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Date: 28/02/2025
My Ref: 243188

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.

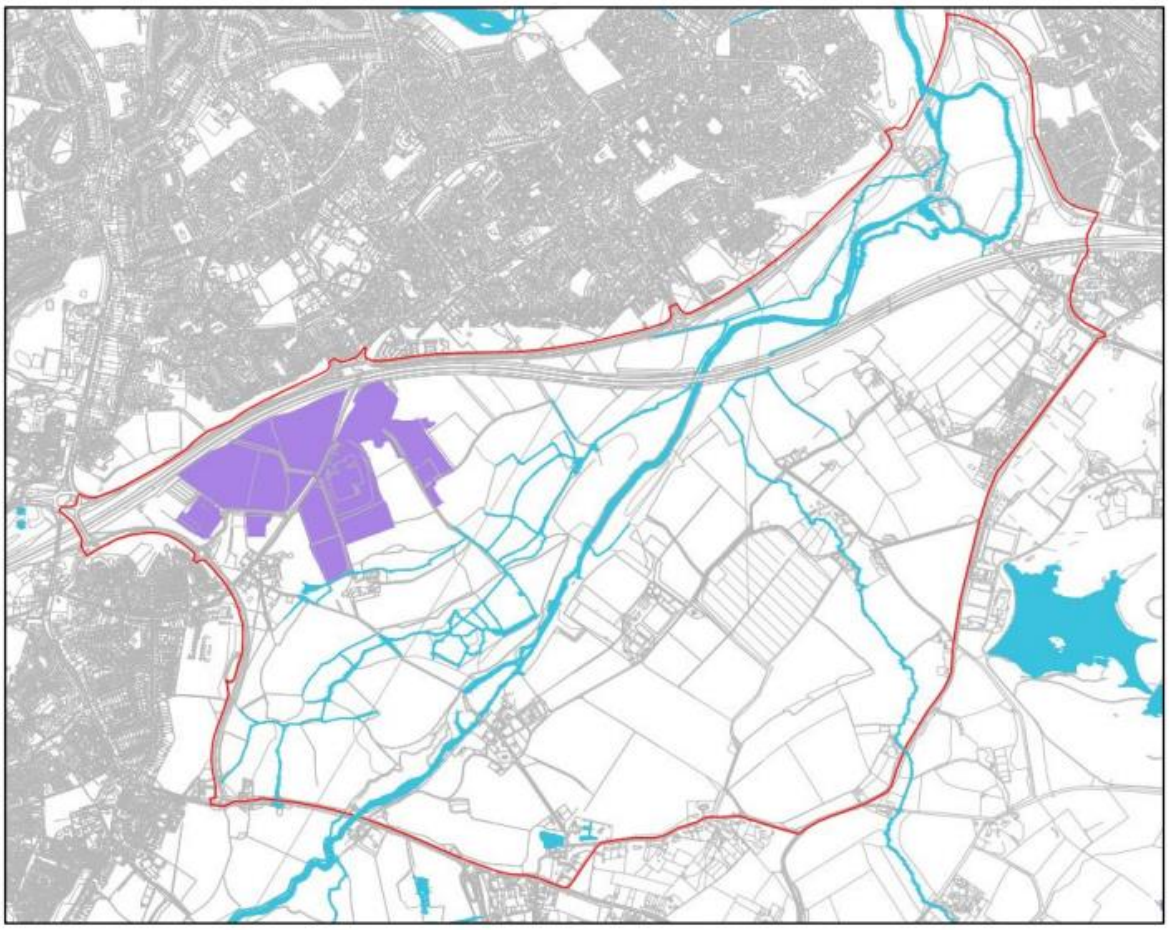

Figure 1: Site boundary

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.

[redacted]

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.

Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust
Estovers, Bury's Bank Road,
Greenham, Thatcham, Berkshire,
RG19 8BZ
Tel: 01635 35157
Email: info@bbowt.org.uk
Visit: bbowt.org.uk

FAO Case Officer

Sent by email only

13th January 2025

To whom it may concern,

243188| 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.| Hall Farm/Loddon Valley SDL

In relation to the above application, we have the following comments on behalf of the Berks, Bucks and Oxon Wildlife Trust (BBOWT). As a wildlife conservation-focused organisation, our comments relate specifically to the protection and enhancement of the natural environment and wildlife. We comment on as many relevant issues as our resources allow, and the absence of a comment on an issue should not be taken as our approval.

