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Dear Mr Conlon

ENVIRONMENTAL COMPLIANCE LETTER: PROPOSED DEVELOPMENT AMENDMENTS TO OUTLINE PLANNING APPLICATION 200328/OUT FOR READING STATION PARK

Date 08/10/2021

INTRODUCTION

We write to you on behalf of Aviva Life & Pensions UK Limited (the 'Applicant') regarding the proposed amendments in respect of the Reading Station Park outline planning application.

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The outline planning application for the Reading Station Park project was submitted to the Reading Borough Council (RBC) in February 2020 (Planning Ref 200328/OUT) for the proposed re-development of the Reading Station Park site (the '2020 proposed development').

Ref RUK2021N00047-RAM-RP-00003_Compliance Letter_FINAL.docx

The proposed amendments are being made in response to comments received from planning officers during the post submission consultation process and specifically to refine the degree of flexibility being sought in the development parameters to give greater certainty as to what the proposed development will comprise.

This Environmental Statement of Compliance (SoC) letter reports on the implications of the proposed amendments and of the amended proposed development as a whole (the '2021 amended proposed development') in respect of the conclusions of the Environmental Impact Assessment (EIA) that was undertaken of the 2020 proposed development (2020 EIA). This is intended to provide RBC with appropriate and up-to-date environmental information on the 2021 amended proposed development's environmental effects.

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Project Background

In February 2020, an outline planning application (Planning Ref 200328/OUT) was submitted by the Applicant to RBC for the intended re-development of the Reading Station Park site, Reading (the 'application site'). The planning application was accompanied by the 2020 EIA.

The post-submission consultation process has been ongoing since then between the Applicant and planning officers at RBC which has resulted in the Applicant refining the degree of flexibility that had originally been sought within the 2020 outline application.

The Applicant is now submitting amended documents and drawings (the 2021 application addendum) to RBC. The accompanying Amendments Cover Letter (prepared by Barton Wilmore) identifies the documents and drawings and explains how the amended proposals respond to comments raised during the consultation process.

PROPOSED AMENDMENTS

The full list of amendments proposed for the 2021 amended proposed development are summarised within the Amendments Cover Letter submitted for this application addendum and detailed within the accompanying revised documents and drawings. The proposed amendments that are material to the EIA are as follows:

- Reduction in the total maximum floorspace within the proposed development from 115,000 m² GEA to 90,850 m² GEA;
- Reduction in the maximum C3 residential floorspace from 100,000 m² (maximum number of residential units remains the same at 1000) to 80,000 m²;
- Reduction in the maximum B1a Office floorspace from 113,000 m² to 24,500 m²;
- Adoption of one Building Heights Parameter Plan (PP-103, submitted as part of this application addendum), rather than the three previously proposed (PP-103: Non-Residential, PP-104: Residential, and PP-105: Mixed-Use); and
- Refinement of the minimum building to building separation distances to exclude the non-residential to non-residential offset distance which is no longer applicable.

The amended area schedule table is shown in Table 1 below, which supersedes the area schedule presented in Table 4.3 of ES Chapter 4 of the 2020 EIA.

Use Class		Plot A	Plot B	Plot C	Plot D	Total GEA
C3 Residential units	Minimum	48,000 (600 residential units)				48,000 (600 units)
	Maximum	16,400	19,750	23,200	20,650	80,000
B1a Offices	Minimum	0	0	0	0	0
	Maximum	0	0	0	24,500	24,500
A1-A5, D1-D2 Retail units/ Community Facilities/ Gym	Minimum	2,000				2,000
	Maximum	7,000	7,000	7,000	7,000	7,000

The confirmed parameter plans for the 2021 amended proposed development are submitted as part of this application addendum. The confirmed height parameter plan (PP-103, submitted as part of this application addendum) is the same as PP-104 presented in Chapter 4 of the 2020 EIA.

APPROACH TO CONSIDERATION OF ENVIRONMENTAL EFFECTS

Ramboll and relevant environmental specialists have reviewed the 2021 amended proposed development, whilst considering the potential implications for the likely environmental effects reported within the 2020 EIA. Consideration has been given to:

- any changes to legislation, policy and assessment methodologies since the 2020 EIA;
- any changes in baseline conditions since the 2020 EIA;
- the list of cumulative schemes considered as part of the 2020 EIA; and
- any changes to the 2020 EIA conclusions as a result of the 2021 amended proposed development.

