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211221 Caversham Park Screening Request



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Dear Steve

**Land at Caversham Park, Peppard Road, Caversham, Reading, RG4 8TZ:
Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) -
Request for an EIA Screening Opinion**

Savills UK Limited, on behalf of Beechcroft Developments Ltd ('Beechcroft'), intend to submit planning and listed building applications at Caversham Park, Reading, for the conversion of the main Listed manor house and existing buildings along the main access road, together with the construction of a care home and the erection of new homes both within and outside the Registered Park and Garden.

Prior to the submission of the planning application, we formally request the Planning Authority's Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (EIA) Regulations 2017 (the EIA Regulations).

In accordance with Regulation 6(2) this letter provides:

- A description of the development, including the physical characteristics and location of the development;
- A description of the aspects of the environment likely to be significantly affected by the development;
- Where information is available, a description of any likely significant effects of the proposed development on the environment; and
- A plan sufficient to identify the land (enclosed separately).

Description of the Site and Proposed Development

The Site

The Site is approximately 37.7 ha in area and is shown edged in red on the plan (enclosed separately). The Site forms part of an historic estate in Caversham with extensive grounds located to the north of Reading and surrounded by suburban development. The majority of the Site is a Registered Historic Park and Garden and the main House itself is Grade II Listed. The house and its grounds have been used by the BBC as its Monitoring Station since 1943 for broadcasting services and other related activity, although they vacated the Site in 2018 and it has since been vacant. BBC monitoring relocated from Caversham Park in 2018 and has been used by BBC for other BBC related use since but is now currently vacant.

The Site is located within the northern suburbs of Reading and close to Emmer Green, which has a range of amenities and facilities and is a predominantly residential area. The Site is bounded largely by residential built development along its northern, eastern and western boundaries, although to the south of the Site are the open spaces associated with the allotments and Reading Cemetery and Crematorium.

Caversham Park House is located in the north of the Site and lies on a plateau at the top of a south-east-facing slope. Panoramic views extend southwards from the house and garden terraces at the top of the slope across Caversham and Reading, towards low, distant hills, probably formerly with views of the Thames which lies 2km to the south.

Access to the Site is at the north-west corner of the Site, via Peppard Road which is to the west of the house. The driveway is flanked by two stone gate piers and the driveway passes a single storey lodge standing adjacent to the south.

Environmental Designations

The Site contains the following designated heritage assets:

- Caversham Park House (Grade II listed under List Entry Number 1113560)
- The Inner Park Walls (Grade II Listed under List Entry Number 1113561)
- The Entrance Gates and Gate Piers (Grade II listed under List Entry Number 1113559)
- The Temple to West of Caversham Park (Grade II listed under List Entry Number 1302853)
- The Walls at Former Kitchen Garden at Caversham Park (Grade II Listed under List Entry Number 1302854)
- Caversham Park is a Registered Park and Garden (Grade II Listed under List Entry Number 1000524)

The Site is not subject to any specific environmental designations such as Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB) or Site of Special Scientific Interest (SSSI) and is not within or adjacent to a Conservation Area.

In flood risk terms, the Site is located within Flood Zone 1, having the lowest probability of flooding.

The Site is also not located within an Air Quality Management Area.

Planning Policy Context

The Site is the subject of a specific policy (Policy CA2) within the adopted Reading Borough Local Plan (November 2019). Policy CA2 and the accompanying text acknowledge that conversion of the main house may be acceptable "if it sustains the significance of the listed building", and also states that: "*any proposal that includes additional development would need to be accompanied by compelling evidence that such development will not have a detrimental impact on the many features of importance within the site, including areas of important habitat, significant trees, the House and other listed structures, views in and out of the site, and the overall significance of the park itself, as well as on considerations such as access.*" In addition, the Policy accepts that "*there may be scope for some limited development on previously developed land within the site, which will need to be justified at application stage.*"

The site does not form part of the Green Belt.

Proposed Development

In agreement with the BBC, the applicant is proposing a development to provide assisted living apartments and a care home as well as new open market retirement living housing and affordable homes at the Site.

