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Date: 28/02/2025
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WOKINGHAM
BOROUGH COUNCIL

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Dear Mr Lindon

Site Address: Land at Hall Farm / Hatch Farm – broadly incorporating land to the west of Mole Road, north of Church Lane, north of Reading Road / Arborfield Road, east of Eastern Relief Road, south of Lower Earley Way / M4 motorway and west of Hatch Farm Way

Proposal: Request for a Scoping Opinion to determine the content of an Environmental Impact Assessment (EIA) for the proposed development

Thank you for your request for a Scoping Opinion pursuant to Regulation 15 of the Town and Country (Environmental Impact Assessment) Regulations 2017.

It is understood that a summary of the development would be as follows:

> *The delivery of 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.*

It is agreed that the set of identified parameter plans which will include a location plan. It would be helpful to clearly set out aspects such as phasing, construction access,

site set up, construction processes and waste management etc for the site in a clear fashion that is easy to understand.

For the parameter plans, it is agreed that the 'robust worst case scenario' for these is applied as suggested to ensure flexibility.

A more specific description of the parameters is set out in section 5.5.6 of the Scoping Report and these broadly reflect discussions to date together with the aspirations of the draft policy SS13 for the Local Plan Update.

Background
The proposal is an urban development project, greater than 0.5ha and falls within Schedule 2 paragraph 10(b) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 where an Environmental Impact Assessment would be required. The application is for a Scoping Opinion pursuant to Regulation 15 of the Town and Country (Environmental Impact Assessment) Regulations 2017.

Site and context
The Scoping Opinion relates to the land defined in Figure 1 below and contains around 700ha of land. In brief, the main existing land uses of the site include agriculture, buildings supporting agriculture, dwellings and associated uses, listed buildings, light industrial uses, equine uses, commercial uses a scheduled ancient monument woodland, hedges, ancient woodlands, nature reserves and copses. The site is dissected by the River Loddon broadly flowing through the site broadly from south west to the north east. There are other watercourses are present including the Barkham Brook running from the south to the north. Some minor roads run through the site and the site area encompasses part of the M4 motorway and Lower Earley Way, together with the routes identified above within the Site Address. The site contains a number of Public Rights of Way.

The main vehicular access points would be via the Eastern Relief Road / South Avenue / Cutbush Lane East, Observer Way / Reading Road, Meldreth Avenue / Lower Earley Way, Mole Road, Mill Lane, Hatch Farm Way. There are further public right of way access points to the site.

We would expect that the Environmental Statement (ES) includes a section describing the site and the wider area in more detail and this should identify sensitive receptors. The impact of the proposed development and associated director indirect on the land should be identified. This should include any associated infrastructure / facilities, required landscaping or any offsite works needed to mitigate the development.

