

Appendix 4.3

Additional Scoping Consultation



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E-mail: natalie.brisland@rpsgroup.com
Date: 15 May 2018

Richard Eatough
Planning Department
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Dear Mr Eatough

Response to Environmental Impact Assessment Scoping Opinion: Reading Metropolitan

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Following our recent discussion, we are writing in response to the Environmental Impact Assessment (EIA) Scoping Opinion received from Reading Borough Council (RBC) in relation to the proposed development of Reading Metropolitan. RPS submitted a request for a Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the EIA Regulations) on behalf of Hermes Investment Management in January 2018 and received a Scoping Opinion from RBC dated 29 March 2018. We understand from the Scoping Opinion that RBC consulted with and received a response from the following statutory consultees:

- Network Rail;
- Environment Agency;
- Berkshire Archaeology;
- RBC Ecologist/Planning Natural Environment Team;
- RBC Environmental Protection;
- Natural England; and
- RBC Transport Strategy.

At the time of writing no response had been received from Crossrail, Thames Water and Scottish and Southern Energy.

The Scoping Opinion requested a number of chapters be included within the scope of the EIA process. We would like to use this opportunity to further explain the reasoning behind the proposition to scope these topics out. This letter is structured by the Environmental Statement (ES) chapters and refers to the RBC Scoping Opinion and consultee responses.

It is noted in the Scoping Opinion that RBC have concerns regarding references to a previously consented scheme (11/00276/OUT) as this permission has now lapsed. This position has been noted and we agree that to reference this previous application as 'consented' is inappropriate. However, we note that the environmental information submitted as part of that application provides existing information relevant to the site and the likely

environmental effects of development at this location. This information, together with other existing information sources, has been used to inform the scoping process.

Chapters Proposed to be Scoped Out of the ES

Historic Environment

The RBC Scoping Opinion and response from Berkshire Archaeology request an assessment of effects on the historic environment within the ES. Berkshire Archaeology state that '*...archaeology should [be] scoped into the EIA, as the assessment of the impact of these new proposals on archaeological remains will need to be completed*'. They then explain that a desk-based assessment should be undertaken first, followed by an assessment of the potential for archaeological remains to exist within the site and the potential impact caused by the construction of the proposals. The response also stated that an archaeological mitigation strategy should be produced to include the preservation of any archaeological remains *in situ* where appropriate. RBC also state that the development would need to be discussed in terms of relevant Heritage Assets within the centre of Reading.

As outlined in the Scoping Report, a chapter on archaeology was included in the ES submitted as part of the previous application in 2011. As part of this, an archaeological desk based assessment was undertaken identifying the potential for archaeological remains for this site. Although this study was undertaken in 2011, archaeological data does not tend to age/change rapidly and therefore it is considered that this forms a useful baseline resource and it is unlikely that repeating this exercise for the site would reveal any additional information.

The archaeology chapter of the ES submitted in 2011 assessed the potential for effects on buried archaeology and cultural heritage assets. The assessment concluded that there would be minor adverse effects on buried archaeology and minor adverse effects on heritage assets during construction. It also concluded that there would be no adverse effects during the operation of the development. Therefore, no significant effects were identified for any phase of the development.

The baseline environment at the site, in archaeological terms, is likely to remain similar to that reported in 2011 and the currently proposed development at Reading Metropolitan is similar in nature and scale to that previously proposed such that it would have similar impacts on buried archaeology and cultural heritage assets to those assessed as part of the previous application. The information requested by Berkshire Archaeology and RBC to make a judgement on the effects in terms of historic environment has already been provided in 2011 and, therefore, can be used to inform the scoping process.

The EIA Regulations require only those effects which are likely to be *significant* to be reported in the ES. Previous work at the site has concluded that there is not likely to be any significant effect in relation to the historic environment as a result of development of this scale and nature and, therefore, we propose to scope this topic out of the EIA process.

As discussed, the ES for Reading Metropolitan would provide a justification as to why this topic has been scoped out and sufficient information will be provided to allow RBC to conclude that there are not likely to be any significant effects. This information is likely to form appendices to the main text and is likely to include:

- The 2011 ES Archaeology chapter;

- Mitigation strategy.

Therefore, we would like to ask RBC to reconsider their opinion that an assessment of impacts on the historic environment is required as a separate chapter of the ES.

Daylight, Sunlight and Overshadowing

The Scoping Report included an initial assessment of daylight, sunlight and overshadowing. This assessment was based on the recommended guidelines and concluded that there are unlikely to be significant environmental effects on existing receptors and future residents.

Further explanation is provided in Appendix 1 to this letter, which concludes that all residential properties in the vicinity of the proposed development would continue to enjoy natural light following construction.

It is not considered that the proposed development would have significant effects in relation to daylight, sunlight and overshadowing and therefore we propose that this topic can be scoped out of the assessment. We would like to ask RBC to reconsider their opinion that an assessment of impacts on daylight, sunlight and overshadowing is required within the ES.

Although a daylight, sunlight and overshadowing chapter is not proposed as part of the scope of the EIA process, it is noted that a separate Light Amenity Assessment and standalone report is proposed to be appended to the ES. This will provide the results of application proposal and highlight the individual impacts to the neighbouring residential buildings (or buildings with a residential component) which surround and face the development site

Traffic and Transport

The Scoping Report proposed to scope out traffic and transport from the EIA based on evidence outlined in the draft Transport Assessment (which was appended to the Scoping Report). RBC does not agree that this should be scoped out of the EIA process. The RBC Scoping Opinion does not provide reasoning for the request to include this within the assessment. However, a comment is provided that the baseline conditions should not be taken to be the lapsed 2012 planning permission.

RPS is in agreement with this comment and would like to note that the 2012 lapsed planning permission has not been assumed as the baseline condition in the draft Transport Assessment. The information submitted as part of the 2011 ES has, however, been used to inform the scoping process i.e. the determination as to whether there is likely to be a significant effect of the proposed development on the current baseline situation.

The 2011 ES concluded that there were not likely to be significant effects associated with previous development proposals. The assessment undertaken in the draft Transport Assessment for the currently proposed development concluded that the trips generated as part of the proposed development would be lower than those associated with the 2011 assessment.

Therefore, the environmental effects associated with the proposed development are also likely to be lower. As the assessed effects were considered not to be significant in 2011, it is reasonable to conclude that the effects associated with lower generated traffic volumes would also not result in significant effects. The EIA Regulations require only those effects which are



likely to be *significant* to be reported in the ES and, based on the information available, it has been concluded that significant effects in relation to traffic and transport are not likely as a result of the proposed development.

As discussed, the ES for Reading Metropolitan would provide a justification as to why this topic has been scoped out and sufficient information will be provided to allow RBC to conclude that there are not likely to be any significant effects.

Although a traffic and transport chapter is not proposed as part of the scope of the EIA process, it is noted that a separate Transport Assessment is proposed to accompany the application. This will provide the results of updated traffic surveys undertaken in October 2017. The Transport Assessment will be written in accordance with extensive previous consultation with RBC.

It is noted that the response from RBC Transport Strategy agreed that the scope of the assessment is acceptable.

Chapters Proposed to be Scoped in to the ES

It is noted that a number of comments have been made by RBC in relation to other topics scoped in to the ES. RPS have reviewed these comments and will ensure these are carried forward to the forthcoming ES. RBC have commented that all extant planning permissions should be included within the assessment of cumulative effects. The list of cumulative developments assessed within the ES will be agreed with RBC prior to submission.

Based on the information contained within this letter and the discussions we have had with RBC, we would like to ask RBC to review their opinion in relation to the topics to be scoped out of the EIA. We have advised RBC that should there be any change to their opinion that they should confirm this in writing as a formal change to their Scoping Opinion.

We would be happy to have further discussions with yourselves or any of your consultees on the matter and we look forward to hearing from you soon.

Yours sincerely
For RPS

A handwritten signature in black ink, appearing to read 'N. Brisland'.

Natalie Brisland
Senior Consultant

Encl.
Appendix 1: Daylight/Sunlight Overview and Update



Barry Kitcherside
Director
Chartplan Ltd
Suite 4G
Enterprise Way
Edenbridge
TN8 6HF

11th September 2017

Dear Barry,

RE: The Emerging scheme at Reading Metropolitan & The Daylight/Sunlight Overview and Update

I write further to our receipt of the latest scheme proposal from TP Bennett for the Reading Metropolitan site as requested Point 2 Surveyors have undertaken a number of detailed technical assessments in order to identify the Daylight and Sunlight position on the neighbouring properties.

As you are aware Point 2 Surveyors have assembled a computer model of the site and surrounding buildings including all of those apertures facing towards the development site that could in turn be affected by the implementation of a scheme. Plate 01 highlights the base condition of the site including the existing structure located on the site. The proposed scheme is shown on Plate 02.



PLATE 01 — OBLIQUE VIEW OF SITE WITH EXISTING SITE BUILDINGS SHOWN IN PINK



PLATE 02 – OBLIQUE VIEW OF PROPOSED DEVELOPMENT (IN BEIGE) WITH SURROUNDING CONTEXT

From a planning perspective, only those buildings which are residential or indeed have a residential component have been considered for the daylight and sunlight analysis. As a first pass, confirmation of the use classification of all neighbouring buildings has been secured by reference to a number of Valuation Office Agency (VOA) searches. Plate 03 confirms the use classification where commercial uses are shown in red and residential highlighted in blue.

