

# **Statement of Common Ground**

between

## **Wokingham Borough Council**

and

## **Environment Agency**

in relation to the

Wokingham Borough Local Plan Update 2023-2040

March 2025

## **1. Introduction**

1.1 This Statement of Common Ground has been prepared by Wokingham Borough Council (WBC) and the Environment Agency (EA), collectively referred to as “the parties”. It sets out matters that are agreed between the parties in relation to the preparation of the Wokingham Borough Local Plan Update 2023 – 2040: Proposed Submission Plan.

## **2. Background**

2.1 The Duty to Cooperate, introduced by the Planning and Compulsory Purchase Act 2004 (amended by Section 33A of the Localism Act) places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis in the preparation of development plan documents and other documents. This is a test that local authorities need to satisfy prior to the local plan examination stage and is an additional requirement to the test of soundness.

2.2 The Duty to Cooperate specifically relates to ‘strategic matters’ which are defined as follows<sup>1</sup>:

- Sustainable development or use of land that has or would have a significant impact on at least two planning areas, (in particular) in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas, and
- Sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.

2.3 Paragraph 20 of the National Planning Policy Framework (NPPF) (2023)<sup>2</sup> also outlines strategic priorities that a local plan should have strategic policies to cover. They include:

- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.4 This Statement of Common Ground (SoCG) has been prepared in accordance with paragraph 27 of the NPPF and the section of the Planning Practice Guidance on Maintaining Effective Cooperation.

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<sup>1</sup> Per Section 33A of the Planning and Compulsory Purchase Act 2004

<sup>2</sup> The plan is intended to be examined against the December 2023 NPPF, as enabled by transitional arrangements in the December 2024 NPPF.

### **3. Context**

#### Local Plan Update

- 3.1 WBC commenced evidence gathering to inform the Local Plan Update in 2016. The plan-making process has been informed by opinions expressed through various consultations, including Issues and Options Consultation (2016), Homes for the Future Consultation (2018), Draft Plan Consultation (2020) and Revised Growth Strategy Consultation (2021). A wide range of technical reports have also been completed, including reports relating to sustainability, landscape character, transport, flood risk, air quality, housing, economic and retail needs, and land supply.
- 3.2 WBC invited representations on the Local Plan Update Proposed Submission Plan between 30th September and 13th November 2024. The plan was submitted to the Secretary of State on 28 February 2025 after full consideration of the representations received.
- 3.3 The plan will be examined against the December 2023 NPPF, as enabled by transitional arrangements.

#### The Environment Agency

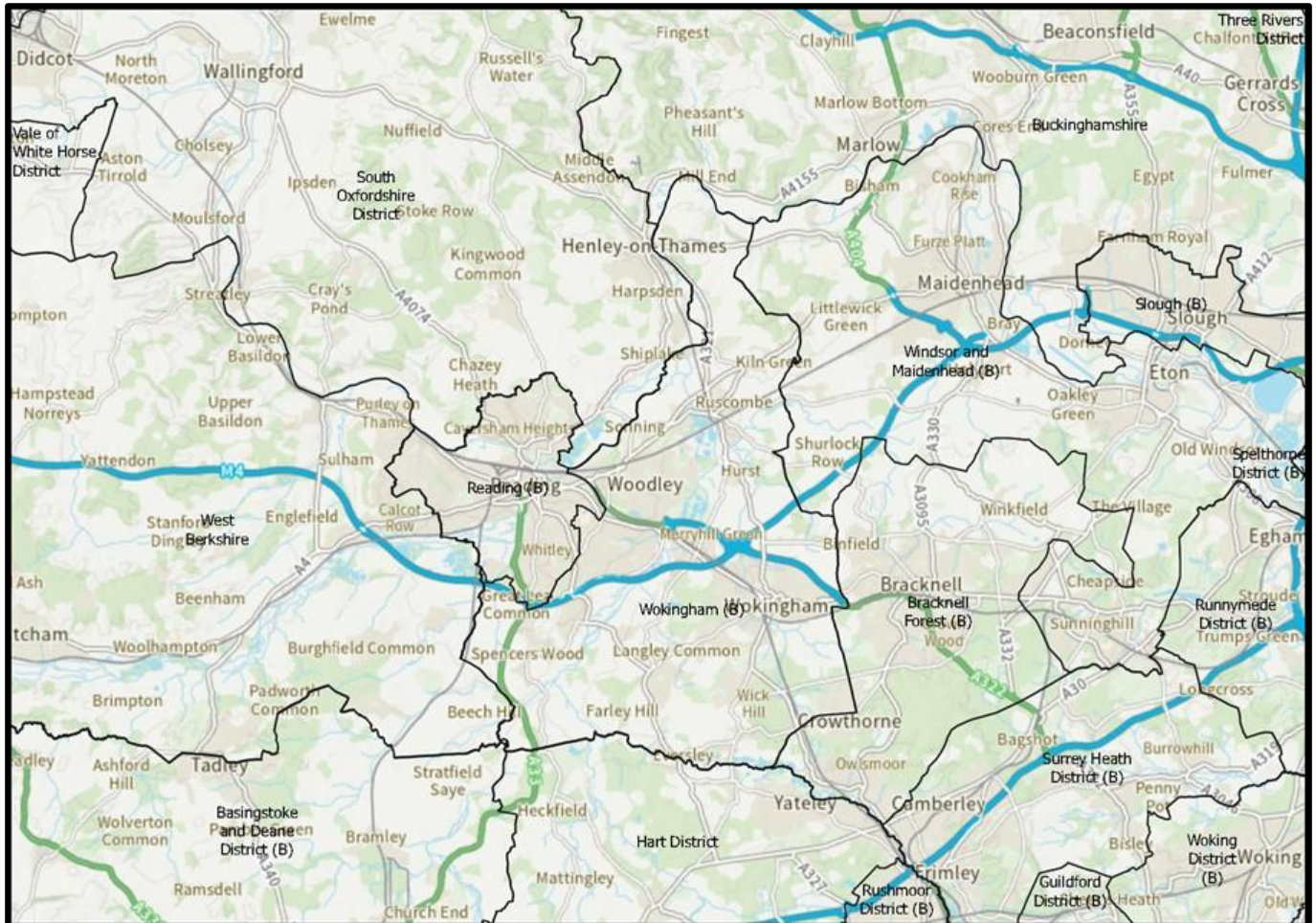
- 3.4 The Environment Agency (EA) is a non-departmental public body responsible for a number of areas including water quality and resources, conservation and ecology, and managing the risk of flooding from main rivers, reservoirs, estuaries and the sea. The EA is not responsible for surface water and ground water flood risks, these being the responsibilities of the Lead Local Flood Authority, which is Wokingham Borough Council (WBC). The EA however has a strategic overview for all sources of flood risk.

#### Strategic Geography

- 3.5 Wokingham Borough is located approximately 50km west of London, in the heart of the Thames Valley and within the Royal County of Berkshire. The borough covers an area of 17,892 hectares and is characterised by a variety of settlements with the largest being Earley, Winnersh and Woodley, which are in proximity to Reading Borough, and Wokingham.
- 3.6 Wokingham Borough has a rich and varied natural environment. The borough supports various green and blue landscape elements, including the Rivers Thames, Loddon and Blackwater. The borough has four Sites of Special Scientific Interest, many areas of ancient woodland, over one hundred Local Wildlife sites, eleven Local Nature Reserves and five Local Geological Sites. Additional detail on flood risk across the borough is set out in the following section.
- 3.7 The population in the borough recorded through the 2021 census was 177,500 people. Between 2011 and 2021 the population of the borough grew by 15.0%, the

third highest in the South East (average 7.5%) and one of the highest in England (average 6.3%).

