



**Reading**  
Borough Council  
**Working better with you**

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Via email to:  
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15<sup>th</sup> April 2020

Your contact is: **Susanna Bedford, Planning**

Dear Mr Sanders,

**Scoping Opinion Request - EIA Regulations 2017 (as amended)**

**Enquiry Reference & Address:** 200229 - Reading Golf Club, 17 Kidmore End Road, Emmer Green, Reading

**Proposal:** Request for an EIA Scoping Opinion in accordance with Regulation 15 (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) with regard to the proposed development at Reading Golf Course to develop a scheme for a mixed-use residential led development to incorporate up to 275 new homes; medical space; associated open space and landscaping; vehicle parking, pedestrian, cycle and vehicular accesses, associated highway works; and associated infrastructure.

**Information considered:**

- Letter from Temple Group dated 13<sup>th</sup> February 2020
- 'Reading Golf Course, Emmer Green EIA Scoping Report Final' produced by Temple Group dated 6<sup>th</sup> February 2020
- Phase 1 Contamination Risk Assessment produced by Ground and Environmental Services Limited dated February 2019

I refer to your formal Scoping Opinion request dated and received 13<sup>th</sup> February 2020, with regard to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), 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 Regulation 15 (4) of the EIA Regs 2017 (as amended) it has been agreed that the opinion is adopted by 15<sup>th</sup> April 2020 (email from Pegasus Group dated 03/04/2020).

This letter constitutes Reading Borough Council's Scoping Opinion. Where matters in the Temple Group Scoping Report are not specifically referenced / responded to, these matters can be considered to be agreed.

The necessary consultations have been carried out and the Authority's formal Scoping Opinion in accordance with the Regulations is set out below.

It is noted in the consultation section that no response has been received from the Environment Agency or Natural England. Any further consultee comments received will be provided to the applicant. Therefore, it is also noted, as set out at Regulation 15(9), that the issue of this Scoping Opinion does not preclude the Local Planning Authority from requesting further information within an Environmental Statement, if necessary to determine any future planning application.

External consultations are summarised below:

Environment Agency - No response to date.

Natural England - No response to date.

Sport England - Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently, we do not wish to comment on the Screening or Scoping Opinion consultation.

Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 96 and 97, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

Southern Gas Networks - No comment received

SSE Power Distribution - No comment received

Thames Water: No objection.

The Marine Management Organisation has not been consulted as the proposed development does not affect any of the specified areas cited at Part 1 Regulation 2 of the EIA Regs. However please be aware it is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

Scoping Report Content

In terms of paragraph 2.1.2 it should be noted that Brooklyn Drive should be referenced, as these residential plots adjoin the application site. Also, the Reading Borough Local Plan was adopted in November 2019, the adopted plan should replace references to the emerging local plan within the submitted report.

In paragraph 2.2.4 please clarify the location of the Air Quality Management Area referred to.

Regarding paragraph 4.1.3 consultation of residents' groups should include Emmer Green Residents Association (EGRA), Keep Emmer Green (KEG), Caversham and District Residents Association (CADRA) and Caversham Globe.

At paragraph 5.3.19 officers consider that a planning search area of a 2km radius, rather than a 1km radius, surrounding the Site should be assessed. This will consider other allocated development sites north of the River Thames within Reading Borough, as specified below. It will also encompass land within South Oxfordshire District, including land within the ownership of Reading Golf Club which may be required to provide mitigation for the proposed development.

Paragraph 5.3.20 and other paragraphs invite RBC officers to identify any additional committed or consented major development relevant to this scheme. Within Reading Borough, I would refer you to adopted Policy CA1 'Sites for Development and change of use in Caversham and Emmer Green'; and the following sites:

180418 - Permitted - Outline application for the demolition of nos 199-203 Henley Road and erection of 42 dwellings at 199-203 Henley Road and to the rear of 205-207 Henley Road with associated access from Henley Road (considering access, appearance, layout and scale).

190835 - Permitted - Demolition of 199-203 Henley Road and erection of part four, part three and part two storey 82 unit residential care home building (C2 use class) with associated external structures, access from Henley Road, car parking and landscaping).

140997 -Permitted - St Martins Precinct, Church Street redevelopment for retail, restaurant, leisure and residential (40 dwellings).

Other commitments/permissions in South Oxfordshire District should also be investigated.

Topic Socio- Economic:

Regarding paragraph 6.1.6 the Study Area (comprising of four wards) should be clarified.

In relation to Table 6.3, at paragraph 6.1.10, both the location and capacity of primary and secondary schools in Reading and South Oxfordshire administrative districts should be considered.

Topic Transport:

The Transport Development Control Manager has no objection to the proposed scoping.

In relation to paragraph 6.2.13 the Transport Assessment (TA) methodology will be agreed with the Local Authority prior to the formal submission of the planning application. An agreed scoping study will help to ensure that the transport and environmental issues are fully factored into the TA from the outset.