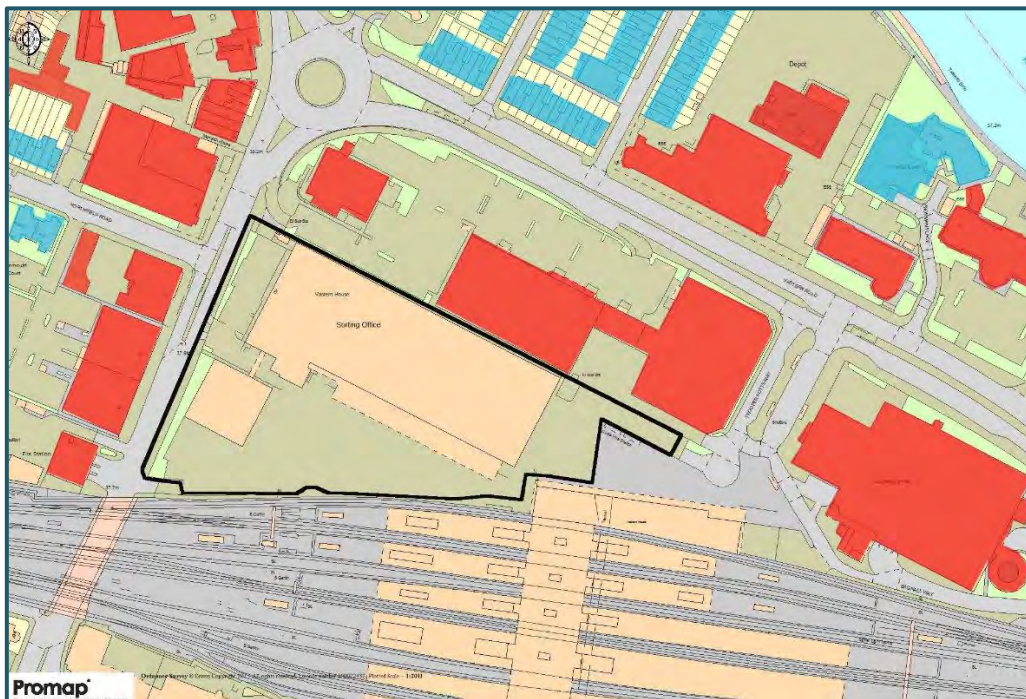


PLATE 03 – RESULTS OF THE VOA ASSESSMENT SHOWING COMMERCIAL (RED) AND RESIDENTIAL (BLUE) USE CLASSES

TABLE 01 – VSC SUMMARY OF NEIGHBOURING RESIDENTIAL BUILDINGS

Address	Total that Meet BRE Guidelines	Below BRE Guidelines			Total	Total No. of Windows
		20-29% Loss	30-39.9% Loss	>=40% Loss		
1-8 MONMOUTH COURT	6	0	0	0	0	6
17 Vastern Road	6	0	0	0	0	6
19 Vastern Road	6	0	0	0	0	6
21 Vastern Road	6	0	0	0	0	6
23 Vastern Road	6	0	0	0	0	6
25 Vastern Road	6	0	0	0	0	6
27 Vastern Road	6	0	0	0	0	6
29 Vastern Road	5	0	0	0	0	5
31 Vastern Road	7	0	0	0	0	7
33 Vastern Road	7	0	0	0	0	7
35 Vastern Road	7	0	0	0	0	7
37 Vastern Road	7	0	0	0	0	7
39 Vastern Road	7	0	0	0	0	7
41 Vastern Road	7	0	0	0	0	7
43 Vastern Road	7	0	0	0	0	7
45 Vastern Road	7	0	0	0	0	7
47 Vastern Road	7	0	0	0	0	7
49 Vastern Road	7	0	0	0	0	7
51 Vastern Road	6	0	0	0	0	6
Total	123	0	0	0	0	123

The results of the VSC method of daylight and sunlight assessment highlight full BRE compliance with all 123 Windows tested meeting the BRE guidelines.

TABLE 02 – NSL SUMMARY OF NEIGHBOURING RESIDENTIAL BUILDINGS

Address	Total that Meet BRE Guidelines	Below BRE Guidelines			Total	Total No. of Rooms
		20-29% Loss	30-39.9% Loss	>=40% Loss		
1-8 MONMOUTH COURT	6	0	0	0	0	6
17 Vastern Road	2	0	1	0	1	3
19 Vastern Road	3	0	0	0	0	3
21 Vastern Road	2	0	1	0	1	3
23 Vastern Road	3	0	0	0	0	3
25 Vastern Road	2	0	1	0	1	3
27 Vastern Road	2	1	0	0	1	3
29 Vastern Road	2	0	0	0	0	2
31 Vastern Road	3	0	0	0	0	3
33 Vastern Road	3	0	0	0	0	3
35 Vastern Road	3	0	0	0	0	3
37 Vastern Road	3	0	0	0	0	3
39 Vastern Road	3	0	0	0	0	3
41 Vastern Road	3	0	0	0	0	3
43 Vastern Road	3	0	0	0	0	3
45 Vastern Road	3	0	0	0	0	3
47 Vastern Road	3	0	0	0	0	3
49 Vastern Road	3	0	0	0	0	3
51 Vastern Road	2	0	0	0	0	2
Total	54	1	3	0	4	58

The results of the NSL method of daylight assessment highlight a compliance rate of 93% with only 4 rooms experiencing a change slightly beyond the permissible 20% suggested by the BRE.

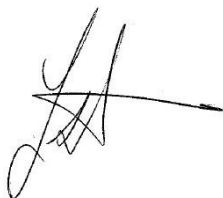
TABLE 03 – APSH SUMMARY OF NEIGHBOURING RESIDENTIAL BUILDINGS

Address	meet BRE Guidelines	No. of rooms below the APSH stated in BRE Guidelines								Total No. Rooms	Winter Gains
		% Below threshold for Winter APSH				% Below threshold for Total APSH					
		20-30%	30-40%	>40%	Total	20-30%	30-40%	>40%	Total		
1-8 MONMOUTH COURT	6	0	0	0	0	0	0	0	0	6	0
17 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
19 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
21 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
23 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
25 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
27 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
29 Vastern Road	2	0	0	0	0	0	0	0	0	2	0
31 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
33 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
35 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
37 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
39 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
41 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
43 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
45 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
47 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
49 Vastern Road	3	0	0	0	0	0	0	0	0	3	0
51 Vastern Road	2	0	0	0	0	0	0	0	0	2	0
Total	58	0	0	0	0	0	0	0	0	58	0

Of these rooms which face the development site and face within 90 degrees of due south, all will meet the BRE requirements for sunlight.

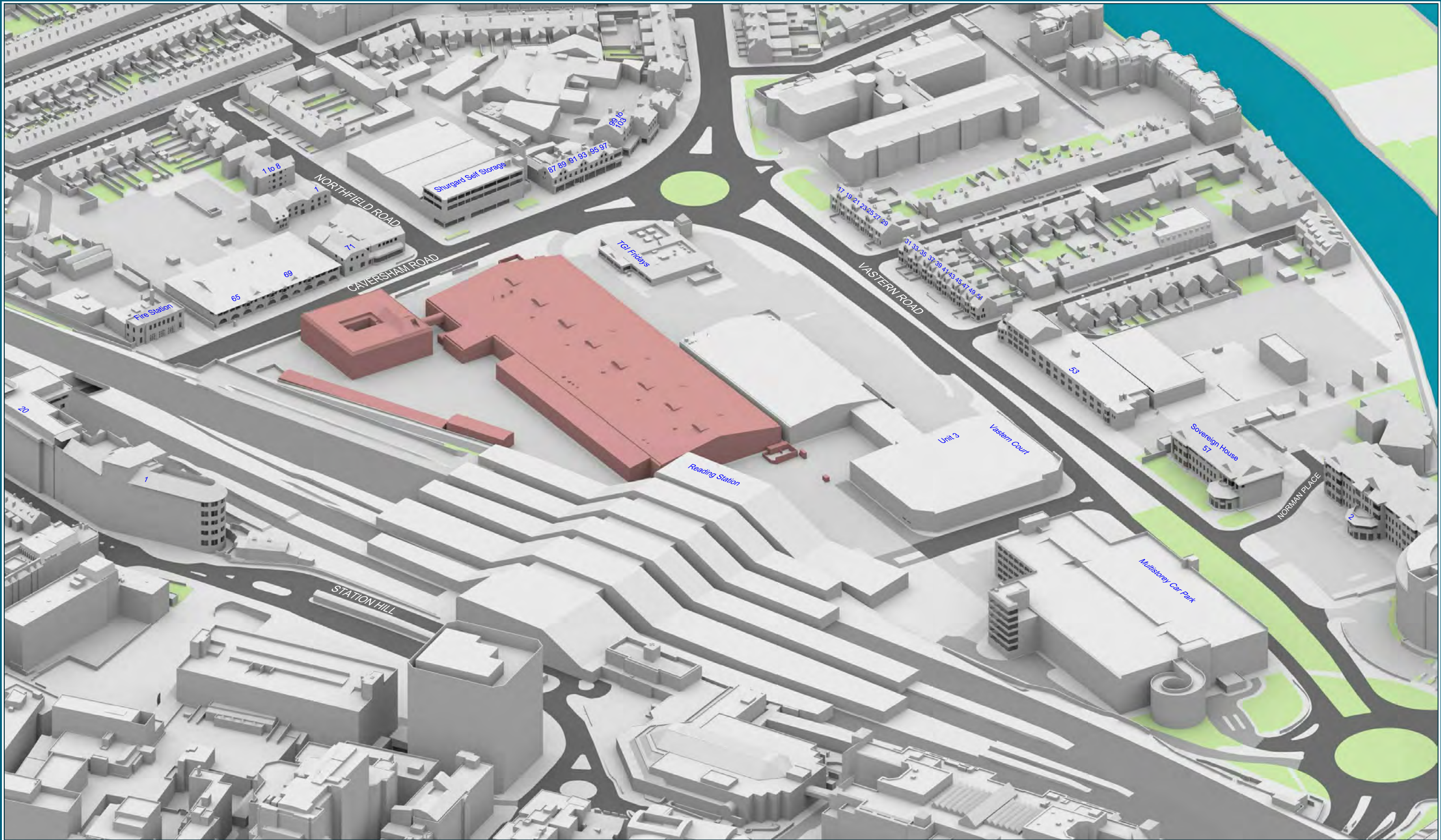
In conclusion Point 2 Surveyors have undertaken a review to establish the amenity position with the implementation of the proposed development. In most instances, it is clear that the neighbouring residential buildings will continue to enjoy natural light within the scheme in place.

Yours sincerely



Justin Bolton
 Director
 For Point 2 Surveyors Ltd
justin.bolton@point2surveyors.com





Sources: Zmapping
Zmap Survey Info (received 10/05/17)
Reading_230816_Solids.dwg
TP Bennett
Proposal Scheme CAD Floor Plans (received 14/06/17)
Caversham Rd Study_A11113-A-0-0516 - Basement Floor Plan.dwg
""_A11113_A-0-0517 - Ground Floor Plan.dwg
""_A11113_A-0-0518- First Floor Plan.dwg
""_A11113_A-0-0530- Phase 1 Schedule & floor plans.dwg
""_A11113_A-0-0531- Phase 2 Schedule & floor plans.dwg
""_A11113_A-0-0532- Phase 3 Schedule & floor plans.dwg
Proposal Scheme Section Heights (received 19/06/17)
Caversham Rd Study_Section.dwg

Key: — Existing Buildings
— Proposed Scheme
All Heights in mm AOD

Scheme Confirmed: -

Date : -

Project: Reading Metropolitan
Vastern House, 80 Caversham Road
READING, RG1 8JG

Drawn By: KS/JR/JB

Scale: NTS @ A3

Date: Jun 17

Title: 3D View
Existing vs Proposed
Existing Buildings

Dwg No: **P1368/02**

Rel: 01

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3rd Floor,
17 Slingsby Place,
London WC2E 9AB
0207 836 5828
www.point2surveyors.com





Sources: Zmapping
Zmap Survey Info (received 10/05/17)
Reading_230816_Solids.dwg
TP Bennett
Proposal Scheme CAD Floor Plans (received 14/06/17)
Caversham Rd Study_A11113-A-0-0516 - Basement Floor Plan.dwg
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""_A11113_A-0-0532- Phase 3 Schedule & floor plans.dwg
Proposal Scheme Section Heights (received 19/06/17)
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Scale: NTS @ A3