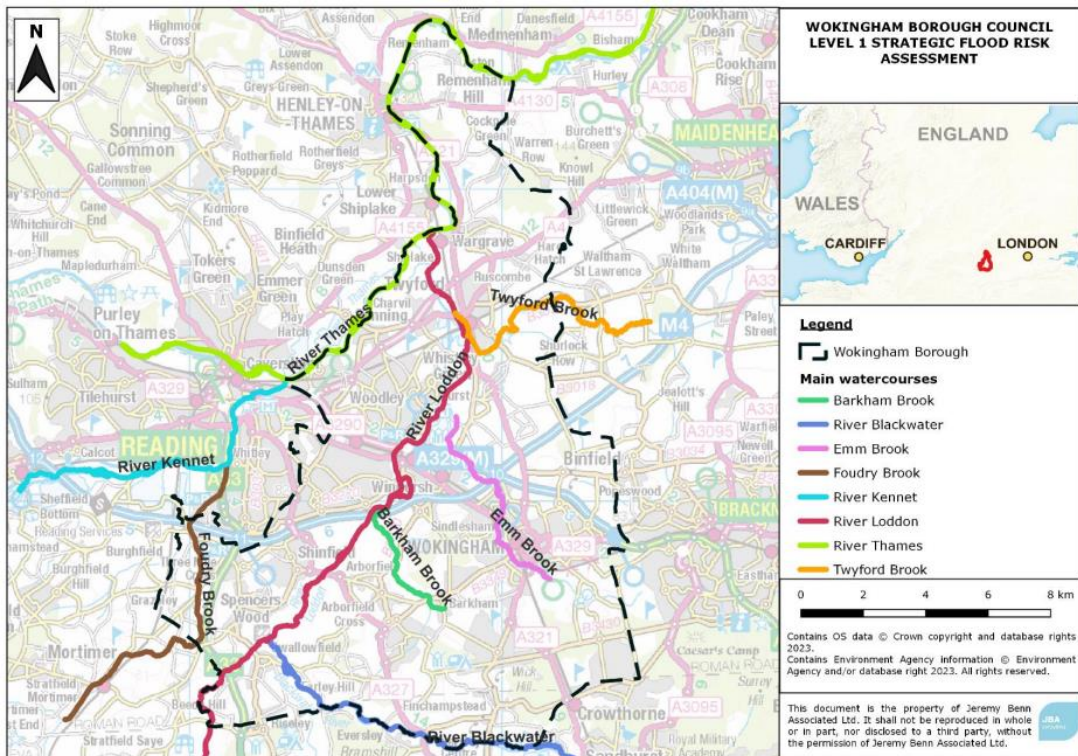
Figure 1: Wokingham Borough and neighbouring local authorities



### Flood Risk in Wokingham Borough

3.8 The primary fluvial flood risk is along the River Thames, River Loddon, River Blackwater, Emm Brook, Foudry Brook, and their main tributaries. The fluvial flood extents cover the majority of the western and northern border of the borough and split the area through the centre along the path of the River Loddon, which flows in a north-easterly direction through the borough.





- 3.9 Regarding surface water, the Risk of Flooding from Surface Water map shows a number of prominent overland flow routes that largely follow the topography of the watercourses. There are some areas where there are additional flow paths and areas of ponding, for example where water is impounded at road or rail embankments and in low-lying areas. There are also considerable flow routes following the roads through the main urban areas of Wokingham, Earley and Lower Earley, and Finchampstead which, alongside isolated areas of ponding, may affect many properties across these settlements.
- 3.10 In terms of sewer flooding, South East Water provides water services to the east side of the Borough whilst Thames Water provides water services to the west side of the Borough and sewerage services across the entirety of the Borough. Details of historic sewer flooding across the Borough has been provided by Thames Water which has informed the Strategic Flood Risk Assessment (SFRA).
- 3.11 The Areas Susceptible to Groundwater Flooding map shows that in general, areas with greater than 50% susceptibility to groundwater flooding are along the main flow routes of the River Thames, River Loddon, River Blackwater, and Foudry Brook. The JBA groundwater emergence map emulates this, with similar areas experiencing emergence levels within 0.5m of the surface, with the addition of the south east of the Borough. The Risk of Flooding due to Surface Water map suggests that any groundwater emerging in these areas is likely to follow the low-lying topography and path of the River Thames, River Loddon, River Blackwater, Emm Brook, and Foudry Brook.
- 3.12 There is a potential risk of flooding from reservoirs both within Wokingham Borough and those outside. The level and standard of inspection and maintenance required

under the Reservoirs Act means that the risk of flooding from reservoirs is relatively low. However, there is a residual risk of a reservoir breach, and this risk should be considered in any site-specific FRAs (where relevant).

#### **4. Current position**

- 4.1 The EA has been engaged throughout the preparation of the LPU. This includes consultation at key milestones during the course of plan preparation, including the four Regulation 18 consultations. Additional detailed engagement has taken place outside formal consultations, including on the Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS), with the EA shaping these documents from inception, through initial drafts and thus informing the published evidence.
- 4.2 The EA responded to the Regulation 19 publication as well as three of the four Regulation 18 consultations undertaken. A summary of the comments to the Draft Plan (2020), Revised Growth Strategy (2021) and Proposed Submission Plan (2024) is provided below.

##### Draft Plan (Regulation 18) consultation: 3 February – 3 April 2020

- 4.3 The EA's response to the Draft Plan consultation welcomed and supported a number of the issues, opportunities, objectives and policy direction. Support was expressed for the principle of the spatial vision and the policies relating to the natural environment, with specific comments provided to improve clarity of policies and ensure a robust and sound plan.

##### Revised Growth Strategy (Regulation 18) consultation: 22 November 2021 – 24 January 2022

- 4.4 The EA's response to the Revised Growth Strategy consultation provided specific comments on proposed site allocations. The comments were considered through the production of updated SFRA evidence and development guidelines for sites in the Proposed Submission Plan.
- 4.5 The EA representation raised some questions on modelling assumptions used in the Level 2 SFRA work that supported the RGS (which has now been superseded). Liaising with Stantec (the consultants that produced the work) the council provided a response to the queries raised via email and phone conversations, to address potential concerns.
- 4.6 The flood modelling used in the SFRA (2023) has been discussed and agreed with the EA, so there are no issues outstanding in relation to this matter for the purpose of plan preparation.

## Proposed Submission Plan (Regulation 19): 30 September 2024 – 13 November 2024

- 4.7 The EA commented on the Proposed Submission Plan in relation to specific policies and site allocations. These comments are outlined in Appendix A.
- 4.8 The comments included support for the intentions and specifics of multiple policies. Other comments recommended modifications to aid clarity. More fundamental comments expressed concern over the deliverability of particular site allocations and the deliverability of necessary sewerage infrastructure to facilitate the level of growth envisaged.
- 4.9 A meeting was arranged to discuss these matters on 4 December 2024, after which WBC issued a note responding to each in turn and agreeing actions for additional work where necessary. This included actions for the EA to revisit specific sites with reference to the available interactive mapping. Upon review, it has now been confirmed by the EA that there is only one site proposed where potential deliverability concern remains, with an agreed way forward to address this.
- 4.10 WBC sought further clarifications from Thames Water in relation to infrastructure improvement commitments. Confirmation has subsequently been received that the Arborfield upgrades are a funded scheme for the period 2025-2030 (AMP8) in the final determination of Thames Water's business plan. WBC is satisfied that necessary upgrades are deliverable and planned for.
- 4.11 Modifications to aid clarity and resolve issues of soundness in relation to the EA's representations are set out in Appendix A.

## Engagement on the SFRA

- 4.12 The EA attended the inception meeting for WBC's Strategic Flood Risk Assessment Level 1 (2023). Following the publication of updated national guidance on flood risk, WBC engaged with the EA to understand its implications, which led to the agreement to prepare the Strategic Flood Risk Assessment Level 2 (2023).
- 4.13 Ongoing engagement involved the sharing of emerging drafts of the Level 1 and Level 2 SFRA documents as part of the collaborative process, and regular meetings to discuss matters as they arose. Comments and suggestion received were incorporated into the final Level 1 and Level 2 SFRA.
- 4.14 This engagement culminated in a signed Memorandum of Understanding<sup>3</sup> in February 2024 which addressed a number of matters including the following key statements:

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<sup>3</sup> The signed Memorandum of Understanding is available at Appendix E of the Duty to Cooperate: Interim Statement of Compliance here: [https://www.wokingham.gov.uk/sites/wokingham/files/2024-09/Reg%2019%20DtC%20statement%20vFinal\\_Redacted.pdf](https://www.wokingham.gov.uk/sites/wokingham/files/2024-09/Reg%2019%20DtC%20statement%20vFinal_Redacted.pdf)

- An assessment of flood risk from all sources has been undertaken through the Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 2023 (produced by JBA Consulting). The SFRA provides a suitable and robust evidence base from which policy and strategy decisions for the LPU can be made.
- That the Environment Agency Loddon Model (as updated by JBA Consulting with latest climate change uplifts and updated hydrology to inform the SFRA in 2023) is sufficiently robust to inform policy and strategy decisions.
- That the Arborfield 2023 model (produced by JBA Consulting to inform the SFRA in the absence of mapped flood zones for the watercourse) is sufficiently robust to inform policy and strategic decisions.
- That whilst the Environment Agency Loddon Model (as updated in 2023) and the Arborfield 2023 model are sufficiently robust to inform policy and strategy decisions, an alternative model could be used to inform future planning applications following validation by the EA.