The proposed development includes:

- Conversion of the main house to provide 63 assisted living apartments;
Construction of a two storey 64 bedroom care home to the west of the main house following demolition of existing buildings;
- Conversion of the existing buildings along the access to the site to 4 houses;
- Erection of 33 houses on land lying outside the Historic Park and Garden boundary;

- Erection of 41 new houses and 12 apartments on land to the east of the main house in the area of existing car parking, hardstanding and infrastructure.
- Refurbishment and extension of the sports pavilion including the provision of 2 no. croquet lawns, 2 no. bowling greens and an additional tennis court.

The above is the quantum of development and has been used to inform the screening conclusions within this letter.

A key aspect of the proposed development is that it will be 'heritage-led'. We have taken the view that if harm to the significance of any heritage assets can be avoided then the development is unlikely to have any significant effect on the historic building environment. As such, our approach has been to seek early engagement with relevant organisations, such as Historic England and the Berkshire Gardens Trust, to identify the significance of those heritage assets that have the potential to be affected by development of the site.

The application of the definition of significance contained within the NPPF and relevant Historic England guidance has allowed us to identify the significance of the relevant heritage assets and the contribution made by their setting to their significance. This process has enabled us to understand where development could take place, and its form, that avoids any material harm to significance and therefore, result in no likely significant effect,

The proposed development comprises a mix of housing types, open market affordable apartments and houses, 'downsizers' apartments and houses and Extra Care Apartments formed by the conversion of the existing buildings. A downsizer can be described as "a person who moves to a smaller property, typically after he or she retires".

The proposed new homes will be a mix of 2 and 2.5 / 3 storeys in height and have been laid out as development within a sylvian setting, seeking to retain all of the established trees. Only the smaller fruit and ornamental trees are proposed for removal.

Car parking is proposed to be located in discrete parcels and will be provided in line with RBC's policies.

EIA Screening Process

Development that falls within Schedule 1 of the EIA Regulations always requires EIA and is referred to as 'Schedule 1 development'. Development listed in Schedule 2 that is located in a 'sensitive area' (as set out in Regulation 2(1)), or exceeds one of the relevant criteria or thresholds given in Schedule 2 is referred to as 'Schedule 2 development'. Not all 'Schedule 2 development' will require an EIA, only the developments likely to have significant environmental effects due to its size, location or nature. Development that requires EIA is referred to as 'EIA development'.

As set out in the table below, the proposed scheme is not Schedule 1 development, but falls within the description in Schedule 2 Part 10(b) 'Urban Development Projects'. The proposed development is not located within a sensitive area but would exceed the relevant criteria in Schedule 2 of more than 150 dwellings. Therefore, the proposed development would constitute EIA development if it were likely to result in significant environmental effects.

The Planning Practice Guidance (PPG) provides indicative thresholds to assist in the determination of whether a project is likely to have significant environmental effects. For urban developments such as this, these indicative thresholds state that "*Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination*". The PPG also defines 1,000 new dwellings as a suitable threshold, which is substantially above the development proposed.

Applying the PPG 'indicative criteria and thresholds' for Schedule 2 Part 10 (b) projects, consideration must also be given to whether the proposed development would have significant urbanising effects in a previously non-urbanised area. On the basis that the proposals are predominantly on previously developed land and are situated within an urban area, the delivery of the proposed development is not considered to result in any significant urbanising effects.

Therefore, given the site is not located within a sensitive area (as defined by the EIA regulations) and, for the reasons described below, significant effects are not considered likely, the proposed development is not considered to constitute EIA development. This is in line with relevant EIA guidance provided in the PPG which states that "*only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment*" (Paragraph: 018 Reference ID: 4-018-20170728). The assessment and consideration of environmental matters related to the proposed development can be appropriately addressed through the planning application process.

Application Thresholds	
i. Does the Proposed Development fall within Schedule 1 (Y/N)?	No
ii. If yes, what is the applicable description?	N/A
If yes, the proposed development automatically requires EIA	
iii. Does the proposed development fall within Schedule 2 (Y/N)?	Yes
iv. If yes, what is the applicable description?	10(b) Urban Development Project
v. Is any part of the proposed development to be carried out in a defined Sensitive Area (see Regulation 2(1))	No
vi. What is the applicable threshold/criteria in Schedule 2?	The development includes more than 150 dwellings; or 1ha of non-residential development; or the overall area of the development exceeds 5ha.
vii. Does the proposed development meet/exceed the applicable threshold (Y/N)?	Yes, the proposed development includes more than 150 dwellings.
If yes to (iii) and then (v) or (vii) the proposed development will require EIA if it is <u>likely</u> to have significant effects on the environment.	
Possible effects on the environment	
The following information has been prepared with reference to the selection criteria for screening Schedule 2 development, provided in Schedule 3 of the EIA Regulations: 1. Characteristics of development (a) – (g) (of the Regulations) 2. Location of development (a) – (c) (of the Regulations) 3. Characteristics of the potential impact (a) – (h) (of the Regulations) Features of the proposed development and any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment have been identified as per the PPG guidance at Paragraph 023 Reference ID: 4-023-20170728.	