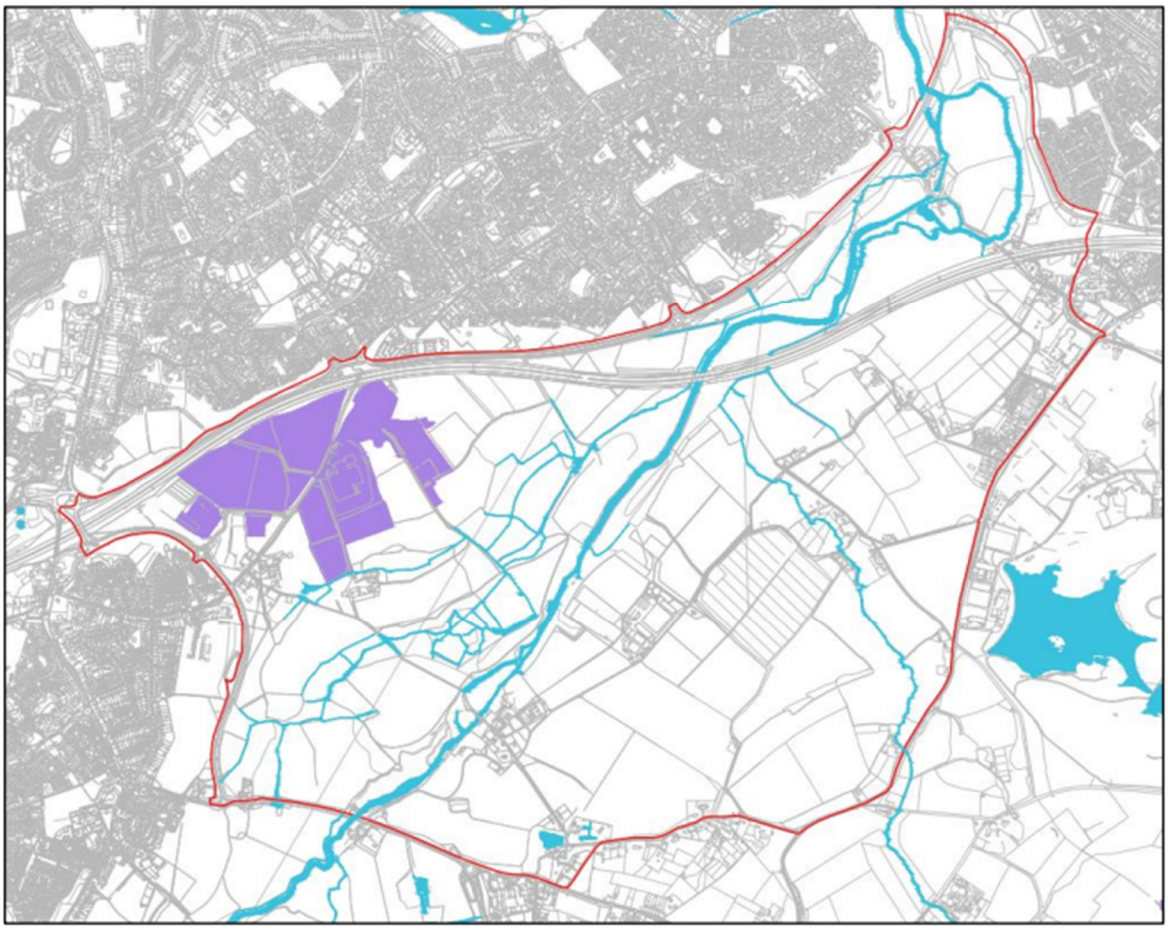

Figure 1: Site boundary

The site is well described within the applicants Scoping Report within Section 2. The main land use of the site is agricultural, the majority of which is predominantly used for grazing for University of Readings dairy herd. The site has been identified by the councils Proposed Submission Local Plan draft policy SS13.

The wider context of the site includes the settlements of Lower Early and Reading to the north, Shinfield to the west, Arborfield Cross, Arborfield Green and Barkham to the south and Sindlesham and Winnersh to the east. In the main, there is a countryside buffer between these settlements and the site area identified beyond the main supporting infrastructure.

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.

Scoping Opinion

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).

The applicant's attention is drawn to Section 18(3) and Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 which outlines what is required in an EIA. These are summarised in sections 5.4.2 and 5.4.3 pf the Scoping Report.

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 Scoping Report titled '*Hall Farm / Loddon Valley Strategic Development Location Environmental Impact Assessment Scoping Report December 2024 Prepared on behalf of University of Reading, Gleeson & Hatch Farm Land Ltd Rev A*' and the supporting information. The Local Planning Authority has consulted statutory consultees identified within the regulations and the responses received have been considered as part of this opinion. Where relevant, issues identified by non-statutory consultees is also included.

In line with the requirements draft policy SS13, Loddon Garden Village (LGV) strategic site as part of the Local Plan Update submission (2023 – 2040), it is expected that any forthcoming planning applications for the site will include a single Infrastructure Delivery Plan (IDP), Strategic Vision, overarching Design Code and Masterplan.

This comprehensive approach will be critical to the success of the applications: notwithstanding, the ES will need assess the cumulative impact of the entire Proposed Submission Local Plan allocation together with existing extant development in the area to demonstrate comprehensive planning and delivery of the complete infrastructure package. This is further outlined below within the Cumulative Impacts of Development section below.

We agree that the proposed development of approximately 3,930 dwellings on 700 ha of previously undeveloped predominantly agricultural land constitutes an urban development project (infrastructure projects) as defined by Part 10(b) of the table set out in schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and is an EIA development.

