

Reading Borough Council  
Development Control  
PO Box 17  
Reading  
Berkshire  
RG1 7TD

**Our ref:** WA/2020/127747/02-L01  
**Your ref:** 200188  
**Date:** 16 October 2020

Dear Sir/Madam

**Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch bridge to Vastern road**

**55 Vastern Road, Reading RG1 8BU**

Thank you for consulting us on the above application, on 17 March 2020, and additional information submitted July –September 2020

We have reviewed the following documents:

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- Flood Risk Assessment (FRA) produced by Stantec dated January 2020
- Landscape General Arrangement Plan (Drawing number 448.LA.101 Rev E)
- Planting Framework Plan (Drawing number 448.LA.102 Rev E)
- Letter with Appendix from John Barnes (eb7 ltd) to Joe Harding (Berkeley Homes (Oxford & Chiltern ) Ltd dated 14 July 2020 relating to additional sunlight/shadowing assessment work
- Phase I-II Geo-Environmental Site Assessment 55 Vastern Road Reading Berkshire RG1 8BU by Omnia dated November 2019
- The Old Power Station, Vastern Road, Reading Proposed Drainage Strategy by Stantec dated January 2020.

Additionally, we received the following document directly and have provided comments although this does not currently appear on the Reading BC planning website:

- E-mail from Joseph Harding (Berkely Group) to Environment Agency, dated 03 September 2020 with attached documents relating to the sunlight assessment

**Environment Agency position - Biodiversity**

We **maintain our objection** as set out in our original response dated 14 April 2020 (ref. WA/2020/127747/01-L01)

Cont/d..

## **Reason**

At this time, we would be unable to remove our objection with regard to the shading impact of the proposed development. It would not be acceptable for it to go ahead in its present form without mitigation, particularly due to the fact that there is very little marginal habitat through this section of the Thames.

### Letter with Appendix from John Barnes (eb7 ltd) to Joe Harding (Berkeley Homes (Oxford & Chiltern) Ltd dated 14 July 2020

We received a copy of this letter from Joseph Harding in July 2020 and commented as follows:

“The scale indicated for the number of hours of sunlight on the river in the Appendix one graphics is too coarse to be useful. Looking back at the earlier Daylight & Sunlight Report (eb7, dated 19 December 2019) submitted with the application, this contained graphics showing transient overshadowing (Appendix 5). The use of this technique might give greater clarification of the impact of the shadowing that might result from the proposed development. We are unsure why this methodology was not used and why an hourly representation for a representative day (e.g. in April, June, August) was not included as was provided in the earlier report.

Given that shading looks to be increased it would also be useful at this stage to see a shade arc on representative days (e.g. in April, June, August). This would give an idea of the height of the shadow. Does it reach the other side? The sunlight hours and shade arc should also be done for a scenario where the building is lower in height next to the river and taller buildings set back from the river to see if that increase can be avoided.”

### E-mail from Joseph Harding (Berkeley Group) to Environment Agency, dated 03 September 2020 with attached documents relating to the sunlight assessment

We received additional information with regard to the sunlight and shadowing assessment our comments were as follows:

“Having reviewed the additional information supplied relating to the transient shadow paths from March-September, the issue of shading of the river and the marginal planting along the river bank adjacent to the development has been clarified.

Comparing the shading between the existing situation and the proposed development it would appear that there would be a significant reduction in sunlight reaching this area, from our interpretation. With no development, it would appear that this area receives 6 to 7 hours of sunlight per day, but with the proposed development, this would be reduced to between 2 and 3 hours, which is likely to reduce the vigour of this planting and may result in the loss of some species”.

## **Overcoming our objection**

Option 1 would be to reduce the height of the buildings and/or set them back further from the river. This has been raised previously. The usual rule of thumb would be to have the building set back from the bank top the same distance as the height of the building to prevent shading of the river and river bank. While this is the best option for preserving the footbridge mitigation planting and riverbed habitat, we do realise this may not be the preferred option.

Option 2 would be to see additional marginal planting installed as a combination of mitigation and ecological enhancement in recognition of the impact of shading. We would also like to see shade tolerant plants added to the footbridge planting area to allow for succession to a shadier environment.