Legislation and Policy

In respect of latest guidance, the Institute of Environmental Management Association (IEMA) published Materials and Waste in Environmental Impact Assessment guidance in 2020¹ for EIA practitioners on screening, scoping, consultation, assessment and reporting and monitoring of impacts and effects on the environment relating to materials and waste. Consideration has therefore been given within this letter to the methods of assessment set out in the IEMA guidance, which is discussed in the Summary of Environmental Considerations section below.

Baseline

As there has been no change to on-site land use since the 2020 EIA was undertaken, the baseline information used for the 2020 EIA is considered to remain valid and representative of the baseline condition on-site.

In respect of terrestrial ecology, an updated ecological site walkover was conducted on the 19 August 2021, which confirmed that the baseline conditions remain as previously reported within the 2020 EIA.

In respect of transport and noise and vibration, it is considered that the baseline data used for the 2020 EIA remains valid given the COVID-19 pandemic restrictions and associated reduction in traffic and traffic-related nuisances which means any updated traffic surveys would not be representative of the pre-COVID-19 baseline.

In respect of air quality, the 2020 EIA was based in the latest air quality monitoring available at the time for the year 2018. Air quality monitoring data for the year 2019 was published in June 2020 recording lower annual mean concentrations in 2019 when compared with 2018. No exceedances of the annual mean nitrogen dioxide concentrations were measured in 2019 along Caversham Road or surrounding the site. The 2020 EIA was therefore based on a worst-case baseline.

Cumulative Schemes

In respect of cumulative schemes, the following two new applications have come forward since the 2020 EIA was undertaken:

- Gas Holder Site (Planning Ref 190627); and
- Rivermead Leisure Centre (Planning Ref 201734).

The Gas Holder site is more than 1 km from the application site and therefore not considered likely to lead to cumulative impacts with the proposed development. The Rivermead Leisure Centre redevelopment, located approximately 800 m from the application site, is a replacement of the existing facilities and is therefore not considered likely to generate any new or amended effects once completed

¹ IEMA, 2020. Materials and Waste in Environmental Impact Assessment

and operational. The project would be expected to employ best practice measures during demolition and construction, to be managed by the Principal Contractor through the implementation of a Construction Environmental Management Plan, which would help to mitigate potential cumulative impacts from the respective construction works. Accordingly, these new applications would not change/have a material effect on the cumulative assessment presented within the 2020 EIA.

Although it is noted that the permission for 52 to 55 Friar Street (included as Cumulative Scheme 6 in the 2020 EIA) has expired, this change does not impact the cumulative schemes assessment undertaken for the 2020 EIA, which would remain a worst-case assessment.

Accordingly, the cumulative schemes assessment as presented within the 2020 EIA remains valid for the purpose of the 2021 addendum application and has not been considered further within this letter.

SUMMARY OF ENVIRONMENTAL CONSIDERATIONS

No new or amended significant effects would arise as result of the proposed amendments and the amended proposed development as a whole and therefore the scope of the 2020 EIA remains valid.

The proposed amendments would not affect the key assumptions set out in ES Chapter 5: Demolition and Construction Description in the 2020 EIA in respect of key plant, peak traffic numbers, construction workers etc. Due to the delay following the submission of the 2020 outline application, the demolition and construction programme has been pushed back with Phase 1 anticipated to commence in Q3 2025 rather than Q2 of 2021. However, the programme duration and sequencing would remain the same and therefore the conclusions of the demolition and construction assessments presented within the 2020 EIA remain valid and has not been considered further.

The following EIA technical specialists have confirmed that no new or amended environmental effects are likely to arise in respect of the following technical assessment topics, due to the nature of the proposed amendments:

Socio-Economics: The amended area schedule, as presented in Table 1 of this letter, would alter the worst-case assessment, in respect of the socio-economic receptors, from that previously presented in the 2020 EIA. To assist the reader, Table 6.3 from Chapter 6 of the 2020 EIA has been copied below (see Table 2), which identified the worst-case assumptions in respect of each of the socio-economic receptor assessments. A third column has been added to identify how those worst-case assumptions have changed as a result of the 2021 amended proposed development and whether the conclusions of the 2020 EIA remained valid or not.