BBOWT has major concerns about the proposed development including the potential negative impact to irreplaceable habitat (ancient woodland and veteran trees), priority habitat and species, multiple Local Wildlife Sites, the River Loddon and the wider ecological landscape.

Negative impact to irreplaceable habitat (ancient woodland and veteran trees) and priority habitat and species

There are multiple areas of ancient woodland including St Johns Copse, Loaders Copse, Newbury's Copse, and Furzen Coppice. There are also number of veteran trees that have been identified across the site. Both ancient woodland and veteran trees are irreplaceable

habitat and under the NPPF development resulting in the loss or deterioration of irreplaceable habitats should be refused (see relevant policy below). According to the Concept Plan in the EIA scoping report the proposed employment development is adjacent to the St Johns Copse ancient woodland and the proposed residential development is adjacent to or nearby the reaming ancient woodlands within the site boundary. These highly sensitive and ecological valuable irreplaceable habitats and the many species they support are greatly vulnerable to recreational pressure, disturbance, risk of antisocial behavior, increased predation from cats and dogs and light pollution. The Woodland Trust's 'Planning for Ancient Woodland: Planners' Manual for Ancient Woodland and Veteran Trees' suggests that "*as a precautionary principle, **a minimum 50 metre buffer should be maintained** between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance*." Therefore, there should be at least a 50m buffer between any ancient woodland and development of any kind to prevent the adverse effects of disturbance and light pollution and if the applicant cannot put this in place, then the application should be refused.

The applicant's Impact Assessment Scoping Report identified Section 41 Habitats of Principle Importance Purple Moor Grass and Rush Pasture and Wet Woodland. In addition to this according to the 'Priority Habitats Inventory (England) © Natural England' Arc GIS layer there are also large amount of floodplain grazing marsh and deciduous woodland.

While we welcome the applicant completing a wide range of species surveys, the results of these surveys should be submitted and uploaded to the public planning portal alongside the mitigation and compensation plan for specific species of ecological importance such as the 15 breeding red list bird species and 8 wintering red list species to ensure what is suggested is appropriate as different species need various specific mitigation. For example, the Impact Assessment Scoping Report states that Skylark *Alauda arvensis* were recorded. Skylarks are a species which nests within open vista habitats such as arable field compartments so if there are breeding pairs of skylarks or other notable ground nesting birds these species need an unbroken line of sight so would avoid nesting at overly developed areas. Therefore, appropriate mitigation for highly sensitive ground nesting birds would require leaving a plot of land that has no or very limited paths/access to avoid disturbance especially during the breeding season.

To comply with both NPPF and local plan policy CP7 Biodiversity (see relative policies below), the applicant must ensure that the development will not result in any harm to priority habitats or species and demonstrate how it will promote the conservation, restoration and enhancement of priority habitats and recovery of priority species.

Negative impact to Local Wildlife Sites

Local Wildlife Sites (LWSs) are identified and selected locally by partnerships of local authorities, nature conservation charities, statutory agencies, ecologists, and local nature experts, using robust scientifically determined criteria and detailed ecological surveys. Their selection is based on the most important distinctive and threatened species and habitats within a national, regional, and local context. This makes them some of our most valuable wildlife areas. Within the site boundary there are seven Local Wildlife Sites (St John's Copse, Hall Farm Woodland Triangle, Arborfield Bridge Meadow, Rushy Mead, Alder Carr adjacent to River Loddon, Loaders Copse Gravel Pit Wood/The Holt, and The Loddon River). It is crucial that the applicant thoroughly demonstrates how they will protect the LWSs

from direct and indirect harm to comply with local plan policy CP7 - Biodiversity (see relevant policies below). For examples, there must not be any new paths or roads through the site which would fragment the habitat and thorough management plans should be created for the LWSs within the applicant's site boundary to mitigate the increased recreational disturbance and increased predation. As part of the management plans the applicant should also state how they plan to restore the habitats, especially the priority habitats in the LWS to improve the resilience of the habitats and species and also to contribute to targets for the BOA which half the site falls within. For example, Arborfield Bridge Meadow LWS used to have lowland fen (according to Natural England Priority Habitat Arc GIS layer) but there has since been a decline in habitat quality and it has been recommended by the Berks LWS panel that the site is reverted to marsh grassland/fen. Therefore, the applicant should create a management plan that includes this restoration.

