

Wokingham Borough Council
Development Control
PO Box 157
Wokingham
Berkshire
RG40 1WR

Our ref: WA/2025/131906/01-L01
Your ref: 243099
Date: 23 January 2025

Dear Sir/Madam

Outline Application For The Proposed Erection Of Up To 111 No. Dwellings With Associated Works, Parking, Landscaping, Publicly Accessible Open Space And Access From Reading Road. (All Matters Reserved Except For Means Of Access.)

Land North Of Reading Road Arborfield

Thank you for consulting us on this application, on 11 December 2024. Thank you for allowing us an extension of time in which to provide this response.

We have reviewed the application in line with our planning remit, including the following submitted documents:

- Flood Risk Assessment & Drainage Strategy – Proposed Residential Development Land North of Reading Road, Arborfield – 14th November 2024 (Doc ref: DANS-E254-274) – Prepared by Terry Seymour
- Location Plan – Land at Reading Road, Arborfield (doc ref: 052403-DAN-LOC01)
- Design & Access Statement (Parts 1 and 2) - Reading Road, Arborfield (November 2024) (Doc ref: 052403-DAN-NHC-DAC).

A main river runs though the western side of the proposal site. The application indicates that works within 8 metres of this section of watercourse will be avoided. However main river also runs along the southern boundary of the site and this has not been addressed nor is shown on the plans. The proposed development would connect to Arborfield Sewage Treatment Works.

Environment Agency position

We **object** to this application as submitted because the proposed development would pose an unacceptable risk of pollution to surface water quality and we recommend that planning permission should be refused on this basis.

Reason

This development will connect to Arborfield STW. Environment Agency records indicate that Arborfield STW is either close to, or already exceeding the maximum headroom in its Dry Weather Flow (DWF) permit, and this development will lead to further exceedances. DWF permits are set with conditions to protect the receiving waterbody from deterioration, and when a DWF permit is exceeded, these conditions are no longer protective of the environment. It is imperative that new developments are supported by adequate infrastructure, which includes ensuring that wastewater can be treated without causing an adverse environmental impact.

Paragraph 187 (e) of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

Policy CP4 in the adopted Wokingham Local Plan states 'Planning permission will not be granted unless appropriate arrangements for the improvement or provision of infrastructure, services, community and other facilities required for the development taking account of the cumulative impact of schemes are agreed.' In addition, the Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.

In this case we consider that the risk of potential harm to the Barkham Brook water quality posed by this proposed development is unacceptable. The proposal would result in the discharge of pollutants to the Barkham Brook waterbody thereby risking failure to meet statutory water quality objectives for that water body. In particular, there is a risk that this proposal would cause deterioration of a quality element to a lower status class and/or prevent the recovery of these to meet statutory waterbody objectives

Overcoming our objection

To overcome our objection, we need to see a detailed foul water strategy for the improvement of the Arborfield sewerage system to accommodate the additional wastewater flows from the development. The strategy shall:

- a. Identify the network and/or wastewater treatment works improvements required to provide sufficient capacity, as defined in the water quality assessment, to accommodate the development.
- a. Include a timeline of the required network and/or wastewater treatment works improvements in relation to the timescales of the development.

Please reconsult us on any further information submitted.

Advice to applicant – Environmental Permit

The applicant will require a Flood Risk Activity Permit (FRAP) to undertake the proposed works as main river runs adjacent to and through the site. The applicant would need to demonstrate that the proposed works will not adversely impact on flood risk or the watercourse.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)

- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to Applicant - Other Consents

As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body.

The applicant should contact 03708 506 506 or consult our website to establish if consent will be required for the works they are proposing. Please see <http://www.environment-agency.gov.uk/business/topics/permitting/default.aspx>

Final comments

Thank you again for consulting us. Our comments are based on the best available data and the information as presented to us.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below. Please quote our reference number in any future correspondence.

Yours faithfully

Sarah Warriss-Simmons
Planning Advisor

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