

# MEMORANDUM

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| <b>From:</b>                | Duncan Fisher<br>Ecology Officer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                |        |
| <b>Service</b>              | SDL Ecology                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>App No:</b> | 243188 |
| <b>Address:</b>             | Hall Farm/Loddon Valley SDL.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                |        |
| <b>Proposal:</b>            | 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. |                |        |
| <b>Type of Development:</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                |        |
| <b>Site Visit Made:</b>     | Yes/No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                |        |

## Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

## Comments On Proposal

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

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

population of this species is of regional importance – perhaps being the last remaining population on this region of the Thames catchment.

The red line boundary for the proposed development includes a stretch of the Barkham Brook. Other sites along the Barkham Brook are proposed to be allocated in the current local plan update. There is also a Thames Water sewage works on the Barkham Brook which will require capacity upgrades to be able to serve these new developments. I recommend that the in-combination assessment for EIA should include White-clawed Crayfish and should have a zone of influence of the entire length of the Brook up to the Arborfield Garrison SDL. This species is likely to require a strategic plan along the length of the Brook to maintain (and ideally enhance) its local conservation status and there may well be relevant actions to undertake within the red line boundary of this site.

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

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

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

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

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

The maps so far provided indicate bat activity without explaining the survey effort and bias to that survey effort. This will be relevant to interpreting the results. Given the scale of the proposal, I would want to see more detail about the survey effort to consider the potential impact on lekking/mating roosts of Nathusius' Pipistrelle (indicated as being present on site). I would also like to see investigation as to what

Myotis species are on site (other than the already identified Daubenton's Bat) as there could be a rarer species of Myotis hidden within that sound analysis grouping.

| Conditions & Reasons (if required) |                       |                |           |
|------------------------------------|-----------------------|----------------|-----------|
| n/a                                |                       |                |           |
| <b>Date:</b>                       | 29<br>January<br>2025 | <b>Signed:</b> | D. Fisher |