

Ref: GA/RW/09116/L006

2 February 2018

Mr S Vigar
Planning Department
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Dear Steve

Request for an EIA Screening Opinion under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Proposed Residential Development of approximately 215 dwellings with associated access, parking, landscape and open space provision following the demolition of existing buildings

Land at former Battle Hospital Site at Portman Road, Reading

I write on behalf of our clients Bellway Homes Ltd to formally request a Screening Opinion from the Council. This request is made in accordance with Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of proposals for residential development at the above site.

The proposals are of a type listed in Schedule 2 (10(b)) of the Regulations. Over 150 dwellings are proposed and accordingly the development must be screened to determine whether an Environmental Statement is required.

In making this request we set out below our consideration of the Regulations and our professional view that the proposal does not represent an Environmental Impact Assessment (EIA) development and therefore does not require the submission of an Environmental Statement (ES).

Required Information

In accordance with paragraph 2 of Regulation 6 the following information is enclosed with this request:

- a) A Plan sufficient to identify the land;
- b) A description of the development, including in particular:
 - i. A description of the physical characteristics of the development and, where relevant, of demolition works;

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- ii. A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- c) A description of the aspects of the environment likely to be significantly affected by the development;
- d) To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:
 - i. The expected residues and emissions and the production of waste and biodiversity; and
 - ii. The use of natural resources, in particular soil, land, water and biodiversity; and
- e) Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

As requested in your e-mail dated 17 November 2017, please find on the enclosed CD electronic copies of the following documents:

- Geo-Environmental Site Appraisal by RSK
- Air Quality Assessment by Mayer Brown
- Ecological Appraisal by Aspect
- FRA and Drainage Strategy by Odyssey

Site Description

The site, the extent of which is shown edged red on the enclosed plan, comprises approximately 3ha of brownfield developed land at the former Battle Hospital site in Reading.

The site is an allocated housing site in the Council's Sites and Detailed Policies DPD (SDPD) 2012, policy reference SA8f. The allocation is proposed to be brought forward in the emerging Local Plan, with the site listed as policy allocation reference WR3i. The site is also the subject of the Battle Hospital Planning Brief (2005).

The site is located in an urban location with a range of uses nearby. To the north beyond Portman Road is a designated employment area and an elevated rail line. To the south is a modern residential scheme, including high rise apartment buildings and an area of open space including children's play space. To the west is a large Tesco superstore. To the south of that Oxford Road is an identified District Centre provided a varied mix of shops and services. It also provides access to high frequency bus services.

The site is not within an Air Quality Management Area (AQMA), but lies in close proximity to one and given the scale of development proposed Reading Borough Council (RBC) have requested an Air Quality Assessment accompanies the planning application.

It is the subject of a Tree Preservation Order (Ref. TPO103/003) which covers part of the site and protects a number of trees including Lime, Alder and Silver Birch.

The site lies almost entirely within flood zone 2, with a small part in flood zone 1.

Planning Background

Planning history records primarily relate to its former use as a hospital. The site is occupied by a range of buildings in varying states of disrepair. Some remain occupied and in active use.

On adjoining land there have been applications associated with the redevelopment of the wider Hospital site for the Tesco superstore and the Kings Oak scheme of housing immediately south of the site. These applications are listed below:

06/00010/FUL – Erection of food store unit shops, drive through restaurant, petrol filling station, 65 residential units, car parking, creation of public space, landscaping, access and associated highway works – Approved 10 November 2006

06/00011/FUL – Erection of 434no. dwellings and primary healthcare facility with associated car parking, open space, landscaping and new access arrangements – Approved 10 November 2006

A Secretary of State Screening Direction in respect of both these, considerably larger, proposals confirmed that EIA was not required.

As part of the wider former Battle Hospital site the site has long been identified by Reading Borough Council as a location for redevelopment for housing. As mentioned above it is an allocated housing site in the Council's SDPD 2012, but is also the subject of a longstanding planning brief (2005) for Battle Hospital which replaced its earlier predecessor adopted in 1995.

The site is now only partly active with the majority of the site vacant. It is occupied by utilitarian style buildings which are falling into disrepair and the site has suffered from incidents of trespass representing a health risk and adversely affecting the amenity of neighbouring occupiers. The visual appearance of the site also detracts from the character and appearance of the area.