There are a number of locations that could be explored for this additional marginal planting on either side of the river. Ideally, upstream between the footbridge and Caversham bridge. We believe that much of this land is under the ownership/control of Reading Borough Council and so any discussions regarding this should include the relevant Reading BC representative.

### **Environment Agency Position – Flood Risk**

We are pleased to see that you have used the most up to date flood model data to inform your Flood Risk Assessment (FRA). We are also pleased that the FRA includes reference to the new (as yet not yet published) Thames Mapledurham to Hurley 2019 modelling.

We are satisfied that the FRA confirms a design flood level of 38.30m AOD based on the 1 in 100 plus 35%. This level is used to inform mitigation proposals in the form of compensatory floodplain storage. Fig 4.1 (Modelled extents with allowance for climate change) provides a really useful illustrative drawing of how the design flood event will impact the site presently. It uses modelled levels from the River Thames in comparison with detailed topographic survey data for the site. This shows that the site is impacted by the 1 in 100 plus 35% design event to the north of the site (adjacent to the river) and to a small portion to the South East of the site.

We are satisfied that there is a commitment to safety of the development within the FRA by proposing to set Finished Floor Levels (FFLs) of the new buildings at a minimum of 38.60 metres AOD thereby providing a degree of resilience above the design flood level.

In line with best practice, we would normally expect a developer carries out level for level compensation for any loss of flood storage up to the 1 in 100 plus 35% flood level. The compensation provides an additional volume of floodplain storage at each 100mm depth band up to the final band as detailed on plan 47500/4001/003 Flood Storage Analysis. At this highest band we note a 'loss' of 6.7 m<sup>3</sup>. However, the overall benefit of the flood compensation being provided is 118 m<sup>3</sup> and provides significant betterment at all water levels up to the final band. We also note that due to the topographic constraints within the brownfield redevelopment it has not been possible to offset this minor change in floodplain storage during the highest order floods. In this specific instance we are therefore satisfied with the compensation provided.

The report notes that proposals to reduce the impacts of flooding in north Reading and Caversham are being developed. These design proposals take account of potential future flood alleviation works. This follows discussions with the developer and their consultant to ensure that the development proposals allow for integration of future works to a pre discussed design standard. We therefore recommend the following condition.

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is included.

### **Condition**

The development shall be carried out in accordance with the submitted flood risk assessment and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 38.60 metres above Ordnance Datum (AOD)
- Compensatory storage shall be provided *in accordance with* plan 47500/4001/003 Flood Storage Analysis

- These design proposals take account of potential future flood alleviation work

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/ phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

### **Reasons**

- To reduce the risk of flooding to the proposed development and future occupants
- To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided
- To ensure the structural integrity of the *or proposed* flood defences thereby reducing the risk of flooding

### **Environment Agency Position – Contaminated land**

Given that the site investigation found relatively low levels of contamination it is expected that limited remedial works will be required from the perspective of controlled waters. In addition as the proposed drainage solution is not proposing to use infiltration there is unlikely to be any mobilisation of contaminants within the soils. There is still a slight uncertainty that the cable oil leak that affected the adjacent site may have impacted the margins of proposed development site, therefore we request the following conditions.

#### **Condition 1**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

#### **Reason**

There is a known cable oil spill on the adjacent site which may have crossed the boundary.

- To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

#### **Condition 2**

The development hereby permitted may not commence until such time as a scheme to

- secure de-watering of the site
- specify the form of foundations

Has been submitted to, and approved in writing by, the local planning authority. The scheme shall be fully implemented and any changes as may subsequently be agreed, in writing, by the local planning authority.

#### **Reason**

To ensure that the proposed development, piling does not harm the water environment in line with paragraph 170 of the National Planning Policy Framework

**Advice for Local Planning Authority**

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, we will recommend the inclusion of ground contamination, biodiversity and flood risk conditions on any subsequent approval.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

**Final Comments**

We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

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 faithfully

Kirsty Macpherson on behalf of

**Miss Michelle Kidd**  
**Planning Advisor**

Direct dial 02030259712

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