Cumulative impacts
Table 5.2 – This needs to be updated for pending decisions and should include other schemes in the area not limited to the administrative boundary of Wokingham – for example Green Park in Reading etc. Some developments seem to be excluded; the table for example does not include the Shinfield Studio development site – 211841 and land North of Arborfield Road - 242484 so please check this. 243099 for 111 dwellings has also been registered since the preparation of the table. There are also applications within the Arborfield Strategic Development Location (SDL). The ES should also be mindful of potential impacts of Local Plan Update sites such as land east and west of Hyde End Road, Barkham Square, Arborfield and South Wokingham extension. It is acknowledged that the footnote identifies that further cumulative will be scoped within the Transport Assessment but these should be clearly presented in the ES.

Topics to be Scoped Out

Table 1.1 set out in section 1.3 sets out the matters to be scoped out of the EIA and the following two chapters are suggested to be excluded. These are broadly agreed but the LPA wishes to draw attention to the points cited under the title headings below:

Ground Conditions and Contamination
The Environmental Health Officer has made the following observations based on the information presented in Chapter 12 of the Scoping Report and reports:

In reviewing this application from an environmental health perspective, my role as a consultee is to be considerate of issues relating to public health and the environment and if any environmental health factor will adversely affect future occupants of the proposed properties or nearby properties. Other planning matters are within the remit of other consultees or the planning team.

Clearly this is a large-scale development, circa 3930 dwellings and considerable commercial premises and infrastructure.

The Environmental Impact Assessment Scoping Report dated December 2024 provided to support the application is comprehensive, it covers the information we would likely ask for, I outline some of the conditions we often apply for information below.

As plans develop, we would expect a full Construction Method Statement (or management plan) as outlined below.

The phase 1 site investigation report provided by RPS group dated June 2022 is comprehensive, at 8. (Conclusions and Recommendations) In the report an intrusive phase 2 site investigation is recommended, this what we would expect to ensure that the site is suitable for the proposal all across the proposed development area, the outline presented for this work is good.

Some work will be required on the site to make the boreholes recommended for soils analysis. We look forward to reviewing this report.

As advisory consideration should be given to potential for UXO on a site like this one should anything anomalous be found while excavating.

External lighting should be adequate for needs, but not overbright, the surrounding properties should not suffer adversely.

As this proposal has been presented, the applicant has shown willingness to undertake all of the work to ensure the development is a success from an EH perspective.

The applicant is further advised that details of Landfill Consultation Zones, Potentially Contaminated Land, EA Groundwater Zones, Air Quality Zones etc. can be found on our website to inform the reports.

Attention is drawn to existing buildings on the site and infrastructure both within and outside of the site boundaries (such as areas identified for highway improvements) that may have unexpected contamination but these should be considered and mitigation if required identified within the reports.

Whilst potentially outside of the scope of the ES, the site is within a Minerals Resource Area. In accordance with the Central and Eastern Berkshire - Joint Minerals & Waste Plan, the application will need to be accompanied by a Minerals Resources Assessment to include issues such as prior extraction.

Solid Waste Management
It is agreed that this can at this stage be scoped out of the ES. The methodology suggested in section 5.4.21 to 5.4.24 is acceptable although this may need to be reviewed if unexpected waste sources are identified.

Topics to be scoped in and further comments

Air quality and odour
The Environmental Health Officer has assessed the scope set out in Chapter 7 of the report and subject to the submission of a chapter on air quality in accordance with the principles set out in the Institute of Air Quality Management the methodology is acceptable.

In respect of odour, it is acknowledged that the site has no sources of odour or emissions from centralised combustion sources and as such, this can be scoped out at this stage.

There are localised odour sources from the agricultural activities although due to the phasing and relocation of the dairy herd means that these can likely be scoped out.

Archaeology
It is agreed that the desk top surveys should inform a more detailed assessment on the historic environment as identified in Chapter 8. Berkshire Archaeology have made the following recommendations:

We have reviewed the documents submitted with this application, including the EIA Scoping report and welcome, and are in agreement with, the statement of intent (8.1.2) that archaeology should be scoped in, including an initial Archaeological Desk-based Assessment (8.2.25).

It is likely more than one phase of archaeological works will be required and therefore we urge the applicant's archaeological consultant to contact us at an early stage to discuss our requirements.

