

Statement of Case

Appendix 29

Environment Agency response to
landscape proposals

Mr. Dave Taylor
Berkely Homes LTD
Farnham House Farnham Lane
Farnham Royal
SLOUGH
SL2 3RQ

Our ref: WA/2020/127978/02-L01
Agreement No. ENVPAC/1/THM/00406
Your ref: 200188
Date: 30 September 2020

Dear Mr. Taylor

Advice on biodiversity objection to: 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 accepting our offer to provide detailed planning advice. The advice detailed below is intended to inform your development proposal. It is not our statutory response to a planning application consultation.

We have reviewed the following documents:

- Email from Joseph Harding (Berkeley Group) dated 03 September 2020 and the documents attached relating to the sunlight assessment.

We are providing this advice under Agreement No. ENVPAC/1/THM/00406. Please note we have taken 13.5 hours in total to review and provide our advice on you development and you will be invoiced accordingly.

Please note that we are only providing you with our advice on the matters as outlined in our amended offer as requested.

Summary

In summary, we would be unable to remove our objection to this application, as it stands, due to the impact of shading on the footbridge mitigation planting and the riverbed habitat. A mitigation strategy is required to address these impacts.

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Environment Agency Advice

Sunlight and shadowing assessment

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.

As discussed at our initial meeting, this planting was agreed and installed as mitigation for the footbridge construction and is included in the drawings listed under Condition 2 of the planning permission for application number 131234. Conditions/requirements of one planning permission cannot be eroded by another application.

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.

One way of preventing this 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. You should consult the LPA on this matter as it is their mitigation planting area, a condition discharged under their planning obligations, and they may have biodiversity net gain goals that this planting area may contribute to.

An alternative option would be to carry out long term monitoring of the existing vegetation and, should there be a reduction in vigour, installing replacement planting at an alternative location in this river reach where it would not be subject to shading. This, however, introduces an element of uncertainty and an ongoing commitment for the developer to carry out monitoring and mitigation.

Our preference, therefore, 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 compensation 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. A site visit may be appropriate to identify the areas that would be most suitable.

Landscape and Planting Proposals

We note the amendments and clarifications relating to the landscape and planting proposals. We note too, that you wish to discuss further the potential to enhance the planting and ecological value between the proposed development and the River Thames. We would welcome the opportunity to include this discussion in the conversation with Reading BC as to the possible location of the additional mitigation planting.

Next Steps

Please provide a mitigation strategy for the impacts to the marginal planting and riverbed habitat. We recommend that a meeting is organised to discuss the options with Reading BC. Their preference may be to reduce the building height or set it back from the river.

Final comments

Once again, thank you for contacting us with your enquiry. Our comments are based on our available records and the information as submitted to us.

I hope the above advice is helpful. If there is any further work you anticipate needing our detailed advice on in relation to this project, please let me know so it can be incorporated into this charging agreement.

Disclaimer

Please note that the views expressed in this report by the Environment Agency, is a response to a pre-application enquiry only and **does not represent our final view in relation to any future statutory consultations made in relation to this site**. We reserve the right to change our position in relation to any such application.

We have only provided advice in relation to the environmental constraints as outlined in our offer as requested. However, we will comment on all environmental constraints within our remit in our statutory response.

You should seek your own expert advice in relation to technical matters relevant to any conditions before submission.

Please quote our reference number in any future correspondence. If you have any queries please feel free to contact me.

Yours sincerely

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