Date: Jun 17

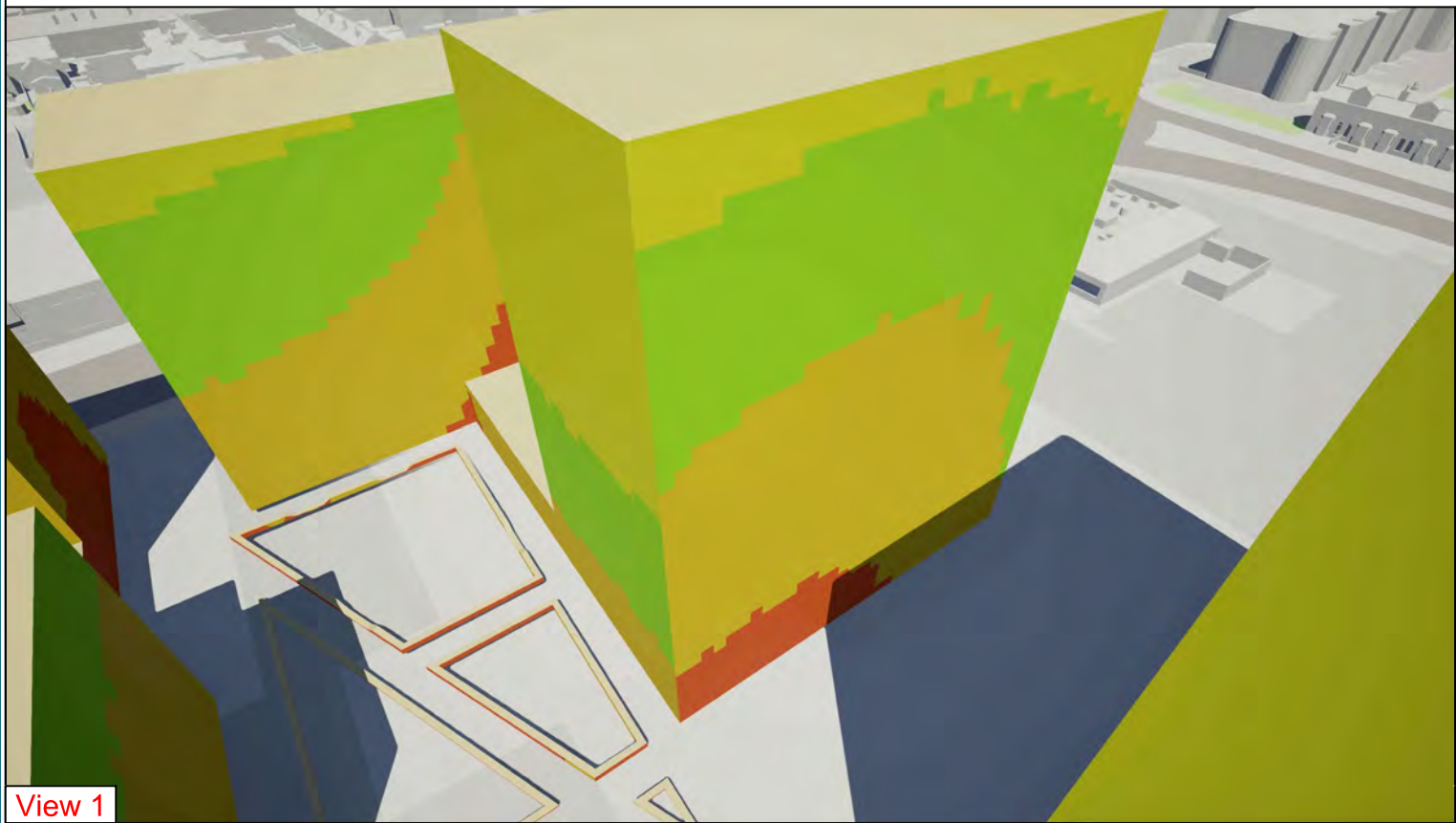
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Existing vs Proposed
Proposed Scheme dated 14/06/2017

Dwg No: **P1368/05**

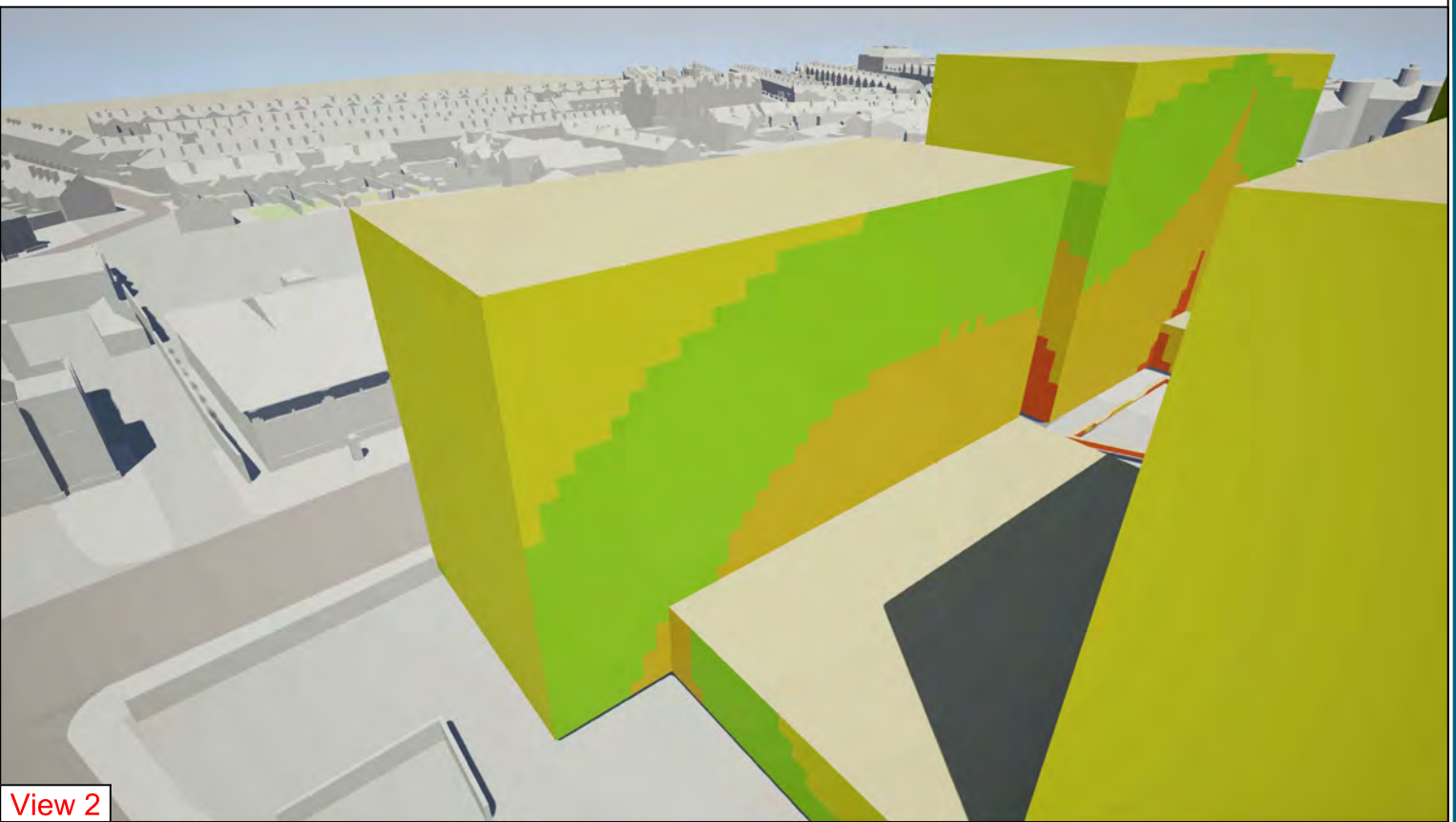
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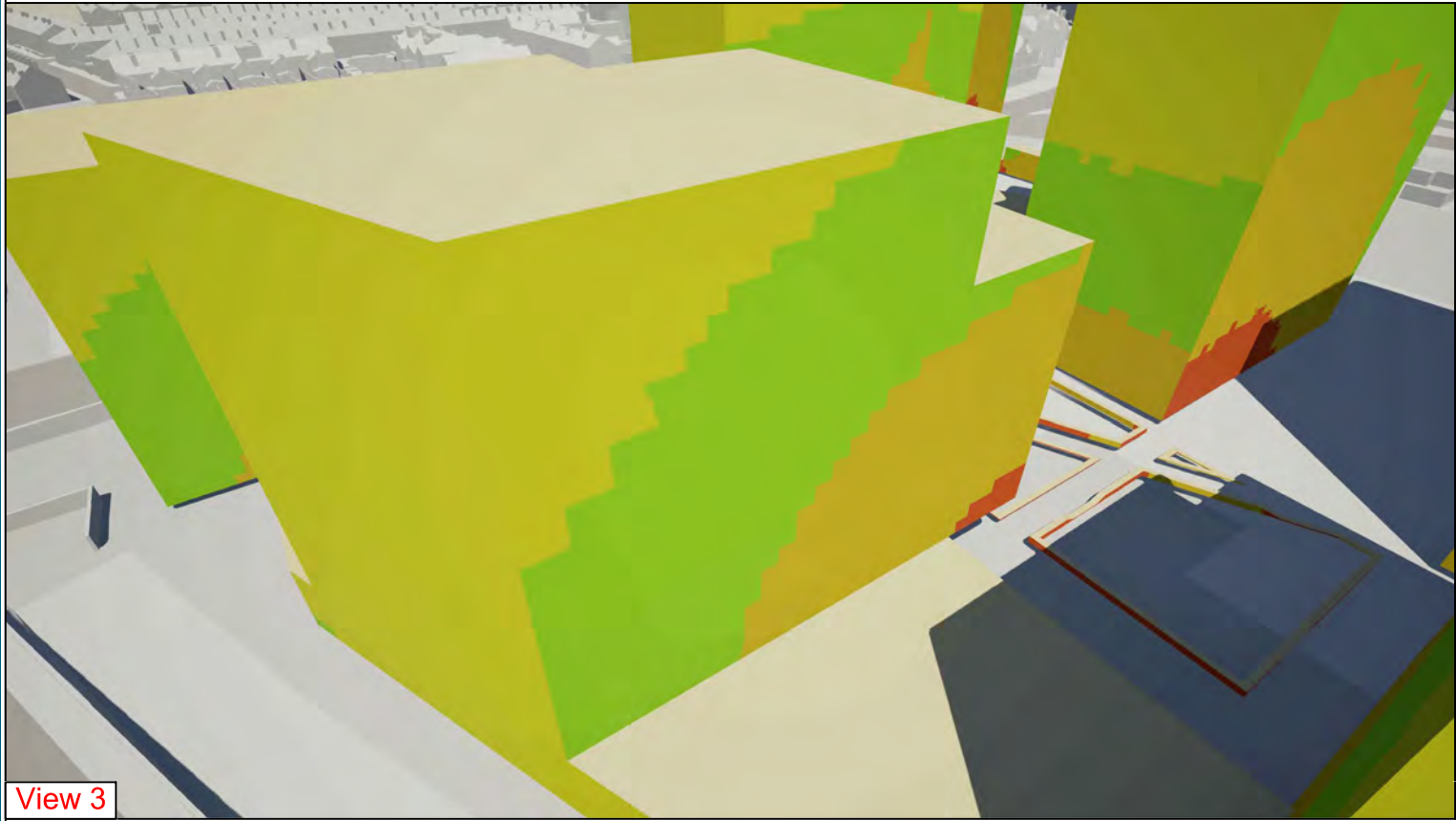




