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29 March 2018

Your contact is: Kiaran Roughan, Planning

Dear Ms. Brisland,

Planning reference 180146/SCO
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 the above request and respond as follows, with my apologies for the delay.

It is accepted by the applicant/owner that this is 'EIA Development'.

The development would consist of the following:

- Demolition of all existing buildings
- Residential 65,188 sq.m.
- B1a offices 3,230 sq.m.
- Retail (A1-A5) 2,200 sq.m.
- Landscaping
- Public open space
- Underground parking 150 spaces

This request includes an EIA Scoping Report by RPS (ref. OXF10985, dated January 2018) and this response will refer to that document. I am afraid references in this document to the consented scheme are inappropriate as the 2012 planning

permission has now lapsed. In any event, it is not a baseline position in EIA terms (the baseline is the existing situation).

It is the formal Opinion of the Local Planning Authority that in various respects, the issues and recommendations set out in the above Scoping Report are deficient and the scope/coverage of the document proposed is incomplete.

Chapter 1: Introduction

No comment.

Chapter 2: Project description

No comment.

Chapter 3: Need and Alternatives Considered

Please note that in relation to baseline conditions, the comments below on transport and traffic generation are relevant.

Chapter 4: Environmental Assessment Methodology

It is proposed to Scope out some topics for the ES. Some of these are not acceptable and I provide confirmation below.

Topics to scope out which are agreed:

- Planning Policy Context: agreed that this need not be a separate chapter although it will be necessary to assess the acceptability of the proposal in policy and related environmental terms
- Climate Change (agree could be covered under other chapters)
- Risks to Major Accidents and Disasters (does not appear to be specifically covered in the report, but for confirmation, risk is considered to be low).
- (Human) Health (agree could be covered under other chapters)
- Radiation and Heat (unlikely to be significant effects)
- Agriculture and Land Use (not considered relevant)
- Ecology and Nature Conservation (agreed that this is not a sensitive area, but please see response from the Council's Ecologist below).

Topics to scope out which are not agreed:

- Historic Environment: the development will need to be discussed in terms of relevant Heritage Assets, which are the settings of Listed Buildings and views into and out of Conservation Areas. I agree with Berkshire Archaeology (their response below) that it is not appropriate to scope out material assets from the ES on archaeological grounds, given the proximity of the site to the town centre, the ground conditions and the depth of foundations required.

- Daylight, Sunlight and Overshadowing: the development will need to discuss its effects on the site to the immediate North and more generally, the suitability in terms of impacts on residents of the development itself
- Traffic and Transport: the baseline condition is not the lapsed 2012 planning permission (although that may be discussed as an 'alternative scheme', as relevant), but the lawful use of the site. That lawful use may be as applied for in the CLP certificate 121483/CLP, issued in 2012.

The above matters should be assessed in full in the ES which accompanies the planning application and are considered to be Likely Significant Effects of the development.

Chapter 5: Townscape and Visual Resources

This chapter will also need to take account of other tall building proposals with consent, but not implemented or under construction and not just Station Hill, see discussion on Cumulative Effects below.

Paragraph 5.24: agree that fully rendered images from various viewpoints will assist.

Chapter 6: Geology, Hydrogeology and Ground Conditions:

The site is/was known to have its own vehicle depot and filling station for Royal Mail fleet vehicles. Fuel tanks will need to be re-surveyed, if still on site and if still at risk of leaking any residual fuel.

Chapter 7: Hydrology and Flood Risk

See the Environment Agency's points below, which are agreed.

Whilst a flooding sequential test may be scoped out of the ES, it will nonetheless be a planning consideration.

Chapter 8: Air Quality

Paragraph 5.63 states that the proposed development is not anticipated to include any centralised means of providing heat and/or power, so intends to scope out this aspect of combustion point sources. However, you are advised that adopted planning Policy DM2 (Decentralised Energy) requires decentralised energy which may include such equipment and the ES will need to discuss this, as appropriate.

Chapter 9: Noise and Vibration

This outline of this chapter is agreed, although your designers may wish to look at the vibration effects on the development as a result of proximity to the railway line, particularly for residential blocks near to the railway.

Chapter 10: Wind Microclimate

This chapter will need to include suitable conditions in the public areas (streets and public spaces/amenity spaces).

Chapter 11: Community and Socio-economics

No comments.

Cumulative Effects

5.103 It would be inappropriate to scope only those planning applications from the last three years. Cumulative effects should be noted in relation to all extant planning permissions.