The applicant has a good understanding of the possible environmental effects of the proposed development and, as such, the layout of the proposed development includes inherent environmental mitigation to respond to the constraints and potential impacts on and off site.

In the absence of inherent and additional mitigation and in advance of any judgments of the significance of individual effects, the possible environmental effects of the proposals are considered to be:

- Air quality – from emissions and dust generated during the construction phases and emissions resulting from the operation of the proposed development.
- Biodiversity and ecology – the effects on existing biodiversity and ecology from the redevelopment of the site.
- Cultural heritage and archaeology – Direct impacts on and effects on the setting of onsite heritage assets. The effects of the proposals on the setting of nearby heritage assets and non-designated heritage assets and impacts upon archaeological resource.
- Hydrology and flood risk – The risk of flooding caused by the development and the management of flood risk both within the Site and beyond its boundaries.
- Landscape, effects – The introduction of the development in the parkland could result in a change to the landscape character and features of these areas.
- Noise and vibration – from the construction and operational phases of the proposed development.
- Risks to human health – the risk of accidents or disasters resulting from the construction and operational phases of the proposed development.
- Social and environmental effects – including the creation of new employment during construction and introduction of additional residential receptors into the site.
- Soils and Contamination – the effects on the existing ground and soil conditions present on the site from the construction and occupation of the proposed development.
- Transport – the traffic movements associated with the proposed development on the local road network during both construction and operation.

1. Characteristics of development

a) The size and design of the whole development	The proposal has been developed on the basis of an understanding of what constitutes the significance of the relevant heritage assets, including the contribution from their setting. This has included an analysis of the history of the site and relevant archival research. Using Historic England guidance and recommended methodologies this work has enabled us to identify those elements of the site, its buildings, their interiors and the land around them, which should be protected. This in turn has enabled the scheme to be developed in a manner that avoids any detrimental impact on the setting and significance of the relevant listed buildings and the significance of the RPG.
b) The cumulation with other existing development and/or approved development	In respect of potential cumulative effects with other development, PPG advises that <i>“each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development”</i> (ID 4-024-201740728). Consideration has been given as to whether there is potential for likely significant effects to occur through the combination of the proposed development with other existing or approved developments. An outline planning application, reference 211843, has been submitted at Reading Golf Club for 223 homes in November 2021. This however is not of a scale where significant cumulative effects are considered likely. Additionally, those approved schemes within the area (1km radius) would not be considered of a scale that would give rise to significant cumulative environmental effects. Based upon the considerations presented within this table and with the implementation of standard mitigation measures, significant cumulative effects related to the overall combined impacts are considered to be unlikely.

