

P22-1156

07 October 2022

Matthew Burns  
Reading Borough Council  
Civic Offices, Level 1 North  
Bridge Street  
Reading  
Berkshire  
RG1 2LU

*By email only*

Dear Matthew,

**RE: Reading Golf Club, Kidmore End Grove, Emmer Green**

My name is James Sutton and I work within the Environment Team for Pegasus Group, where I specialise in Environmental Impact Assessment (EIA). As a Chartered Environmentalist (CEnv) and a Full Member of the Institute of Environmental Management and Assessment (MIEMA), I am considered to be a qualified competent expert with regards to matters concerning EIA.

As such, the existing Environmental Statement (ES) produced by Temple Group to support an outline application for a residential led scheme in order to redevelop an area of land at the former Reading Golf Course has been reviewed accordingly.

**Planning Context**

We understand that the outline application was approved in March 2022 (Ref: 211843) and as part of the Reserved Matters process, it was apparent that the design of the outline consent did not meet Building Regulations requirements in relation to accessible car parking spaces. Furthermore, following a detailed design review by the Applicant it was evident that the drainage scheme was ineffective and there were not enough visitor car parking spaces. As a result of these issues, a Section 73 application was submitted which proposed variations to the planning permission, in order to secure design amendments to housing positioning and mix, car parking, drainage infrastructure, landscaping and open space and energy supply to the residential units.

As per the Environmental Impact Assessment (EIA) Regulations 2017, it is clear that a Section 73 application is considered to be a new application for planning permission and if an EIA was carried out for the original application, the EIA Regulations make provision for the planning authority to consider if further information needs to be added to the original ES in order to satisfy the requirements of the Regulations.

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As a result of the above, it was clear that the original ES needed to be carefully reviewed to understand if there was capacity for the proposed amendments (as outlined in the S.73 application) to be accepted without causing significant effects. The EIA review is outlined below in the following paragraphs.

### **EIA Review**

The original ES was assessed against a set of development parameters, which set the maximum extent of the parameters and to control the proposals to ensure that any detailed design and subsequent applications – such as the S.73 application – comply with the parameters stipulated in the ES.

To summarise any changes that exceed the maximum parameters that were originally assessed in the ES would potentially need to be approved through a supplementary environmental assessment if the amendment is not deemed to be minor or non-material. For example, the maximum heights of the buildings that were assessed as part of the ES, if the Applicant reduces the heights, the assessed effects are still robust and valid as the 'worst case' has been assessed. If the heights are increased above those that have been assessed, consideration by the LPA will have to determine if the increase alters the conclusions of the original ES.

As such, a review of the original ES was undertaken to review the proposed amendments (through the submission of the Section 73 application) under the following headings or matters that are subject to variation;

- Layout;
- Housing Mix;
- Parking;
- Drainage;
- Open Space / Play Provision; and
- Energy.

### **Layout**

The changes to the layout result in minor revisions to the approved layout and are required as the original design did not meet various standards and Building Regulations, as such, they are compulsory. In terms of EIA, they do not increase the maximum building heights that were originally assessed and therefore the EIA remains robust and in accordance with the landscape and visual ES technical chapter.



### Housing Mix

The proposed amendments to the housing mix seek to reduce the number of 1 and 2 bed flats / houses in order to increase the number of 3, 4 and 5 bed houses. This would provide a 68.2% of homes which are 3 bed or larger and this strongly supports Policy H2 of the Local Plan, that states *"at least 50% of the homes outside centres will be three bed or larger"*. Again, in terms of EIA as the changes to the housing mix do not increase the maximum building heights, or exceed the overall number of residential units, which remain at 223 dwellings. Therefore, the EIA remains robust and as per the layout amendments, remains in accordance with the landscape and visual ES technical chapter.

### Parking

As outlined earlier in this letter, the proposed amendments to the car parking are a result of the need to adhere to specific Building Regulations to ensure the spaces are accessible to all intended users as well as ensuring that there were enough spaces for visitors. Ultimately, this means the proposed car parking bays need widening and the S.73 application also includes an additional 28 spaces, raising the total number of bays from 442 to 470.

The additional spaces relate to an increased level of visitor parking as well as through the proposed changes to the layout of the housing plots, which included maximising driveways to allow for two car parking spaces. Therefore, the approved Land Use Parameter Plan remains accurate for the amended design layout for up to 470 car parking spaces.

It should also be noted that the additional 28 car parking spaces do not materially affect the conclusions of the ES or its accompanying air quality assessment, as these spaces are either for visitors, which suggest sporadic use or are additional spaces provided to residential units but it is clear not every household will have more than one privately owned vehicle. Therefore, the direct emissions and associated noise levels as a result of these additional spaces will be limited.

### Drainage

Through further detailed assessment it has been concluded by the Applicant that the previously approved sustainable drainage system (SuDS) is not achievable 'on the ground'. The central basin has been adjusted to ensure that it can accommodate runoff from its catchment area and to reflect the retention of existing trees. It is also proposed to reposition the swale along the northern boundary to enable access for maintenance and again ensure that the Root Protection Zones (RPZs) for the retained trees are safeguarded. The amendments also include the provision of several culverted crossings to ensure the proposed open space is not affected by the drainage system.

