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Mr Charles McClea - Senior Planner
Savills
2 Charlotte Place
SOUTHAMPTON
SO14 0TB

Our ref: WA/2025/131910/01-L01
Your ref: 243188

Date: 07 February 2025

Dear Mr McClea,

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 Neighborhood And District Centers (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.

Hall Farm/Loddon Valley SDL

Thank you for consulting us on the above EIA scoping opinion request, which we received on 20/12/2024.

Environment Agency position

We have reviewed the submitted scoping report compiled by Savills (UK) Limited, dated December 2024. The following comments, made in respect of flood risk, water quality and biodiversity will ensure the environmental statement addresses the key environmental issues for this proposal.

Flood risk

We support that flood risk has been scoped into the EIA. We have a number of recommendations and guidance as covered below. For general guidance on completing a flood risk assessment we recommend reviewing: [Flood risk assessments: applying for planning permission - GOV.UK](#). A national update to the Flood Map for Planning is upcoming in Spring 2025. This means that the flood zones may change within the site. Please visit [Updates to national flood and coastal erosion risk information - GOV.UK](#) for more information.

NaFRA2 is coming! In Spring 2025, the Flood Map for Planning will be updated with new flood zone data. More information is available here: [Updates to national flood and coastal erosion risk information - GOV.UK](#). Please read this guidance at your earliest opportunity to prepare for the NaFRA2 changes!

The Environment Agency holds detailed modelling for this area - the Loddon (Lower) 2009 model. However please note this model is not suitable for a site-specific flood risk assessment for a development of this size and scale. This modelling can be supplied free of charge by contacting: enquiries_THM@environment-agency.gov.uk. We are aware the local authority has undertaken modelling in this area in recent years, this modelling has not been reviewed by our specialist modelling team and so we are unable to advise on its suitability to inform a site-specific flood risk assessment. It is likely that such modelling would require a modelling technical specialist to review and advise on any updates required to the hydrology and hydraulic model. Any modelling used to support the planning application will need to be submitted in full to the Environment Agency as part of the planning consultation process. We recommend reviewing: <https://www.gov.uk/government/publications/river-modelling-technical-standards-and-assessment>

National and local policies

We note Section 14.2.3 of the Scoping Report references the National Planning Policy Framework (NPPF), stating it was most recently updated in December 2023. We are pleased that the Scoping Report references the National Planning Policy Framework and the Planning Practice Guidance as the development will need to be in accordance with these. However, please note that there has since been a further update to the NPPF on the 12th of December 2024.

We are pleased to see that the Wokingham Borough Council Strategic Flood Risk Assessment levels 1 and 2 documents are referenced within section 14.2.14. Please also refer to the Wokingham Borough Council Local Plan Update Level 2 Strategic Flood Risk Assessment dated November 2021. This contains a number of specific requirements and recommendations in relation to the Hall Farm site. Specifically:

- The requirement in section 8.3 for any encroachment within the 1 in 100 annual probability flood event, plus an appropriate allowance for climate change, to be compensated for by level-for-level compensation. Additionally, proposals must not detrimentally impact flood flow routes.
- The requirement for any proposed bridges to be tested through detailed hydraulic modelling, as stated in section 8.5.5
- Possible future flood risk reduction schemes in the area, as covered in section 10. In particular it is recommended in section 10.1.13 that areas outside of the present day 1 in 100 flood event but which fall within the proposed scheme additional flood area (as shown in figure 10.1) remains free of built development.

Functional floodplain – Floodzone 3b

We note the definition of the functional floodplain (Flood Zone 3b) is not covered in the scoping document, please note that the latest definition of the functional floodplain is outlined in the Wokingham Borough Council Level 2 Strategic Flood Risk Assessment, August 2023 in section 3.2.2: "Functional floodplain (Flood Zone 3b) is identified as land which would flood with an annual probability of 3.3% AEP (1 in 30 years)".

NPPF Annex 3 classifies development types according to their vulnerability to flood risk. Table 2 of the Planning Practice Guidance is clear that more vulnerable development should not be permitted in Flood Zone 3b, the Environment Agency will object to any

development that proposes this. Land raising to facilitate more vulnerable development in Flood Zone 3b is not considered acceptable.

Climate change

We support that climate change has been scoped into the Environmental Impact Assessment as mentioned in section 10.1.4. There is not much mention of the impact of climate change on fluvial flood risk. Please note this will need to be covered in the Flood Risk Assessment; please refer to our guidance for further information: [Flood risk assessments: climate change allowances - GOV.UK](#)

Voids

Section 8.3.6 of the Wokingham Borough Councils Local Plan Update, Level 2 Strategic Flood Risk Assessment, dated November 2021 states that "it may be acceptable to mitigate the loss of floodplain storage through incorporation of floodable elements at ground level of new development - e.g. open floodable undercrofts or floodable voids".