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

Please note, Berkshire Archaeology only consider the below ground archaeology, the Built Heritage Statement also referred to in the EIA Scoping Report should be sent to the LPA Conservation Officer.

Agricultural land and soil

It is agreed with the methodology set out in 5.4.17 to 5.4.20 and the Agricultural Classification Report will provide further information than available on the base maps to inform this section of the ES.

Built Heritage

The methodology set out in chapter 9 has been reviewed by the Heritage Officer who makes the following comments:

From a heritage stance overall, I would agree with intended approach set out in the scoping report for undertaking EIA for the site albeit with the following caveats:

- Table 9.6 (Built Heritage Receptors to be scoped in or out of EIA process) with respect to those sites to be scoped out of the EIA process here I would however argue that these should be included/scoped, as they are either within the site or directly adjacent to it.
- A need to have identified and assessed all heritage assets within the site that are non-designated heritage assets. It is noted that the Scoping Report makes no mention of the historic buildings, such as the boat house (that had been for Arborfield House) to rear of Aberleigh, the long single storey farm building and that of the walled garden both of which lie to SW of Hall Farmhouse Arborfield, or Upperwood Farmhouse. Historic maps and aerial photographs do also indicate there are further historic buildings that are at least over a century old to found within other parts of the site in locations such as Julkes and Parkcorner Lanes, as well as Betty Grove and Gipsy Lanes and Mill Lane (to either side of the M4). It is noted Arborfield & Newland Parish Council's comments on this application likewise identify other heritage assets of note that would be expected to be included in the EIA.

In addition, Historic England have made the following comments:

The development could, potentially, have an impact upon a number of designated heritage assets and their settings in and around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement (ES) to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

I therefore endorse the scoping in of undesignated areas of archaeological potential, and designated heritage assets. In view of the large size of the application site and the potential for substantial impacts on the built historic environment and below-ground archaeological deposits, I agree that that the ES should include an appendix consisting of an up-to-date archaeological desk-based assessment as proposed. This should then be used to inform an assessment of the impacts of the development upon the historic environment.

I concur with the identified need for the ES to thoroughly assess potential impacts on the significance of the Scheduled Monument known as the Site of St Bartholomew's Church (List no. 1006975), which lies within the SW sector of the development site, and that this should include an assessment of impacts on significance, as contributed to by the monument's setting. The 'settings assessment' should follow Historic England's Good Practice Advice Note 3 (GPA 3) guidelines and look to outline ways to minimise any harm identified from the development.

As ever, we recommend that the applicant consults the Berkshire Archaeology Advisers during the development of the ES, in relation to areas of archaeological potential, and that they seek an informed local opinion of need from the local authority Historic Environment staff, specifically in relation to the Listed Buildings and Conservation Areas.

Other relevant sections within the ES such as noise assessment and LDVIA should be utilised for the cultural heritage impact assessment and cross-referenced appropriately. This development is likely to be visible across a very large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the potential that alterations to drainage patterns might lead to in situ decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.

It is noted that whilst part of the St Bartholomew's Church Grounds, the Simonds Family Tomb has not been cited in the list of Grade II buildings specifically and should be included.

The applicant is advised to review the local designations within the Arborfield and Barkham Neighbourhood Plan under Policy IRS4 to aid with the scope for their ES. Local non designated heritage assets should be scoped in where appropriate.

Climate change and greenhouse gases
Chapter 10 of the Scoping Report details the methodology and scope for climate change and greenhouse gasses. The Sustainability Officer has made the following recommendations:

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 though 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.

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.

Ecology

The Scoping Report in chapter 11 sets out details for informing the Ecology section of the ES. This has been reviewed by the Ecology officer who makes the following comments:

Proposed scoping for Environmental Impact Assessment is given in section 11 of the submitted Environmental Impact Assessment Scoping Report (Savills, December 2024). Broadly, I am in agreement with the potential environmental impacts and effects identified.

I note that the species White-clawed Crayfish is proposed to be out of scope. I am not confident that the eDNA surveys used to form this proposal are sufficient to rule out this species. The record of the specimen in the Barkham Brook is an in-hand record that has been validated by experts. Other eDNA surveys concomitant to those undertaken by EPR have returned positive results. The indicative low population of this species is of regional importance – perhaps being the last remaining population on this region of the Thames catchment.

