authorities should:</i></p> <p><i>a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and</i></p> <p><i>b) approve the application if its impacts are (or can be made) acceptable⁵⁴. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale</i></p>
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		<p><i>projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”</i></p>
<p><i>Policy TB23: Biodiversity and Development</i></p> <p><i>1. Sites of national or international importance are shown and sites of local importance are defined on the Policies Map.</i></p> <p><i>2. Planning permission for development proposals will only be granted where they comply with policy CP7 – Biodiversity of the Core Strategy and also demonstrate how they:</i></p> <p><i>a) Provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing</i></p> <p><i>b) Provide appropriate buffer zones between development proposals and designated sites as well as habitats and species of principle importance for nature conservation</i></p> <p><i>c) Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network.</i></p>	<p>Applicants will be expected to go further and identify opportunities to provide biodiversity net gains, with 10% expected as minimum with an ambition to achieve 20%. WBC will consider the measurable net gains when assessing applications.</p>	<p>To accord with NPPF, in particular paragraph 174 and 180: <i>“174. Planning policies and decisions should contribute to and enhance the natural and local environment by:...</i></p> <p><i>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</i> <i>“</i></p> <p><i>“180. When determining planning applications, local planning authorities should apply the following principles: ...</i></p> <p><i>d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”</i></p> <p>Additionally, the Environment Act will introduce a mandatory net gain requirement of at least 10%, with an intention for this to be mandatory from November 2023. It is reasonable that developments be expected to achieve this now. Further, the council is actively considering the achievement a 20% net gain and therefore strongly encourages this being achieved⁹</p>

⁹ See agreed motion: <https://wokingham.moderngov.co.uk/ieListDocuments.aspx?CId=131&MIId=3998>

- 4.6 The key message of this section is that we wish to see development proposals go above and beyond adopted policy requirements wherever possible, and this will be weighed positively in the balance where it can be achieved.
- 4.7 Measures that reduce climate change impacts in ways that were not envisaged by existing policy, for example actions to reduce the embodied carbon of new buildings, will also be considered.

5. Emerging Local Plan

5.1 The emerging LPU contains the following draft policies, consulted upon in 2020¹⁰, which set out the direction of travel with regards to climate change adaptation and mitigation:

- Policy SS8: Climate Change
- Policy SS9: Adaptation to Climate Change
- Policy C1: Active and Sustainable Transport and Accessibility
- Policy C3: Cycling and Walking
- Policy DH1: Place Making and Quality Design
- Policy DH7: Energy
- Policy DH8: Environmental Standards for non-residential development
- Policy DH9: Environmental Standards for residential development
- Policy DH10: Low carbon and renewable energy generation
- Policy HC5: Environmental Protection
- Policy HC6: Air Pollution and Air Quality
- Policy HC9: Contaminated Land and Water
- Policy NE1: Biodiversity and Nature Conservation
- Policy NE3: Trees, woodland and hedgerows
- Policy NE4: Development and existing trees, woodland and hedgerows
- Policy NE5: Landscape and Design
- Policy NE6: Landscape Character, Value and Green Routes
- Policy NE8: Development and Flood Risk (from all sources)
- Policy NE9: Sustainable Drainage
- Policy NE10: River Corridors
- Policy MW1: Sustainable Waste Management

5.2 WBC is proactively reviewing the draft policies, considering updated evidence and best practice examples to maximise the robustness of policies to ensure they are as effective as possible in order to meet national policy requirements and our Climate Emergency commitments. WBC is committed to demonstrate local leadership on sustainable development.

5.3 The LPU is still at a consultative stage and therefore carries limited weight. Notwithstanding, in addition to the clarifications provided in Section 4, where applicants can demonstrate an ability to satisfy emerging requirements from the LPU

¹⁰ Available at: <https://www.wokingham.gov.uk/resources/assets/attachment/full/0/508528.pdf>

which go above and beyond existing policy, this will be encouraged and will be weighed positively into the planning balance when considering applications.

6. General Relevance of the Climate Emergency in determining planning applications

- 6.1 The delivery of sustainable standards above and beyond adopted policy requirements is capable of being a material consideration that can be weighed positively into the planning balance when assessing planning application. As set out above, the Climate Emergency is a key issue for our members at the moment, so it is highly likely that questions on measures proposed to tackle these issues will be an integral part of Planning Committee meetings and application negotiation.
- 6.2 In order for climate emergency matters to be given as much weight as possible, applicants must robustly demonstrate that the proposed development will deliver the promised sustainability standards. To assist, the use of recognised existing assessment methods is encouraged. These include, but are not limited to:
- Building Research Establishment Environmental Assessment Method (BREEAM)
 - CEEQUAL
 - Home Quality Mark
 - Leadership in Energy and Environmental Design (LEED)
 - Passivhaus
 - WELL Building Standard
 - Building for Healthy Life
- 6.3 We would expect applicants agree to the use of planning conditions in order to secure the implementation of all proposed sustainability measures and ensure promises made at the application stage are implemented in practice. This will avoid 'green washing' where promised improvements cannot actually be delivered. In particular, where post occupancy testing can be agreed by condition, this should carry significant weight. Some assessment methods, such as BREEAM, include post occupancy assessments to monitor the 'performance gap'. Therefore, this is not uncommon industry practice and is something we would strongly encourage applicants to utilise more.
- 6.4 It should be recognised that this Statement does not override the general presumption in favour of sustainable development emanating from the National Planning Policy Framework and the subject of local policies. Sustainable development is a multidimensional concept, and refers to economic, social and environmental factors. As such, this Statement must be read in conjunction with the development plan as a whole. For example, the delivery of a net zero carbon dwelling in an isolated countryside location is not desirable where this would be reliant on vehicle journeys to access amenities / facilities and / or where it may have significant harmful impacts on landscape or ecology.
- 6.5 Overall, this statement sets out the desire from WBC to see development proposals being delivered to the highest possible sustainability standards. Where proposals are

clearly able to deliver over and above local and national policy requirements as regards climate change, this will be given positive weight in the planning balance.