Concluding remarks

1. The ES is now required to be prepared on the basis of this Opinion, in accordance with the 2017 Regulations.
2. This Opinion has been issued on condition of the information presented in the proposed development only and you are advised to consult with the Local Planning Authority over any changes to the subsequent planning application which may differ from the proposal presented for this Opinion.
3. No specific monitoring requirements are identified at this time, but it is noted that the ES proposes to cover such matters within each chapter.
4. In accordance with Regulation 30, this decision shall be made publicly available.

The above is the Opinion of the Local Planning Authority. I trust the above and enclosures is of use and I once again apologise for the delay in supplying this written letter. If you require any further assistance with regard to the issues herein, please do not hesitate to contact me.

Yours sincerely,



Kiaran Roughan
Planning Manager

Encs.: responses from consultees

Responses received from consultees:

Network Rail

Whilst there is no issues we would like to raise to be assessed in a forthcoming environmental statement we do have the following comments which should be passed to the developer.

I give below my comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land and provide some suitably worded conditions and a list of informatives to ensure that the proposed development has no adverse impact on the railway.

FENCING

If not already in place, the Developer/applicant must provide at their expense a suitable trespass proof fence (of at least 1.8m in height) adjacent to Network Rail's boundary and make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point either during construction or after works are completed on site should the foundations of the fencing or wall or any embankment therein be damaged, undermined or compromised in any way. Any vegetation on Network Rail land and within Network Rail's boundary must also not be disturbed.

DRAINAGE

Additional or increased flows of surface water should not be discharged onto Network Rail land or into Network Rail's culvert or drains. In the interest of the long-term stability of the railway, soakaways/ attenuation ponds should not be constructed within 20 metres of Network Rail's boundary. Any surface water run-off from the site must drain away from the railway boundary and must NOT drain in the direction of the railway as this could import a risk of flooding and / or pollution onto Network Rail land.

SAFETY

No work should be carried out on the development site that may endanger the safe operation of the railway or the stability of Network Rail's structures and adjoining land. In particular, the demolition of buildings or other structures must be carried out in accordance with an agreed method statement. Care must be taken to ensure that no debris or other materials can fall onto Network Rail land. In view of the close proximity of these proposed works to the railway boundary the developer should contact Richard Selwood at Network Rail on AssetProtectionWestern@networkrail.co.uk before works begin.

ENCROACHMENT

The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not affect the safety, operation or integrity of the operational railway, Network Rail and its infrastructure or undermine or damage or adversely affect any railway land or structures. There must be no physical encroachment of the proposal onto Network Rail land, no

over-sailing into Network Rail air-space and no encroachment of foundations onto Network Rail land and soil. Any future maintenance must be conducted solely within the applicant's land ownership. Should the applicant require access to Network Rail land then they must seek approval from Network Rail Asset Protection Team. Any unauthorised access to Network Rail land or air-space is an act of trespass and we would remind the council that this is a criminal offence (s55 British Transport Commission Act 1949). Should the applicant be granted access to Network Rail land then they will be liable for all costs incurred in facilitating the proposal.

SITE LAYOUT

It is recommended that all buildings be situated at least 2 metres from the boundary fence, to allow construction and any future maintenance work to be carried out without involving entry onto Network Rail's infrastructure. Where trees exist on Network Rail land the design of foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines.

PILING

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

EXCAVATIONS/EARTHWORKS

All excavations / earthworks carried out in the vicinity of Network Rail's property / structures must be designed and executed such that no interference with the integrity of that property / structure can occur. If temporary compounds are to be located adjacent to the operational railway, these should be included in a method statement for approval by Network Rail. Prior to commencement of works, full details of excavations and earthworks to be carried out near the railway undertaker's boundary fence should be submitted for approval of the Local Planning Authority acting in consultation with the railway undertaker and the works shall only be carried out in accordance with the approved details. Where development may affect the railway, consultation with the Asset Protection Engineer should be undertaken.

ENVIRONMENTAL ISSUES

The design and siting of buildings should take into account the possible effects of noise and vibration and the generation of airborne dust resulting from the operation of the railway.

PLANT, SCAFFOLDING AND CRANES

Any scaffold which is to be constructed adjacent to the railway must be erected in such a manner that, at no time will any poles or cranes over-sail or fall onto the railway. All plant and scaffolding must be positioned, that in the event of failure, it will not fall on to Network Rail land.

Crossrail

No response. Any response will be forwarded separately.

Environment Agency

Thank you for your consultation on the above EIA scoping opinion.

Flood Risk Management

We believe that fluvial flood risk can be **scoped out** of the Environmental Statement.

We also have the following advice.

The site lies within Flood Zone 2 in accordance with our flood risk mapping. Flood Zone 2 is defined as having a medium probability of flooding. This is in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance.