#### Engagement on the WCS

- 4.15 The EA similarly attended the inception meeting for WBC’s Water Cycle Study (Phase 2) (2023) WCS. Ongoing engagement involved the sharing of emerging drafts of the Phase 1 and Phase 2 WCS documents as part of the collaborative process. Comments and suggestions received were incorporated into the final documents.
- 4.16 This engagement culminated in a signed Memorandum of Understanding in February 2024 which included the following relevant statements of understanding:
- That an assessment of the impacts of growth is required and that the Wokingham Borough Water Cycle Study (Phase 1) (2019), and Water Cycle Study (Phase 2) (2023) provide a suitable basis for informing the new local plan and further engagement.

#### Sequential and Exception Test (September 2024)

- 4.17 The EA’s representation on the Proposed Submission Plan raised specific queries regarding groundwater flood risk and its consideration in the Sequential and Exception test (S&ET). However, these were for clarity purposes only and no matters of concern or soundness with the S&ET were raised. It is common ground between the parties that the EA is not responsible for groundwater flood risk, this being the responsibility of the Lead Local Flood Authority, which is Wokingham Borough Council (WBC).

### **5. Areas of Agreement**

- 5.1 The parties have engaged effectively and on an on-going basis during the plan making process and WBC has fulfilled its duty to co-operate with the EA.



- 5.2 The parties agree that the evidence supporting the respective plans is robust and proportionate, namely:
- The Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 2023;
  - Water Cycle Study (Phase 1) (2019) and Water Cycle Study (Phase 2) (2023); and
  - Sequential and Exception Test (2024).
- 5.3 The parties agree that the policies contained within chapter 10. Flooding and Drainage of the plan, following clarifications and amendments, are sound, namely:
- FD1: Development and flood risk (from all sources)
  - FD2: Sustainable drainage
  - FD3: River corridors and watercourses
- 5.4 The parties agree that WBC as the Lead Local Flood Authority<sup>4</sup> will advise applicants about the need for groundwater monitoring and how it can be robustly undertaken with regard to the site context.
- 5.5 The parties agree that detailed consideration will be given to the design and location of SuDS through the planning application process to ensure it is appropriate and accords with Policy FD2.
- 5.6 The parties agree that all the proposed development allocations in relation to flood risk in the local plan are developable in principle with the exception of site SS14.23, Winnersh Plant Hire (see paragraph 6.1 below). The parties also agree that detailed flood risk and drainage considerations will be considered through the planning application process, which may include advising parties proposing planning applications on the need to undertake more detailed hydrological and hydraulic assessments of relevant watercourses.
- 5.7 Specifically, that there are no flood risk barriers that would prevent the delivery of the proposed new community on land between Shinfield, Sindlesham and Arborfield Cross (known as Loddon Valley Garden Village), including the delivery of road infrastructure through the flood plain linking the site internally and with Lower Earley Way to the north.
- 5.8 Necessary engagement in relation to plan making will continue beyond submission as appropriate and necessary.

## **6. Areas of Further Work / disagreement**

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<sup>4</sup> The Lead Local Flood Authority are a consultee on planning applications.

- 6.1 WBC recognises the concerns of the EA in relation to site SS14.23 - Winnersh Plant Hire, Reading Road, Winnersh, specifically that it has not currently been evidenced how safe access can be achieved. It is agreed that WBC commits to investigating additional evidence in this regard to inform the Local Plan Examination. The parties will continue to engage on this matter.
- 6.2 The parties also disagree on the level of certainty that required upgrades to Arborfield waste water treatment works will be secured. WBC is satisfied that the required upgrades are understood and appropriately committed by Thames Water as part of the AMP8 period from 2025-2030. The EA would like additional assurance to a level of detail that Thames Water has not been able to provide. WBC has a signed SoCG with Thames Water and will continue to engage with them and the EA on this matter.
- 6.3 The EA is publishing new national flood and coastal erosion risk datasets<sup>5</sup>. This includes new National Flood Risk Assessment (NaFRA2) flood zone data, which is expected to be published at the end of March and will be available on the 'Flood map for planning'<sup>6</sup>. This updated data will need to be reviewed and any implications for the Local Plan Update and its evidence base will need to be considered, in consultation with the EA.

## **7. Governance Arrangements Including Future Review**

- 7.1 The parties agree to:
- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of the local plan;
  - Keep a dialogue open on the emerging National Flood Risk Assessment (NaFRA2) and its potential implications for plan making and evidence;
  - Work collaboratively to ensure that any necessary mitigations are secured, funded and delivered at the appropriate time, including maximising opportunities for the design of infrastructure to achieve flood betterment downstream;
  - Review and update this Statement of Common Ground in the light of any material change in circumstance; and
  - Maintain positive principles of cooperation.

## **8. Signatories**

- 8.1 We confirm that the information in this Statement of Common Ground reflects the joint working and engagement undertaken to date to address identified strategic matters. The parties will continue to work together to address cross boundary issues.

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<sup>5</sup> <https://www.gov.uk/guidance/updates-to-national-flood-and-coastal-erosion-risk-information>

<sup>6</sup> Available at: <https://flood-map-for-planning.service.gov.uk/>

***Signed for Wokingham Borough Council***



Name: Trevor Saunders  
Position: Assistant Director, Planning  
Date: 28 March 2025

***Signed for Environment Agency***



Name: Judith Montford  
Position: Planning Specialist  
Date: 27 March 2025

## Appendix A: Summary of EA representations on the Proposed Submission Plan

| Summary of EA comment   | WBC response  | Agreement or need for further discussion  |
|---|---|---|
| <i>Policy SS11: Arborfield SDL</i>  |   |   |
| <p>Place shaping principle point 4d) states – ‘Locate new buildings outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas of flood risk.’ This should relate to all sources of flooding. Point 4d should be amended to read;</p> <p><i>‘Locate new buildings outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas <b><u>of all sources</u></b> of flood risk.’</i></p>   | <p>Agree. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed:</p> <p><i>“4.d) Locate new buildings outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas of flood risk <b><u>from all sources.</u></b>”</i></p>   | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |
| <p>We are pleased to note that Place shaping principle 4e) requires the design to ‘<i>Draw on the recreational and ecological opportunities of watercourses.</i>’ However, we would like to see a statement in the policy ensuring that water quality will not deteriorate during and after completion of development on site. This point should also include opportunities to undertake improvements to watercourses and watercourse corridors. Recommend reference to ‘water quality’ in part 4 of the policy.</p> <p>In point 7 a), we are pleased to see that there will be a provision of a SuDS drainage scheme including mitigation at source with the aim of making improvements to biodiversity and water quality,</p> | <p>Agree. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed:</p> <p><b><u>4.f) Ensure that water quality on site will not deteriorate during and after completion of development and that opportunities to undertake improvements to watercourses and watercourse corridors are maximised.</u></b></p> <p><b><u>7.c) Protects water quality by ensuring the phased delivery of water, foul water and sewerage upgrades so that development does not outpace the delivery of necessary upgrades.</u></b></p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment  | WBC response   | Agreement or need for further discussion  |
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| <p>however there is no mention of adequate foul drainage provision to meet the growth delivered at this SDL. We suggest an additional section on water quality that highlights the need for development not to outpace the delivery of swage infrastructure or of foul water and sewerage upgrades. This is to ensure the sustainable discharges of wastewater from proposed development with the aim of protecting the water environment.</p>   |  |   |
| <p>Arborfield Sewage Treatment Works (STW) will receive the majority of flows from the developments proposed within this in this local plan including proposed growth within the SDL. Arborfield STW is already at its Dry Weather Flow (DWF) capacity and there is no headroom to accommodate additional flows. It also had a concerning number of spills in 2023 (52). The Water Cycle Study acknowledged that Arborfield STW will exceed its DWF permit as a result of the proposed development and must have treatment upgrades and/or apply for an increase in DWF permit. When proposals are brought forward at the planning application stage, we will object to the proposal on water quality and the protection of the water environment grounds until there is sufficient capacity at the receiving STW to ensure no deterioration in the water quality of the receiving WFD waterbody (Barkham Brook). This means as it stands, the Arborfield Green SDL – cannot be delivered and to progress means the plan will be contrary to advice in national policy (NPPF paragraph 180e). We would like to see improvements to STW</p> | <p>WBC shared Thames Water’s Reg 19 representations in this regard with the EA on 10 December 2024. WBC sought further confirmation that the upgrades were funded and Thames Water confirmed in December 2024 that Arborfield has a growth scheme in AMP8 to build capacity up to 2036. When the business plan was prepared this was based on 4,800 new homes between 2024-2036.</p> <p>Note that sites along Nine Mile Ride, and Arborfield Green SDL likely to feed into Arborfield STW.</p> <p>WBC consider that the relevant proposed allocations equate to fewer than 4,800 homes and therefore planned capacity would be sufficient.</p> <p>In addition to the above, the EA sought additional assurance in February 2025 from Thames Water that improvements at Arborfield have been funded and have a secured delivery profile. Thames Water confirmed on 13 February that in relation to Arborfield STW, the final determination has included funding for this scheme for delivery in AMP8 (2025-2030).</p> | <p>This matter was discussed at a meeting on 6 March 2025. Action for the EA to engage with WBC and Thames Water and for the parties to continue engagement on this matter as and when additional information is available.</p> |