Negative impact to River Loddon chalk stream

The River Loddon is an incredibly wildlife rich chalk stream. These rivers are globally important and rare, there are only approximately 220 chalk streams in the world and most are in Southern England. Supporting countless species of plants, invertebrates, fish, birds and mammals which rely on very specific conditions such as water quality and temperature, chalk streams are highly vulnerable. Even the smallest changes put some of our most iconic wildlife at risk. According to the South East Rivers Trust the section of the River Loddon running through the site is already struggling with a moderate phosphate status and an overall status of poor. Any further pollution, including urban runoff, could tip this river over the edge making it impossible for it to recover.

There are no rivers achieving good chemical status and only 16% of designated rivers are in good ecological health in England. This is indicative of the current state of the water and drainage infrastructure which frequently fails and is unable able to meet existing requirements or adhere to licensed conditions. It is essential that the local wastewater infrastructure has the capacity to cope with an additional 3,930 dwellings and this should be assessed and taken into account by the council before granting permission, so the development does not result in additional sewage overflow incidents that pollute the local rivers and put wildlife at risk.

The Loddon Catchment partnerships' Action Plan[1] identifies flooding as one of the key issues impacting the River Loddon, especially as flooding events are being projected to become more frequent and more severe as the climate changes. When surplus water flows across the landscape it picks up chemicals and pollutants from urban runoff. Any development, but particularly development on and near a floodplain, like this application, will result in more impermeable surfaces inevitably increasing the flood risk. Therefore, it is crucial that the applicant provides a thorough and robust plan that shows that applicant will put in place Natural Flood Management that reduces flood risk by reinstating natural features such as wet woodlands, marshlands, water meadows, and meanders back into river systems which can absorb and hold water. This should be in addition to installing effective Sustainable Drainage Systems (SuDS) that also provide opportunities for wildlife to reduce flood risk and deliver wider benefits for biodiversity and water quality.

The habitat management and restoration plans for the development should incorporate the catchment priorities set out in the River Loddon Action Plan[2].

[1] https://storymaps.arcgis.com/collections/4328b25bc06947889a21710cbefcca4e?item=4
[2] https://storymaps.arcgis.com/collections/4328b25bc06947889a21710cbefcca4e?item=5

Biodiversity Net Gain and Nature Positive design

The proposed site is situated in a key potential location to reconnect the wider ecological network along the River Loddon. Surrounding the site are various sites of ecological significance including 32 Local Wildlife Sites within 2km and four SSSIs and the Thames Basin Heaths Special Protection Area (SPA) within 5km of the site.

Approximately half of the site area lies within the Loddon Valley South Biodiversity Opportunity Area (BOA). The targets and opportunities for this BOA are river management, restoration and protection, management and re-creation of lowland meadow habitat, management of wet woodland, parkland and farmland for farmland birds.

If the biodiversity of the site was significantly improved, it could have the potential to act as a strategic part of a larger landscape recovery. However, if the site's biodiversity was compromised then the wider ecological network could become further fragmented and prevent future ecological connectivity. The local planning authority should consider the impacts of the proposed development on any local wildlife and ensure that the applicant goes above and beyond to deliver environmental benefits. This can be achieved by appropriate habitat management, restoration and creation across the site, SuDS and Natural Flood Management and design that provides green infrastructure built in from the start such as biodiversity enhancement features (e.g. swift bricks, bat boxes, hedgehog highways etc) and green roofs.

If this is done the applicant should easily be able to achieve a high Biodiversity Net gain which is why we recommend the application should not be approved unless there is a minimum 20% Biodiversity Net Gain and the entire development has nature positive design.

Whilst the legal requirement is to meet a minimum 10% Biodiversity Net Gain, Government advice and Impact Assessments[3] suggest that 10% net gain is likely in practice to only achieve "no net loss" rather than delivering 'net gain' that would contribute to nature's recovery. We suggest looking at Kent County Council's assessment[4] of the potential effect of a 15% or 20% Biodiversity Net Gain target on the viability of residential-led development in Kent. In summary, a shift from 10% to 15% or 20% Biodiversity Net Gain did not materially affect viability in the majority of instances when delivered onsite or offsite. The biggest cost in most cases is to get to the mandatory, minimum 10% Biodiversity Net Gain which is already legally required as of February 2024. The increase to 15% or 20% Biodiversity Net Gain in most cases costs much less, is generally negligible, and it is unlikely to be what renders development unviable. Therefore, to deliver a true net gain, we would recommend that applicants deliver a minimum of 20%.