Sequential Test

The sequential will need to be applied to the proposed development in accordance with paragraph 103 of the National Planning Policy Framework (NPPF). Following this the exception test may also need to be applied depending on the vulnerability of the development proposed in Flood Zone 2. Please consult Tables 2 'Flood Risk vulnerability classification and 3 'Flood risk vulnerability and flood zone compatibility in the Planning Practice Guidance. The proposed development will have mixed vulnerabilities as it is a mixed use development.

Fluvial Flood Risk

A flood risk assessment will be required for the proposed development to assess the flood risk associated with this site in order to be compliant with paragraph 103 of the NPPF.

The EIA Scoping Report (Ref: OXF10985, dated January 2018 compiled by RPS) broadly covers the key flood risk and hydrological scope of the EIA. The scoping report acknowledges that the site is located in Flood Zone 2 and that the impact of climate change will need to be assessed within an FRA from all sources of flood risk. Chapter 7: Hydrology and Flood Risk sets out what we would expect to see in the proposed approach. There is much focus on the need to assess the effect of an increase in surface water run-off as a result of the proposal. It is mentioned that fluvial flooding will also be assessed but does not go into as much detail as it does for surface water.

Although the site lies within Flood Zone 2, Reading Borough Councils level 2 SFRA shows that the site lies wholly within the climate change flood extent. An FRA would need to assess if the proposal will cause any third party detriment as a result of any loss of floodplain storage. It is currently unclear if the proposal would result in a bigger built footprint on the site, or if any ground level raising is proposed. If so, floodplain compensation should be assessed. The applicant should refer to the design recommendations for floodplain storage, floor levels, basements and a safe route of access and egress recommended in the level 2 SFRA assessment (site AB004: NORTH OF THE STATION (Local Plan Ref: CR11e). Our current best available model of the Thames in this area to run the climate change flooding scenarios has been used. The level 2 SFRA shows the climate change flood

extents but does not provide the flood levels which will be needed in any flood mitigation designs. The applicant may be able to contact your authority for any climate change flood levels and can use the data, or the applicant may need to carry out their own assessment to obtain the appropriate climate change levels to ensure the development is safe for the lifetime of the development by providing the necessary mitigation measures.

Climate Change

Guidance on how to assess the appropriate climate change allowances can be viewed at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Please be aware that we are currently improving and updating the Thames flood model in this area which will also include the following climate change allowances (25%, 35% and 70%). The predicted completion date for this model is not until late summer 2018. Once complete, this model will become the best available flood model for this site.

Advice to LPA and applicant - Flood Risk

Under the 2010 flood and water management act, responsibility for local flood risk (ie flood risk from ordinary watercourses, surface water and ground water) is transferred to the lead local flood authority. The Town and Country Planning (Development Management Procedure) (England) Order was amended on 15 April 2015. The statutory responsibility to review and assess surface water drainage proposals for major applications passed to the relevant Lead Local Flood Authority (LLFA) from this date. In this case the LLFA is Buckinghamshire County Council.

¹The Environment Agency does not comment on groundwater or sewer flooding. We only comment on fluvial flood risk (flooding from main rivers).

Groundwater quality

We believe that groundwater quality should be **scoped into** the Environmental Statement.

This site lies on principal and secondary aquifers. This includes a chalk aquifer. We have reviewed the RPS Reading Metropolitan EIA Scoping Report dated January 2018. Item 5.31 of this report refers to elevated concentrations of polycyclic aromatic hydrocarbons and petroleum hydrocarbons that have previously been identified in groundwater samples. However, Item 5.32 proposes an approach to contamination that only involves review of previous site investigations and a site walk over but does not recommend the potential need for intrusive site investigation of the site. Our understanding of the site investigation that identified this groundwater contamination was that it was a very limited investigation. The report commented that the investigation was not carried out in the potentially most contaminated part of the site, namely not in the refuelling area and vehicle maintenance and repair workshop. Further site investigation was recommended. Given that this Royal Mail site housed a refuelling area and vehicle maintenance and repair workshop there is potential for contamination to be present in the soils and groundwater and this should be explored. The need for further investigation of the potentially most contaminative parts of the site should be included in the

¹ This appears to be an error, should say Reading Borough Council

Environmental Statement. We understand that this development will required the use of deep penetrative foundation methods (piling) that will likely embed into the top of The Chalk. We therefore need to ensure that the use of piling will not create preferential pathways for contamination to migrate from the surface and through Langley Silt Member (clay and silt) and into the aquifers below the site (alluvium; Taplow Gravel Formation - both Secondary A Aquifers and The Chalk - Principal Aquifer). To this end we need to know the contaminative status of the soils and groundwater in the refuelling area and under the vehicle maintenance and repair workshop (that may have included inspection pits). Remediation of this site may be required before the use of piling could be considered to be acceptable.