| Summary of EA comment  | WBC response  | Agreement or need for further discussion  |
|--|---|---|
| <p>including a phased delivery of improvements as required to ensure it accommodate the proposed growth within the Arborfield Green SDL. We are happy to work with you to address these issues of concern.</p>   | <p>WBC signed a SoCG with TW in February 2025 that states there are no known significant water supply, waste water or sewage treatment capacity issues that would prevent, or delay the delivery of the site allocations proposed in the plan. The EA intend to engage with WBC and Thames Water to seek further information on the project with further discussions between all the parties as appropriate. This SoCG has been finalised with the EA recognising that the parties have different positions on this matter.</p>   |   |
| <p>The site geology is London Clay therefore infiltration SUDs are unlikely to be suitable for any drainage needs. Penetration of the London Clay to achieve soakage will not be acceptable. This should be acknowledged in the site delivery requirements to ensure the protection of ground water.</p> | <p>WBC considers this to be a clarity rather than a soundness issue. There will be a need for site specific FRAs at the application stage and separate SuDS guidance exists that will need to be considered, which prioritises use of infiltration SuDS first in the SuDS train. Without certainty at this stage that infiltration SuDS are not appropriate across all parts of the site, it is not considered reasonable to preclude their use. The current policy allows for a flexible approach to drainage solutions, which is essential given the variability in site conditions across this strategic site. The suitability of infiltration SuDS can only be accurately determined through detailed site investigations, including geotechnical and hydrogeological assessments. These assessments are typically carried out during the planning application stage. The EA and other relevant bodies provide input during the planning application process, ensuring that drainage solutions are appropriate and do not pose a risk to the environment.</p> <p>Therefore, it is not considered necessary to include that level of prescription in the site specific policy. Modifications are recommended to policy FD2 elsewhere</p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |



| Summary of EA comment   | WBC response   | Agreement or need for further discussion  |
|---|--|---|
|   | in this table to reflect the principles of infiltration SuDS being considered on a case by case basis.   |   |
| <p>To ensure the watercourses will be adequately protected these principles should be strengthened by an additional point in the Biodiversity section (8) to highlight the importance of ecological buffer zones along the watercourses and the requirement of any new watercourse crossings to minimise negative impact on both the channel and corridor. The proposed plan for this development includes several new watercourse crossing points and the need to minimise both the number and the negative impact from them should be highlighted as part of the Design Principles/development requirement for the site and its policy SS11. We suggest an additional point 8 c): <i>‘Provide measures to avoid and mitigate the impact of development on new watercourse crossings on both the channel and the river corridor as well as ensure recreational activity will be balanced with the needs of wildlife through careful management of blue and green corridors.’</i></p> | <p>Policy FD3 ensures that development proposals recognise the special contribution of rivers and watercourses through their conservation and enhancement. Part 2d) of Policy FD3 requires, where appropriate, development proposals to provide or retain an undeveloped buffer zone from a river or watercourse. This is therefore considered a clarity rather than soundness issue when considering the plan as a whole. Notwithstanding, the following proposed modification is considered appropriate to provide further clarity for this strategic site:</p> <p><b><u>“8.c) Provide measures to avoid and mitigate the impact of development on new watercourse crossings on both the channel and the river corridor as well as ensure recreational activity will be balanced with the needs of wildlife through careful management of blue and green corridors.”</u></b></p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |
| <p>A1.6h) it would be useful to explain whether all areas of surface water flood risk (i.e. all events) will be left free of development? It is currently not clear that this is the case.</p>  | <p>Disagree that additional clarity is required. The existing wording states ‘surface water corridors should be left free of development’. This wording isn’t prescriptive on how SW flood risk will be managed and this is for the FRA to consider in detail and justify at the application stage.</p>  | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |
| <b>SS12: South Wokingham SDL</b>  |  |   |
| <p>Point 4e) states – <i>‘Locate new buildings outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas of flood risk’</i> This</p>   | <p>Agree. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed:</p>   | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment   | WBC response  | Agreement or need for further discussion  |
|---|---|---|
| <p>should relate to all sources of flooding. Point 4d should be amended to read;</p> <p><i>'Locate new buildings outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas <b>of all sources</b> of flood risk.'</i></p>   | <p><i>"4.e) Locate new buildings outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas of flood risk <b>from all sources.</b>"</i></p>   |   |
| <p>In regard to flood risk, the site (ref: 5WW030 – Land South of Waterloo Road – site shown on page 78 of the plan) is partially located in the 1 in 100 year plus climate change flood extent. It is therefore required that an assessment is undertaken and included within the Level 2 SFRA to determine if safe access and egress will be possible. As the development will all be steered to Flood Zone 1 and we assume that access/egress will be through Flood Zone 1 we request that this information is detailed in the SFRA to demonstrate that the exception test can be passed and that the site is deliverable.</p> | <p>Modest area associated with the Emm Brook covered by 1 in 100 yr plus climate change flood extent. At this stage, the Level 2 SFRA is carried out on the provision of a red line boundary and identifies potential restrictions or mitigations which can support the allocations process. The detail of site masterplanning was not available to JBA at SFRA stage. Level 2 SFRA Appendix A site tables identify any foreseeable key issues with local roads and potential access routes, citing maximum hazard and velocity where relevant. JBA expect that the site-specific FRA should demonstrate where access/egress is proposed and demonstrate that it is safe based on the specific proposals. Ultimately, even if a site is surrounded by high risk, there are ways in which a developer could make safe access possible. Therefore, consider it to be the role of the FRA.</p> <p>Following further review of SFRA Level 2 mapping post Reg 19 consultation, the EA are satisfied that it is likely that a safe route of access and egress will be possible from the new dwellings to Easthampstead Road or Waterloo Road located in Flood Zone 1. The EA expects that an assessment of flood hazard should be detailed within the site-specific FRA, which will be for the applicant to consider.</p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment  | WBC response   | Agreement or need for further discussion  |
|--|--|---|
|  | <p>The following modification is proposed to development guidelines (Appendix B of the plan) for additional clarity:</p> <p><i>“B3.9 d) Address the potential changes associated with climate change and flood risk, providing safe access and egress <b><u>(through an assessment of flood hazard within the site specific FRA)</u></b>, taking into account potential increases in severity and frequency of flooding, and ensure buildings and homes are designed to be safe for the intended lifetime. A comprehensive and integrated site-wide sustainable drainage network must be provided that makes use of the existing topography and natural features of the site. All opportunities should be further explored to achieve flood betterment, reducing risk within and beyond the SDL.</i></p> |   |
| <p>The place making principles Point 4f states; ‘<i>Draw on the recreational and ecological opportunities of the Emm Brook and its tributary by utilising its role and function in natural flood management and biodiversity enhancement; and increasing accessibility to watercourses as part of the provision of a continuous, high quality and attractive and accessible open space network</i>’. Nonetheless there is no explicit mention of improving or ensuring no deterioration in water quality during and after development.</p> | <p>Agree. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed:</p> <p><b><u>4.g) Ensure that water quality will not deteriorate on site during and after completion of development and that opportunities to undertake improvements to watercourses and watercourse corridors are maximised.</u></b></p>   | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |
| <p>The policy requirement should also include proposals to ensure the Emm Brook (physical, ecology and/or chemical) WFD/RBMP status does not further deteriorate but rather improve the WFD status of the watercourse. We suggest an additional point 7 c)</p>   | <p>Agree. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed which in part replicates the existing wording in Policy FD3:</p> <p><b><u>7.c) Protects water quality by ensuring the phased delivery of water, foul water and sewerage upgrades so</u></b></p>  | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment   | WBC response   | Agreement or need for further discussion  |
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| <p><i>'Provide measures to ensure the status of watercourses do not deteriorate but is enhanced/improved.'</i></p> <p>In point 7 a), we are pleased to see that there will be a provision of a SuDS drainage scheme including mitigation at source with the aim of making improvements to biodiversity and water quality, however there is no mention of adequate foul drainage provision to meet the growth delivered at this SDL. We suggest an additional section on water quality that highlights the need for development not to outpace the delivery of swage infrastructure or of foul water and sewerage upgrades is added to this policy. This is to ensure the sustainable discharges of wastewater from proposed development with the aim of protecting the water environment.</p> | <p><b><u>that development does not outpace the delivery of necessary upgrades. This should include demonstrating how development proposals will support the achievement of Water Framework Directive (WFD) objectives, and guidance set out any relevant catchment management plans.</u></b></p>   |   |
| <p>The Wokingham Sewage Treatment Works (STW) would receive wastewater from proposed development within the South Wokingham SDL. The Wokingham STW the has the capacity to receive the flows from the proposed development currently, however the LPA should be aware this is not a guarantee of headroom when the developments are built. It should be a requirement for every planning application for development within this SDL to ensure there is sufficient capacity for wastewater discharges at the Wokingham STW prior to development. We would like to see improvements to STW infrastructure which including a phased delivery of improvements as</p>   | <p>WBC shared Thames Water's Reg 19 representations in this regard with the EA on 10 December 2024. Consider this to be a clarity rather than a soundness issue given identified capacity. Notwithstanding, the suggested modification to add additional criterion 7.c) above is considered to cover this point, replicated as follows:</p> <p><b><u>7.c) Protects water quality by ensuring the phased delivery of water, foul water and sewerage upgrades so that development does not outpace the delivery of necessary upgrades. This should include demonstrating how development proposals will support the achievement of Water Framework Directive (WFD)</u></b></p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment  | WBC response  | Agreement or need for further discussion  |
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| required. The LPA would have to work with the sewage undertaker to come to a resolution.   | <b><u>objectives, and guidance set out any relevant catchment management plans.</u></b>   |   |
| <p>In Appendix B, We are pleased to note that Concept Rationale B3.8c) requires the design <i>“To provide a continuous, connected and multi-functional network of green and blue infrastructure, with high quality, safe and accessible open space, to include SuDS, SANG and sports provision, which are connected and integrated into the wider network and take advantage of the corridor of the Emm Brook and its tributaries and their role in flood water attenuation and potential for enhanced biodiversity.”</i> The Emm Brook is a significant length within the red line boundary of the South Wokingham SDL. In order that the watercourse and associated buffer zone will be adequately protected the SDL delivery principles should include an additional point to require any new watercourse crossing to minimise negative impact on both the channel and river corridor. We suggest an additional point 8 c in the policy SS12 under ‘Biodiversity’: <i>‘Provide measures to avoid and mitigate the impact of development on new watercourse crossings on both the channel and the river corridor.’</i></p> | <p>Policy FD3 ensures that development proposals recognise the special contribution of rivers and watercourses through their conservation and enhancement. Part 2d) of Policy FD3 requires, where appropriate, development proposals to provide or retain an undeveloped buffer zone from a river or watercourse. This is therefore considered a clarity rather than soundness issue when considering the plan as a whole. Notwithstanding, the following proposed modification is appropriate to provide further clarity for this strategic site. This includes additional wording to the EA’s suggested modification for consistency with the proposed modification to SS11:</p> <p><b><u>“8.c) Provide measures to avoid and mitigate the impact of development on new watercourse crossings on both the channel and the river corridor as well as ensure recreational activity will be balanced with the needs of wildlife through careful management of blue and green corridors.”</u></b></p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |
| <b>SS13: Loddon Valley Garden Village SDL</b>  |   |   |
| <p>We are pleased to see the phased delivery of foul water and sewerage upgrades is required as part of the development (pg. 84, section 13). The Wargrave STW will be receiving flows from 885 dwellings. It currently has the required headroom for these developments, but the LPA should be aware that this is not a guarantee of headroom when the</p>  | <p>Support for the wording of section 13 of policy SS13 noted and welcomed. WBC shared Thames Water’s Reg 19 representations in this regard with the EA on 10 December 2024. Given the applicant will need to secure permissions from the necessary sewerage undertaker, the existing policy wording at part 13 is considered sufficient and</p>  | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment   | WBC response   | Agreement or need for further discussion  |
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| <p>developments are built, especially due to the cumulative impact of proposed developments from both Wokingham and Reading local plans. The 2024 Water cycle study evidence base predicted that Wargrave STW may exceed their dry weather flow permit in the future due to the combination of both Wokingham and Reading local plans. If there is no capacity at the Wargrave STW, we will object to planning applications for proposed development within the SDL. It should therefore be a requirement for every planning application for development within this SDL to ensure there is sufficient capacity for wastewater discharges at the Wargrave STW prior to development. This should be included as a requirement for development in this SDL.</p> | <p>consistent with the modifications posed to SS11 and SS12 above.</p> <p>WBC signed a SoCG with TW in February 2025 that states there are no known significant water supply, waste water or sewage treatment capacity issues that would prevent, or delay the delivery of the site allocations proposed in the plan.</p>  |   |
| <p>There is little opportunity for infiltration SuDS due to high groundwater levels in the Loddon Valley Garden Village SDL. This should be acknowledged, and we suggest that this is included in the site requirements.</p>  | <p>WBC considers this to be a clarity rather than a soundness issue. There will be a need for site specific FRAs at the application stage and separate SuDS guidance exists that will need to be considered, which prioritises use of infiltration SuDS first in the SuDS train. Without certainty at this stage that infiltration SuDS are not appropriate across all parts of the site, it is not considered reasonable to preclude their use. The current policy allows for a flexible approach to drainage solutions, which is essential given the variability in site conditions across this strategic site. The suitability of infiltration SuDS can only be accurately determined through detailed site investigations, including geotechnical and hydrogeological assessments. These assessments are typically carried out during the planning application stage. The EA and other relevant bodies provide input during the planning application</p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |



| Summary of EA comment  | WBC response   | Agreement or need for further discussion   |
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|  | <p>process, ensuring that drainage solutions are appropriate and do not pose a risk to the environment.</p> <p>Therefore, it is not considered necessary to include that level of prescription in the site specific policy. Modifications are recommended to policy FD2 elsewhere in this table to reflect the principles of infiltration SuDS being considered on a case by case basis.</p>   |  |
| <p>Point 3i) states: <i>‘Locate new buildings, except those for water compatible uses, outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas of flood risk.’</i> We are pleased that all new buildings will be located outside of flood risk areas. This should relate to all sources of flooding. Point 3i) should be amended to read;<br/><i>‘Locate new buildings, except those for water compatible uses, outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas of <b><u>all sources of flood risk</u></b></i></p> | <p>Agree. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed:</p> <p><i>“3.i) Locate new buildings, except those for water compatible uses, outside areas of flood risk, with development planned for sequentially, by placing the most vulnerable development in the lowest areas of flood risk <b><u>from all sources;</u></b>”</i></p>   | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p>  |
| <p>As the site is located in the 1 in 100 year plus climate change flood extent an assessment should be included within the Level 2 SFRA to determine if safe access and egress will be possible. Currently we are unsure if safe access and egress is achievable (as no hazard rating has been calculated) and therefore whether the exception test can be passed, and if the site is deliverable.</p>  | <p>At this stage, the Level 2 SFRA is carried out on the provision of a red line boundary and identifies potential restrictions or mitigations which can support the allocations process. The detail of site masterplanning was not available to JBA at SFRA stage. Level 2 SFRA Appendix A site tables identify any foreseeable key issues with local roads and potential access routes, citing maximum hazard and velocity where relevant. JBA expect that the site-specific FRA should demonstrate where access/egress is proposed and demonstrate that it is safe based on the</p> | <p>This matter was discussed at a meeting between the parties on 6 March 2025, where WBC explained that engagement with the site promoter had confirmed the need to account for the upper allowance impacts of climate change at the application stage, and that this had been adequately covered in the SFRA. This approach was noted and agreed. No further action required.</p> |

