

Date: 30 October 2024
Application: 242610



**WOKINGHAM
BOROUGH COUNCIL**

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Screening or Scoping Response Letter

Application Number: 242610
Site Address: Longmoor Bog SSSI
Expiry Date: 1 November 2024

Proposal: Screening Opinion application for an Environmental Impact Assessment for a proposed replacement of 2no 11kV electricity wood pole structures on its Crowthorne (CROW) E10L5 11kV Circuit.

Dear Alex Monk,

Thank you for your request for a Screening Opinion for 2no replacement 11kv electricity wood pole structures. The application has been screened in accordance with Regulation 6 (2) of the EIA Regulations 2017 (Town and Country Planning Environmental Impact Assessment Regulations 2017) and the supporting Planning Practice Guidance and this is set out in Table 2 below.

In summary, due to the scale of the development, existing land use (namely the feature of existing poles) and context of the application site, it is not considered at this stage and based on the information submitted that an Environmental Impact Assessment (EIA) should accompany any forthcoming planning application.

Yours sincerely,

Development Management

Site description and background information

The site relates to around 0.3ha of land within the Longmoor Bog Site of Special Scientific Interest ("SSSI"), Finchampstead. The land is bound on the northern and western boundary by agricultural units 'Bluebell Farm' and 'High Barn Farm' and the southern and eastern boundary by the Longmoor Bog SSSI. Further west of the application site lies sporadic residential development such as 'Honeysuckle Lodge', 'Finches' and 'Downshire Lodge'.

The site itself has been, and still remains part of the Longmoor Bog SSSI, however, two existing electricity poles (of timber construction) have featured on the land which lies adjacent to a streetlight lit pedestrian footway, connecting around the SSSI itself. The poles themselves are located to the south of this pathway and are only accessible through the existing fence (panels require removal to facilitate access).

From the submitted documents it is understood that the application can be described as the proposed replacement of 2no 11kV electricity wood pole structures on its Crowthorne (CROW) E10L5 11kV Circuit. The respective poles are labelled as P899 and P900 on the submitted plans and remain in the existing location.

Screening Opinion:

Before submitting an application, developers who are in doubt as to whether an Environmental Impact Assessment (EIA) is required, may request a screening opinion from the Local Planning Authority in accordance with Regulations 6 (1) and 15 (1) of the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 (the '2017 Regulations'). The request seeks to determine whether or not the proposal is for a form of development that is covered by Schedule 2 of the EIA Regulations and whether or not EIA is required.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out that Environmental Impact Assessment's (EIA's) are needed for certain developments whereby the proposal is to have likely significant effects on the environment. The application seeks a Screening Opinion to be considered in accordance with Regulation 5 of the Town and Country Planning (Environmental Regulations 2017). The key issues for consideration are:

- whether the proposed development would comprise a Schedule 1 or Schedule 2 development for the purposes of the Regulations; and if so,
- whether the development is EIA development requiring any future planning application to be accompanied by a full Environmental Statement being mindful of factors such as the nature of the development, size and location and the requirements of Schedule 3 of the Regulations.

In undertaking the assessment, the applicant is obliged to provide enough information about the proposed development for the Council to make an adequate assessment, such as providing a description of the development and a plan of the site location. Such information has been received for this submission against these requirements.

National Planning Practice Guidance

Paragraphs 033, 057 and 058 of the Planning Practice Guidance (PPG) provide guidance on whether significant effects are likely. In general, the more environmentally sensitive the location, the lower the

threshold will be at which significant effects are likely. Paragraph 033 states that all developments in, or partly in, such areas should be screened. These are:

- Sites of Special Scientific Interest and European sites;
- National Parks, the Broads and Areas of Outstanding Natural Beauty; and
- World Heritage Sites and scheduled monuments.

The site is located within an SSSI which is considered a highly environmentally sensitive location. The provisions of Schedule 2 apply. Environmental Impact Assessment is more likely to be required if the project affects the features for which the sensitive area was designated. However, it does not follow that every Schedule 2 development in (or affecting) these areas will automatically require an Environmental Impact Assessment. It is necessary to judge whether the likely effects on the environment of that particular development will be significant in that particular location.