Date: 07 January 2025
Our ref: 496752
Your ref: 243114



Wokingham Borough Council

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Sir / Madam,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Scoping Opinion application to determine the content of an Environmental Impact Assessment for Barkham Square.

Location: Barkham Square, Barkham Square, Arborfield, Wokingham, RG41 4TJ.

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 11 December 2024, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely,

Natural England
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 180-181 and 185-188) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**:

- Thames Basin Heaths Special Protection Area

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). In addition paragraph 187 of the National Planning Policy Framework (NPPF) requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a

critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment

<https://www.gov.uk/guidance/appropriate-assessment>

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

Nationally designated sites

The development site is within or may impact on the following **Site of Special Scientific Interest:**

- Longmoor Bog SSSI
- Bramshill SSSI
- Heath Lake
- Broadmoor to Bagsot Woods and Heaths
- Castle Bottom to Yateley and Hawley Commons
- Blackwater Valley
- Wellington College Bog
- Sandhurst to Owlsmoor Bogs and Heaths
- Hazeley Heath
- Lodge Wood & Sandford Mill
- Wykery Copse
- West Minley Meadow
- Stanford End Mill and River Loddon

The development site is within the following **National Nature Reserve:**

- Castle Bottom

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 186 of the NPPF. Further information on the SSSI and its special interest features can be found at www.magic.gov.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geportal](#).

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 180 and 181). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local

body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [*Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.*](#)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)

- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The development site is within an area of ancient woodland.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Biodiversity net gain

Paragraph 180 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character

area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 180 and 181 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 217 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by

[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site.

Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).


The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people

and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

Central Hub Fire Safety Office, Wokingham Fire Station, 11-13
Easthampstead Road, Wokingham, Berkshire, RG40 2EH
Email: centralhubfiresafety@rbfrs.co.uk
Switchboard 0118 945 2888
Royal Berkshire Fire and Rescue Service  rbfrs.co.uk



Head of Planning
planning.enquiries@wokingham.gov.uk

Your ref 243114
Our ref 535710
Ask for Amy Mendham
Date 09 January 2025

Dear Sir or Madam,

Re: Town and Country Planning Act 1990 (as amended)

Further to your letter dated 11 December 2024, it is noted that the application ref 243114 has been made under the Town and Country Planning Acts.

At this stage there is no duty placed upon the Fire Authority under the aforementioned legislation to make any comment relative to the application.

Any structural fire precautions and all means of escape provision will have to satisfy Building Regulation requirement. These matters are administered by the local authority Building Control or approved inspectors, who you are advised to contact in this regard.

Please be advised that any comments made by the Fire Authority in this letter must not be taken as formal approval that your plan/s conform to the requirements and recommendations of current Guides or Codes of Practice for means of escape in case of fire.

Recommendations identified under Section B5 of Approved Document B

Summary

At this stage of the planning application, Royal Berkshire Fire and Rescue Service makes comment relating to Section B5 of Approved Document B. This section specifies the provision of facilities to assist firefighters within the building and to enable fire appliances to gain access to the building externally.

Chief Fire Officer – Wayne Bowcock

Complying with these requirements, in advance of the formal statutory Building Regulation consultation process, will assist that process and the following recommendations are made without prejudice to that process

Access and facilities for the Fire and Rescue Service

Full guidance criteria is published in Approved Document B accessed via web link:
<https://www.gov.uk/government/publications/fire-safety-approved-document-b>

Automatic water-based suppression system

The nature of the proposal gives reason for the Fire Authority to strongly advise the consideration of an appropriate automatic water-based suppression system for the proposed premises. Automatic water-based suppression systems can significantly reduce the risk to life and mitigate the damage caused by fire.

The case for installing automatic water-based suppression systems is compelling; they save lives, reduce injuries, protect property and increase sustainability. Over the past few years, there has been a growing recognition of the effectiveness of automatic water-based suppression system in domestic premises.

Further information on the benefits of automatic water-based suppression systems and how they can play a significant role in saving life and property from the devastating effects of fire is available on the following websites:

www.nfsn.co.uk

National Fire Sprinkler Network

www.firesprinklers.info

Fire Sprinkler Association

www.bafsa.org.uk

British Automatic Fire Sprinkler Association

www.rbfrs.co.uk

Royal Berkshire Fire and Rescue Service

Water supplies for firefighting

Consideration is to be given to the *National Guidance Document on the Provision of Water for Firefighting* and the specific advice of this Fire Authority on the location of fire hydrants.

Yours faithfully,



Amy Mendham
Authorised Fire Safety Inspector
And on behalf of the Royal Berkshire Fire Authority

Chief Fire Officer – Wayne Bowcock