| Summary of EA comment  | WBC response  | Agreement or need for further discussion  |
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|  | <p>specific proposals. Ultimately, even if a site is surrounded by high risk, there are ways in which a developer could make safe access possible. Therefore, consider it to be the role of the FRA.</p> <p>The EA sought clarification in February 2025 that there is a low hazard route from the site to an area wholly outside of the floodplain. This is confirmed to be the case and is agreed.</p> <p>The EA sought clarification in February 2025 that the upper end allowance for peak river flow has been assessed and treated as a 'sensitivity test' to help assess how sensitive a proposal is to changes in climate for different future scenarios. WBC provided previous email exchanges between January – April 2023 where it had been agreed with the EA that the SFRA appropriately considered the relevant upper end climate change allowances.</p> |   |
| <p>It would be helpful to explain which flood zones are included as 'higher flood risk' and 'lower flood risk'. We would expect that all new development is located in Flood Zone 1, please detail. Please include reference to the opportunities to de-culvert watercourses. It would be helpful to explain which flood zones are included as 'higher flood risk' and 'lower flood risk'. We would expect that all new development is located in Flood Zone 1, please detail.</p> | <p>As set out in the Sequential and Exception test, no development classified as 'more vulnerable' is proposed within FZ2, which accords with national policy. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed to development guideline B4.4 b) which should be read in conjunction with the proposed modification to part 3.i) of the policy set out above:</p> <p><i>B4.4. b) To ensure new buildings (except for compatible uses) are located outside of areas <del>of higher flood</del> <b>at risk of flooding from all sources</b>, placing the most vulnerable</i></p>   | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment  | WBC response   | Agreement or need for further discussion   |
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|  | <i>development in the lowest areas of flood risk <b><u>in accordance with national policy and guidance.</u></b></i>  |  |
| B4.5.l) – We request that opportunities to reduce off-site flooding are explored (i.e. NFM, attenuation etc.) and that opportunities are investigated to reduce flood risk (from all sources) on and off the site.   | Agreed – this is the intention of the requirement in development guidelines that: ‘ <i>All opportunities should be further explored to achieve flood betterment, reducing risk within and beyond the garden village.</i> ’ The EA subsequently confirmed in February 2025 that it was happy with this wording and therefore no further modifications considered necessary. It is noted that the EA would like to see examples, if possible, to demonstrate what is acceptable. However, given the detail of the measures to be implemented is still being investigated and considered, it is deemed premature and unjustified to include examples at this stage.   | This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.   |
| B4.7.y) We advise that new bridges (essential infrastructure) are kept to a minimum and are designed to be clear ‘open’ span. We advise that any bridge crossings and new road infrastructure over or through the floodplain will need to fully consider and mitigate the impacts on floodplain storage and flood flow routes up to the relevant 1 in 100 year plus appropriate allowance for climate change flood level. We advise that mitigation will need to be provided up to the appropriate 1 in 100 year plus climate change flood level (essential infrastructure) with the ‘upper end’ allowance also being tested to understand how sensitive the proposal is to changes in climate for different future scenarios. The design of any main river crossing and associated road infrastructure should also be discussed with the Environment Agency as early as possible, and any abutments set | Noted. This will be a matter for consideration through detailed design. WBC shared the promoter’s indicative bridge drawing with the EA on 10 December 2024, which showed a clear span bridge. However, this is early design stage and subject to change, for example, provision of open span design may not ultimately be preferable if there are opportunities for flood betterment downstream by holding water back through alternative design. It is acknowledged that engagement with the EA, supported by appropriate flood modelling, will be essential, and therefore the following modification to the development guidelines is proposed to highlight this point:<br><br><i>“B4.7. y) A new bridge over the River Loddon with an associated link road delivered from Loddon Valley Garden Village. <b><u>This will require early and detailed engagement with National Highways as well as the Environment</u></b></i> | This approach was discussed at a meeting between the parties on 6 March 2025, with the principle of keeping options open for delivering a bridge with a design that may lead to improved flooding offsite being understood and agreed. The parties, as well as the site promoters, will continue to liaise regarding the detailed design of bridge crossings, including through the planning application and permitting processes. |

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| <p>back from the edge of the watercourse in line with our requirements as it is likely that a Flood Risk Activity Permit (FRAP) from the Environment Agency will also be required. We also advise that fluvial flood modelling will likely be required to assess the impacts of the watercourse crossing(s) and test options to ensure that flood risk is not increased on or off the site.</p> | <p><b><u>Agency to ensure flood risk is not worsened by the design of the crossing and explore opportunities to reduce the risk of flooding to areas beyond the garden village. Detailed flood modelling will be required, as appropriate.”</u></b></p>  |   |
| <p><i>General site allocations comments (SS14)</i></p>  |  |   |
| <p>Development must ensure there is sufficient capacity at the receiving STW to ensure no deterioration in the water quality of the receiving WFD waterbody (Barkham Brook)</p>   | <p>WBC shared Thames Water’s Reg 19 representations in this regard with the EA on 10 December 2024. WBC sought further confirmation that the upgrades were funded and Thames Water confirmed in December 2024 that Arborfield has a growth scheme in AMP8 to build capacity up to 2036. When the business plan was prepared this was based on 4,800 new homes between 2024-2036.</p> <p>Note that sites along Nine Mile Ride, and Arborfield Green SDL likely to feed into Arborfield STW.</p> <p>WBC consider that the relevant proposed allocations equate to fewer than 4,800 homes and therefore planned capacity would be sufficient.</p> <p>In addition to the above, the EA sought additional assurance in February 2025 from Thames Water that improvements at Arborfield have been funded and have a secured delivery profile. Thames Water confirmed on 13 February that in relation to Arborfield STW, the final determination has included funding for this scheme for delivery in AMP8 (2025-2030).</p> | <p>This matter was discussed at a meeting on 6 March 2025. Action for the EA to engage with WBC and Thames Water and for the parties to continue engagement on this matter as and when additional information is available.</p> |

| Summary of EA comment   | WBC response  | Agreement or need for further discussion |
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|   | <p>WBC signed a SoCG with TW in February 2025 that states there are no known significant water supply, waste water or sewage treatment capacity issues that would prevent, or delay the delivery of the site allocations proposed in the plan. The EA intend to engage with WBC and Thames Water to seek further information on the project with further discussions between all the parties as appropriate. This SoCG has been finalised with the EA recognising that the parties have different positions on this matter.</p>   |  |
| <p>Confirmation required in the SFRA that safe access and egress can be achieved in the event of a 1 in 100 year plus climate change flood event (multiple sites) in order to confirm that the exception test can be passed</p> | <p>At this stage, the Level 2 SFRA is carried out on the provision of a red line boundary and identifies potential restrictions or mitigations which can support the allocations process. The detail of site masterplanning was not available to JBA at SFRA stage. Level 2 SFRA Appendix A site tables identify any foreseeable key issues with local roads and potential access routes, citing maximum hazard and velocity where relevant. JBA expect that the site-specific FRA should demonstrate where access/egress is proposed and demonstrate that it is safe based on the specific proposals. Ultimately, even if a site is surrounded by high risk, there are ways in which a developer could make safe access possible. Therefore, consider it to be the role of the FRA.</p> <p>Following the meeting of 4<sup>th</sup> December, WBC reshared the appropriate SFRA interactive mapping for EA review and the list of sites where potential concern may remain was narrowed to the following:</p> | <p>No further action required</p>        |