c) The use of natural resources, in particular land, soil, water and biodiversity	Development would require the use of a range of common natural and man-made construction materials and resources for the build and fit-out of the scheme. Consideration of the potential impacts from the use of these resources is presented below. As the development is proposed on largely previously developed land, it is not envisaged that the proposed development will require any changes to the current site levels. As such, natural resources are not expected to be required in order to create a suitable development platform. Water During the construction phase, certain activities require water, including some common mitigation measures used to control potential demolition and construction impacts, such as dust dampening. However, taking into account the scale and nature of the proposed development, significant effects related to consumption are not considered likely and would be suitably controlled through the implementation of standard best practice construction techniques (to be set out in a Construction Environmental Management Plan (CEMP) and secured via planning condition). During the operational phase, water consumption associated with the residential use will occur. Water consumption from the proposed development will increase above the recent baseline usage from the site in line with the proposed increase in residential dwellings and the care home. However, the proposed development provides an opportunity to promote sustainable water use through design and fit out of the scheme, for example through the incorporation of efficient water fixings to meet building regulations. Biodiversity There are no designated ecological sites either on or in proximity to the site. <i>Refer to ecological value of the site....what opportunities for wildlife does the site provide – nesting birds...bats?</i> Overall, the proposed development, including the demolition of the existing buildings and loss of a number of the onsite trees, is not considered to cause the loss of any significant or important habitats in the area, or adversely impact the biodiversity resource. Once operational, vehicle movements on site and noise and light impacts associated with the proposed development may have some negligible effects on habitats (both positive and negative). External lighting design can be developed, taking account of sensitive ecology/habit areas, and by using cut-off lanterns light spill can be minimised. And the emerging design will incorporate embedded mitigation through the provision of soft landscaping areas and new planting which will reduce the impact on biodiversity to ensure that significant adverse effects are avoided. Moreover, there could be scope for net gains to be delivered compared to the existing situation. It is anticipated that the proposed development will deliver a net gain in biodiversity on site. It is therefore considered that the development proposals would not lead to significant effects in terms of biodiversity resource. Soil and Minerals The site is within a built up urban environment and the proposed development will not have a significant effect related to soils or the availability of agricultural land. The
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	site has not been identified or allocated for mineral extraction and is not situated within a mineral safeguarding area. Use of Materials As with any modern development project, through the careful selection of materials, and best practice construction methods, the consumption of materials and energy during construction and operation will be minimised. Overall, given the scale and nature of the proposed development, significant environmental effects related to the use of natural resources is considered unlikely.
d) The production of waste	Construction Demolition and Excavation (CD&E) During the demolition and construction phase, waste will be generated on-site with the highest quantities of waste typically generated during earthworks (albeit that minimal earthworks are anticipated). Given the availability of waste infrastructure/facilities to manage the CD&E waste types, it is unlikely that there will be any significant impacts on the local waste infrastructure as a result of the waste generated during these activities from the proposed development. During the construction phase, best practice construction methods will be adopted, controlled via a standard Construction Method Statement, to ensure that construction waste is appropriately managed, in compliance with the waste hierarchy, including onsite methods of segregation, refuse and recycling wherever practicable. Operational waste The residential units and the care home will result in the generation of household recyclable material and some clinical waste. The nature of the proposed development is such that excessive or abnormal waste generation is unlikely to occur. Therefore, the potential effects of waste arisings during the operational phase on local waste infrastructure is not considered to be significant. Alongside appropriate storage, this waste will be collected and managed in accordance with all relevant legislation and guidance. Following collection, the waste would be suitably disposed of or recycled by, or on behalf of, Reading Borough Council as the waste disposal authority. The method of treatment of the likely waste arisings is commonplace and would not necessitate an EIA to evaluate its impact.