Table 2: Worst-case Scenario for Receptors		
Receptor	2020 Proposed Development	2021 Amended Proposed Development
Housing	The worst-case scenario for housing assumed that no residential uses would be delivered.	The amended area schedule means that worst-case housing delivery for the 2021 amended proposed development is likely to be 600 to 700 residential units. This would result in a Moderate Beneficial and significant effect at the local level which represents an improvement from the 2020 proposed development.
Local Expenditure	Any new population generated by the proposed development (whether that be residential or employees) has the potential to generate local expenditure. Spending potential is greater for a residential population as spending would be on convenience, comparison and leisure goods and services. Spending from employees is assumed to be limited to convenience goods. The worst-case assessment for local expenditure assumed no residential development and 100% employment uses. Again, to assess worst-case, it has been assumed that the employment floorspace would be occupied by the use classes which generate the least employment. This is 100,000 m ² of office floorspace (B1a); 8,000 m ² of hotel floorspace (C1) and 7,000 m ² of leisure floorspace (D1-D2).	The amended area schedule means that worst-case local expenditure assumes the following mix: 600 to 700 residential units; 3,850 m ² of office floorspace (B1a) and 7,000 m ² of leisure floorspace (D1-D2). As per the 2020 proposed development, this would result in Major Beneficial and significant effect at the local level.
Employment/ Economic output	The worst-case would be the scenario that generates the least employment/economic output. As such, the assessment of effects on employment/economic output assumed 100,000 m ² residential floorspace (C3); 8,000 m ² of hotel floorspace (C1); and 7,000 m ² of leisure floorspace (D1-D2).	The amended area schedule means that worst-case employment / economic output assumes the following mix: 1,000 residential units; 3,850 m ² of office floorspace (B1a) and 7,000 m ² of leisure floorspace (D1-D2).
Education (early years, primary and secondary)	The worst-case scenario for education would be the scenario which generates the greatest extent of residential population and therefore demand for education services. As such, the assessment of effects on education assumed that the proposed development would deliver 1,000 residential units. It is also assumed that all residents would be new to the area and not already attending a local school/early year service. The development parameters state that all of the residential units would be apartments. To assess a worst-case scenario it has been assumed that the maximum of 60% would be two+ bedrooms and 40% one-bedroom apartments.	The worst-case assumption of 1,000 residential units remains the same and therefore the conclusions of the 2020 EIA remain valid.

Table 2: Worst-case Scenario for Receptors		
Receptor	2020 Proposed Development	2021 Amended Proposed Development
Primary healthcare (General Practitioner (GP) and dental provision)	The worst-case scenario for primary healthcare would be the scenario which generates the greatest extent of residential population and therefore demand for primary healthcare services. As such, the assessment of effects on primary healthcare assumed that the proposed development would deliver 1,000 residential units. It is also assumed that all residents would be new to the area and not already registered with a local health practitioner.	The worst case assumption of 1,000 residential units remains the same and therefore the conclusions of the 2020 EIA remain valid.
Open/play space	Worst-case scenario for open/play space would be the scenario which generates the greatest extent of residential population and therefore demand for open/play space. As such, the assessment of effects on open/play space assumes that the proposed development would deliver 1,000 residential units. The development parameters state that at least 10% of the overall application site area would be provided as publicly accessible open space. Worst-case assessment assumes that the proposed development would deliver the minimum 10% .	The worst case assumption of 1,000 residential units and 10% of developable land as open space remains the same and therefore the conclusions of the 2020 EIA remain valid.

In respect of deprivation, the 2020 EIA assumed no residential provisioning and therefore the 2021 amended proposed development represents an improvement with the minimum housing provision assumed to be 600 to 700 residential units which would result in a Minor Beneficial effect at the local level.

In respect of crime, the 2021 amended proposed development would not alter the 2020 EIA assessment and therefore the conclusions of the 2020 EIA remain valid.

Air Quality: Since the 2020 EIA, revised emission factors (emission factor toolkit (EFT) Version 10.1) have been published by Department of the Environment, Food and Rural Affairs (Defra). Air Quality Consultants (AQC) have published a study² comparing EFT v10 with EFT v9 used in the 2020 EIA; the study concludes that EFT v10 generally predicts lower NOx emissions than EFTv9. The revised emission factors would therefore not be expected to change the outcome of the assessment.

The proposed reduction in total floorspace combined with the proposed reduction in maximum B1a floor space would result in a reduced vehicle trip generation for the proposed development with associated improvements in respect of emissions generated from vehicular traffic during the completed development stage. Accordingly, the conclusions reported within the 2020 EIA represent a worst-case assessment and remain valid.