| Summary of EA comment | WBC response   | Agreement or need for further discussion  |
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|                       | <ul style="list-style-type: none"> <li>• SS14.11 (5SH025) – Land North of Arborfield Road: WBC considers that safe access and egress can be achieved based on the SFRA evidence. Whether the applicant’s flood modelling is fit for purpose on live application (ref: 242484) is a matter for the EA and applicant.</li> <li>• SS14.12 (5SH023, 5SH027) - Land East and West of Hyde End Road. WBC notes the EA’s latest position that safe access and egress can be achieved. The following development guideline for the site (Appendix E of the plan) is proposed to ensure this is appropriately evidenced at the application stage:<br/><br/> <u>“Demonstrate safe access and egress (through an assessment of flood hazard within the site-specific FRA)”</u></li> <li>• Land at Bridge Farm, Twyford (SS14.19) – agreement that the site benefits from planning permission</li> <li>• Land off Poplar Lane and Watmore Lane, Winnersh (SS14.21) – agreement that the site benefits from planning permission</li> <li>• SS14.23 (5WI008) - Winnersh Plant Hire, Reading Road, Winnersh: WBC note the EA’s comments as follows: <i>We have reviewed the flood risk mapping (site ref: 5WI008) within Appendix D of the Level 2 SFRA and the information within the Detailed Site Summary Table within Appendix A of the Level 2 SFRA for this site (site code: 5WI008). The GeoPDF map for the site includes flood depths for the 1%</i></li> </ul> | <p>No further action required.</p> <p>No further action required.</p> <p>No further action required.</p> <p>No further action required.</p> <p>WBC to explore additional evidence, including engagement with the landowner.</p> |



| Summary of EA comment  | WBC response  | Agreement or need for further discussion  |
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|  | <p><i>AEP plus 46% allowance for climate change flood event but does not include Fluvial Flood Hazard Mapping. As the site is located in the 1% AEP plus climate change flood extent an assessment should be included within the Level 2 SFRA to determine if safe access and egress will be possible. Currently this information has not been included within Appendix D (the flood risk mapping) or Appendix A (Detailed Site Summary Table) and therefore we are not certain whether safe access and egress will be possible from the site to an area wholly outside of the floodplain. Therefore, we request that this assessment is undertaken as part of the Local Plan Update to determine if the site is deliverable in line with planning policy. The following additional development guideline is proposed in appendix E of the plan: <b><u>Demonstrate that safe access and egress is achievable during surface water flood events for both residents and emergency vehicles</u></b></i></p> <ul style="list-style-type: none"> <li>SS14.26 (5WK045) - Bridge Retail Park, Finchampstead Road, Wokingham: Agreement that and assessment of safe access and egress is not required.</li> </ul> | <p>No further action required.</p>  |
| <p>Comment in relation to specific site allocations and generally about development in FZ1 that where a watercourse is present, a buffer should be incorporated either side of present watercourses and that opportunities for environmental enhancements are taken.</p> | <p>Requirement for a buffer included within policy FD3: River corridors and watercourses, part 2. d). Requirements for natural enhancements also included in 2.c). Plan should be read as a whole so no further reference considered necessary.</p>   | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |
| <p>Comments about the suitability of infiltration SuDs for various sites</p>   | <p>Consider this to be a clarity rather than a soundness issue. There will be a need for site specific FRAs at the application</p>  | <p>This approach was discussed and agreed at a meeting between the</p>  |

| Summary of EA comment                        | WBC response  | Agreement or need for further discussion  |
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|  | <p>stage and separate SuDS guidance exists that will need to be considered. Not considered necessary to include that level of prescription in the policy.</p> <p>WBC considers this to be a clarity rather than a soundness issue. There will be a need for site specific FRAs at the application stage and separate SuDS guidance exists that will need to be considered, which prioritises use of infiltration SuDS first in the SuDS train. Without certainty at this stage that infiltration SuDS are not appropriate across all parts of specific sites, it is not considered reasonable to preclude their use. The current policy allows for a flexible approach to drainage solutions, which is essential given the variability in site conditions across the borough. The suitability of infiltration SuDS can only be accurately determined through detailed site investigations, including geotechnical and hydrogeological assessments. These assessments are typically carried out during the planning application stage. The EA and other relevant bodies provide input during the planning application process, ensuring that drainage solutions are appropriate and do not pose a risk to the environment.</p> <p>Therefore, it is not considered necessary to include that level of prescription in site-specific policy / development guidelines. Modifications are recommended to policy FD2 elsewhere in this table to reflect the principles of infiltration SuDS being considered on a case by case basis.</p> | <p>parties on 6 March 2025, including the EA being satisfied that proposed site capacities have appropriately taken into account the need for space for drainage and SuDS features. No further action required.</p> |
| No hazard rating calculated for site SS14.11 | The site was judged as 'amber' flood risk in the Level 2 SFRA sifting process and not progressed to detailed Level 2 assessment (instead see Lv2 appendix C). WBC   | This was discussed at a meeting between the parties on 6 March 2025, with the EA to continue to provide input   |

| Summary of EA comment  | WBC response   | Agreement or need for further discussion  |
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|  | subsequently provided a hazard map for the site which was shared with the EA.  | into the live planning application. No further action required.   |
| <i>SS15 – Securing Infrastructure</i>  |  |   |
| <p>There is currently no evidence available to show that a number of the housing allocations in the Local Plan can be delivered without impacting water quality, in particular concerns with capacity at the Arborfield STW. Request work to understand the scale of the impacts from future development, and to see evidence/information that demonstrates that there are solutions that are technically possible and deliverable within reasonable timescales.</p> | <p>Not considered a soundness issue for the policy requiring specific modification. Consider WCS to be robust, and the representation does not dispute this, rather it seeks assurance around capacity and of upgrades in certain instances.</p> <p>TW have confirmed Arborfield has a growth scheme in AMP8 to build capacity up to 2036. When the business plan was prepared this was based on 4,800 new homes between 2024-2036.</p> <p>WBC consider that the relevant proposed allocations equate to fewer than 4,800 homes and therefore planned capacity would be sufficient.</p> <p>In addition to the above, the EA sought additional assurance in February 2025 from Thames Water that improvements at Arborfield have been funded and have a secured delivery profile. Thames Water confirmed on 13 February that in relation to Arborfield STW, the final determination has included funding for this scheme for delivery in AMP8 (2025-2030).</p> <p>WBC signed a SoCG with TW in February 2025 that states there are no known significant water supply, waste water or sewage treatment capacity issues that would prevent, or delay the delivery of the site allocations proposed in the plan. The EA intend to engage with WBC and Thames</p> | <p>This matter was discussed at meeting on 6 March 2025. Action for the EA to engage with WBC and Thames Water and for the parties to continue engagement on this matter as and when additional information is available.</p> |

| Summary of EA comment   | WBC response   | Agreement or need for further discussion   |
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|   | Water to seek further information on the project with further discussions between all the parties as appropriate. This SoCG has been finalised with the EA recognising that the parties have different positions on this matter.   |  |
| <i>CE2 – Environmental standards for non-residential development</i>  |  |  |
| Support expressed for the range of greywater recycling measures and lower water consumption targets included within the policy. | Support noted and no changes required.   | No further action required.  |
| <i>CE3 – Environmental standards for residential development</i>  |  |  |
| Support expressed for the range of greywater recycling measures and lower water consumption targets included within the policy. | Support noted and no changes required.   | No further action required.  |
| <i>C4 - Green and blue infrastructure and public rights of way</i>  |  |  |
| Support expressed for this policy   | Support noted and no changes required.   | No further action required.  |
| <i>H11 – Houseboat moorings</i>   |  |  |
| Lack of consideration of flood risk.  | Agree. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed:<br><br>“1.h)There would be no unacceptable impact <b>on flood risk nor</b> on biodiversity of the water course, its margins and nearby areas of nature conservation; | This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required. |
| <i>FD1 - Development and flood risk (from all sources)</i>  |  |  |
| The policy does not specifically reference functional floodplain, which is a missed opportunity. This could                     | Agree. While WBC considers this to be a clarity rather than a soundness issue, particularly when the plan is read as a whole, the following modification is proposed:  | This approach was discussed and agreed at a meeting between the  |