e) Pollution and nuisances	Traffic & Transport The planning application will be accompanied by a Transport Assessment (TA), Travel Plan, and Outline Construction Traffic Management Plan. During the demolition and construction phases, HGV's will be required to access the site and use the surrounding road network to remove and import materials. This may result in slightly more HGVs than the baseline/permitted use but would be temporary in nature. Furthermore, vehicle movements can be controlled through a routing agreement with restrictions imposed over timings as appropriate. A temporary impact could arise on local traffic which could affect people who live and work in the area. However, the site is within an area with well-established road and travel infrastructure. Therefore, with the implementation of standard control methods, significant environmental effects are not considered likely during construction phase. This will be reflected within a Construction Logistics Plan. The overall scale and nature of the proposed development is likely to result in a net reduction in traffic, compared to the permitted use, so no significant adverse effects on traffic or transport are likely to result. Consequently, it is not considered that the scheme warrants an EIA on transport grounds. Noise During the demolition and construction phases, construction traffic and machinery will generate new sources of noise and vibration. The closest noise sensitive receptors to the site are residential properties within the surrounding area, in particular residential properties on Peppard Road immediately to the west. Noise and vibration associated with the demolition and construction phases of the development have the potential to impact upon these receptors. However, impacts will be temporary and can be limited to day time hours via commitments in the anticipated CEMP secured through planning conditions. Although the construction works will be carried out during the day time, some equipment, such as power generation plant for security or lighting, may be required to run at night. All plant will be selected, maintained and positioned to minimise potential noise impacts. It is therefore considered that demolition and construction impacts can be appropriately mitigated, through the use of appropriate equipment and standard best practice methods to ensure no significant effects occur. The effects of any construction noise and vibration would be minimised throughout the development of the site by compliance with relevant environmental protection legislation and through accordance with best practice. During the operational phase, taking into the account the proposed uses, background noise levels within the vicinity of the site are unlikely to change from the existing baseline and traffic flow levels are forecast to fall from the permitted baseline. Therefore it is considered unlikely that traffic movements, and any related noise impacts, will cause significant environmental effects or nuisances. Air Quality As set out above, the site is not located within an Air Quality Management Area (AQMA). The key considerations for air quality relate to impacts on existing receptors due to emissions associated with demolition of the existing later additions to the main house and subsequent construction and operation of the new build elements of the
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	proposed development. The other key consideration is the suitability of the site for its proposed use. While there is likely to be some dust creation during construction, this would be controlled by appropriate planning conditions. Through the adoption of standard best practice measures the likely residual impact of the proposed development are not considered to be significant in accordance with the IAQM guidance. Mitigation measures such as implementing a dust management plan, ensuring screens are placed around dust producing activities and using dampening techniques would further reduce the potential impacts. Air quality impacts from construction vehicle emissions will be reduced through following standard best practice construction techniques such as ensuring that vehicles are not left idling. Construction plant emissions and non-road mobile machinery (NRMM) emissions are not anticipated to be significant. The above will be implemented and managed through the production of a CEMP. During operation, it is anticipated that the proposed development will result in a reduction in local traffic movements compared to the existing permitted use with small reductions in commercial traffic on the local roads. Sustainable travel modes will also be promoted within the proposed development through a comprehensive Travel Plan offering incentives for sustainable travel choices. Therefore significant effects related to air quality are not considered likely to result, with any effect likely to be beneficial. Overall, it is considered unlikely that the proposed development will result in air quality effects that are deemed significant in EIA terms. Ground Conditions Considering the current and previous uses of the site the nature of any potential contaminants that might be present are not likely to be unusually complex or hazardous that would pose any significant environmental or health risk. As such, standard best practice and mitigation methods would be sufficient to ensure no significant effects arise. As such, significant effects warranting assessment through EIA are not considered likely to result and consideration of ground conditions can be suitably addressed (where necessary) through the planning application process. Lighting (Including Daylight, Sunlight and Overshadowing) The proposed development comprises the conversion of the main house alongside demolition and new construction. The proposed new buildings would not exceed 3 storeys in height and are not located in close proximity to any existing dwellings or public amenity spaces. As such, impacts associated with daylight, sunlight and overshadowing are not likely in respect of existing receptors. Similarly, taking the above into account, it is expected that suitable light levels would be achieved in respect of future occupiers of the site. Therefore, it is not considered that significant environmental effects will arise that would warrant EIA. Greenhouse Gas Emissions The proposed development will result in greenhouse gas emissions from activities undertaken throughout its lifecycle. In line with best-practice guidance presented by IEMA, all greenhouse gasses emitted to the atmosphere are considered significant, however, the emissions associated with this proposed development are not considered likely to prevent the UK or local authority in meeting its current or future carbon emission reduction ambitions.
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	Opportunities to minimise carbon emissions will be incorporated into the design through: ▪ Adopting best practice working and construction methods, administered and monitored through a detailed CEMP; ▪ The development and incorporation of an energy and net zero carbon strategy. These measures will help to reduce the carbon footprint of the development. Furthermore, the new buildings introduced will be compliant with current policies and standards in relation to energy efficiency and sustainability. Taking into account the above, implementation of suitable mitigation measures and the nature and scale of the proposed development, adverse effects related to greenhouse gas emissions sufficient to warrant an EIA are considered unlikely. Wind The proposed development involves new buildings up to a maximum of 3 storeys in height – buildings of this height have limited potential to influence the microclimate in which they are situated and as a result no significant effects are considered likely to arise.
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f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge	The site's location within the UK is such that natural disasters, including those caused by climate change, are not considered to represent a likely risk to the proposed development. For example, it is considered that the likelihood of an earthquake with a magnitude sufficient to cause damage to buildings and/or loss of life occurring and impacting the site is extremely low. The proposed development will be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of the site to major accidents and/or disasters. It is considered that, whilst there is always a potential risk that an accident, fire or natural disaster could result in a significant environmental impact, this risk can be appropriately mitigated through embedded design measures and through compliance with statutory design guidelines. Therefore, significant effects are considered to be unlikely. The nature of the proposed development is such that it is not likely to give rise to a major accident or disaster as it will not alter the existing use on the site. Climate Change Resilience Aspects of the proposed development, such as the infrastructure and functionality of the building and users will be subject to current and future changing climates. Summers are likely to be increasingly warmer and drier, whilst winters are likely to be warmer and wetter. Opportunities to increase the resilience of the proposed development to climate change will primarily be incorporated into the design through: ▪ Sustainable Urban Drainage Systems. ▪ Material choice and landscaping that reduces the heat island effect and overheating. ▪ Landscaping zones to enhance the local microclimate and counter air pollution ▪ Buildings orientated and configured to maximise both natural heating and ventilation and reduce exposure to winds and other elements ▪ Mitigation methods to prevent overheating ▪ Utilisation of sustainable sanitary features and rainwater harvesting to reduce consumption and preserve water supply ▪ Overall reduction of energy consumption through efficient heat sources, high levels of insulation, enhanced energy efficient measures and renewable technology to future proof the development ▪ It is therefore considered that the proposed development will be resilient to future climate scenarios and would not be vulnerable to any significant impacts as a result of climate change.
g) The risk to human health (for example, due to water contamination or air pollution)	During the construction phase a temporary increase in HGV movements could present an increased accident risk on the local road network. However, given the scale of the development and the implementation of temporary construction traffic controls, it is not considered that a significant risk will arise. Therefore this consideration can be suitably addressed through the planning application process.