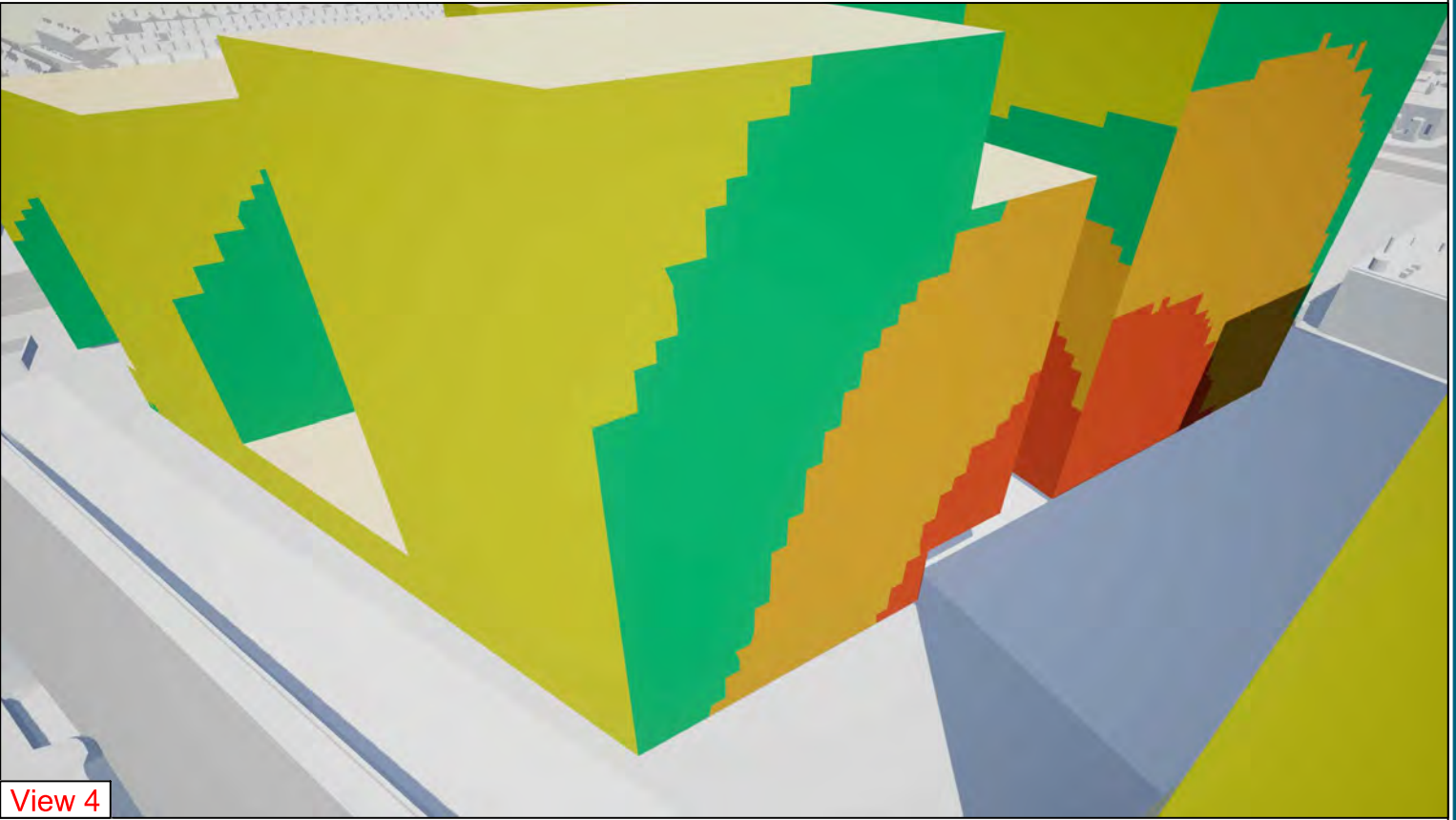
View 1



View 2



View 3



View 4

Sources: Point 2 Surveyors
Point Cloud Laser Scan

Proposal Scheme 3d Model (received 07/12/17)
171207_A11113-3DMassing.dwg

Key: **ADF(%)**

- Under 1%
- 1 to 1.5%
- 1.5 to 2%
- Over 2%

Based on 7.45m wide 8.0m Deep Room
2.2m floor to head window



Project: Reading Metropolitan
Vastern House, 80 Caversham Road
Reading, RG1 8JG

Title: Proposed Scheme Approximate ADF
Facade Values
50% Glazed Scenario

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17 Slingsby Place,
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Scheme Confirmed: -

Date : -

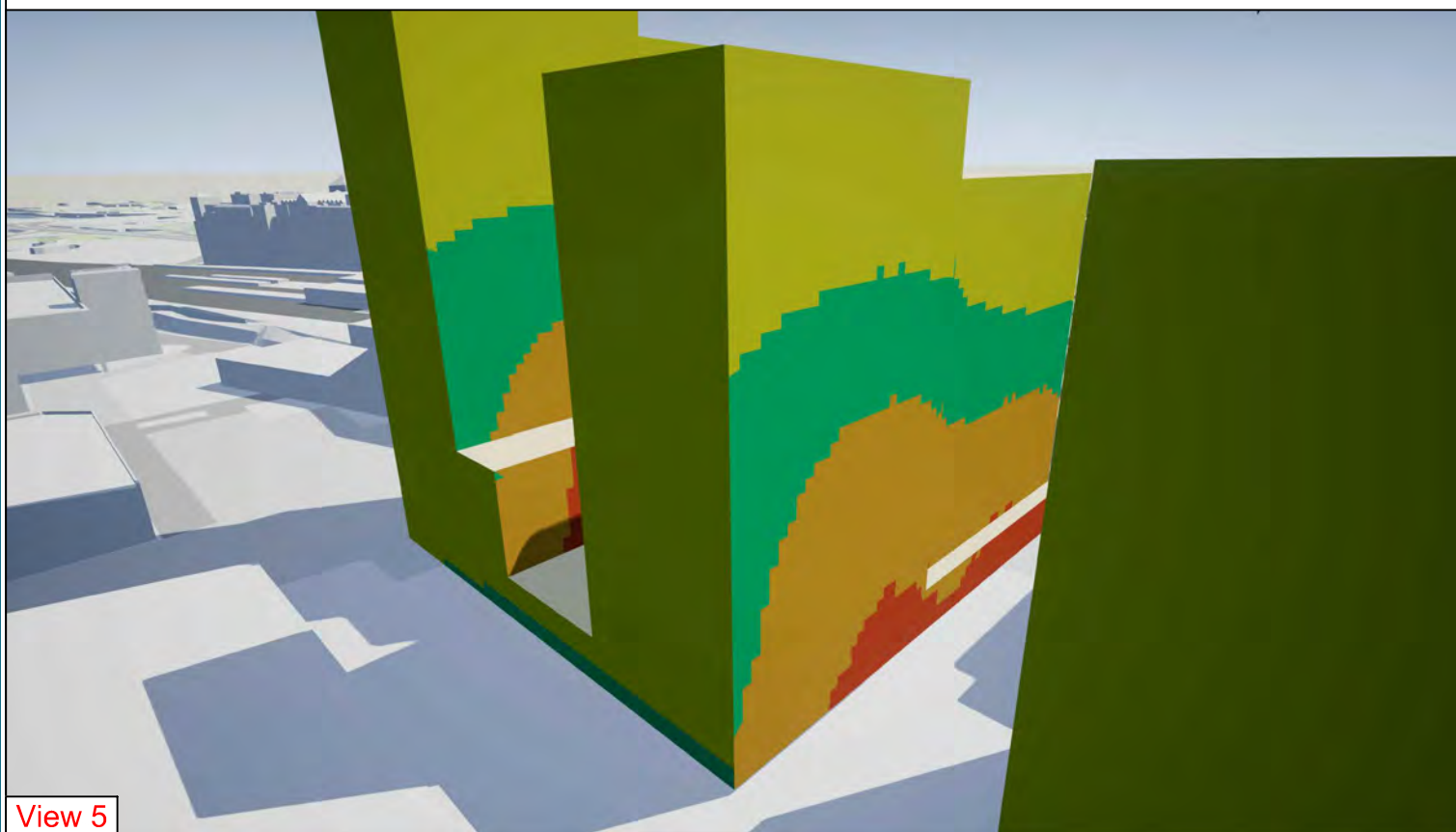
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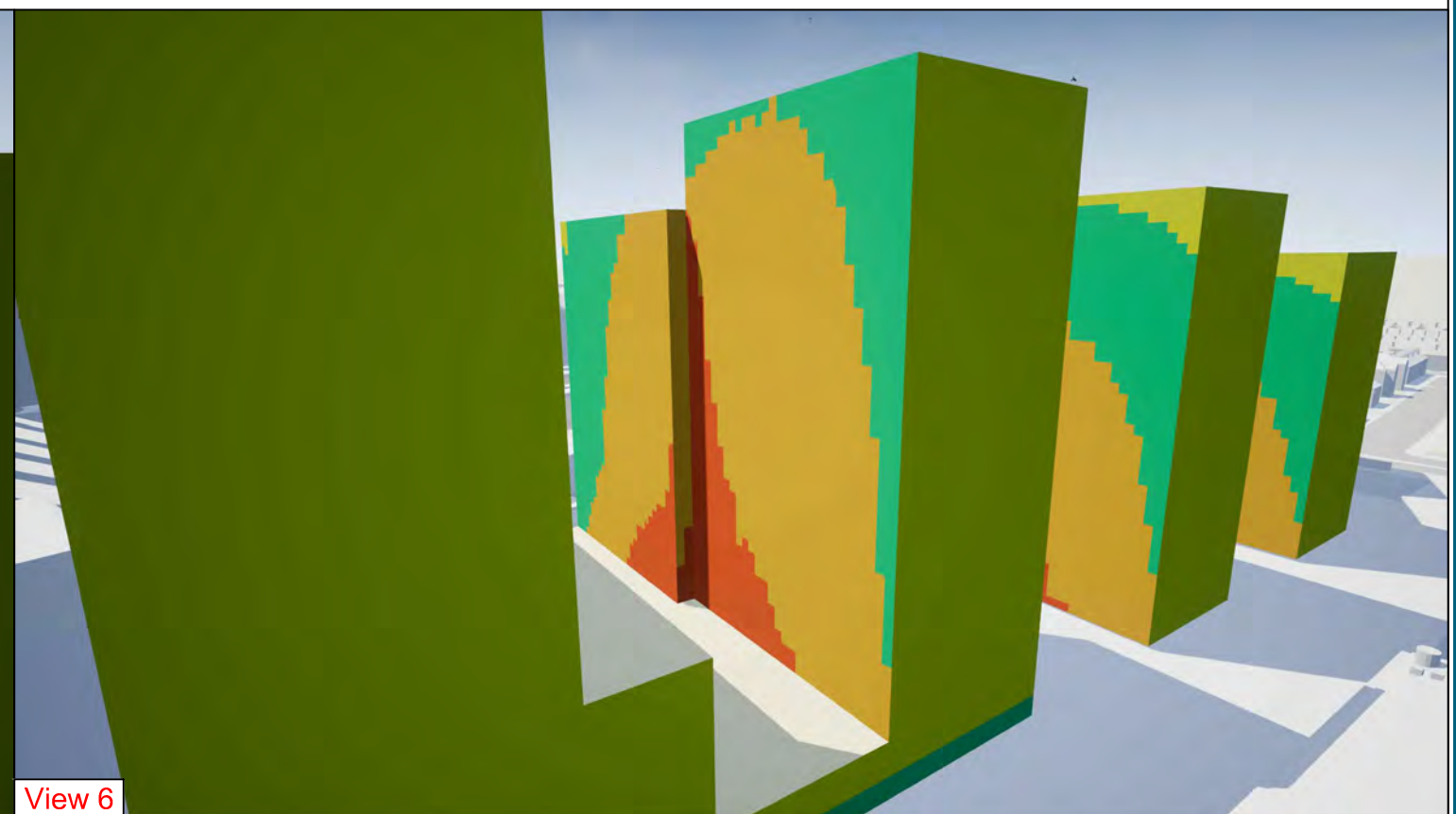
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Dwg No: **P1368/FS/05**