Noise and Vibration: As above, the reduction in vehicle trip generation would result in improvements in respect of noise from vehicular traffic. Accordingly, the conclusions reported within the 2020 EIA represent a worst-case assessment and remain valid.

Wind: The wind micro-climate assessment presented within the 2020 EIA was based on PP-105 as this was considered to represent a worst-case from a wind perspective. The adoption of PP-104 from the 2020 application (PP-103, submitted as part of this application addendum) as the proposed maximum height parameter for the 2021 amended proposed development would therefore not be expected to lead to any new or amended significant effects and the conclusions of the 2020 EIA are considered to remain valid.

Daylight, Sunlight and Overshadowing and Solar Glare: The Daylight, Sunlight and Overshadowing assessment presented within the 2020 EIA was based on PP-104 as this represented the worst-case due to its height. The 2021 amended proposed development has adopted PP-104 as the preferred maximum height parameter plan (shown as PP-103, submitted as part of this application addendum) and therefore no new or amended impacts would arise and the 2020 EIA remains valid in respect of Daylight, Sunlight and Overshadowing. There has been no change to the materiality of the proposed development and therefore the conclusions of the solar glare assessment remain valid.

Townscape and Visual Impact: The Townscape and Visual Impact assessment presented within the 2020 EIA was based on PP-105 as this was considered to represent a worst-case from a townscape and visual perspective. The adoption of PP-104 (PP-103, submitted as part of this application addendum) as the proposed maximum height parameter for the 2021 amended proposed development has resulted in a smaller parameter for the maximum development with greater offsets between the development blocks creating a greater degree of separation between the taller elements of the blocks and reducing the perceived mass of built form. As such, an updated ES chapter has been provided that assesses the revised parameters for the scheme (presented as an updated ES chapter in Appendix 1 of this letter). The updated ES chapter has identified that the revised parameters represent an improvement in terms

² Air Quality Consultants (2020). Comparison of EFT v10 with EFT v9. September 2020. Available at: <https://www.aqconsultants.co.uk/resources>

of townscape and visual impacts due to the increased spatial separation between the development blocks.

Table 3 provides a comparison of effects against the previously submitted 2020 ES chapter, setting out where the likely effects of the proposed development have been updated to reflect the revised parameters for the scheme.

Table 3: Comparison of Completed Effects on Townscape and Visual Receptors			
Receptor Type	Receptor	Significance of Effect 2020	Significance of Effect 2021
Visual	Site Context Photograph 03: View north from Station Square North	Negligible Beneficial	Minor Beneficial
Visual	Site Context Photograph 07: View east from Swansea Road/Northfield Road	Negligible Beneficial	Minor Beneficial
Visual	Site Context Photograph 10: View north from Station Road	Negligible Adverse	Negligible Beneficial
Visual	Site Context Photograph 11: View south-east from Christchurch Meadows	Negligible Beneficial	Minor Beneficial
Visual	Site Context Photograph 17: View north from Mount Pleasant/Southampton Street	Negligible Beneficial	Minor Beneficial
Visual	Site Context Photograph 25: View north from Station Square	Minor Adverse	Negligible Beneficial
Cumulative Visual	Site Context Photograph 25: View north from Station Square	Moderate Adverse	Negligible Beneficial

Built Heritage: Due to a change in team personnel, an updated Built Heritage Assessment has been undertaken and is presented as an updated ES chapter in Appendix 2 of this letter.

In summary, the majority of receptors identified in the 500 m radius have been scoped out of full assessment owing to the nature of the immediate and wider settings of these receptors. A large number are located at a significant distance from the site and /or the significant infrastructure of the ring road and railway act as a truncating features which divorce the site from their settings.

Most of the designated heritage receptors are located south-east of the application site within the historic centre of Reading and obscured from the application site.

Four receptors, the Grade II* listed Former Town Council Chamber, the Grade II listed Former School of Art, The Concert Hall and the Market Place Conservation Area have been scoped into assessment which were not included in the 2020 assessment (these are shown in blue text in Table 4). These have been scoped in following further assessment and review with site visit.

Table 4 provides a comparison of effects against the 2020 EIA. The residual effects range from permanent, indirect, Negligible Adverse (not significant) to permanent, indirect, Minor/Moderate Adverse (not significant).