2. Location of Development

a) The existing and approved land uses	As set out above, the site is currently vacant following its previous use by the BBC before which the site comprised a school and prior to that a large residential dwelling with associated gardens and parkland. As such, the existing and previous use of the site is not considered likely to give rise to significant effects either through cessation of the previous use or through potential impacts arising as a result of that use (e.g. land contamination).
b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	In relation to criteria 2 (b) and (c), consideration is given below to potential environmental impacts by virtue of the site's location. Consideration has also been given to any high quality and scarce resources on and around the site which could be impacted by the development. Built Heritage and Archaeology The proposals have been developed on the basis of an informed assessment of the relative importance and significance of the heritage assets that are contained within the Site. The grounds and landscape are the result of a number of manmade interventions, some by notable landscape architects and designers. Those elements of the landscape that make a material contribution to the significance of the Registered Park and Garden have been identified and harm to them avoided. Similarly, appropriate research and site evaluation has been undertaken to identify the significance of the listed buildings on the Site and the contribution from their settings. This has enabled the scheme to be designed in an informed manner, avoiding and minimising harm to significance as much as possible. In respect to archaeology a review of the Historic Environment Record and other appropriate archives has indicated that the development, because of its siting, is unlikely to result in any material effect on archaeology that is of significance. Landscape and Visual The Site's location, topography and historic development mean that the landscape within the site and beyond makes a significant contribution to the appearance of the area. The elevated location of the house means that is visible in distant views from parts of Reading to the south, however the proposed development areas are well screened by existing vegetation within Caversham Park. These including woodlands to the south-west, west and south-east of Caversham park and mature trees and scrub around the northern and north-eastern boundaries of the parkland. Whilst there would be glimpsed views of new houses beyond an existing hedgerow on Peppard Road, the development would not form a dominant element in this suburban view. It is therefore considered that, overall, the proposal is unlikely to result in a significant effect on visual amenity. Caversham Park is a Registered Park and Garden with a parkland character that has been eroded by its institutional uses over the past century and the suburbanisation to the north, west and east since the mid to late 20th century. Due to the visual enclosure of the proposed development areas, there will be little change to the wider townscape character. With regards to effects on landscape features, the proposed development predominantly comprises the re-development of existing areas of built form. The removal of trees will be minimised, although the proposals provide the opportunity to rationalise some late twentieth century trees and provide a new cohesive structure to native parkland tree planting around the northern frontage of Caversham Park House.