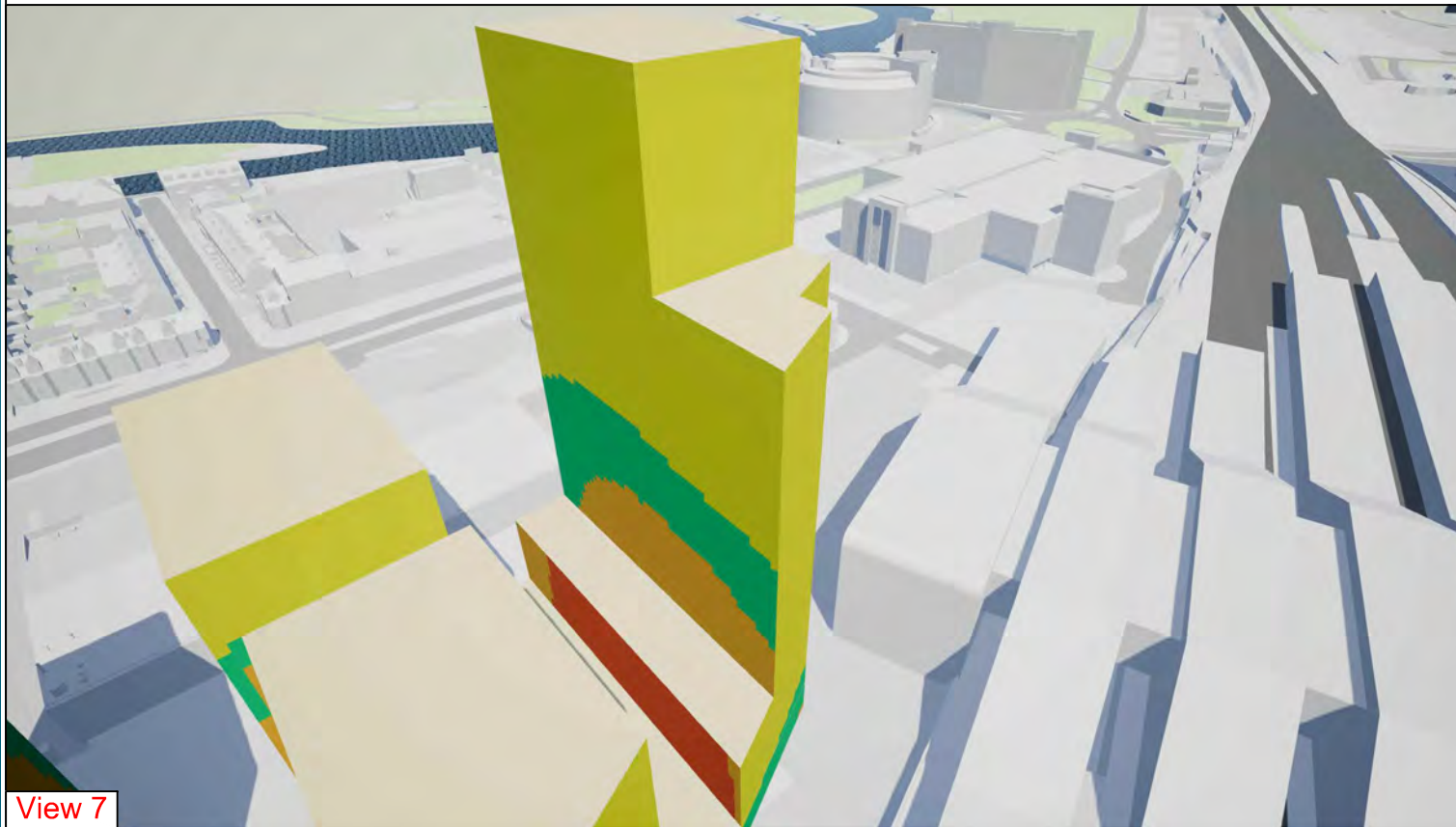
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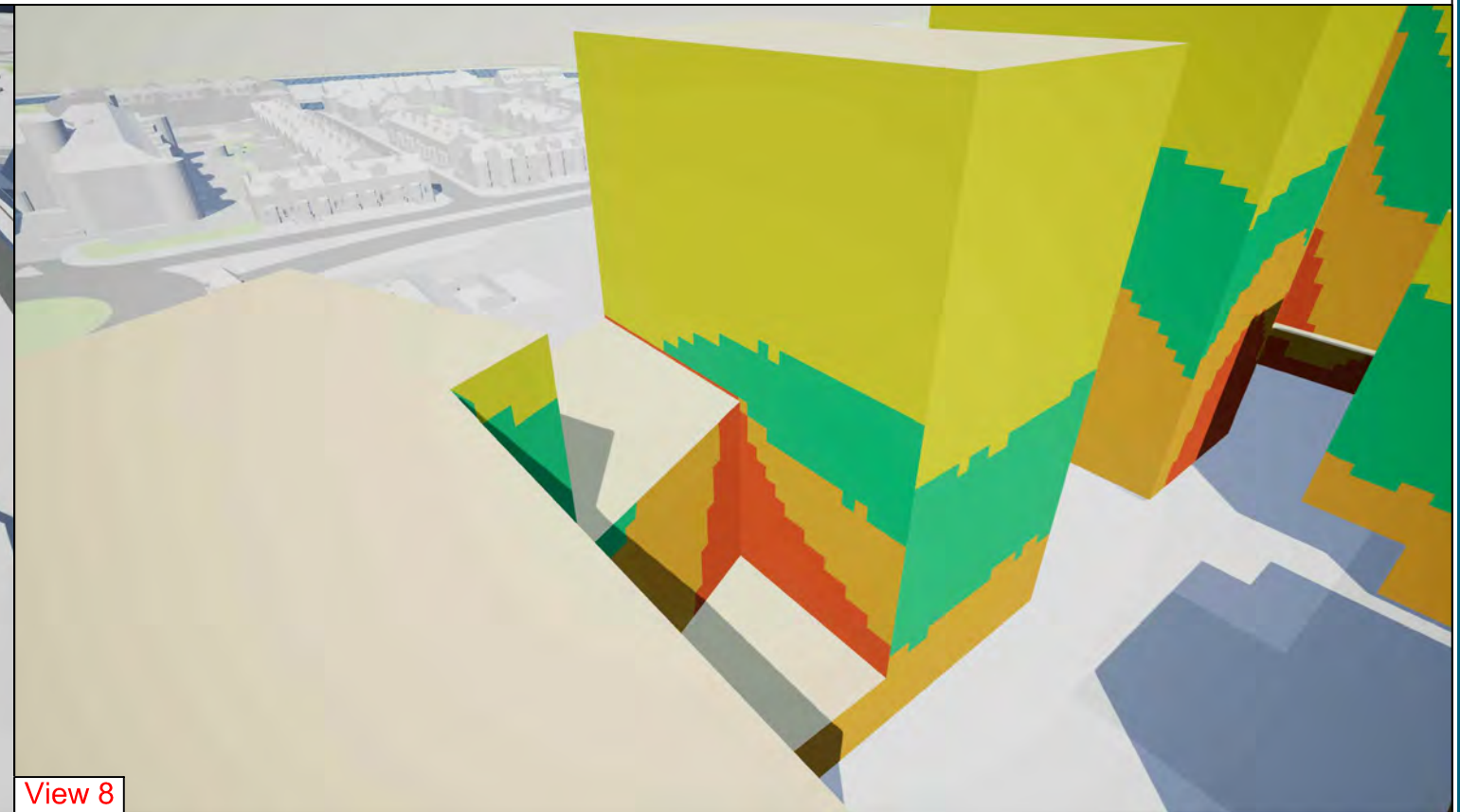
View 5