These assessments are based on professional judgement and best practice guidance including Historic England's Managing Significance in Decision Making (GPA Note 2), The Setting of Heritage Assets (GPA Note 3).

Table 4: Comparison of Completed Effects on Heritage Receptors

Heritage Map No.	NHL Number	Grade	Name	Heritage Value	Significance of Effect 2020	Heritage Value	Significance of Effect 2021
3	1113400	II*	Former Town Council Chamber	N/A	Not assessed separately	High	Negligible Adverse
4	1321892	II	Main building of Reading General Station	High	Moderate	Medium	Minor/Moderate Adverse
8	1113434	II	Regent Place	High	Negligible	Medium	Negligible Adverse
18	1113433	II	29 and 31 Caversham Road	High	Negligible	Medium	Negligible Adverse
5	1113589	II	Statue of King Edward VII	High	Negligible	Medium	Negligible Adverse
6	1113591	II	Great Western House	High	Minor	Medium	Negligible Adverse
9	1113590	II	13 and 15 Station Road	High	Negligible	Medium	Negligible Adverse
10	1321990	II	Reading Museum	High	Negligible	Medium	Negligible Adverse
11	1113600	II	Former School of Art	High	Negligible	Medium	Negligible Adverse
13	1113401	II	The Concert Hall	High	Negligible	Medium	Negligible Adverse
36	N/A	N/A	55 Vastern Road	Medium	Minor	Low	Negligible Adverse
A	N/A	N/A	Market Place Conservation Area	N/A	Not assessed separately	Medium	Negligible Adverse

In respect of topics previously scoped out the 2020 EIA, the 2021 proposed amendments would not give rise to any new or amended significant effects and therefore the scope of the 2020 EIA remains valid. Of relevance to the EIA in respect of the implications of the 2021 proposed amendments on scoped out topics, the following is noted:

- Construction Waste: Consideration has been given to the methods of assessment set out in the IEMA guidance³ in determining the potential for significant environmental effects of the use of materials and anticipated waste arisings as presented in Chapter 4: Proposed Development Description and Chapter 5: Demolition and Construction Environmental Management of the 2020 EIA. It has been concluded that significant effects in respect of waste and materials are not anticipated to arise as a result of the 2021 amended proposed development based on the following considerations:
 - Materials: No allocated minerals sites would be sterilised by this development. There are no known issues regarding supply of key construction materials and the quantity of materials to be used for this development is unlikely to have a significant impact on regional supply. There are suppliers available in the region for sustainable materials including recycled steel and recycled or secondary aggregates. Opportunities to specify sustainable materials would be undertaken throughout the design process; some of these opportunities will come at detailed design stages post planning;
 - Waste: Waste generation is likely to comprise of a range of materials such as timber packaging, metal off-cuts and inert waste arisings such as concrete and soil. These waste streams have a high potential to be diverted from landfill and the overall quantity of waste is unlikely to have a significant impact on the regional landfill void capacity. The design team will take opportunities to minimise waste arisings to support a range of environmental benefits, such as reducing carbon emissions;
 - Operational Waste Management Strategy (OWMS): An OWMS was submitted with the original 2020 application that sets out the proposed development’s strategy to ensure that waste is effectively managed in line with the waste hierarchy and relevant policy requirements. The OWMS remains valid for the 2021 application addendum.

Intra-Cumulative Effects

As there have been no changes to the assessment of effects for each of the technical chapters, and the 2020 EIA is considered to represent the worst-case scenario, the intra cumulative effects associated with the 2021 amended proposed development would remain the same as presented in the 2020 EIA.

Residual Effects

The residual effects, conclusions and summary of the 2020 EIA would remain valid for the proposed development. Consequently, no further assessment needs to be undertaken at this stage or additional mitigation measures required.

SUMMARY AND CONCLUSION

The 2021 application addendum seeks to amend the outline planning application for the Reading Station Park project, submitted to the RBC in February 2020 (ref: 200328/OUT). Due to the minor nature of the proposed amendments to the 2021 amended proposed development, it is considered that there would be no material change to the predicted likely significant environmental effects reported in the 2020 EIA.

³ IEMA guide to: Materials and Waste in Environmental Impact Assessment 2020



APPENDIX 1

UPDATED TOWNSCAPE AND VISUAL IMPACT ASSESSMENT ES CHAPTER

APPENDIX 2

UPDATED BUILT HERITAGE ES CHAPTER