The red line boundary for the proposed development includes a stretch of the Barkham Brook. Other sites along the Barkham Brook are proposed to be allocated in the current local plan update. There is also a Thames Water sewage works on the Barkham Brook which will require capacity upgrades to be able to serve these new developments. I recommend that the in-combination assessment for EIA should include White-clawed Crayfish and should have a zone of influence of the

entire length of the Brook up to the Arborfield Garrison SDL. This species is likely to require a strategic plan along the length of the Brook to maintain (and ideally enhance) its local conservation status and there may well be relevant actions to undertake within the red line boundary of this site.

I also note that the species Hazel Dormouse is proposed to be out of scope. Please ensure that the full supporting survey evidence is submitted to justify this, particularly in relation to the size of the sites and the woodlands considered optimal habitat that were not surveyed. If current absence is adequately demonstrated, it may still be that the proposed Eco Valley presents an opportunity for species recovery that can be considered within the EIA and I would encourage the applicant not to scope out an opportunity to recognise a potential significant benefit of the scheme.

On a similar note, the proposal to scope out Water Vole and reptile species from the EIA where they could form part of a plan for significant species recovery within the site should be reappraised.

Regarding Badgers, I note that the surveys so far have not covered Gravel Pit Wood and Carters Hill. This looks like a significant limitation to assessing the impact of the proposal given the quantum of development that will surround this wood. I recommend that the zone of influence extends beyond the current survey boundary to understand the impact of the proposal on Badger clan interactions and permeability, scoping in neighbouring clans to the site.

The summary of surveys so far completed is helpful. It is not clear if the botany surveys include searches for the nationally rare Loddon Pondweed which has been recorded within this stretch of the River Loddon previously. This species will need consideration.

The maps so far provided indicate that fields have been mapped to grassland/wetland type. The biodiversity net gain baseline will need to follow the Statutory User Guide for biodiversity net gain rules in relation to accounting for floodplain wetland mosaic – which is indicated in Natural England inventories as being present on site and so will need to be factored in to the baseline.

The maps so far provided indicate bat activity without explaining the survey effort and bias to that survey effort. This will be relevant to interpreting the results. Given the scale of the proposal, I would want to see more detail about the survey effort to consider the potential impact on lekking/mating roosts of Nathusius' Pipistrelle (indicated as being present on site). I would also like to see investigation as to what Myotis species are on site (other than the already identified Daubenton's Bat) as there could be a rarer species of Myotis hidden within that sound analysis grouping.

The applicant has indicated that there is further work in respect to bat surveys which may inform whether there is a need for bats to be scoped within the ES, in the absence of these we believe that they should be scoped in at this stage. We would strongly recommend that a dialogue is maintained between their ecologist and our Ecology Officer to form a view as to whether these are included within the ES.

The Environment Agency have made the following comments:

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.

Responses have been received from Berks, Bucks and Oxon Wildlife Trust and Natural England which is appended to this report.

As a note, the applicants will need to be mindful of the Habitat Regulation Assessment (HRA) and there may be cross reference to this in the ES. It is however noted that the HRA falls under separate legislation, Where the application follows the parameters as that considered within the local plan update, there may be potential to rely on and refer to the HRA for that plan making process - although greater detail of mitigation proposals such as SANG will be expected. If the application differs in quantum or proposed transport links, it may not be able to reply on the local plan update HRA.

Human health
The Scoping Report sets out the methodology for informing the ES in respect to human health and this is agreed.

Water Resources
Chapter 14 of the Scoping Report sets out the methodology for informing the ES which has been reviewed by Thames Water and Flood Risk Officer.

In addition to the comments made below, it is considered that the scope should be widened to include the Bearwood Reservoir which as we understand has informed the masterplanning work undertaken to date.

Comments from Lead Local Flood Authority (LLFA):

LLFA received this 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 on 20th december 2024.

1. Surface Water Drainage Strategy

Given the scale of this development, a comprehensive surface water drainage strategy is critical. The proposal includes significant residential, commercial, and infrastructure elements, which will introduce large impermeable areas that could increase surface water runoff and exacerbate flood risks.

