

MEMORANDUM

From:	Úna Haran, Lead Sustainability Planning Officer		
Service	WBC Sustainability	App No:	243188
Address:	Hall Farm/Loddon Valley SDL.		
Proposal:	Scoping Opinion application to determine the content of an Environmental Impact Assessment for the proposed development of the Site to deliver around 3,930 dwellings together with associated infrastructure (to include internal roads / internal and external access points. landscaping, site wide flood alleviation and surface water drainage and other required infrastructure). New link road over the M4 motorway to Lower Earley Way; new junctions and potential highway upgrades to existing routes. Phased expansion of the Thames Valley Science and Innovation Park (around 100,000m2). New neighbourhood and district centres (retail, leisure, sports, cultural, health and service facilities); and associated education facilities to include primary and secondary school provision. Provision of Suitable Alternative Natural Greenspace, landscaping to include a country park.		
Type of Development:			
Site Visit Made:	Yes		

Summary Of Recommendations

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

Comments On Proposal

1. Comments on Climate Change issues in respect of EIA Scoping Opinion Report authored by Savills on behalf of University of Reading, Gleeson Land and Hatch Farm Land Ltd., December 2024, specifically Chapter 10 authored by Daedalus Environmental Limited.
 - 1.1. In respect of paragraphs 10.2.2-10.2.10 the context in terms of carbon budgets is supported as a frame of reference. It is recommended that the impacts of the development are considered in terms of how they contribute to the expenditure of the Borough-level carbon budget as suggested in paragraph 10.2.22.
 - 1.2. In respect of paragraph 10.2.7 reference to both the MDD Local Plan (in particular policies CC04 and CC05) should be included, alongside reference to the WBC Climate Change Interim Policy Position Statement which clarifies how older planning policies in relation to sustainable development are expected to be complied with under the current LDF.
 - 1.3. The use of RCP 8.5 for assessment of impact significance is supported.
 - 1.4. In respect of paragraph 10.2.21-10.2.23, the intention to accept the suggestion from the IEMA guidance that all GHG emissions are significant, is supported.
 - 1.4.1. The suggestion to use 1. Embodied emissions targets that demonstrate best practice and 2. Legislative and local emissions budgets to guide the proposed development towards an overall acceptable level of emissions is supported, however it is noted that the distribution of emissions, and intersections with climate adaptation requirements, will need to be examined in more detail as the proposals evolve to agree on acceptable impacts for aspects of the scheme.
 - 1.5. In respect of paragraph 10.2.31 the use of South East of England projections is supported and should be combined with examination of data which is as localised as 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. Recommended additional 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 are available online and are free to use.
 - 1.5.1. 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. This contains information relating to local climate hazards and priorities.

- 1.6. In respect of paragraph 10.2.28 regarding climate change adaptation, key issues of climate change adaptation applicable to the site are: energy security, drought resilience through water literate design, climate change resilient landscapes and planting, an adaptable and responsive built environment and climate resilient transport. The focus of the climate change adaptation section of the assessment should be 1. Identifying the hazards arising from climate change which are applicable to the site and scheme, 2. Setting out the means by which these are proposed to be addressed to reduce harm and disruption and 3. Identifying as far as possible the degree to which the hazards can be addressed through the proposals and the residual risk remaining.
- 1.7. In respect of paragraph 10.2.33 – when addressing the identified risks, it will be important to set out any frameworks, methodologies, certifications or targets used to inform an appropriate response, for example, CIBSE TM52 and TM59 methodologies to accurately assess overheating risk in buildings are recommended.
- 1.8. In respect of paragraph 10.4.4, mitigation measures should be supported by demonstration of how they have influenced proposals, ideally through iterative illustration. This will be particularly important to explain the masterplanning approach. The mechanisms by which these mitigation measures have influenced the development of the proposals, and the key way-points at which this influence has been applied, should be demonstrated.
- 1.9. As a general note – climate change hazards identified in the risk assessments must be addressed separately and should not be used to offset severity against one another, for example, some models may identify a reduced heating load in future winters due to climatic heating, this would not mitigate the increased need for cooling in summer. Similarly, an increase in winter rainfall is not mitigated by reduced rainfall in summer (in fact, drier summers increase flooding risk due to less receptive ground conditions caused by dehydrated substrates).
- 1.10. In respect of tables 10.02 and 10.03, the use of BS EN 15978 and PAS 2080 are supported. The proposal to scope Module D out of the assessment is noted, however, it would be preferable that some consideration in respect of benefits and loads beyond the lifecycle are provided, in line with the aspirations towards circularity. It is understood that these will need to rely on assumptions, however, the reduction of harmful impacts around the end of building and infrastructure lifecycles is important to influence the design of proposals.

1.10.1. Benchmarks and targets to be used in LCA should be identified along with monitoring frameworks. It is important to understand where responsibility for compliance will sit, and how progress towards targets will be measured. Most importantly it is vital that subsequent planning applications can demonstrate how these assessments have iteratively influenced the decision making process as the design of the proposals advances and refines.

1.11. In respect of paragraph 10.5.3, the identification of carbon dioxide, methane and nitrous oxide as the primary greenhouse gases arising from the impacts of the development is supported.

1.11.1. The decision to scope sulphur hexafluoride out of the assessment is – this gas is used in power distribution infrastructure, and could be relevant to the infrastructure delivery serving the site. Confirmation that no measurable and significant impact from the use of sulphur hexafluoride will occur would be useful, comment from DNO would be helpful if this is to remain out of scope.

1.11.2. Since assumptions around scope 3 emissions used in the BS 15978 and PAS 2080 reporting will contain the full range of GHGs, it is suggested that it is useful to retain them in the scope of the assessment to allow consistency at all scales, but with recognition that the major contributing gases will be those identified. The normalisation in terms of CO₂e will account for this relative impacts and proportions of emissions.

Conditions & Reasons (if required)

To follow at application stage.

Date:

31/01/2025

Signed:



Úna Haran
Lead Sustainability Planning
Officer
BSc MArch