It is also proposed to remove the western attenuation basin as it is unlikely to be able to hold enough water to support the efficiency of the overall drainage scheme. By maximising the capacity of the central basin (as outlined above) the western basin becomes redundant and can be used to provide additional open space.

Within the parameters plan, it is clear that both sustainable drainage features and open space form part of the 'Green Infrastructure' which wraps around the proposed built form. Therefore, although the changes as outlined will alter the appearance of the Green Infrastructure on the Parameter Plan, none is being 'lost' through these design alterations. Therefore, in EIA terms the total area of Green Infrastructure remains the same as in the assessed and approved application and does not alter the conclusions of the water resources and flood risk ES technical chapter.

#### Open Space / Play Provision

As a result of the proposed changes to the SuDS as outlined above, the Applicant is proposing an expansion to the overall open space and play space that can be provided by the scheme. In terms of open space, this will expand from 3.89 hectares (ha) to 3.94ha, (i.e. an increase of 0.05ha) whilst the play space will marginally increase from 0.16ha to 0.17ha i.e. an increase of 0.01ha).

#### Energy

The original proposals stated that an air source heat pump would supply energy to all the new units and this would be supplemented by solar photovoltaic (PV) systems. However, since this ES was submitted the Distribution Network Operator (DNO) has advised that there is insufficient capacity on the local network to meet this demand and as a result only 83 of the 223 units will reflect the original energy strategy.

As per the proposed amendments outlined in the S.73 application within the updated energy statement, the remaining dwellings will utilise high efficiency gas boilers, which will be supplemented by solar PV systems in accordance with the original strategy. This will deliver the minimum requirements of the 35% carbon reductions as outlined in the Local Plan.

It is evident within the Energy Sustainability report that was submitted as part of the original ES, that gas boilers were assessed as an alternative to the heat pump systems and it was noted that boilers would be more appropriate for the apartments and smaller houses, as opposed to the multiple bedroom units. Therefore, as long as those dwellings which are fitted with gas boilers comply with the RBC planning policies relating to carbon emissions reduction targets, (i.e. 35% minimum) they remain in line with the parameters assessed in the original ES and do not alter the conclusions of the climate change resilience and mitigation ES technical chapter.

#### Cumulative Effects

The original ES considered four other sites that had the potential to cause cumulative effects alongside the Proposed Development, these are listed below with an update provided on these specific applications;

- Ref: 200188 – Land at Vastern Road, Reading, involving demolition of a number of structures on the site and the erection of a new residential scheme (up to 210 units), with a max height of 11 storeys (up to 36m above ground level) including a new north south pedestrian link, connecting Christchurch Bridge to



Vastern Road towards the station as well as drainage infrastructure and landscaping – appeal was upheld and determined on 9<sup>th</sup> April 2021 but not yet under construction, so still needs to be considered as part of the original cumulative assessment

- Ref: 182137 – Broad Street Mall, construction of three residential buildings (Use Class C3) ranging in height from 5 to 22 storeys above Broad Street Mall (Site E to provide up to 50 units, Site B to provide up to 134 Units and Site A to provide up to 164 units) and provision of a podium level amenity area, construction of a 16 storey building on South Court comprising ground and first floor retail (Use Class A1/A2/A3) and residential over upper floors (Use Class C3, Site C to provide up to 98 units), creation of ground floor retail units (Use Class A1/A3/A4) fronting Dusseldorf Way and ground floor retail (Use Class A1/A2/A3) – approved 6<sup>th</sup> December 2021 but not yet under construction so still needs to be considered as part of the original cumulative assessment
- Ref: 190835 – Land at Henley Road, demolition of 199–203 Henley Road and erection of part four, part three and part two storey 82 unit residential care home building (C2 use class) with associated external structures, access from Henley Road, car parking and landscaping – now essentially constructed so can be excluded from original cumulative assessment
- Ref: 140997 – Land at St. Martins Precinct, Redevelopment for retail restaurant, leisure and residential (40 dwellings) – approved in 2014 and remains under construction with completion set for 2023 so would still be included as part of the original cumulative assessment

Given the above, it is clear that three of the four cumulative sites that were included in the ES assessment are still relevant to the Proposed Development as outlined within the S.73 application that this letter supports. In addition, there are no other new developments that need to be considered as part of the cumulative assessment for the proposed amendments to the development proposals. Therefore, the cumulative assessment that was in the approved ES remains robust for the proposed amendments and would not need to be updated.

### **Deed of Variant (DoV)**

For completeness, as a S.106 legal agreement accompanied the original ES and subsequent planning permission and the proposed amendments as detailed in the S.73 Application will involve the reissue of the planning permission (subject to approval), any legal agreement attached to that consent will need to be varied or updated in accordance with the new permission.

In this case, the original outline permission (Ref: 211843) included a S.106 agreement, which referenced the approved housing mix at Schedule 1 and Schedule 5 relates to the proposed open space, therefore the legal agreement will need updating when the S.73 application is determined.



### **Summary**

To summarise, following a review of the original ES, it is evident that the ES has the capacity within its previously assessed parameters for the proposed amendments as outlined within the S.73 application to be determined without the need for further detailed environmental assessment.

Effects relating to biodiversity are not considered to be materially affected by the proposed amendments either during construction or operation and therefore have not been considered within this review.

Yours Sincerely

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**Principal Environmental Planner**

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