- **SuDS (Sustainable Drainage Systems):** The use of SuDS should be a key part of the drainage strategy. Features such as permeable paving, swales, retention basins, and green roofs should be explored to manage surface water runoff. These systems must be designed to mimic natural drainage patterns and attenuate runoff to greenfield rates, ensuring no increase in flood risk for the surrounding area.
- **Flood Risk Assessments:** A detailed flood risk assessment will be needed for the entire site, considering the existing drainage network, potential offsite flooding, and the impact of climate change (e.g., increased rainfall intensity). A drainage strategy should include flood attenuation measures to handle both stormwater runoff and potential flooding from nearby watercourses or drainage systems.
- **Storage Requirements:** The phased development, with different areas being developed at different times, may require temporary drainage solutions for stormwater storage. The phased approach will need to consider temporary retention ponds or tanks, which could then be integrated into the overall drainage system once the development is completed.

2. Strategic Considerations

- **Site-wide Flood Alleviation:** The mention of site-wide flood alleviation implies a larger-scale strategy to mitigate the risk of flooding across the development. This should include detailed hydraulic modelling to ensure that any on-site flooding risks are mitigated and that the downstream watercourses or drainage infrastructure are not adversely impacted. Given the complexity of the development (including roads, commercial areas, and housing), a holistic approach will be needed to ensure no adverse impacts on flood zones, including the M4 corridor.
- **Sewer Capacity and Network:** Given the scale of the development (3,930 dwellings and associated infrastructure), a detailed analysis of the existing sewer system will be necessary to ensure that it can accommodate the additional load. This may involve upgrading or expanding the local sewer network, particularly for surface water and foul water drainage.

3. Impact of the Link Road Over the M4 and New Junctions

The introduction of new roads and access points, especially the link road over the M4 motorway, will need a detailed drainage design to handle runoff from the road surface, considering both the direct runoff from the road and any potential for contaminants (e.g., oil, silt) in the runoff. Drainage strategies for these roads should

include the use of permeable pavements, attenuation ponds, and oil separators where appropriate.

4. Integration with Existing Infrastructure

The proposed development will potentially interact with existing drainage systems, such as local road drainage and the Thames Valley Science and Innovation Park. Coordination with existing drainage infrastructure operators is essential to assess capacity and to ensure the integration of the proposed system with existing watercourses and sewers.

5. Water Quality and Pollution Control

A key consideration for drainage in large developments is water quality. Pollution prevention measures should be implemented throughout the development, especially in relation to the transport and industrial areas of the Thames Valley Science and Innovation Park. The use of oil interceptors, detention basins, and filtration systems will be necessary to treat runoff before discharge into any watercourses or sewers.

6. Sustainability and Long-term Maintenance

In addition to the technical aspects of drainage design, it's essential that the long-term maintenance of drainage systems is considered. The inclusion of SuDS should be accompanied by a clear and practical maintenance plan to ensure the systems remain effective over time. This should be integrated into the development's long-term management strategy.

7. Environmentally Sensitive Areas

The proposal includes the creation of new green spaces, including a country park and Suitable Alternative Natural Greenspace (SANG). The drainage strategy must account for the need to protect these areas from flooding or waterlogging, and any associated runoff should be treated to a high environmental standard.

8. Climate Change Adaptation

Given the scale of the development, it is essential to design the drainage systems with future climate change in mind. This includes increased rainfall intensity and potential changes in ground conditions, which could alter surface water runoff patterns. The drainage design should incorporate climate change allowances to future-proof the infrastructure.

Conclusion

In summary, the drainage strategy for this proposed development should focus on sustainable, integrated solutions that address both flood risk and water quality. The drainage network should be designed to handle surface water and foul water runoff without exacerbating flood risks in surrounding areas. Careful consideration of flood alleviation, SuDS implementation, sewer capacity, and water quality control will be essential. Coordination with existing infrastructure and attention to long-term sustainability and maintenance will also be critical for the success of the drainage system.

Comments from Thames Water:

Thank you for giving Thames Water the opportunity to comment on the above application. 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 Public: Information that can be seen and used by everyone inside and outside the Council. utility services. The developer can obtain information to support the EIA by visiting the Thames Water website:

Working near our pipes | Developer services | Thames Water

Comments from the Environment Agency:

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.

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.

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.

Landscape and visual impact
Broadly the methodology set out in Chapter 15 is acceptable although the following comments should inform the ES.