Furthermore, it is acknowledged that through legislation, developments are required to manage the habitats for at least 30 years. However, this should be seen as a very minimum. Once built, if approved, the development can be reasonably assumed to be there for ever, since even when the buildings are replaced, they would be likely to be replaced by other forms of development. Therefore, the wildlife habitat will be lost forever, and any

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf
[4] https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf

compensation must be provided forever. Otherwise, the result is to simply defer a significant loss of biodiversity that should not be occurring either now or in 30 years' time.

In perpetuity is considered to be at least 125 years in accordance with legislation which defines the 'in perpetuity' period (Perpetuities and Accumulations Act 2009). For example, this legislation was used to define in perpetuity in this extract from the Thames Basin Heaths SPA. Para 3.1.5 Thames Basin Heaths Special Protection Area Supplementary Planning Document which states: "*The avoidance and mitigation measures should be provided in order that they can function in perpetuity which is considered to be at least 125 years. An 'in perpetuity' period of 125 years has been applied in this SPD in accordance with the legislation which defines the 'in perpetuity' period (Perpetuities and Accumulations Act 2009.*"

On-site or off-site compensation that involves only a 30-year agreement with no guarantee of the long-term security in perpetuity of the wildlife habitat created would not be appropriate. The loss of wildlife habitat on the site, and the potential impact on wildlife habitat away from the site, will be permanent so the compensation must be permanent.

As for nature positive design, integrating nature into new developments is proven to have a whole range of benefits for the community. The Wildlife Trusts' report '*Swift and Wild: How to build houses and restore nature together*'[5] sets out how this can be achieved with case studies that demonstrate it's success. Furthermore, we recommend the development is designed with the Building with Nature standards[6], or an equivalent standard which ensures that all green infrastructure is delivering maximum benefits for the health and wellbeing of residents, and for nature's recovery.

Relevant Policies

National Planning Policy Framework (2023)

Habitats and biodiversity 185.

To protect and enhance biodiversity and geodiversity, plans should:

(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity [65]; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation [66]; and

(b) ***promote the conservation, restoration and enhancement of priority habitats****, ecological networks and the protection and* ***recovery of priority species****; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

186.

When determining planning applications, local planning authorities should apply the following principles:

[5] https://www.wildlifetrusts.org/sites/default/files/2024-10/24SEP_Planning_Report_HR-DIGITAL%20%281%29.pdf
[6] https://www.buildingwithnature.org.uk/

*a) **if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused**;*

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

*c) **development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees)** should be refused, unless there are wholly exceptional reasons67 and a suitable compensation strategy exists;*

Wokingham Borough Core Strategy (Adopted 29 January 2010)

CP7 - Biodiversity

Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance.

Development:

*A) Which **may harm county designated sites (Local Wildlife Sites in Berkshire)**, whether directly or indirectly, or*

*B) Which **may harm habitats or, species of principle importance in England for nature conservation**, **veteran trees or features of the landscape** that are of major importance for wild flora and fauna (including wildlife and **river corridors**), whether directly or indirectly, or*

C) That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:

i) Mitigation measures can be put in place to prevent damaging impacts; or

ii) Appropriate compensation measures to offset the scale and kind of losses are provided.

CP1 – Sustainable development

Planning permission will be granted for development proposals that:

1) Maintain or enhance the high quality of the environment;

2) Minimise the emission of pollutants into the wider environment;

3) Limit any adverse effects on water quality (including ground water);

4) Ensure the provision of adequate drainage;

5) Minimise the consumption and use of resources and provide for recycling;

6) Incorporate facilities for recycling of water and waste to help reduce per capita water consumption;

7) Avoid areas of best and most versatile agricultural land;

8) Avoid areas where pollution (including noise) may impact upon the amenity of future occupiers;

9) Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater);

10) Provide attractive, functional, accessible, safe, secure and adaptable schemes;

11) Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6; and

12) Contribute towards the goal of reaching zero-carbon developments41 as soon as possible by:

a) Including appropriate on-site renewable energy features; and

b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.

CP3 - General Principles for development

Planning permission will be granted for proposals that:

[…]

c) Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.