Schedule 1 Development:

It is not considered that the proposed development falls within any of the categories of development listed in Schedule 1 of the Regulations, which comprise potentially the most significantly harmful forms of development in terms of environmental risk. As such an assessment of the proposal is required to determine whether it falls within the remit of Schedule 2 of the Regulation

Schedule 2 Development:

Schedule 2 Development:

Schedule 2 development is deemed to be those forms of development listed within Schedule 2 of the Regulations which:

- i) has any part of the development located wholly or partly in a ‘sensitive area’ as defined in Regulation 2(1) or
- ii) meets one of the relevant criteria or exceeds one of the relevant thresholds listed in Schedule 2. In having regard to criteria i) above,

Table 1 below sets out the indicative criteria as per Schedule 2(ii), thresholds and key issues to be considered in determining whether a development is likely to be EIA development identified in the Planning Practice Guidance.

Table 1:

Development type	Schedule 2 indicative criteria	Indicative criteria and threshold	Key issues to consider
3(a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1);	The area of the development exceeds 0.5 hectare.	Thermal output of more than 50MW. Small stations using novel forms of generation should be considered carefully.	Level of emissions to air, arrangements for the transport of fuel and any visual impact.

Whilst table 1 outlines the thresholds for screening based on thermal output and novel forms of generation these thresholds are not triggered by the proposal. The site is located within a Site of Special Scientific Interest (SSSI) which is classed as a 'sensitive area' as defined in regulation 2(1). On this basis, EIA screening is necessary.

Planning History

There is no relevant planning history.

Screening Assessment

Table 2 below sets out the screening assessment for the site for the purpose of an EIA.

Natural resources				
1.1 Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	No	The proposed development would not require re-modelling of the site to accommodate the replacement poles. Therefore, the topography of the site would remain unchanged.	N/A	
1.2 Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?	Yes	The replacement poles would require foundations in the ground, including relevant ground works to permanently secure them.	No	The area of land for the poles is limited, and the usage of materials to provide the poles themselves would not be considered a significant use of resources.
1.3 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	No	Whilst the site is located within the Longmoor Bog SSSI and surrounded by mixed woodland, the proposal uses the footprint of existing poles and would not significantly affect the surrounding resources.	N/A	
Waste				
2.1 Will the project produce solid wastes during construction or operation or decommissioning?	Yes	The removal and decommissioning of the existing poles would generate timber waste and residual hardcore from the footings but only a limited amount.	No	The level of waste produced by the removal of two timber poles and footings is not considered to be significant.
Pollution and nuisances				
3.1 Will the project release pollutants or any hazardous, toxic or noxious substances to air?	No	The 2no. replacement poles constructed of timber would not omit hazardous, toxic or noxious substances.	N/A	
3.2 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes	The erection of 2no. replacement poles including the removal of the existing timber poles would cause a degree of noise and vibration given the piling required to secure their foundations.	No	Given the duration of the project is 3 days and limited works are required to undertake the replacement, no long term noise or vibration will arise from the development.
3.3 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	No	The modest scale of construction required to facilitate the erection of two poles and distance away from the ordinary watercourse is unlikely to lead to any significant contamination.	N/A	

3.4 Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No	The access to the site is located within an area of potential land contamination, however, the works proposed fall outside of this area.	N/A	
Population and human health				
4.1 Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	No	The site is located within the 12km Zone for Atomic Weapon Establishment (AWE) Burghfield. The scale of the proposed development falls outside of any consultation criteria identified by the Office for Nuclear Responsibility. Construction activities will be managed by Health and Safety legislation requirements.	N/A	
4.2 Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning (for example due to water contamination or air pollution)	No	The site is located within the 12km Zone for Atomic Weapon Establishment (AWE) Burghfield. The scale of the proposed development falls outside of any consultation criteria identified by the Office for Nuclear Responsibility.	N/A	

Water resources				
5.1 Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?	No	The site is predominantly within flood zone 1 and located next to an ordinary watercourse (and within the ordinary watercourse consultation zone). However, whilst limited information has been submitted relating to the management of surface water, given scope of works the proposal would not significantly impact these water resources.	N/A	
Biodiversity (species and habitats)				
6.1 Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local)).	Yes	The site itself lies within the Longmoor Bog SSSI As identified in the applicants screening letter, Natural England do not object to the proposal subject to mitigation which is secured under separate legislation.	No	The proposals feature Natural England conditional Agreement which require the following: 1. All vegetation/cuttings or arisings must be removed off site to prevent impacts from nutrification, change in temperature and light levels. 2. The works must be carried out when the ground is sufficiently dry to ensure vehicle use does not cause damage to the soil surface. Further, wildlife is protected under the Wildlife and Countryside Act 1981 and separate legislation. Protected species licences will need to be obtained as necessary.