View 6



View 7



View 8

Sources: Point 2 Surveyors
Point Cloud Laser Scan

Proposal Scheme 3d Model (received 07/12/17)
171207_A11113-3DMassing.dwg

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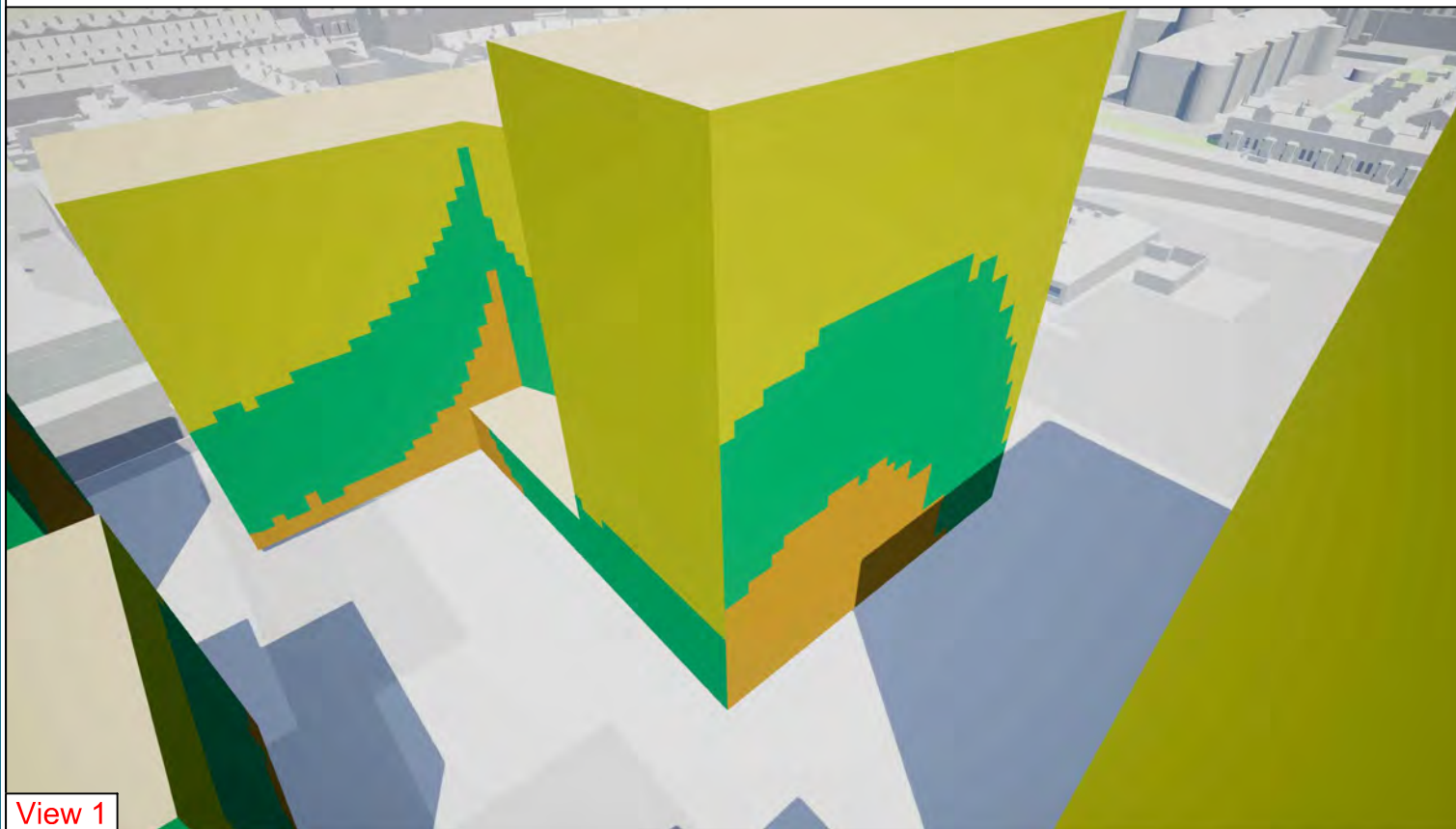
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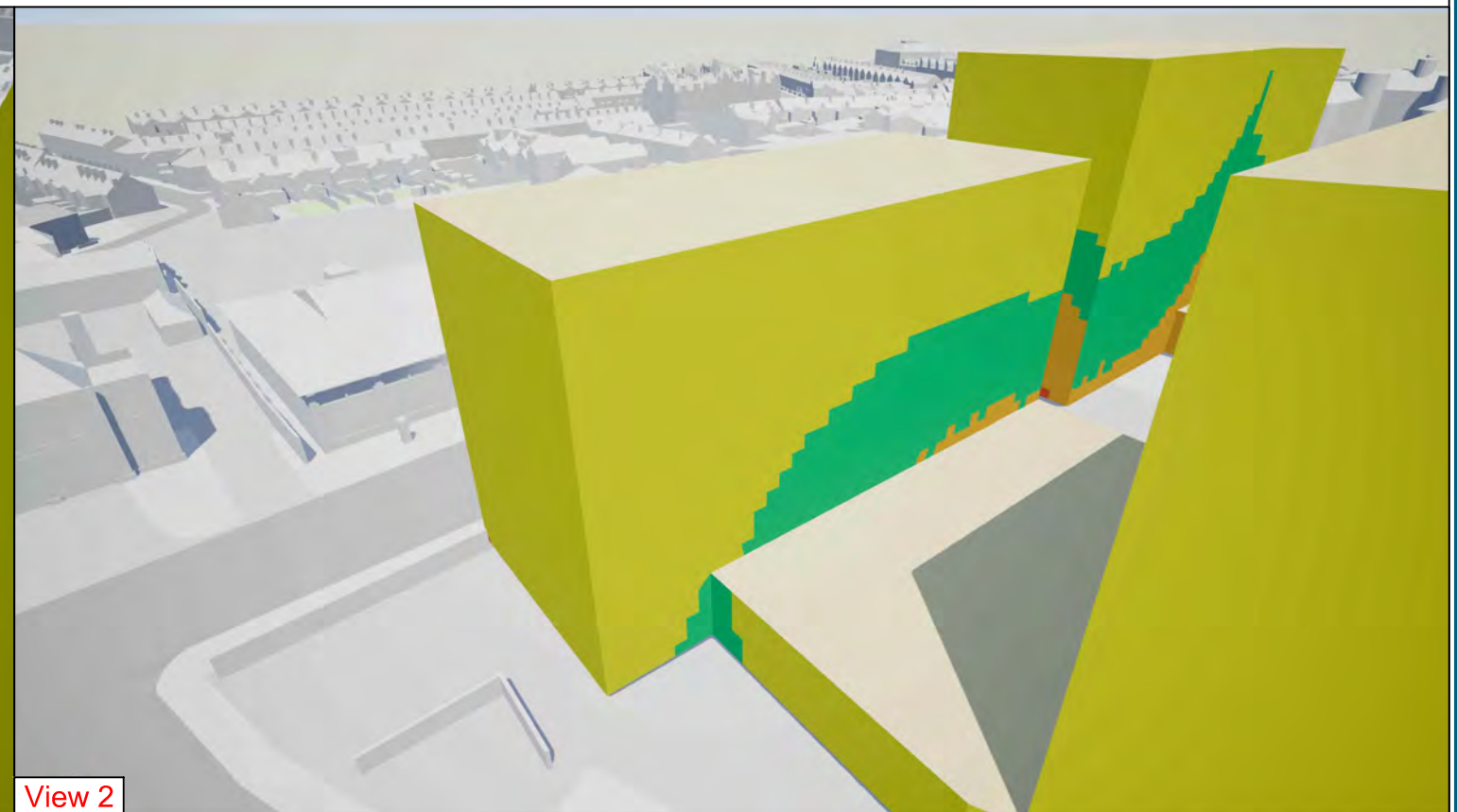
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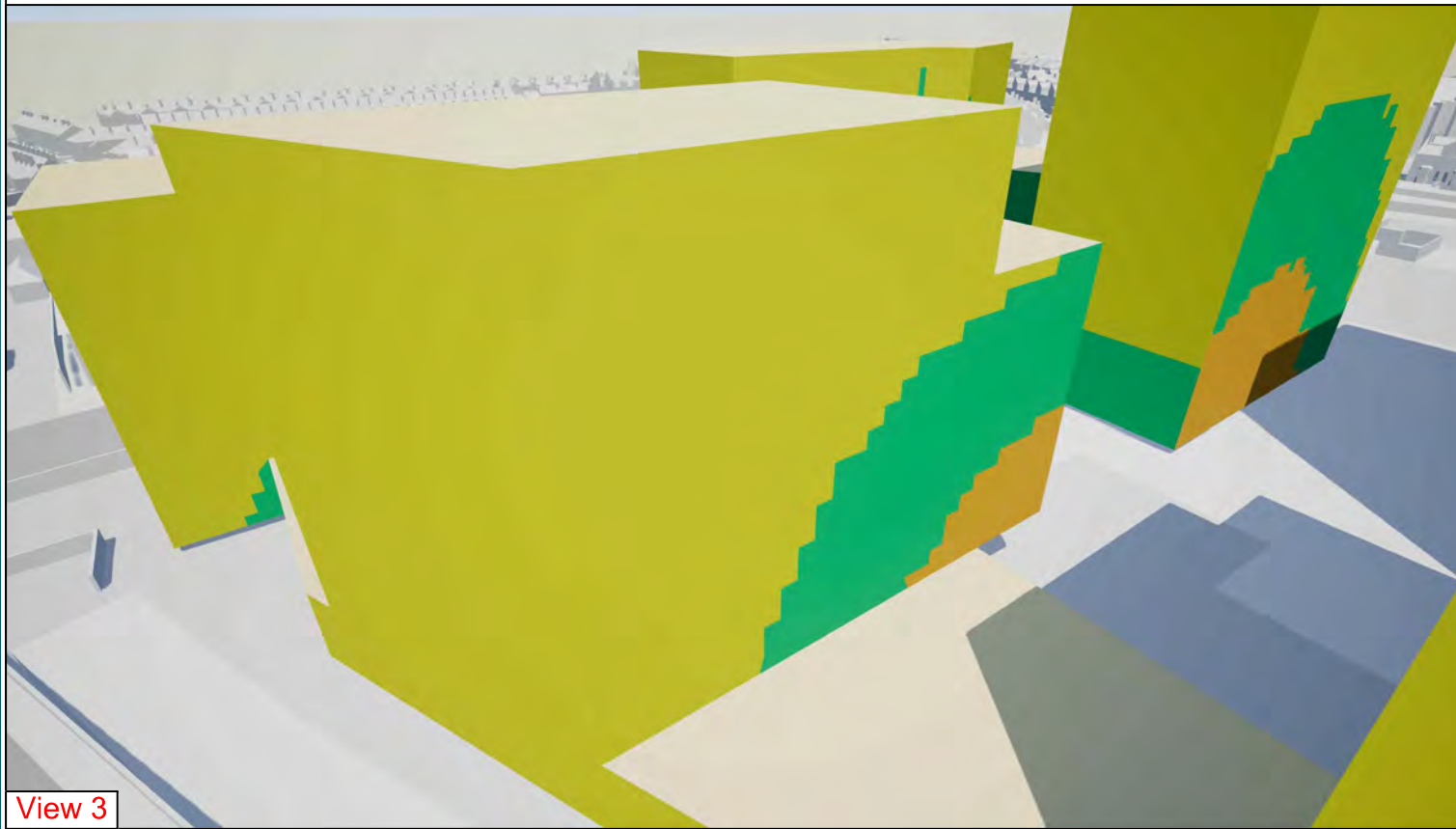
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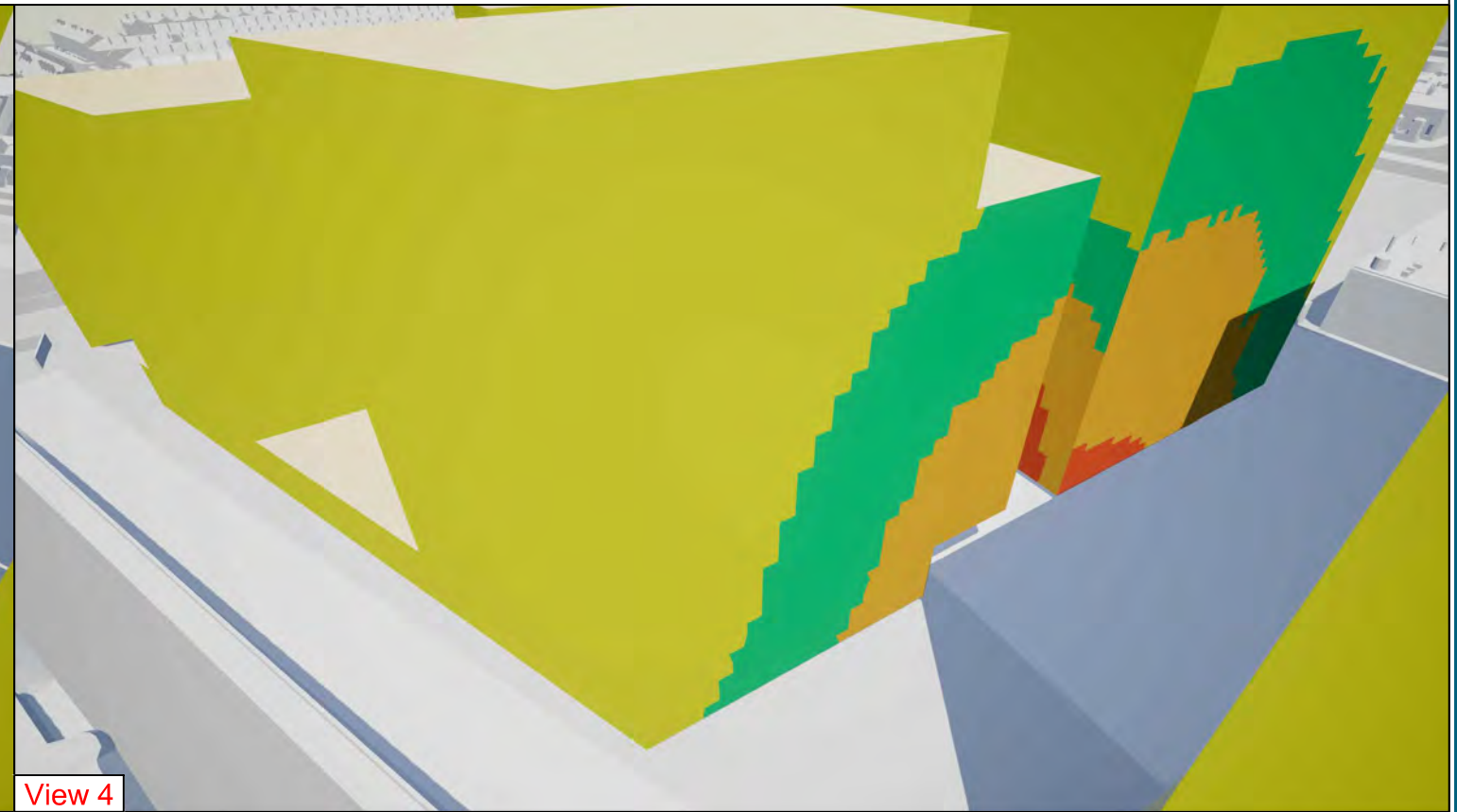
View 1



