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Environment Agency

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

Our ref: WA/2020/127794/02-L01
Your ref: 200328

Date: 16 February 2022

Dear Alison Amoah

Outline Planning Permission With The Details Of Access, Appearance, Landscaping, Layout And Scale Reserved For Later Determination. A Demolition Phase And Phased Redevelopment (Each Phase Being An Independent Act Of Development) Comprising A Flexible Mix Of The Following Uses: Residential (Class C3 And Including Prs); Offices (Use Class B1(A); Development In Use Classes A1, A2, A3 (Retail), A4 (Public House), A5 (Take Away), D1 And D2 (Community And Leisure); Car Parking; Provision Of New Plant And Renewable Energy Equipment; Creation Of Servicing Areas And Provision Of Associated Services, Including Waste, Refuse, Cycle Storage, And Lighting; And For The Laying Out Of The Buildings; Routes And Open Spaces Within The Development; And All Associated Works And Operations Including But Not Limited To: Demolition; Earthworks; Provision Of Attenuation Infrastructure; Engineering Operations.

Vastern Court Caversham Road, Reading

Thank you for consulting us on the outline planning application (with all matters reserved) noted above. We apologise for the delay in providing our comments and are grateful of the extension of time you agreed with us. We have reviewed the submitted information with regards to our remit including the topics of fluvial flood risk and water quality.

We have reviewed the Flood Risk Assessment Technical Note prepared by Simpson | TWS, reference P19-418 and the submitted flood risk assessment included in the Environmental statement document prepared by Ramboll.

The additional information and clarity does address the majority of our fluvial flood risk concerns and demonstrates that a fluvial flood water storage compensation scheme can, in principle, be provided within the site. However, prior to the approval of reserved matters full design details for an appropriate flood water storage scheme, preferably on a level-for level basis, will be required to ensure that the proposed layout of the development will not increase flood risk elsewhere in accordance with national and local planning policy.

Also, Reading Borough Council will need to consider the potential implications of some of the proposed flood water storage compensation areas being located in the same location as the some of the proposed safe access and egress routes from the site during a time of flood. Please refer to our further advice below regarding safe access and egress.

Environment Agency Position
The proposed development will only meet the National Planning Policy Framework's requirements if the following 6 **planning conditions** are included on any planning decision notice. Without these conditions the proposed development would result in a risk to people and the environment and we would object to the scheme as submitted.

Condition 01
Prior to the approval of any reserved matters a flood water storage compensation scheme shall be submitted to and approved in writing by the local planning authority. The flood water storage compensation scheme shall:

- be developed in accordance with the principles noted within the submitted Floor Risk Assessment and Flood Risk Assessment Technical Note prepared by Simpson | TWS, reference P19-418;
- provide compensation on a level-for-level basis and where this is not possible, on a volumetric basis with justification for this approach;
- provide appropriate compensation for all fluvial flood events up to and including the 1% annual probability with a minimum 31% allowance for climate change flood extent and level;
- demonstrate that the fluvial compensation areas are hydraulic linked to the fluvial flood plain and how they will drain following a flood event;
- include a maintenance details/schedule confirming how the flood water storage compensation areas shall be retained and maintained for the lifetime of the development.

Therefore the development shall be carried out and maintained for the lifetime of the development in accordance with the approved scheme. Any subsequent amendments shall be agreed in writing with the local planning authority.

Reasons 01
This condition is sought in accordance with paragraph 167 of the National Planning Policy Framework and seeks to reduce the risk of flooding to the proposed development and by ensuring that compensatory storage of flood water is provided and retained for the lifetime of the development.

Condition 02
The development shall be carried out in accordance with the submitted Flood Risk Assessment and Flood Risk Assessment Technical Note prepared by Simpson | TWS, reference P19-418 including the mitigation measure that finished floor levels shall be set no lower than 38.59m above Ordnance Datum (AOD).

Reasons 02
This condition is sought in accordance with paragraph 167 of the National Planning Policy Framework and seeks to reduce the risk of flooding to the proposed development and by ensuring that appropriate flood resistant and resilience measures are implement and that the development is safe.

Condition 03
No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A site investigation scheme, based on the application's preliminary risk assessment (project no. 1700003910), issued by Ramboll in February 2020, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site;

2. The results of the site investigation and the detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons 03
This condition is sought in accordance with paragraph 170 of the National Planning Policy Framework and seeks 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.

The application's preliminary risk assessment (project no. 1700003910), issued by Ramboll in February 2020, identified significant potential risks to controlled waters mainly associated with the legacy use of the site as part of the Great Western Railway Works with a coal depot and multiple railway sidings. A comprehensive site investigation is therefore required to adequately characterize the risk to controlled waters presented by this site.

Condition 04
Prior to any part of the permitted development being occupied or brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reasons 04
This condition is sought in accordance with paragraph 170 of the National Planning Policy Framework and seeks to ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete.

Condition 05
Piling using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reasons 05
This condition is sought in accordance with paragraph 170 of the National Planning Policy Framework and seeks 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.

The application's preliminary risk assessment (project no. 1700003910), issued by Ramboll in February 2020, identified significant potential risks to controlled waters mainly associated with the legacy use of the site as part of the Great Western Railway Works with a coal depot and multiple railway sidings. Piling may create or enhance a pollutant linkage between possible near-surface contamination and the underlying principal aquifer by the artificial formation of preferential migration pathways.

Condition 06
No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reasons 06
This condition is sought in accordance with paragraph 170 of the National Planning Policy Framework and seeks 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.

The application's preliminary risk assessment (project no. 1700003910), issued by Ramboll in February 2020, identified significant potential risks to controlled waters mainly associated with the legacy use of the site as part of the Great Western Railway Works with a coal depot and multiple railway sidings. The use of infiltration SuDS may liberate contamination within the unsaturated zone and cause unacceptable levels of water pollution. The site is also located on low permeability superficial deposits and infiltration testing may show that infiltration SuDS methods are not feasible on this site.

Flood Risk Sequential Test - Advice to LPA
In accordance with the National Planning Policy Framework paragraphs 159-169, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Flood Risk Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the National Planning Policy Framework. Our flood risk standing advice reminds you of this and provides advice on how to do this.

Flood Risk - Safe Access and Egress – Advice to LPA
The proposed development and/or the access route is located within the 1% annual probability (AP) plus an appropriate allowance for climate change flood extent.

Cont/d..

In accordance with paragraph 167 of the National Planning Policy Framework (NPPF), you must ensure that ‘the development is appropriately flood resistant and resilient’ and that ‘safe access and escape routes are included where appropriate, as part of an agreed emergency plan...’. This is on the understanding that you have concluded that the proposed development has passed the flood risk sequential test as required.

Within the application documents the applicant should clearly demonstrate to you that a satisfactory route of safe access and egress is achievable. It is for you to assess and determine if this is acceptable.

We enclose a copy of our safe access and egress guidance statement to assist you with your assessment. Please note we have not assessed the proposed access and egress route.

Final Comments
Once again thank you for contacting us. Our comments are based on our available records and the information as submitted to us.

Please quote our reference number in any future correspondence.

If you have any queries please contact us.

Yours faithfully

Mr Jonathan Fleming
Sustainable Places | Team Leader

Email: planning_THM@environment-agency.gov.uk

End