6.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?	Yes	The proposal is located within an SSSI and Local Nature Reserve Local Nature Reserves (LNRs) are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities. Further the site is located within the 5km consultation zone for the Thames Basin Heath Special Protection Area.	No The proposals feature Natural England conditional Agreement which require the following: 1. All vegetation/cuttings or arisings must be removed off site to prevent impacts from nutrification, change in temperature and light levels. 2. The works must be carried out when the ground is sufficiently dry to ensure vehicle use does not cause damage to the soil surface. Further, wildlife is protected under the Wildlife and Countryside Act 1981 and separate legislation. Protected species licences will need to be obtained as necessary. The impact on the Thames Basin Heath Special Protection Area would be negligible given Natural England attribute impact to net increases in residential population. The proposal does not include new houses, does not propose additional recreational opportunities, nor would increase the net residential population using the SPA. On this basis, the proposal is unlikely to harm the habitats of protected species residing within the special protection area.
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Landscape and visual

7.1 Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project?¹ Where designated indicate level of designation (international, national, regional or local).	Yes	The site sits within an area locally identified as the 2019 Loddon Valley Landscape Character Assessment as the Finchampstead Forested and Settled Sands. The landscape identified as highly sensitive, of high quality with low capacity for change.	No The proposal is well screened behind dense, existing vegetation and would replace existing poles, therefore the visual impact would be limited. Whilst the Finchampstead Forested and Settled Sands is highly sensitive, replacement poles would not significantly harm its high quality as there would be very little change from the existing situation.
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¹ See question 8.1 for consideration of impacts on heritage designations and receptors, including on views to, within and from designated areas.

7.2 Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)	No	The proposal would lie directly adjacent to the BARK14 bridleway which is a public right of way. The proposed towers replace the existing which would be notably set back from this path by c.98 metres at the closest point and significantly screened by dense and inaccessible woodland.	N/A	
Cultural heritage/archaeology				
8.1 Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).	No	The site is not located within an archaeological consultation zone, is not adjacent to listed buildings or their buffer zones, is not located adjacent to a conservation area, is not located adjacent to or within any historic parks and gardens nor is located within or adjacent to an area of special character.	N/A	
Transport and Access				
9.1 Are there any routes on or around the location which are used by the public for access to recreation or other facilities which could be affected by the project.	Yes	The site is located directly adjacent to and accessed from Barkham Bridleway BARK14. Temporary access to the site could cause I disruption to users of BARK14 subject to compliance with the conditions provided by Natural England.	No	Given the limited nature of the works, construction workers will access the site off BARK14 (through the removal of fence panels). SSE have not indicated that BARK14 would be closed for the 3-day duration of the project, nor that any parking would hinder this access (connection shown from the public highway where parking is not restricted). Accordingly, the project is unlikely to significantly effect public access to recreation.
9.2 Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project	No	There are no transport routes around the application site that are subject to congestion. The limited traffic generation caused by work vehicles entering the site would not change this.	N/A	
Land use				

10.1 Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.	Yes	The site is located within the Longmoor Bog SSSI where there is public access (around the periphery) for recreational leisure. The site itself however is not publicly accessible	No	Given the short duration of the works and proposed access, there would be no significant impact on users of the BARK14 right of way.
10.2 Are there any plans for future land uses on or around the location which could be affected by the project?	No	The site has no relevant planning history and given the nature of the surrounding area as an SSSI, development is highly unlikely to come forward in future.	N/A	
Land stability and climate				
11.1 Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No	The site is not located within an area of any known earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions.	N/A	
Cumulative effects				
12.1 Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	No	The site proposed for development has no relevant planning history.	N/A	
Transboundary effects				
13.1 Is the project likely to lead to transboundary effects?²	No		N/A	

² The Regulations require consideration of the transboundary nature of the impact. Due to the England's geographical location the vast majority of TCPA cases are unlikely to result in transboundary impacts.

Requirement for an EIA

The proposal is considered to fall under category 3(a) of Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The development site is less than 0.5 hectares of urban development and the proposal does not produce a thermal output above 50MW. It is not considered to be more significantly harmful in appearance than existing, nor would lead to unacceptable emissions or require the transport of fuel. The proposed development is, however, within an SSSI.

Based on the submitted information and site background, the proposed development is not considered to be EIA development. This view is in accordance with Schedule 3 (Selection Criteria for Screening Schedule 2 Development) as well as the criteria provided in the Planning Practice Guidance.

Conclusion

In summary, notwithstanding location within an SSSI, due to the scale, duration of works and nature of the proposed development and for the reasons set out above, it is not considered that an EIA should accompany any forthcoming application for the site.

Yours sincerely,



Development Management
30 October 2024