Conclusion

The proposed site is in a location which is critical for wider landscape recovery and restoration in the local area. The River Loddon, a rare and important LWS chalk stream that is of major importance for the ecological network, runs through the middle of the site. There are multiple LWSs, irreplaceable habitats, and priority habitats which support many priority and notable species, and the Loddon Valley South BOA covers approximately half of the site further highlighting the importance of this site's role in nature recovery locally. With this is mind we believe the site is inappropriate for development, particularly one of this size and poses great risk to the local environment and wildlife. Therefore, if it is demonstrated that the need for this development in this location outweighs the risk, the applicant must do everything possible to prevent any direct or indirect harm to the ancient woodland, veteran

trees, and River Loddon, and as for the rest of the site mitigate the risk, compensate for any harm done and go above and beyond in contributing to nature's recovery on the site. This includes a very minimum of 20% and clear demonstration and the entire development has benefits for wildlife integrated into the design.

Please do not hesitate to get in touch should you wish to discuss any of the matters raised.

Yours sincerely,

Holly Gray

Planning and Policy Officer

Berks, Bucks and Oxon Wildlife Trust

Date: 08 January 2025
Our ref: 497998
Your ref: 243188

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development.control@wokingham.gov.uk

BY EMAIL ONLY

Dear Sir/Madam,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): 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.
Location: Hall Farm/Loddon Valley SDL

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 20 December 2024, received on 20 December 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on environmental assessment, natural environment and climate change.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours faithfully

Tina Kerr
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on environmental assessment and natural environment.

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The National Planning Policy Framework (paragraphs180-181 and 185-188) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the natural environment.

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a duty to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available here.

Designated nature conservation sites

International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s):**

- Thames Basin Heaths Special Protection Area (SPA)

European site conservation objectives are available at http://publications.naturalengland.org.uk/category/6490068894089216

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). In addition paragraph 187 of the National Planning Policy Framework (NPPF) requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential

SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment
https://www.gov.uk/guidance/appropriate-assessment

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

Nationally designated sites

The development site is within or may impact on the following **Site of Special Scientific Interest:**

- Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI)
- Bourley and Long Valley Site of Special Scientific Interest (SSSI)
- Bramshill Site of Special Scientific Interest (SSSI)
- Broadmoor to Bagshot Woods and Heaths Site of Special Scientific Interest (SSSI)
- Castle Bottom to Yateley and Hawley Commons Site of Special Scientific Interest (SSSI)
- Chobham Common Site of Special Scientific Interest (SSSI)
- Colony Bog and Bagshot Heath Site of Special Scientific Interest (SSSI)
- Eelmoor Marsh Site of Special Scientific Interest (SSSI)
- Hazeley Heath Site of Special Scientific Interest (SSSI)
- Horsell Common Site of Special Scientific Interest (SSSI)
- Ockham and Wisley Commons Site of Special Scientific Interest (SSSI)
- Sandhurst to Owlsmoor Bogs and Heaths Site of Special Scientific Interest (SSSI)
- Whitmoor Common Site of Special Scientific Interest (SSSI)

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 180 and 181). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017

is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, [redacted] and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures . A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A DLL scheme for GCN may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 180 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including draft Planning Practice Guidance, can be found here

The statutory biodiversity metric, together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.
The metric should be used to:
• assess or audit the biodiversity unit value of land within the application area
• calculate the losses and gains in biodiversity unit value resulting from proposed development
• demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound

basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon

store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 180 and 181 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

As set out in paragraph 217 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and
The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1].A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site.
Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections.

The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change

Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society's nature-based solutions report (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

creating a better place

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 100,000m^2). 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

Cont/d..

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 Lodden, 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 Lodddon 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
Direct e-mail: Planning_THM@environment-agency.gov.uk
Direct dial: 02030251755

End

ONR Land Use Planning - Application 243188

Dear Sir/Madam,

ONR land use planning processes are published here: http://www.onr.org.uk/land-use-planning.htm.

ONR has no comment on planning application reference: 243188 as it does not meet ONR's consultation criteria:

DEPZ	Any new development, re-use or re-classification of an existing development that could lead to an increase in residential or non-residential populations thus impacting on the off-site emergency plan. Any new development, re-use or re-classification of an existing development that could pose an external hazard to the site. Any re-use or re-classification of an existing development that could introduce vulnerable groups to the DEPZ.
Outer Zone	Any new residential development of 200 dwellings or greater. Any re-use or re-classification of an existing development that will lead to a material increase in the size of an existing development (greater than 500 persons). Any new non-residential development that could introduce vulnerable groups to the OCZ. Any new development, re-use or re-classification of an existing development that could pose an external hazard to the site.

Kind regards,

Land Use Planning

Office for Nuclear Regulation

ONR-Land.Use-planning@onr.gov.uk