

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

Our ref: WA/2025/132454/01-L01
Your ref: 251814
Date: 12 August 2025

Dear Sir/Madam

Prior Approval Submission For Erection Of A Two Storey Upwards Extension To Provide 32no Residential Units On The 4th And 5th Floor With Associated Plant, Car And Cycle Parking.

400 Regus House, Thames Valley Park Drive, Earley, Wokingham RG6 1PT

Thank you for consulting us on this application on 30 July 2025. We have reviewed the submitted information in line with our planning remit, including the following document:

- Tier 1 Contaminated Land Preliminary Risk Assessment. 400 Thames Valley Park Dr, Earley, Reading RG6 1PT. Reference: P1202-02/R1/V2. EPS Consulting. May 2024.

The site lies over a principal bedrock aquifer and secondary A superficial aquifer. The submitted desktop report (Tier 1 risk assessment) has indicated that due to historic on-site activities and wider off-site activities in the locality, further investigation is needed to better constrain the potential risks at this site. This is considered reasonable.

Environment Agency position

The previous uses of the proposed development site as a railway sidings, and engineering and other works/factory etc., presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a principal aquifer/secondary aquifer A.

The application's desktop report (Tier 1 risk assessment) demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken.

In light of the above, the proposed development will be acceptable if **planning conditions** are included. Without these conditions we would object to the proposal in line with paragraph 187 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition 1 - remediation

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 desk study PRA 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.

Reason 1

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 in line with paragraph 187 of the National Planning Policy Framework.

Condition 2 - verification

Prior to any part of the permitted being 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.

Reason 2

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. This is in line with paragraph 187 of the National Planning Policy Framework.

Condition 3 – previously unidentified contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason 3

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 from previously unidentified contamination sources at the development site. This is in line with paragraph 187 of the National Planning Policy Framework.

Condition 4 - boreholes

A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the local planning authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to the occupation of any part of the permitted development.

Reason 4

To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 187 of the National Planning Policy Framework and Position Statement A of [‘The Environment Agency’s approach to groundwater protection’](#).

The submitted planning application indicates that boreholes will need to be installed at the development site to investigate groundwater resources/carry out soakage tests. If these boreholes are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is located upon a principal aquifer/secondary aquifer A.

Condition 5 - piling

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.

Reason 5

To ensure that the proposed development, does not harm groundwater resources in line with paragraph 187 of the National Planning Policy Framework and Position Statement N of the [‘The Environment Agency’s approach to groundwater protection’](#).

Piling using penetrative methods can result in risks to potable supplies from, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Groundwater is particularly sensitive in this location because the proposed development site is located upon principal aquifer/secondary aquifer A. In light of the above, the proposed development will only be acceptable if a planning condition controlling disturbance of the aquifer is imposed.

Condition 6 – infiltration drainage

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.

Reason 6

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 caused by mobilised contaminants. This is in line with paragraph 187 of the National Planning Policy Framework.

The previous uses of the proposed development site as a railway sidings, and engineering and other works/factory etc., presents a medium risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS). This could pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a principal aquifer/secondary aquifer A. In light of the above, we do not believe that the use of infiltration SuDS is appropriate in this location.

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 www.gov.uk/guidance/check-if-you-need-an-environmental-permit.

This includes any proposal to undertake work in, over, under, or within 8 metres of the top of the bank of a designated Main River, called a Flood Risk Activity permit.

Final comments

Thank you again for consulting us on this application. 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

Direct dial 0203 025 9855

Direct e-mail Planning_THM@environment-agency.gov.uk