	The proposals will also enable the reduction of and enhancements to the existing parking area to the north of the house. In addition, the proposals can be accompanied by extensive areas of new areas of wildflower meadow within the northern part of the parkland. Ecology There are no designated ecological conservation sites within or in proximity to the site. The closest designated sites (e.g. Lodge Wood and Sandford Mill SSSI) are all located over 2km away. Impacts associated with development such as pollution events, dust deposition and noise pollution/vibration are therefore considered unlikely due to distance. Whilst the site has a potential to support a range of species, the proposed development predominantly comprises the re-development of existing areas of built form, retaining the designated parkland. Within the area of new development as many of the trees will be retained on site as possible, with removal restricted to fruit and ornamental trees. The loss of any trees will be mitigated through new planting as part of the soft landscaping scheme for the development. It is therefore considered that, overall, the proposal is unlikely to result in a significant effect on ecology and nature conservation, and provides opportunity to enhance landscape features on the Site which will help promote biodiversity. Air Quality The A4155 forms part of the wider Air Quality Management Area. Traffic flows on the corridor have fallen in real terms since 2002 (~11,200 AADT) to 2018 (~9,900AADT) with HGV's falling by more (~35%) over the same period. The redevelopment is expected to contribute to a reduction in traffic (compared to the permitted use) thus the proposals are likely to result in a small positive effect in terms of road traffic emissions. Noise The site is located in an area where the background noise levels are principally characterised by road traffic. However, as described above, the proposed development is not considered likely to result in traffic increases which would materially alter background noise levels. The proposed uses are not of a type likely to give rise to significant noise and vibration effects. Given its location within a predominantly residential area the site is considered to be suitable for the proposed development and reasonable acoustics conditions of future occupants will be maintained. Furthermore, with the introduction of new buildings and modern building materials, improvements to internal noise conditions may be achieved. With appropriate standard mitigation employed, where necessary, to ensure future amenity, no significant effects are likely. Flood Risk and Drainage The Environment Agency (EA) Flood Map for Planning shows that the site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding). Notwithstanding the above, in line with national policy, a site-specific Flood Risk Assessment (FRA) will be undertaken to inform the preparation of a suitable surface water drainage strategy. The drainage strategy will be prepared in accordance with national and local design guidance, such as National Planning Policy Framework, Planning Practice Guidance, non-statutory technical standard for SuDS, etc. with reference to the Strategic Flood Risk Assessment prepared by Reading Borough Council. The surface water drainage network for the site will be designed to
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	accommodate the 1 in 100 year event including a suitable allowance for climate change. With the implementation of appropriate and established mitigation measures to be set out in the drainage strategy, this will ensure that no on site property flooding or increased off site flood risk will occur for events up to and including 1 in 100 year event, plus climate change. The drainage strategy will also ensure suitable management of surface water quality. Therefore, significant effects in relation to flood risk are not considered likely. Socio-Economics The proposed development will deliver additional residential and care accommodation to assist in meeting the housing requirements for Reading Borough. The proposed development will deliver a mix of housing types including both affordable and private sale. The care and assisted living elements of the proposals will represent additional employment opportunities and will promote employment growth and job creation in the local area. An initial review was undertaken to assess the availability of local primary and secondary schools within the surrounding catchment which has shown a number of schools present providing both primary and secondary facilities. The anticipated incoming population associated with the additional 90 homes that would result from the proposed development is not considered likely to result in increased pressures to an extent that would create a significant effect on the local schools. In relation to doctors' surgeries and hospitals, Reading contains a number of GP surgeries and Royal Berkshire Hospital is located approximately 3km to the south which would provide good access to health services for the future residents of the proposed development alongside the provision on site as part of the care and assisted living elements. Whilst the development's additional incoming population would result in increased pressures, the extent of this pressure is not anticipated to create a significant effect on doctors' surgeries that could not be suitably addressed through the planning application process. The applicant would expect that an appropriate financial contribution could be secured, through the Community Infrastructure Levy (CIL), to address any impacts on local education, community and health facilities. There are likely to be some short term employment benefits during the construction period. Furthermore, direct and indirect jobs will be created, which are likely to be beneficial in the local context. However, given the scale of the proposed development, significant effects are not likely to occur. Waste A key requirement of the emerging Central and Eastern Berkshire Joint Minerals and Waste Plan is to ensure that sufficient waste management capacity exists to cater for anticipated waste arisings in the Plan Area. This includes the safeguarding of the 11 waste management facilities already located in the Borough of Reading. The nature of the proposed development is such that waste generation during both construction and operation would be typical in both quantity and composition. As such, its management would be adequately catered for by existing and new management capacity in the local area without giving rise to significant environmental effects.
c) The absorption capacity of the natural environment 	
	The magnitude and spatial extent of the impact will be local in nature, both geographically and in terms of population that could potentially be affected. Therefore, the site is considered to have the capacity to accommodate the level of development proposed.