For these reasons, its longstanding allocation for housing and the benefits that would arise from its positive redevelopment for housing, which Reading are partly reliant upon in their 5year housing land supply (HLS) trajectory, there should be a collective desire to see the redevelopment of the site for housing realised.

Nature of the Development

The proposed development is illustrated on the enclosed site layout plan. The plan which has been produced following a comprehensive pre-application process with RBC and other key stakeholders can be summarised as follows:

- The provision of approximately 215 dwellings in a mix of houses and apartments;
- Building storey heights ranging from single storey to 6 storeys in height for the apartment building at the south-west corner of the site;
- Provision of amenity open space and green space;
- Creation of earth bund and SUDS features along the northern boundary of the site with Portman Road;
- 3m wide footpath/cycle path orientated north/south through the development site linking Portman Way and Portman Road;
- New tree planting and landscaping;
- Continuous footpath along the northern edge of the site;
- Vehicular access from the south via Portman Way in accordance with site allocation policy guidelines.

Likely Environmental Impacts of the Development

The environmental issues upon which the proposals could impact are as follows:

1. Air Quality
2. Climate Change
3. Ecology, Landscape and Nature Conservation
4. Flood Risk, Drainage and Water Resources
5. Heritage/Archaeology
6. Land Contamination
7. Social and Economic Impacts

8. Traffic and Transport
9. Noise
10. Construction Impact

Summary of Likely Effects

1. Air quality

An air quality assessment has been undertaken to accompany the application. The report assesses the impact of the development on air quality arising from: construction dust; construction traffic and plant and development traffic. The assessment finds that with recommended measures in place the residual effects of construction dust and emissions from construction plant/vehicles upon the local area and sensitive receptors although adverse, will be temporary and considered to be 'not significant'.

Furthermore the quantitative assessment of traffic related air quality impacts arising from the completed development demonstrates that all residential receptors are within national objective levels and impacts are considered imperceptible and therefore negligible.

It is concluded that the proposed development fully complies with air quality related national and local planning policy and any mitigation if considered necessary can be secured pursuant to appropriate planning conditions on any permission.

2. Climate Change

The energy and climate change effects of the development will be related to minimising carbon emissions and ensuring the impacts of future climate change can be accommodated on the site. The level of impact is related to the scale of the development, and its relatively small scale will have a limited effect on climate change adaptation requirements. These matters can in any event be appropriately dealt with at the application stage and via any post permission submissions pursuant to conditions should these be considered necessary.

3. Ecology, Landscape and Nature Conservation

An ecological appraisal has been undertaken. The appraisal confirms that the site itself is not subject to any statutory or non-statutory ecological designations. In addition it is well separated from designated ecological sites in the area by existing development. The prospect of trans-boundary effects are therefore very limited.

The site is dominated by existing buildings and hardstanding and the habitats present on-site are of negligible to low ecological value, therefore the proposed losses are of negligible to minor ecological significance. Proposals for new tree and shrub planting will compensate for the proposed losses and new hedgerow planting and SuDS creation would provide ecological enhancements compared to the existing situation.

The habitats present on-site have poor suitability to support protected or notable species. Specific survey work in respect of bats and reptiles confirmed that reptiles are likely absent from the site and the buildings have negligible potential to support roosting bats. The proposed landscape planting scheme will provide new opportunities for a range of fauna.

The proposals therefore offer the opportunity to deliver net gains in biodiversity.

4. Flood Risk, Drainage and Water Resources

A Flood Risk Assessment & Drainage Strategy (FRA) has been prepared following detailed pre-application discussions with the Environment Agency. The majority of the site falls within flood zone 2. The measures outlined in the FRA will ensure the development proposals are resilient and flood risk is not increased off-site.

As an allocated housing site in the development plan the Sequential Test has been passed. The exception test is also considered to be passed as residential dwellings fall into the 'more vulnerable' category and the development proposals do not encroach into the 1 in 100 year plus climate change flood plain event.

It is proposed that surface water runoff generated over the development area is managed via SUDS features which will comprise directing runoff to a lined granular sub-base beneath the highway surface, to lined cellular storage tanks and swales prior to restricted discharge to the existing Thames Water public surface water network. It is anticipated that the maintenance of the onsite drainage system will be carried out by a private recognised management company.

It is proposed that a separate foul water system at the site connects into the existing sewer system network adjacent to the site. Thames Water own the drainage network in the area and have confirmed that there is existing capacity in their network to accommodate both foul and surface water run-off from the development.