Please note that the planning practice guidance has been updated since 2021, the PPG is now clear (see Paragraph: 049 Reference ID: 7-049-20220825) that while voids may be used to mitigate flood risk to the building itself, they are not appropriate compensation for loss of floodplain storage. This is because voids do not allow the free flow of water through them and may get blocked or silted up. It is also difficult to prevent them being used for storing belongings or other materials. The Environment Agency will object to any application that uses voids to mitigate loss of floodplain storage.

Access

We support that access has been scoped into the EIA as mentioned in section 18.1.2. We note that the transport assessment will demonstrate that "safe and suitable access to the site can be achieved for all users". Part of this assessment will need to cover flood hazard data from suitable modelling. Please view the following guidance for more information: [Microsoft Word - Sub-Guidance of Safe Access and Exit](#)

Permitting

It should be noted The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- On or within 8 metres of a main river (16 metres if tidal)
- On or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- On or within 16 metres of a sea defence
- Involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- In a floodplain more than 8 metres from the riverbank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422

549. It should not be assumed that a permit will automatically be forthcoming once planning permission has been granted, and we advise you to consult with us at the earliest opportunity.

Water quality

We would like to see the impact on the water framework directive (WFD) of the receiving waters following the submitted details of the discharge of foul water.

For example, any development connecting to Arborfield sewage treatment works (STW) may lead to a deterioration of the water environment within the Barkham Brook (GB106039017400). This scenario would be contrary to the advice and guidance of the NPPF and the Thames River Basin Management Plan.

As the site is currently greenfield, it is required that there should be no increase in surface water run-off rates and volumes as a result of the development and rates should be reduced where practicable. Opportunities should be investigated in the early stages when designing the Masterplan for allocating green space for the location of Sustainable Urban Drainage features. These can be in the form of ponds, swales, basins, wetland areas, infiltration techniques etc. This is to prevent deterioration of the groundwater and surface waterbodies.

We wish to see further information regarding: The potential impacts during construction phase, proposed mitigation and enhancement measures during construction, potential residual impacts to the watercourse and Loddon (Swallowfield to River Thames confluence) (GB106039023160). The EIA should pay particular attention to the prevention of pollution of the waterbodies as well as the ponds, streams and ditches during construction.

Biodiversity

We welcome paragraph 1.1.8 which states “The Proposed Development is expected to be consistent, where possible, with the development principles outlined under emerging Policy for Hall Farm / Loddon Valley Strategic Development Location (SDL) of the forthcoming Local Plan Update.” In particular, we are pleased to see that this policy addresses the need for robust ecological buffers and protection for river corridors and we would expect to see this represented in any proposals with meaningful ecological buffers around all watercourses within the site.

However, we are aware that there are some discrepancies and omissions that should be addressed within the Scoping Document, EIA and any subsequent proposals:

- The Scoping Document (paragraph 3.1.3) specifies biodiversity enhancements will achieve a biodiversity net gain (BNG) of 10%. However, Policy SS13 of Wokingham emerging Local Plan update (2023-2040), specifically point 8, part a, specifies a minimum of 20% BNG and we'd expect this to be recognised in any future proposals. 20% BNG is also required in watercourse units on the River Loddon, Barkham Brook, and the ordinary watercourses on site.
- We would also expect to see any proposals incorporate robust enhancements to rivers, including both the bed and banks.

We note that there are many opportunities on the River Loddon to improve connectivity with the floodplain, in particular around the artificial embankment and in the potential to

connect existing wet features with the river. Also, opportunities exist for both the creation and enhancement of backwater features here.

The bottom section of the Barkham Brook should undergo a robust habitat assessment to identify the numerous opportunities for habitat improvement which should include options for backwater creation, floodplain reconnection and opportunities to remove barriers to fish passage.

- Neither the Scoping Document or emerging policy SS13 address the issues associated with access and potential new crossings of watercourses. It is expected that these will avoid culverting and use a clear span bridge in line with Environment Agency policy and minimising the impact of any essential new crossings on the ecology of the watercourse.
- Furthermore, neither the Scoping Document or Policy SS13 clearly define the requirement for essential bank protection to avoid hard bank protection methods but rather to utilise soft landscaping/protection measures. This should be incorporated into any future proposals or documents.

In addition, we expect the EIA, and any subsequent proposals, will include reference to priorities highlighted in the Berkshire Local Nature Recovery Strategy, this indicates that currently water vole are considered absent from, at least the Berkshire part of, the Loddon catchment but that water vole are present along the River Thames and that their surveys identify them as a priority species for stakeholders.

Please be aware that we will object to any proposals that do not adequately address the above points and that any such proposals may not be granted associated Flood Risk Activity Permits, transfer licenses etc. These would be considered independently of any planning application.

Closing comments

Thank you again for consulting us on this scoping report. Our comments are based on the best available data and the information as presented to us. Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me. Please quote our reference number in any future correspondence.

Yours sincerely,

Mr Nathan Davis
Planning Advisor

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