

11th November 2016

Alice Appleton / Peter Cole
Temple Group Ltd
Devon House
58-60 St Katharine's Way
London
E1W 1LB

Via email to:
alice.appleton@templegroup.co.uk

Your contact is: Mr Jonathan Markwell, Planning

Dear Ms Appleton / Mr Cole,

Scoping Opinion Request - EIA Regulations 2011 (as amended)

Enquiry Reference & Address: 161632/SCO - Land at Kenavon Drive (Homebase & Toys R Us site), Reading

Proposal: Demolition of the existing buildings on the Application Site (Toys R Us and Homebase Units); erection of between 700-800 residential units (to a maximum of 19 storeys); 1300 sqm of commercial/ community/retail floorspace; and revitalisation of the riverside public realm, including two new squares (one on the riverside and one at the entrance to the Application Site) (as per paragraph 2.1.1 of the report submitted).

Information considered: Kenavon Drive EIA Scoping Report by Temple Group Ltd, Version 2.0 dated 25/08/16, received 30/08/16 (including appendices); Letter from Temple Group Ltd, Ref T3563.1, dated & received 30/08/16

I refer to your formal Scoping Opinion request dated 30th August 2016 with regard to Regulation 13 of the EIA Regulations 2011 (as amended by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015 (Adopted as of 06/04/15)), as to the content of the Environmental Statement (ES) to be prepared in connection with the development proposed at the above site.

In line with Part 4, Para 13 (4) of the EIA Regs 2011 (as amended) it has been agreed that the opinion is adopted by 11th November 2016.

This letter constitutes Reading Borough Council's scoping opinion.

The necessary consultations have been carried out and the Authority's formal Scoping Opinion in accordance with the Regulations is set out below. External consultations (and responses where applicable) are specified below:

- Historic England - response sent via email 27/09/16

- Environment Agency - initial response sent via email 27/09/16; full response sent via email 11/10/16
- SSE Power Distribution - no response received to date. Should this be received in due course, it will be forwarded to you.
- Natural England - response sent via email 26/09/16
- Berkshire Archaeology - response sent via email 07/10/16
- Canal & River Trust - response sent via email 12/09/16
- Network Rail - response sent via email 26/09/16
- Southern Gas Networks - no response received to date. Should this be received in due course, it will be forwarded to you.

The Council is of the opinion that the ES should include a full factual description of the development. It should also evaluate and deal with the issues set out in your Scoping Report (and related supporting documentation submitted included within the appendices), duly take into account the external consultation responses already sent to you (as per the list above) and also include the following amendments and additions (which incorporates internal consultation responses received from Environmental Protection, Transport, Natural Environment - Trees / Ecology, Historic Buildings Consultant):

Section 3.3 refers only to the Core Strategy and the Reading Central Area Action Plan (RCAAP). Any proposed development would also be required to take into account the adopted Sites and Detailed Policies Document (2012, altered 2015). The following policies within this document would be of relevance: SD1, DM1, DM2, DM3, DM4, DM10, DM12, DM16, DM18, DM19, DM22, DM23.

In terms of the 'other relevant documents' noted at paragraph 3.3.3, the complete list of SPDs / other relevant documents are found on the [Council's website](#). In particular, it is considered that the following SPDs will need to be carefully considered and adhered to: Affordable Housing; Employment, Skills & Training; Revised Parking Standards and Design; Planning Obligations under S106.

It is noted that there is some inconsistency regarding the construction start date. Paragraph 2.1.2 states autumn/winter 2017, whereas paragraph 5.2.3 refers to winter 2016/17. It is assumed that paragraph 2.1.2 is correct.

With regard to section 5.6 of the report (cumulative effects), it is considered that land allocated within the East Side Major Opportunity Area (as per policy RC3 of the RCAAP) can be classified as 'certain projects which are reasonably foreseeable and reasonably likely to come forward / approved'. It is considered that the allocation and information within table 9.2 of the RCAAP should form a basis for your consideration of the cumulative effects in these regards. With specific regard to the Reading Prison site, please also refer to the [outline development framework](#) adopted in March 2015.

In addition to the sites referenced at figure 5.3 of the report, you should also be aware and take into account the following:

- Cooper Reading BMW, Kings Meadow Road (RC1H allocation) - although application [150120](#) was refused at the site, it is in the [public domain](#) that a new proposal will be submitted shortly.
- 40 Kenavon Drive (part of the RC3C and part of the RC3D allocation) - although application 111524 was withdrawn, you should also be mindful of screening opinion

131193 at the site. It is anticipated by officers that proposals at this site will be forthcoming in the near future.

- Gas Works Road - Works approved to facilitate 20 residential units on 28/10/16 under permission 160378.

In response to section 6.2 of the report (Air Quality), specialist Environmental Protection officers at RBC are generally content with this element of the report. However, it is emphasised that the assessment must determine if future occupants are at risk of exposure to air pollution above the national air quality objectives and if so, mitigation measures should be proposed in the full application. This extent of mitigation measures goes beyond that detailed at paragraph 6.2.13, whereby mitigation is only referenced during the construction phase.

Other related Environmental Protection based comments are (in relation to sections 7.7 and 7.8 of the submitted report) as follows:

- Noise impact of traffic and nearby commercial use on the proposed residential dwellings should be assessed and if required, mitigation measures should be proposed in the full application.
- Contaminated land assessment to determine if future occupants are at risk of exposure to soil contamination or gas migration and if so, mitigation measures should be proposed in the full application.
- Methodology for the control of noise and (air quality to include dust) during demolition and construction should be submitted.