In the light of the above, no significant effects on flooding, drainage or water resources are anticipated.

5. Heritage/Archaeology

The site is not located within a conservation area. The nearest listed buildings are located on Oxford Road with high rise development in between. As such there is no inter-divisibility between the two sites. The proposed development would not therefore affect their setting.

The development plan allocation of the site indicates development proposals must take account of the potential archaeological significance of the site. However Reading Borough Council have advised at pre-application stage that previous archaeological investigations targeting the area of most potential within the site showed a significant depth of made ground within the area and it was concluded that there was no potential for archaeological remains to survive. Accordingly we have been advised that further archaeological investigations are not required within the site boundary.

In the light of the above it is considered that the site will have no significant effects on any designated heritage assets.

6. Land Contamination

Site investigations have been undertaken on the site, which confirm that there is evidence of ground contamination, the presence of a number of hazardous materials associated with the existing buildings and previous construction on the site, all of which have potential linkages to the end residential use.

To date concentrations of lead, petroleum hydrocarbons, asbestos, copper, zinc, mercury and nickel have been identified.

At this stage, whilst it has been identified that there are a number of remediation measures available to ensure that the site can be made safe and suitable for the purposes of residential development, the final decision on the exact remediation measures that will be adopted will be dependent on further detailed ground investigations and testing, which are currently ongoing.

Notwithstanding the above, a recommended remediation strategy will be available to support the planning application, which can be secured through suitably worded planning conditions.

7. Social and Economic Impacts

The proposed development would comprise around 215 dwellings, which will provide a positive boost to the local economy during the construction and at the post-occupation phase. Reading Borough Council operates a regime

of CIL charging. The CIL contribution made in association with the redevelopment of the site would be used to off-set or mitigate the impact of the development on local infrastructure.

8. Traffic and Transport

In accordance with the planning brief and site allocation the site is to be accessed from the south via Portman Way. The development will also deliver a north/south footpath/cycle path connecting Portman Way and Portman Road and will improve pedestrian and cycle permeability through the site, including the provision of a footpath/cycleway along the northern frontage of the site in accordance with the site allocation.

The Transport Assessment for the planning application will consider the impact of the development on the local highway network including impacts on the Cow Lane Bridges and the Norcot Road/Oxford Road/Portman Road roundabout. The assessment will show that any impacts of the development on existing local junctions will be minimal.

The Transport Assessment will demonstrate that the site is well located in respect of sustainable modes of travel, including foot, cycle and public transport and thereby complies with local and national policies to promote development in sustainable locations. A Framework Travel Plan will also be produced for the development, setting out measures to reduce the dependency of residents on single occupancy car journeys.

Whilst the TA will be used as source material, it primarily identifies the Proposed Development's compliance with national, regional and local transport planning policy in terms of its accessibility by non-car modes and identifies how safe and acceptable access will be provided. Additionally, it describes the proposed measures to a) mitigate the expected transport effects of the Proposed Development; and b) improve accessibility and safety for all transport modes, particularly for alternatives to the car such as walking, cycling and public transport.

The TA does not however fully assess the environmental effects of the road traffic generated by the Proposed Development. This requires assessment against different criteria as set out in the Institute of Environmental Management Assessment's (IEMA's) 'Guidelines for the Environmental Assessment of Road Traffic'.

The assessment is divided into two distinct phases in accordance with best practice as set out in the IEMA guidelines - the assessment separately considers a) construction traffic; and b) development (operational) traffic.

In order to determine the extent of the local highway network which may require assessment, the following thresholds are set out in the IEMA guidance:

"Include links where traffic flows are expected to increase by more than 30%, or where HGV flows are expected to increase by more than 30% as a result of the Proposed Development; and

Include links in proximity to sensitive receptors as defined previously, where traffic flows are expected to increase by more than 10% as a result of the Proposed Development."

Paragraph 3.20 of the IEMA guidelines sets out that 'sensitive' locations include:

"accident blackspots, conservation areas, hospitals, links with high pedestrian flows, etc. Normally it would not be appropriate to consider links where traffic flows have changed by less than 10% unless there are significant changes in the composition of traffic, e.g. a large increase in the number of Heavy Goods Vehicles."

The initial work undertaken by i-Transport identifies that on key links which will be impacted by the development, increases in traffic flows are expected to be less than 30% or are at such a low level that there would be no significant impact. Furthermore, there are no sensitive receptors within close proximity of the site, where traffic volumes would expect to be increased by more than 10% as a result of the Proposed Development.