#### Topic Air Quality:

Regarding paragraph 6.3.7 it is not clear from this that the 'hot spot' in Prospect Street will be assessed for air quality. The ES could include this.

Paragraph 6.3.10 could add a further scenario to assess the road traffic impact when the development is fully completed.

#### Topic Water Resources and Flood Risk:

Paragraph 6.5.3 states the underlying bedrock geology is classified as a Principal Aquifer where the bedrock is comprised of the Seaford Chalk and a Secondary (A) Aquifer where the bedrock is formed of the Lambeth Group. The Site is located within Source Protection Zone III (Total Catchment). Ground water contamination should therefore be assessed.

Surface water quality should be assessed; and at paragraph 6.5.8, which sets out the management of surface water during the construction phase, the location of the temporary site discharge points should be clarified.

It is also recommended that Thames Water are consulted to ensure that there is sufficient capacity within the foul drainage network and sewage treatment works to accommodate the proposed development. This is to ensure that there is no detrimental impact on controlled waters, in accordance with Paragraph 109 of the National Planning Policy Framework (NPPF).

#### Topic Ecology:

The Councils Consultant Ecologist has stated the ES should also include:

- *A survey for dormice as the site appears to contain good habitat for this species and there are records within 10km of the site*
- *A requirement to demonstrate that there will be no net loss in biodiversity and that, in accordance with recent advice from DEFRA a 10% uplift in "biodiversity units" should be achieved. An assessment of the scheme using DEFRA's Biodiversity Metric 2.0 will need to be undertaken.*
- *Further ecology studies. The report states that a Preliminary Ecological Assessment (PEA) will be submitted as a supporting document but the PEA alone will not be sufficient to inform the EIA.*

Paragraph 6.6.5 states "Construction and operational phase impacts are likely to result in some habitat modifications that may reduce the value of the Site for some bird species and foraging bats (particularly from light pollution)" However there is no specific scoping topic in relation to lighting. It is therefore advised that the scope of the ES be amended to include a lighting assessment of the impact of the proposals on the adjacent area, in particular the undeveloped area to the north, and surrounding wildlife, paying particular attention to light sensitive species, such as bats. The assessment should include a baseline survey of light levels around the site and assess how these will change as a result of the development, how any effects will be minimised and what impact this will have on bats and other wildlife.

#### Topic Archaeology and Built Heritage:

The Council's Built Heritage Consultant has queried the statement at paragraph 6.7.6 that “No impacts are predicted on the fabric or setting of designated heritage assets (listed buildings) during the construction or operational phases.” This should be supported by justification to inform this conclusion. Also, officers would seek to clarify which Historic England guidance is referred to.

Regarding paragraph 6.7.7 Berkshire Archaeology were consulted on behalf of the Local Planning Authority who comment as follows:

*An archaeological desk-based assessment (DBA) has been prepared which usefully sets out the archaeological potential of the Golf Course and the wider area. The DBA concludes that the site has a high archaeological potential. The DBA notes Berkshire Archaeology's advice that further information, initially through geophysical survey, will be required to inform the assessment of the archaeological impacts. It should be noted that, should the results of the geophysical survey identify anomalies of potential archaeological significance, exploratory trial trenching may also be sought as part of the assessment process in order to understand the impacts of the proposal on the buried archaeological heritage.*

#### Topic Climate Change and Greenhouse Gas Emissions:

Paragraph 6.8.8 acknowledges that the GHG emissions associated with the development will have a significant adverse effect on the global climate. The loss of mature trees within the site that provide a positive function by the absorption of carbon emissions should be addressed.

Paragraph 6.8.10 also stated the key principle of EIA is to reduce the impact of a project's emissions through mitigation. Therefore, mitigation measures will be required to be specified within the Environmental Statement.

#### Topic Landscape and Visual Impact Assessment:

Paragraph 6.9.18 sets out that within the Landscape and Visual Impact Assessment the two assessments carried out are both in winter (surveyed in February and December). A spring /summer view is therefore also sought to consider the value of the visual contribution of the site to the wider landscape. The impact of light pollution should also be addressed in this section.

Regarding Fig 6.3 an additional viewpoint has also been sought on the Kidmore End Road frontage between locations 5 and 6.

#### Topic: Ground Conditions and Contamination (paragraph 7.4)

These matters do not appear as a Scoping Topic; however due to the site containing mineral deposits a Mineral Resource Assessment should be submitted as a supporting document. It should also be noted The Environment Agency may also have comments on this topic.

It is advised that the above comments / action points should be incorporated into your future assessment.

In relation to the list of supporting documents at table 8.3.5 these should also include:

1. Further detailed ecology studies including dormice
2. A Mineral Resource Assessment

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 15(9) states that the authority which has adopted a scoping opinion is not precluded from requiring additional information from you in connection with any statement that may be submitted by you as an environmental statement in connection with an application for planning permission or a subsequent application for the same development.

Yours sincerely

*Susanna Bedford* (via email only) *RE*

Susanna Bedford - Principal Planning Officer