Berkshire Archaeology

Having reviewed the EIA Scoping Report for 80 Caversham Road it is our view 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. Using an archaeological desk-based assessment as the starting point, the Archaeology Chapter in the Environmental Statement will need to consider the potential for archaeological remains to exist within the site, the extent and nature of the potential impact caused by the construction of the proposals and an archaeological mitigation strategy, including preservation in situ where appropriate.

Thames Water

No response and any response received will be relayed to you.

RBC Ecologist/Planning Natural Environment Team

This application is for a scoping opinion regarding an EIA of the proposed mixed-use development at 80 Caversham Road. It is proposed to demolish the existing buildings and to construct 8 residential tower blocks as well as commercial and office units with open space and underground parking. A similar outline application was approved in 2012 (11/00276/OUT), which the developer considered to be an EIA development.

The ecology section of the scoping report sets out the likely ecological impact of the proposals, and states that the development site will be subject to an updated Phase 1 Habitat Survey and bat survey. This will be adequate to assess the likely ecological impact of the proposals and the applicant should submit the survey reports with the application.

Ecology can be scoped out of the EIA but advises that the applicant should submit the reports (updated Phase 1 Habitat Survey and bat survey) with the planning application.

RBC Environmental Protection

The developer proposes to carry out an air quality assessment, noise & vibration assessments and contaminated land investigations in line with the relevant national guidance documents. These will be adequate to assess any impacts from the proposed development and enable appropriate mitigation to be put in place.

Scottish and Southern Electricity

No response and any response received will be relayed to you.

Natural England

Thank you for your consultation dated and received by Natural England on 6 February 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at consultations@naturalengland.org.uk and we may be able to provide further information.

RBC Transport Strategy

Transport Strategy confirms that the ES needs to include the TA. For information, they provided the following response to the updated TA (supplied separately to the Request for a Scoping Opinion). Please note:

- The actual date of the ATC surveys undertaken by the applicant have been confirmed and these are deemed acceptable with the actual survey results to be submitted alongside any Transport Assessment.
- The TA refers to just two access points one on Vastern Road and the other via a left in only junction onto Caversham Road, this is as per the previous

approval on the site. This proposed layout is likely to remove any rat running through the site (Vastern Road to Caversham Road) in times of peak hour congestion and therefore is accepted in principle.

- The access layout at Vastern Road does now take into account the existing layout of the taxi rank within the Northern Interchange and ensures that this is retained.
- My previous comments stated that the TA should provide a detailed assessment of the visibility associated with the proposed Vastern Road access and the service road associated with the Aviva site located to the north. It has since been stated that Chapter 6 of the TA highlights the net change in development vehicular traffic flows upon the external highway network between the 2012 Consented Scheme and 2017 Proposed Scheme. This illustrates that no further junction assessment modelling is required to support the scheme and there are no significant issues with the visibility at the eastern access point (A329 Vastern Road) for vehicles egressing the site. However, visibility at this junction was not previously assessed and given the limited visibility at this point it would need to be demonstrated that the proposed development would result in fewer trips than the existing use.
- A 50% ratio of new trips associated with the restaurant use has been deemed acceptable.
- No further junction assessments are proposed given that the proposed trip rates generated in comparison to the 2011 scheme has reduced. Table 6.3 and Appendix G demonstrates that there will be a reduction in vehicular traffic associated with the proposed development in comparison with the consented scheme upon all highway links, with the exception of minimal increases on:
 - Trooper Potts Way (southbound) during the PM peak (11 trips);
 - A329 Vastern Road (eastbound) during the PM peak; (6 trips)and
 - A329 Caversham Road (northbound) during the PM peak (3 trips).

This is not material and would therefore be deemed acceptable. Now that the access arrangements are the same as those previously approved and there are significant reductions in vehicular movement no further assessments would be required.

- The residential total people trip rates have been assessed using TRICS data with the mode share assessment utilising census data, this methodology has been accepted in this instance given that the sites included within the trip rate data from TRICS has a much higher car parking ratio than that proposed. Although car parking does not ultimately increase car use it could result in a slightly higher trip rate given the reduced parking provision on the site. The census data includes

Abbey Ward which has a lower provision of parking and therefore would provide a comparable assessment. It is however noted that this is being reviewed given the subsequent reduction in car parking.

- The office trip rates have been generated utilising census data and these are deemed acceptable.
- It is now confirmed that all servicing will be undertaken from within the application site and not from Caversham Road. However, tracking of refuse / delivery vehicles travelling through the site and accesses all servicing points will be required with turning areas also identified.

As a result of the above I can confirm that the Scoping is acceptable.