View 2



View 3



View 4

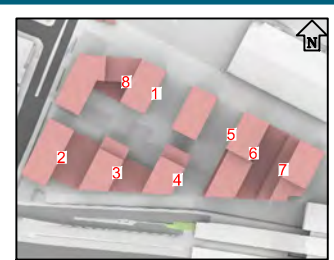
Sources: Point 2 Surveyors
Point Cloud Laser Scan

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Facade Values
66% Glazed Scenario

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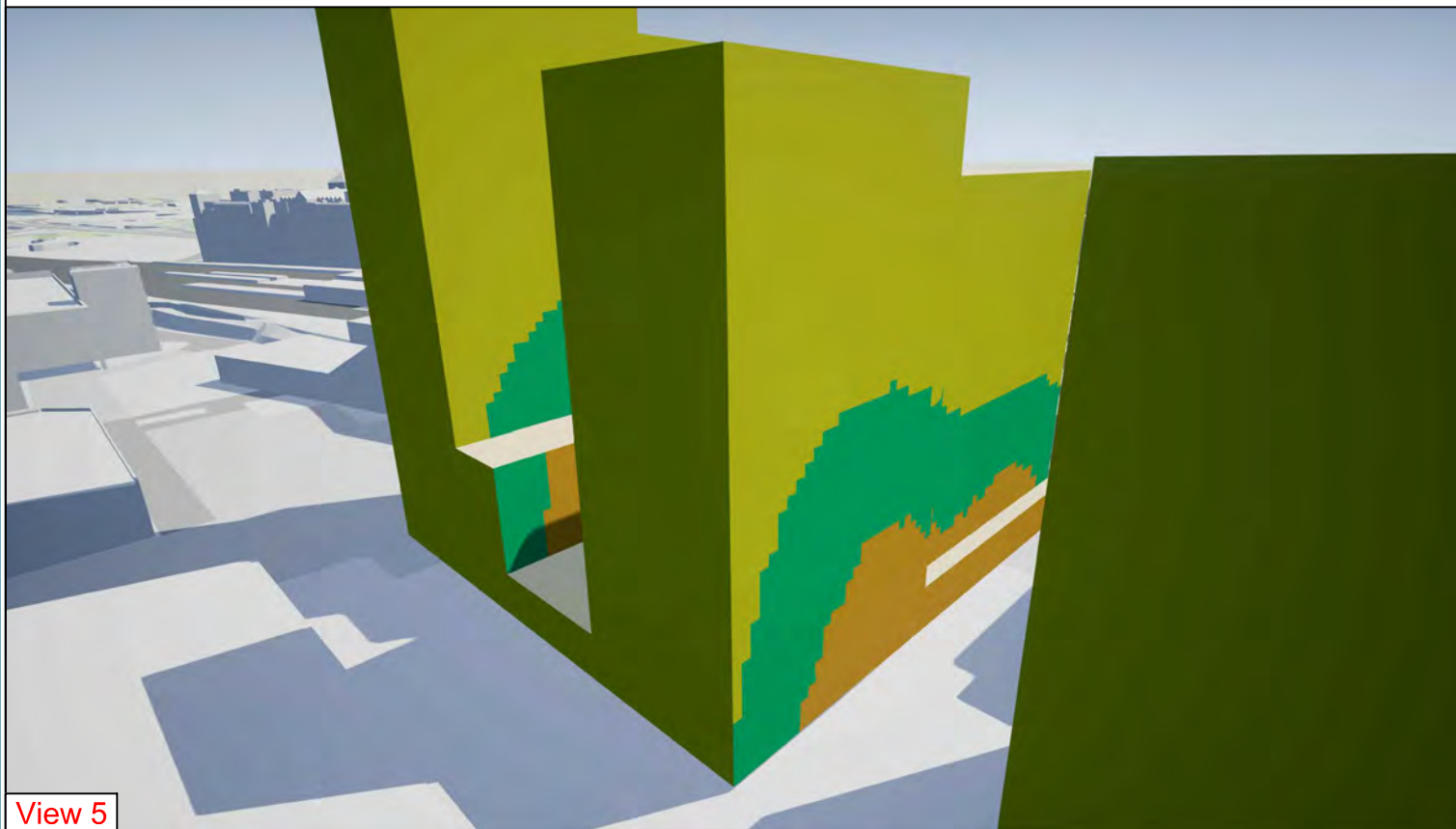
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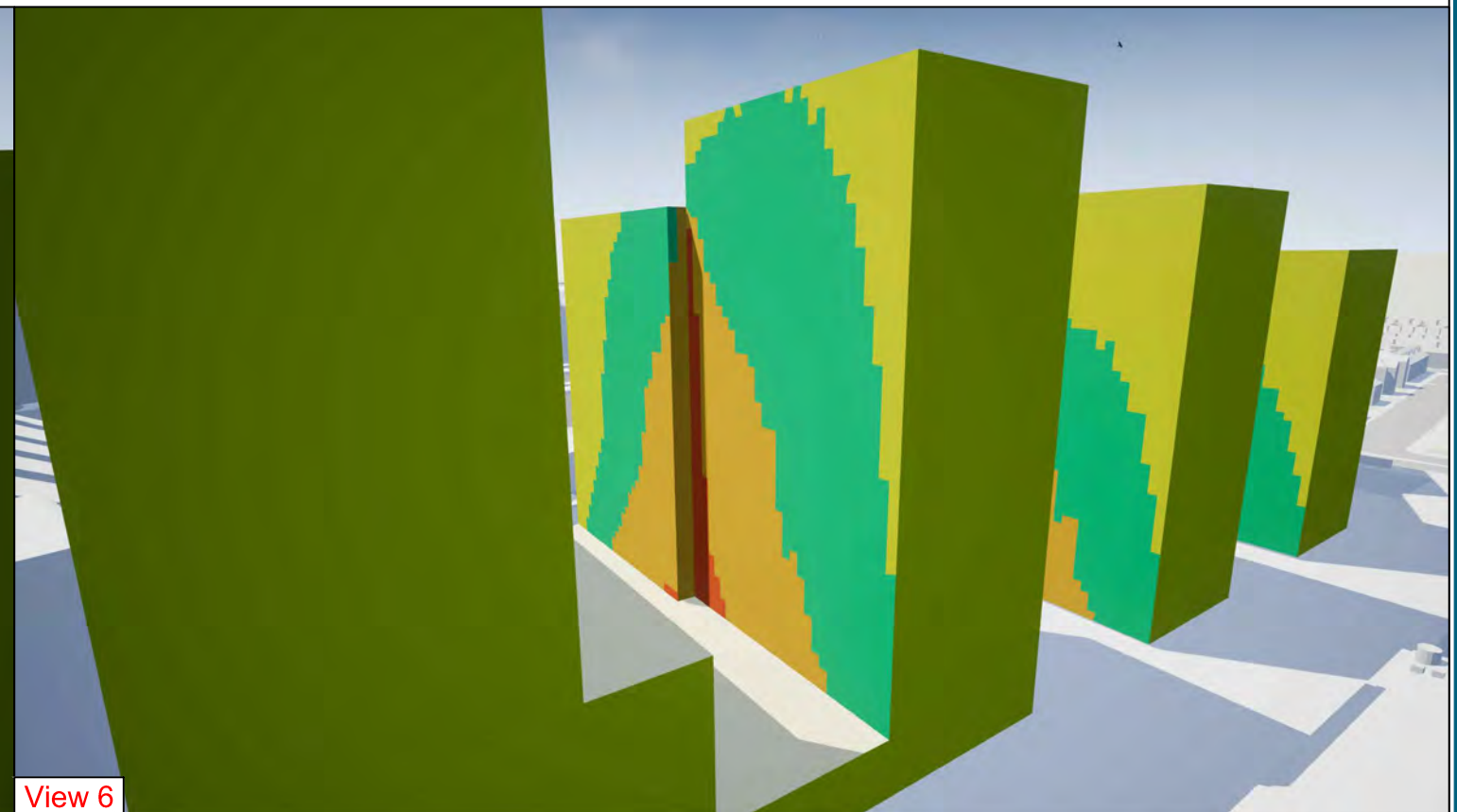
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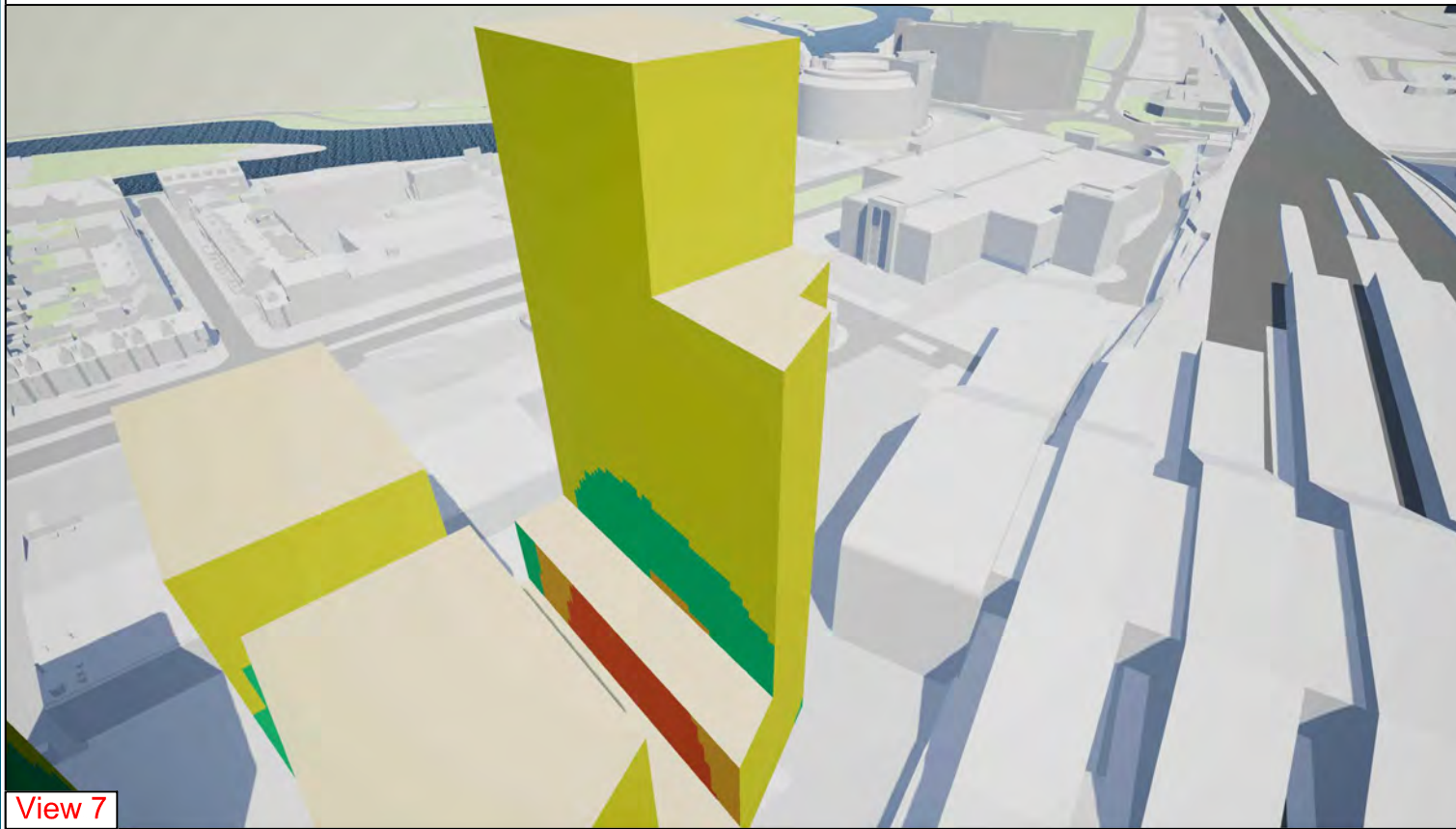
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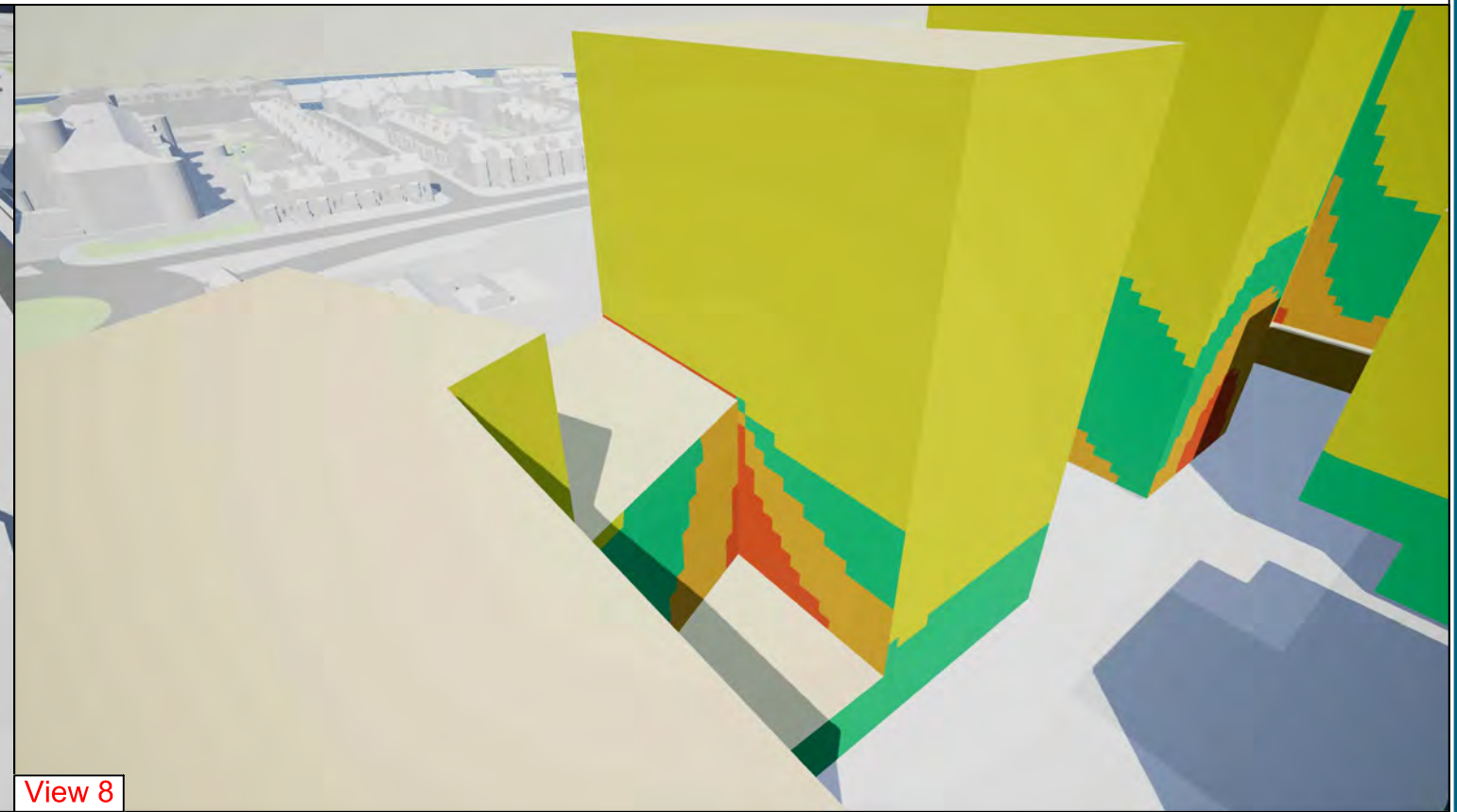
View 5



View 6



View 7



View 8

Sources: Point 2 Surveyors
Point Cloud Laser Scan

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Scheme Confirmed: -

Date : -

Drawn By: JR

Scale: NS @ A3

Date: Dec 17

Dwg No: **P1368/FS/08**

Rel: 05



Natalie Brisland
RPS Group
20 Western Avenue
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Giorgio Framalicco
Director of Planning, Development and
Regulatory Services

Civic Offices, Bridge Street, Reading RG1 2LU
☎ 0118 937 3787

Our Ref: 180146/SCO
Your Ref:

Direct: ☎ 0118 937 3338
e-mail: Richard.Eatough@reading.gov.uk

11 July 2018

Your contact is: **Richard Eatough, Planning**

Dear Ms. Brisland,

**Town and Country Planning (Environmental Impact Assessment)(England)
Regulations 2017**

**Request for a Scoping Opinion from the Local Planning Authority under
Regulation 15 for a redevelopment consisting of:**

**Demolition of existing buildings; Residential 65,188 sq.m.; B1a offices 3,230
sq.m.; Retail 2,200 sq.m.; Landscaping; Public open space; and underground
parking 150 spaces**

80 Caversham Road, Reading

