

From: [Henry Parkinson](#)
To: [Palmer, Leanne](#)
Cc: [Rupert Warren QC](#); [Martin Evans](#); [Tim Stansfeld](#); [Ben Littman](#); [Paul Newton](#); james.crowley@chpsurveyors.com
Subject: 3289748 Vastern Court, Caversham Road, Reading - EIA Regulations [CMCK-UK.FID15237041]
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Attachments: [image001.png](#)

Dear Leanne,

The Inspector has requested the Appellant's opinion on whether a direction ought to be made for "further information" pursuant to regulation 25(1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the "Regulations") in respect of certain information requested by the Council.

The information requested by the Council is an Average Daylight Factor Analysis of a sample of assumed living rooms on the 1st floor of Block E-G and the second floor of Block A of the outline scheme at 80 Caversham Road.

The Appellant's position is that it is not necessary for the environmental statement to be supplemented with additional "further information" to enable the Inspector and the Secretary of State to reach a reasoned conclusion on the likely significant effects of the proposed development.

The information already provided by the Appellant satisfies the requirements of regulations 18(3) and 18(4); the façade analysis already undertaken by CHP Surveyors in relation to the cumulative impact of the proposed development on the outline scheme at 80 Caversham Road constitutes the information reasonably required to reach a reasoned conclusion on the likely significant effects of the proposed development, taking into account the current knowledge (that 80 Caversham Road is an outline scheme with no details of internal configurations) and methods of assessment (that this type of façade analysis is wholly standard practice where the effects on an outline scheme are being assessed).

Without prejudice to this opinion, in the interests of seeking to address the requests from the Council and narrow the issues in dispute the Appellant has agreed to carry out the additional analyses requested by the Council and will provide this evidence in due course.

The Appellant's opinion is therefore that no formal direction is required. If the Inspector disagrees then it would be open for her to issue a formal direction and accept the evidence as "further information" pursuant to the Council's request or, if she disagrees with the Council, the evidence can be treated as "any other information" as defined by the Regulations.

In either scenario then in accordance with regulation 25(2) because the information will be provided for the purposes of the Inquiry the requirements of paragraphs (3) to (11) of regulation 25 would not apply and so no procedural consequences would flow from either course of action.

I would be grateful if you would please pass this on to the Inspector.

Kind regards,
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