

Wokingham Borough Council
Development Control
PO Box 157
Wokingham
Berkshire
RG40 1WR

Our ref: WA/2025/131928/01-L01
Your ref: 243124
Date: 04 March 2025

Dear Sir/Madam

Application For The Approval Of Reserved Matters Pursuant To Outline Planning Consent 212720 For The Erection Of 200 Dwellings With Associated Infrastructure, Open Space, Biodiversity Enhancements, Landscaping And Green Infrastructure (Appearance, Landscaping, Layout And Scale To Be Considered).

Land At Bridge Farm, Twyford

Thank you for consulting us on this application, on 18 December 2024. We apologise for the delay in providing this response.

We have reviewed the application in line with our planning remit, including the following documents:

(Redacted) Ecological Permeability Report V3 Dated December 2024
(Redacted) 7236.TN02 Drainage Strategy Issue 04
Layout - Housing Mix DES-703-401-1 - DAS-Part5
Comments - Richard H Thomas - 243124
Tree Planting Schedule
Landscape Masterplan CH038-002H
Landscape Design Statement CH038-001H
Landscape and Ecological Management Plan v3 RJ EW 071124
(Redacted) Lighting Strategy WLC1233LSR001R0

Environment Agency position

We have **no objection** to the proposals. However, we would like to make you aware of the following advisory comments.

We understand that the proposal is now for drainage to a surface watercourse and with no infiltration SuDS in view of the high groundwater levels. Given this sensitivity of the site we would like to be consulted on any future relevant discharge of condition applications.

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!

Advice to Applicant and Local Authority - Incorporation of In-channel Features for Enhancement of River Loddon

Condition 17 requires the Landscape Ecological Masterplan (LEMP) to include "Details of all new habitat created on site, including enhancements to the River Loddon and its riparian corridor." Further, in reference to otter and water vole, sections 3.29 and 3.34 of the *"Ecological Permeability Report"*, both state the following:

"The river is to be enhanced as part of the Proposed Development, potentially creating new opportunities for this species."

We acknowledge and welcome the plans for riparian planting as outlined in section 4.74 of the LEMP. However, we question why the enhancement work to the river corridor is restricted to the terrestrial habitat.

Section 3.4 of the LEMP states the following:

"The river Loddon (r1a) and associated riparian habitat is located along the western Site boundary. The river forms part of The River Loddon Local Wildlife Site (LWS), designated for its diversity of river features (including adjacent marsh, islands, inlets riffles, river cliffs, and extensive and varied channel vegetation), rare plant species, water vole, and a variety of dragonflies and damselflies."

Further, as acknowledged in the Ecological Permeability Report, the site borders approximately 380m of the River Loddon and thus, designated Local Wildlife Site.

Given this significant opportunity, the enhancement proposals should help develop and support features characteristic of the LWS designation. The inclusion of in-channel enhancements, such as backwaters, woody debris and the introduction of locally sourced river gravels, would contribute to the watercourse's morphological complexity and as such, natural processes. These measures would introduce and promote the formation of features such as islands, inlets, riffles, and varied channel vegetation, which are integral to the ecological character of this designation.

Such enhancements would also help mitigate the impacts of the development, including the proposed outfall discharging into the watercourse and the encroachment of a footpath into the riparian habitat. We therefore strongly encourage extending the remit of the watercourse enhancements to include the channel itself, ensuring that opportunities to enhance both aquatic and riparian habitats are fully realized.

Advice to Applicant and Local Authority - Positioning of Drainage Outfall

While we welcome the dimensions of general layout of the outfall, which includes a suitable length of swale at the downstream extent of the structure, the headwall is currently positioned to discharge at a 90° angle, perpendicular to the flow of the watercourse. The following risks are associated with discharging at a steep angle, contradictory to the flow of the watercourse:

- Erosion Control: Discharging at a right angle can create a concentrated and forceful flow against the opposite bank, causing significant erosion, destabilizing the bank, and introducing additional sedimentation (and thus turbidity) into the watercourse.
- Environmental Impact: Minimizing turbulence and erosion protects aquatic and marginal habitats. Sudden, forceful discharges can disturb sediments and harm aquatic life.
- Hydraulic Efficiency: Angled discharges enhance hydraulic efficiency by reducing energy losses. Right-angle discharges often result in higher energy dissipation and

turbulence, affecting the drainage system's efficiency.

- Structural Integrity: Discharging water at a right angle places significant stress on the outfall structure, potentially leading to damage or failure over time.
- Aesthetics and Maintenance: Aligning discharges with the flow of the watercourse is more aesthetically pleasing and requires less maintenance due to reduced erosion and sediment buildup.

We therefore recommend that the position of the outfall is adjusted to discharge at an angle more parallel and in keeping with the direction of flow. This will protect the aquatic and marginal environment, and support the longevity of the structure.

The installation of the proposed outfall structures are likely to require a Flood Risk Activity Permit (and potentially discharge consents), which will require the details above to have been addressed.

Advice to Applicant - Other Consents

As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body.

The applicant should contact 03708 506 506 or consult our website to establish if consent will be required for the works they are proposing. Please see www.gov.uk/guidance/check-if-you-need-an-environmental-permit.

This includes any proposal to undertake work in, over, under, or within 8 metres of the top of the bank of a designated Main River, called a Flood Risk Activity permit.

Final comments

Thank you again for consulting us. Our comments are based on the best available data and the information as presented to us.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below. Please quote our reference number in any future correspondence.

Yours faithfully

Sarah Warriss-Simmons
Planning Advisor

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