I refer to your letter of 15 May and apologise for the delay in replying. Your letter asks for aspects of the Scoping Opinion 180146 to be reconsidered. As far as I am aware, there is no mechanism within the above Regulations for reviewing an Opinion already issued and you appear to asking that the Local Planning Authority should issue a revised formal Opinion. As we discussed, I have consulted on your letter.

I have had only one response to my communication to the relevant consultees as to whether the ES should be amended in the ways you suggest. That response was received on 19 June from Berkshire Archaeology who advised that archaeology should not be scoped out of the ES. Their email to me says:

Our view, that archaeology should be scoped into the Environmental Statement, remains the same. This is a new application and larger in scale than previously approved, therefore an assessment of the impact of these new proposals on archaeological remains needs to be provided in order to inform further decisions regarding mitigation.

Submitting the information previously provided in 2011, as proposed, will not be sufficient as the data will need to be updated to reflect the new proposals and impacts, and include an updated search of the HER to ensure new information is considered.

I have had no further responses. This is a very different and larger-scale redevelopment than the now lapsed scheme and circumstances have changed since 2012. The other matters referred in your letter are considered to be significant effects and should be covered in the ES.

Accordingly and for the reasons stated in the Scoping Opinion, the matters expressed in the issued Opinion are confirmed and the ES should be prepared in accordance with the formal Opinion. No further Opinion shall be issued by the Local Planning Authority.

If you wish to discuss any aspects of this matter, please contact me.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'R. Eatough', with a long horizontal flourish extending to the right.

Richard Eatough
Principal Planning Officer (North/Central)