It is considered therefore that there will be no significant transport related effects arising from the proposal.

9. Noise

The northern boundary of the site is adjacent to Portman Road which accommodates constant traffic flows throughout the day. Beyond Portman Road are potentially noisy industrial uses and a rail line. For these reasons a noise assessment has been prepared to support the application.

The noise assessment concludes that future residents of the development would be provided with an appropriate acoustic environment, subject to the following measures:

- Glazing to the apartments on the north of the site benefitting from enhanced double glazing and an acoustic form of background ventilation;
- The houses to the south will not require any acoustic enhancement, nor will amenity areas require screening;
- Noise levels on balconies overlooking Portman Road would experience noise levels above WHO targets, but partial mitigation can be achieved by glazed screens to the front elevations;
- Building services equipment associated with the commercial business immediately to the south of the site can be attenuated either at source or by means of a localised acoustic screen on the southern boundary of the site.

10. Construction Impact

The control of noise and dust emanating from the site during the demolition phase can be controlled in line with measures detailed in a Construction Method Statement to be secured pursuant to a condition on any permission. Planning conditions can also be used to restrict hours of noisy activities and prohibit burning of waste on site should this be considered necessary.

The construction phase of the development will be time limited and with appropriate management safeguards in place, no unacceptable impacts should arise.

Determining Whether EIA is Required

Having established that the proposal is Schedule 2 development it is necessary to consider whether the effects likely to result from the development are significant and therefore whether the proposal warrants an EIA.

Schedule 3 of the Regulations provides guidance on the selection criteria for screening Schedule 2 development. These comprise the characteristics of the development, the location of the development and its environmental sensitivity and the characteristics of the potential impact having regard to these. These are dealt with in turn below:

Characteristics of Development

We have set out above a description of the proposed development and its likely impacts. We have demonstrated that by reason of scale and nature the proposed residential development would not result in anything other than local impact, and where impacts would result these can be satisfactorily mitigated. Furthermore, these impacts can be assessed and suitably mitigated as part of the usual planning application process. The site is an allocated brownfield development site, the redevelopment of which can be managed without risks of major accidents or to human health. The proposals would not give rise to pollution, waste issues or the use of natural resources beyond usual building practices.

As such we consider that there are no significant effects arising from the characteristics of development to suggest it is EIA development.

Location of Development

Schedule 3 guides the decision maker in assessing whether the development site is within a sensitive location. The existing site is a developed urban site which is not environmentally sensitive. The site is not within or in close

proximity to any site of special scientific interest, European Site or National Park. Nor is it located in a conservation area or close to any listed buildings or scheduled ancient monuments.

Characteristics of the Potential Impact

Given the scale and nature of the proposals, we consider that it is reasonable to conclude that the effects arising from them will not in themselves be significant – either in isolation or combination. Schedule 3 of the Regulations guides the decision maker to consider the geographical extent, the magnitude and complexity, probability and duration, frequency and reversibility of the effects.

In this respect the main effect of the development will be additional pressure on local infrastructure arising from the increase in resident population and associated traffic impacts. However it should be noted that the site is already developed, and although the site is now largely vacant, the quantum of existing floor space is not insignificant. The existing buildings on-site amount to over 7,000 sqm, which includes former hospital buildings and the South-Central Ambulance Service Base and former nurses' residential accommodation.

The NPPG includes reference to a table which includes indicative criteria and thresholds to assist in judging whether proposals are likely to represent EIA development. In respect of Class 10(b) development it advises 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."

Clearly this is not the case here where proposals are in line with the sites policy allocation and will replace an existing developed site in an urban area, where impacts will not be of a markedly different nature.

The impacts of the development are capable of mitigation through the provision of highways works, careful design and CIL/S106 obligations. We therefore consider that the characteristics of the impacts cannot be defined as significant.

Conclusion

It is considered having regard to the characteristics of the proposed development, the location and sensitivity of the site and characteristics of the potential impacts, that the proposed development will not give rise to any significant environmental effects.

While some effects are likely to occur, the mitigation measures built into the development will control these such that no effects of significance will occur. As such the proposals do not constitute EIA development and a negative screening opinion is warranted.

I look forwards to receiving your screening opinion within the statutory 21 day period. However please do not hesitate to contact me should you require any further information to reach your decision in this regard.

Yours sincerely



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