In relation to the townscape, visual effects and built heritage section of the report (section 6.3), the Council's Historic Buildings Consultant is generally content with the scope provided, but has provided the following comments:

It is noted that the report does not include reference in paragraph 6.3.13 to Historic England's Good Practice Advice in Planning *Note 4: Tall Buildings* (Historic England, 2015c). This is considered to be particularly relevant to this proposed development and should be taken into account.

Paragraph 6.3.14 indicates the potential effects on townscape, views and built heritage are identified as:

- the physical characteristics both of the character of the existing townscape
- an effect on locally important views
- direct effects on built heritage receptors as a result of ground borne vibration from construction activities.
- indirect effects upon built heritage receptors, derived from visual, noise and air quality impacts upon their setting.

It is noted that this paragraph appears to pre-judge a number of these effects as being beneficial.

The Further Work and Impact Assessment section (starting at paragraph 6.3.15) specifies that a Townscape and Visual Impact Assessment (TVIA), based on the principles set out in the third (2013) edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA) capturing visual impacts on the historic environment, will be undertaken. This will include a Zone of Visual Influence (ZVI) to confirm the baseline assessment viewpoints and visual

effects will then be assessed by reference to Verified Visual Montages (VVMs) and Accurate Visual Representations (AVRs) generated for a number of views. Discussions regarding the exact scope of this are on-going with RBC officers.

A Built Heritage Assessment will also be carried out which will consider the potential for the proposed development to affect sensitive built heritage receptors in the surrounding area. It proposes that a Townscape Character, Visual Effects and Built Heritage assessment would address potential study impacts upon any built heritage features and conservation areas. As such, it will draw upon and cross reference the Archaeology chapter as needed.

The Archaeological and Built Heritage assessment will assess heritage assets within 250 m of the proposed site. However 250m is considered inadequate for an assessment of the potential impacts of the development of the settings of designated heritage assets. Although the Reading Abbey Scheduled Monument, Forbury Gardens Registered Historic Park and Garden, the Eldon Square Conservation Area and the Reading Gaol and other Listed Buildings are referred to as important designations, there is the potential for visual impacts outside 250m of the site given the proposed storey heights of the buildings within the site.

The built heritage assessment proposes to combine the Built Heritage and Townscape and Visual Assessment together. It is usual to divide the historic environment assessment separately into an Archaeological Remains section and a Built Heritage section, with a separate Townscape and Visual Assessment Section rather than combining the latter two.

Turning to consider the ecology section of the report, the Council's Ecologist is satisfied that the scope of EIA will assess the main ecological impacts of the proposals. It is however advised, in line with the EA's comments, that the ecology chapter should also include a section on birds (in particular sand martins - it is known that this has already been discussed with the prospective applicant).

In terms of section 7 (non-significant issues) of the scoping report, it is considered that this again appears to pre-judge these effects as 'non-significant'.

With regard to the socio-economic section, it is considered necessary for due reference to be made to crime / fear of crime / anti-social behavior matters, owing to the nature and size of the proposed development. Furthermore, while education and healthcare are referenced, it is considered that the following should also be considered: community facilities, open space and play spaces. The potential impacts in these regards should be considered on a local ward and wider borough basis. Accordingly, it is considered that socio-economic effects should be specifically included within the future ES, contrary to the submitted report at paragraph 7.2.5.

In response to section 7.5 (Traffic and transport) specialist Transport officers confirm that a Transport Assessment will accompany the application, which is considered acceptable. In addition, the scope of the TA has previously been agreed with the applicants transport consultant. As such, it is confirmed there are no principle objections to the Traffic and Transport section of the Scoping report.

In other regards you have indicated that the matters highlighted will be "scoped out" of the ES. Typically this is owing to the anticipated impact and these matters being addressed in separate standalone documents within a future submission. In this regard, mindful of the NPPG advice ([paragraph 035 Reference ID: 4-035-20140306](#)), it is considered that very brief treatment of these matters will need to be detailed within the EA. Typically this should

include a short commentary and reference to the more detailed standalone document(s) in many instances. As such, it is recommended in response to paragraph 8.1.2 it is considered that additional chapters considering 'other matters' is included, as well as the aforementioned additional chapter regarding socio-economic matters.

In response to section 9 of the report, please refer to the Council's [Planning Applications Validation Information Requirements Checklists and Guidance](#) (September 2016) as to the national and local requirements required to be submitted with any future application.

I trust that this information is of assistance but should you require any further clarification please do not hesitate to contact me on the above telephone number. This opinion is without prejudice to any decision that may be made and is given in the context of the planning policies, regulations and guidance applicable today.

Please note that this Scoping Opinion is offered with the caveat that should the form of development deviate to a significant degree from that described and assessed within the Scoping submission, a further application for Scoping Opinion may prove necessary.

Please note that Regulation 13(9) states that the authority which has adopted a scoping opinion is not precluded from requiring additional information in connection with any ES that may later be submitted in connection with an application for planning permission or a subsequent application for the same development.

Yours sincerely

Jonathan Markwell (via email only)

Jonathan Markwell - Principal Planning Officer
LEB