b) The nature of the impact	As discussed above, the site and proposed development are such that significant effects are unlikely. The scheme has been designed in an informed manner to avoid any significant effects on the historic environment. The proposed development is of a scale that the local highway network can sustain and mitigation and safeguarding measures mean that no significant ecological or other impacts are likely to occur.
c) The transboundary nature of the impact	Impacts are unlikely to be transboundary, given the scale and nature of the development proposed.
d) The intensity and complexity of the impact	The overall impact of the proposed development is predicted to be of a normal intensity and complexity for a scheme of this size and nature. As discussed above, any anticipated developmental effects can be managed effectively through common mitigation measures.
e) The probability of the impact	All of the potential impacts and their probability are understood and predictable. With the implementation of standard best practice measures, none of the potential impacts are considered likely to result in significant effects.
f) The expected onset, duration, frequency and reversibility of the impact	The potential for temporary impacts to arise during the construction phase of the project has been outlined above. However, these will be minimised through adherence to best working practices. The duration and reversibility of some proposed impacts, particularly in relation to the impact on the historic environment would be considered permanent (but not significant).
g) The cumulation of the impact with the impact of other existing and/or approved development	The possibility of cumulative impacts has been considered in association with selection criteria 1(b).
h) The possibility of effectively reducing the impact	As no significant effects are considered likely to arise, consideration of the probability of effectively reducing impacts is not determinative in this case. Nevertheless, as discussed above, the potential impacts associated with the proposed development can be mitigated through the use of best practice construction methods and the implementation of typical mitigation measures. During the construction phase, such measures would be controlled through a CEMP. The Transport Assessment, ecological surveys, Flood Risk Assessment and other technical reports, which will accompany the Planning Application, will identify appropriate mitigation measures for operational impacts that can be secured as part of the application submission, subsequent planning conditions and legal agreements. Whilst potential impacts have been identified, the nature of these are such that these are not considered likely to be significant, therefore would not trigger EIA and would be suitably addressed through the planning application.

Conclusions

The proposed development does not qualify as a Schedule 1 development and is not located wholly, or partly, within a 'sensitive area' as defined in Regulation 2(1). However, it does fall within the description of 'Infrastructure Projects 10(b) Urban Development Projects' within the first column of Schedule 2 of the

Regulations and exceeds the thresholds in the second column, as the proposal includes more than 150 dwelling houses.

To determine whether the proposed development comprises EIA development it is necessary for the Local Planning Authority to consider whether it is likely to have significant effects on the environment, taking into account all of the selection criteria in Schedule 3 of the Regulations.

Our assessment concludes that the characteristics and location of the development are unlikely to give rise to significant environmental effects, alone, or in accumulation with other developments. It is no considered to result in any significant urbanisation. Whilst the additional residential properties and the care home will provide additional new development on the site, this respects the significance of the identified heritage assets and is consistent with the surrounding residential area and will not introduce any different sensitive receptors into the site or wider area than are already present.

Many of the potential environmental impacts from the development are considered to be of similar nature to those already present and experienced by the surrounding environment and would not result in new or different effects that would warrant the need for EIA. Additionally, as set out in this letter, with the implementation of suitable design alongside mitigation and avoidance measures, drainage design, landscaping and best practice construction methods, it is considered that significant environmental effects are unlikely to arise and therefore the proposal would not constitute EIA Development for the purposes of the EIA Regulations.

This conclusion is in line with PPG guidance on Schedule 2 development which defines 1,000 new dwellings as a suitable threshold above which significant effects may occur. This is substantially higher than the quantum of development proposed (particularly given that the scheme provides for only 153 new dwellings and a care home).

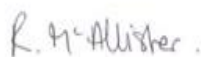
As stated in the PPG: *“Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination”*.

We request that, in accordance with the EIA Regulations, Reading Borough Council provides a formal EIA Screening Opinion within the requisite three weeks.

As outlined in this letter, the planning and listed building applications for the proposed development will be supported by a series of technical assessments and reports that will ensure environmental factors are suitably addressed and taken into account through the planning application process.

Please do not hesitate to contact me should you require additional information prior to forming the Screening Opinion.

Yours sincerely

A handwritten signature in blue ink, appearing to read "R. McAllister".

Rebecca McAllister
Director

C.c. Matthew Jeal, Beechcroft