

Mr Jonathan Markwell
Reading Borough Council
Civic Offices Bridge Street
Reading
Reading
RG1 2LU

Our ref: WA/2019/126495/01-L01
Your ref: 190451
Date: 08 May 2019

Dear Mr Markwell

Request for an EIA scoping opinion in accordance with Regulation 15 (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) with regard to the proposed redevelopment of 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

55 Vastern Road, Reading

Thank you for consulting us on this scoping report on 3 April 2019, please accept our apologies for the delay in responding. We are not seeking any revisions to the proposed scope of the EIA. We do hope that our advice will be taken into consideration by the applicant during the design process.

The proposed development site lies within an area identified at risk of flooding, with the River Thames on one boundary. The site also lies above sensitive aquifers where risk to water quality from contamination is a factor.

Flood Risk

The site lies within Flood Zones 3, 2 and 1 in accordance with our Flood Risk Mapping. We do not dispute flood risk being scoped out of the EIA and are pleased to see that a Flood Risk Assessment (FRA) as required by the Planning Policy Framework will be produced and submitted separately to support the planning application.

We would like to make the applicant aware that we have recently undertaken new modelling through the centre of Reading which should be available for public use very soon although we do not currently have a specified date of release. We would advise the applicant to wait for this data as it would give the most current and up to date reflection of flood risk in the area. Alternatively, they could make a commitment to update their FRA at a later stage if publication of the data is delayed, although this may

Cont/d..

mean alterations to the scheme may be required if the risk increases.

The FRA should demonstrate that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall in accordance with national and local planning policy.

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please contact 0203 025 9804 or email Enquiries_THM@environment-agency.gov.uk. Your local planning authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform the FRA.

Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

The FRA must also consider flood risk over the anticipated lifetime of the development as a result of climate change. Refer to '[Flood risk assessments: climate change allowances](#)' to determine which allowances should be used to assess future flood risk for your development and location. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Where assessment shows flood risk increases steadily and to shallow depths, it is likely to be more appropriate to choose a flood lower in the range. Where assessment shows flood risk increases sharply due to a 'cliff edge' effect caused by, for example, sudden changes in topography or defences failing or overtopping, it is likely to be more appropriate to choose a flood level higher in the range.

The proposal will also be required to meet the Sequential and Exception Tests in accordance with the National Planning Policy Framework. It is for the local planning authority to determine if the sequential test has to be applied and whether or not there are other sites available at lower flood risk. Our flood risk standing advice reminds you of this and provides advice on how to apply the test.

Our comments on the proposals will relate to the part of the exception test that demonstrates the development is safe. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

Biodiversity

Given the low biodiversity value of the existing site and the lack of designated nature conservation sites on or close to the site, we do not dispute biodiversity being scoped out of the EIA. This does not preclude the need for protected species surveys, the most likely of which would be bats using the existing buildings that are to be demolished or trees within the site. We note in section 2.9 however, that an initial assessment concluded that neither the buildings nor the trees on site are likely to be used by bats. This is confirmed in the Extended Phase 1 Habitat Survey (Appendix 3 (Ecoconsult, April 2018)), that shows that the survey followed approved methodologies, and therefore there should not be the need for any further bat surveys. We also note in section 2.11 that a lighting strategy will be submitted as part of the planning application and that the design will minimise impacts on biodiversity.

The development will need to ensure that a buffer to the River Thames of at least 10 metres is provided with a net gain in biodiversity in accordance with emerging local

policy EN11 and EN12.

The buffer should be as natural as possible and be free of built development, hard standing, car parking and formal landscaping. While the Thames Path is between the river and the site, this is still an opportunity to start to create a wildlife corridor along this part of the Thames which if planted and managed sympathetically, would improve the area for both wildlife and people.

It would also complement the marginal vegetation that has established along the right bank of the Thames which was put in as mitigation for the new footbridge that is adjacent to the site. This has established well and forms a valuable habitat in this urban environment. It is therefore important that the new development does not impact adversely on this marginal strip, such as by over-shading. We would therefore prefer to see the tallest part of the development set towards the road side of the site rather than the river side.

In section 2.9 it states that the development will result in a net gain in biodiversity, partly through habitat creation. We would expect all or at least a significant part of this habitat creation to be within the undeveloped buffer zone to the river.

Contaminated Land and water quality

We do not dispute Contaminated Land being scoped out of the EIA. However, there are underground fluid filled cables on site and there is a plume of cable fluid contamination in the groundwater and this must be considered and addressed within the application.

The risk of using piling should be assessed from a) the perspective of creating vertical pathways for contamination during construction and b) the potential for damaging fluid filled cables during piling.

The underlying geology is Langley Silt (Unproductive Stratum) over Alluvium (Secondary A Aquifer) over Kempton Park or Taplow Gravel Formation (Secondary A Aquifers) and under this is the Newhaven and Seaford Chalk (Principal Aquifer). The River Thames runs along the northern boundary of the site. It is therefore essential that water quality within the aquifers and the river is protected from any contamination that may be present on site and that which may be mobilised during development.

Environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption 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 culverted main river (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 river bank, 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. The applicant should not assume that a permit will automatically be forthcoming

once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Note to applicant

Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The terms and conditions of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us at planning_THM@environment-agency.gov.uk.

We are in the process of developing a flood risk management scheme that will reduce flooding to this area. For more information on this proposed scheme please contact Jon Mansbridge the Funding and Benefits Realisation Manager for the Reading and Caversham Scheme on: reading&cavershamscheme@environment-agency.gov.uk

Finally, I thank you again for your consultation on this Scoping report and should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Miss Sarah Green
Sustainable Places - Planning Advisor

Direct dial 0208 474 9253

Direct e-mail planning_THM@environment-agency.gov.uk