An Environmental Impact Assessment Scoping Report (December 2024) is provided with the application. Landscape and Visual is set out in Chapter 15 and I have the following comments to make regarding this chapter:

1. Paragraph 15.2.4 refers to the Valued Landscape Topic Paper (January 2020), this has now been superseded by the Valued Landscapes Assessment (September 2024) and will need to be referred to in the ES in this paragraph and paragraph 15.3.1.
2. The visual assessment will consider a number of key views which will be a representative selection and agreed with WBC. A number of viewpoints are indicated in Figure 15.5 within the Scoping Report, however it is not clear if all these will be included in the ES plus WBC will need the opportunity to discuss whether any further viewpoint locations (probably outside the site boundary) should be included.
3. I have no concerns over the methodology proposed in this chapter.

Noise and vibration
The ES should include a full noise assessment both for construction and post occupation of the proposed development. This should identify measures to mitigate existing and new residents from noise sources.

Vibration should also be understood for construction and post occupation and identify sensitive receptors existing residents and new occupants. The ES should identify and mitigate the impacts of this and have regard to heritage assets.

For a proposal of this size, we would always recommend a noise assessment to inform the design and an air quality assessment as recommended by the IAQM.

External lighting should be adequate for needs, but not overbright, the surrounding properties or landscape should not suffer adversely.

Socio-economics
Chapter 17 of the Scoping Report sets out the methodology to inform this chapter of the ES and we agree that this as set out is acceptable.

Transport and access
The Highways Development Manager has assessed the Scoping Report and requested amendments in terms of the geographical scope as outlined in section 18.28. This allows flexibility in respect to the geographical extent of the Environmental Statement which may be impacted by modelling data particularly in regard to the wider area. There could also potentially be other impacts identified as a result such as the Air Quality and Noise chapters. This has been reviewed by the applicant and incorporated in the latest scoping report.

In addition, National Highways have made the following observations:

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national

asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have potential to impact the safe and efficient operation of the SRN, in this case the M4 motorway.

We do not offer a view if the EIA is required or not as this is for the Local Planning Authority to determine.

We reviewed information on your planning portal and note that proposal is for the delivery of around 3,930 dwellings together with associated infrastructure as well as a new link road over the M4 motorway to Lower Earley Way and the phased expansion of the Thames Valley Science and Innovation Park, new neighbourhood and district centres, associated education facilities to include primary and secondary school provision and the provision of Suitable Alternative Natural Greenspace, landscaping to include a country park. Around 100,000m2 of research and development floorspace or equivalent trip generating activity within use class E(g), B2 and B8 and other complementary uses, through an extension of the Thames Valley Science and Innovation Park.

The proposal includes the potential delivery of new link road over the M4 to Lower Earley Way and associated highways works; and it is proposed to produce an Illustrative Masterplan to demonstrate how the quantum of development proposed could be delivered within the site. To date National

Highways has not seen any evidence in accordance with the Design Manual for Roads and Bridges (DMRB) to demonstrate that the proposed new link over the M4

is feasible/deliverable and therefore welcome early engagement regarding this matter.

We also note that two high pressure gas mains run across the site, with one being located along the northern boundary adjoining the M4.

We note that details of measures to protect the environment during the construction of the Proposed Development will be set out in a CEMP and be implemented on a phase-by-phase basis, with CEMP being a condition of the planning permission(s) and that it will be regularly monitored. We welcome this approach and wish to be consulted on this document.

We look forward to working with the Applicant and Wokingham Borough Council to develop the scope and any modelling requirements to inform the subsequent Transport Assessment (TA) and we would expect the TA to assess any potential impacts to the M4 and take into account any other development in the area.

Further feedback:
As a note, the applicant's attention is drawn to the significant volume of representations received from residents and local Parish Councils which is available on the council's planning website. In general, these views have been helpful for the screening opinion for local constraints etc and in addition, there are more detailed comments that sit outside of the scoping process but they may help inform the material for any forthcoming planning application.

Further comments received from external stakeholders is appended below for the applicant's information.

We hope this is of assistance and should you have any queries in respect to this or require any further information, please contact the case officer Christopher Howard.

Yours Sincerely,

Connor Corrigan
Service Manager

Enc.