| Summary of EA comment   | WBC response  | Agreement or need for further discussion  |
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| <p>have been mentioned under Point 2 of policy FD1. We suggested point 2 is reworded to read;</p> <p><i>2. Development proposals in Flood Zones 2 or 3 <b>and 3b (functional floodplain)</b> must take into account the vulnerability of proposed development.</i></p>  | <p><i>“2. Development proposals in Flood Zones 2 or 3 (<b>including Flood Zone 3b the functional floodplain</b>) must take into account the vulnerability of proposed development.”</i></p>   | <p>parties on 6 March 2025. No further action required.</p>   |
| <p><b>FD2 – Sustainable drainage</b></p>  |   |   |
| <p>Policy doesn't consider the limitations of infiltration SuDS in certain circumstances. We suggest an additional bullet point is added under point 2 of the policy and suggest this wording:<br/><i>'Avoid the use of infiltration SuDs to manage surface water runoff and the discharge of foul/trade effluent to ground.'</i></p> | <p>WBC considers this to be a clarity rather than a soundness issue. There will be a need for site specific FRAs at the application stage and separate SuDS guidance exists that will need to be considered, which prioritises use of infiltration SuDS first in the SuDS train in order to manage surface water runoff. Without certainty at this stage that infiltration SuDS are not appropriate across all parts of specific sites, it is not considered reasonable to preclude their use in principle in this policy. The current wording allows for a flexible approach to drainage solutions, which is essential given the variability in site conditions across the borough. The suitability of infiltration SuDS can only be accurately determined through detailed site investigations, including geotechnical and hydrogeological assessments. These assessments are typically carried out during the planning application stage. The EA and other relevant bodies provide input during the planning application process, ensuring that drainage solutions are appropriate and do not pose a risk to the environment. Further, the recommended mod doesn't take account of circumstances where infiltration SuDS are appropriate to manage flood risk, so we'd question whether the recommended approach is sound.</p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment   | WBC response  | Agreement or need for further discussion  |
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|   | <p>It is however noted that from a water quality perspective, it is important to protect groundwater sources where appropriate. The EA's suggested modification is part accepted and proposed to be made as follows:</p> <p><b><u>Avoid the use of infiltration SuDs to manage the discharge of foul/trade effluent to ground.</u></b></p> <p>Additional supporting text is proposed as follows:</p> <p><b><u>"10.17 The Council supports the use of SuDS in new developments, where appropriate, to manage surface water run-off and reduce flood risk. SuDS are the first choice for managing surface water. Their design should be carefully considered from the early design stages of proposed developments. The specific type of SuDS to be used will be determined on a site-by-site basis, taking into account local conditions such as geology, groundwater levels, and contamination risks. The Council will work with developers, the EA, and other relevant bodies to ensure that the most appropriate drainage solutions are implemented, in line with national guidance and best practice."</u></b></p> |   |
| <i>FD3 – River corridors and watercourses</i>   |   |   |
| <p>We are pleased to see consideration given to: ecological buffers, conservation and enhancement of natural watercourse banks, restoration of natural elements, reference to Water Framework Directive (WFD) and Thames River Basin Management plan, and local catchment management plans and also of culverts and de-culverting. Point 4 states; <i>The</i></p> | <p>Support noted.</p> <p>The policy states that the culverting of watercourses should be avoided where possible. The council is satisfied that the policy provides an appropriate basis for assessing planning applications and that the further advice on the</p>  | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |

| Summary of EA comment   | WBC response  | Agreement or need for further discussion |
|---|---|--|
| <p><i>culverting of any watercourses should be avoided where possible, and opportunities for the de-culverting of watercourses should be actively explored and pursued.</i> As it is stated that the culverting of any watercourses should be avoided where possible, the policy or the justification notes should set out when culverting would be acceptable. For example, it may be that culverting would only be accepted for essential access where it is shown that a bridge cannot be installed, and demonstrated the structure does not increase flood risk</p> | <p>circumstances where culverting would be acceptable is unnecessary.</p> |  |
| <p><i>NE1 – Biodiversity and geodiversity</i></p>   |   |  |
| <p>Support expressed regarding recognition in the policy of the importance of connectivity, buffers, invasive species and linkages to biodiversity strategies</p>   | <p>Support noted and no changes required.</p>                             | <p>No further action required.</p>       |
| <p><i>NE2 – Biodiversity net gain</i></p>   |   |  |
| <p>Support expressed for this policy</p>  | <p>Support noted and no changes required.</p>                             | <p>No further action required.</p>       |
| <p><i>NE3 – Thames Basin Heaths Special Protection Area</i></p>   |   |  |
| <p>Support expressed for this policy</p>  | <p>Support noted and no changes required.</p>                             | <p>No further action required.</p>       |
| <p><i>HC7 – Light pollution</i></p>   |   |  |
| <p>Support expressed for this policy, particularly the requirement for a lighting appraisal</p>   | <p>Support noted and no changes required.</p>                             | <p>No further action required.</p>       |
| <p><i>HC9 – Contaminated land and water</i></p>   |   |  |
| <p>Support expressed for the policy requirement that development proposals will not be supported where unacceptable risk or harm from contamination would arise.</p>  | <p>Support noted and no changes required.</p>                             | <p>No further action required.</p>       |

| Summary of EA comment  | WBC response   | Agreement or need for further discussion  |
|--|--|---|
| <i>Miscellaneous</i>   |  |   |
| <p>Paragraph 9.102 states that gypsy and caravan sites are ‘more vulnerable’ in relation to flood risk – is this the correct classification or should it be ‘highly vulnerable as in Annex 3 of the NPPF.</p>      | <p>The intention of the wording was to describe in a general sense that Gypsy and Traveller development is more susceptible to flooding and AWE impacts than built forms of accommodation. It was not supposed to be a specific reference to flood risk vulnerability in NPPF / PPG classifications. Agree that the wording is misleading given ‘more vulnerable’ is a specific flood risk vulnerability classification in national policy / guidance, and caravans are actually specifically defined as ‘highly vulnerable’ i.e. at greater risk than the wording suggests. The following minor change is considered appropriate for clarification purposes:</p> <p><i>“Gypsy and Traveller sites are considered inappropriate development in the Green Belt (in accordance with the PPTS) and are <del>more vulnerable</del> <b>more at risk</b> in terms of <b>floodi</b>ng risk and with regard to the AWE offsite Emergency Plan <b>compared to other forms of accommodation...</b></i></p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |
| <i>SFRA</i>  |  |   |
| <p>Recommend that the plan or supporting evidence state in a logical place that developers will, at the application stage, need to assess whether existing modelling is suitable for use in site specific FRAs</p> | <p>SFRA Lv2 in section 3.13 Depth, velocity, and hazard to people states:</p> <p><i>‘As part of a site-specific FRA, developers will need to undertake more detailed hydrological and hydraulic assessments of the watercourses to verify flood depth, velocity and hazard based on the relevant 1% AEP plus climate change event, using the relevant climate change allowance based on the type of development and its associated vulnerability classification. Not all this</i></p>  | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. No further action required.</p> |



| Summary of EA comment | WBC response   | Agreement or need for further discussion |
|-----------------------|--|--|
|                       | <p><i>information is known at the strategic scale and the level of resolution may not be appropriate to enable site scale assessment of proposed development schemes.'</i></p> <p>While it is considered this point is adequately covered in the evidence base, it is agreed additional clarity could also be provided within the plan itself. The following addition to supporting text is recommended:</p> <p>New paragraph to be inserted after paragraph 10.12:<br/> <b><u>At the planning application stage, developers will need to assess whether existing modelling (as produced for the SFRA or available EA modelling) is suitable for use for site-specific flood risk assessments. Developers will need to undertake more detailed hydrological and hydraulic assessments of relevant watercourses to verify flood depth, velocity and hazard based on the relevant 1% AEP plus climate change event, using the relevant climate change allowance based on the type of development and its associated vulnerability classification. Any new hydrological and hydraulic modelling undertaken to support new development will need to be reviewed by the Environment Agency and where possible completed to the standards needed to update the Flood Map for Planning (Rivers and Sea). Not all this information is known at the strategic scale and the level of resolution may not be appropriate to enable site scale assessment of proposed development schemes. Regard should be had to Government Guidance 'Using modelling for flood risk assessments' or any successor guidance published.</u></b></p> |  |

| Summary of EA comment   | WBC response  | Agreement or need for further discussion  |
|---|---|---|
| <p>Within the SFRA Level 2, where there is fluvial flood risk, an assessment of the likely hazard on the site and along the route should be included. The hazard rating should be considered. Many of the sites being taken forward are Flood Zone 1 so will have low hazard access but for those with fluvial flood risk, a route should be identified and the likely flood hazard noted. Where a low hazard is not available, this should be explored within the SFRA Level 2 to demonstrate these sites can be delivered safely.</p>   | <p>The Level 2 SFRA Appendix A contains site summary tables for each site. This provides detailed description of fluvial flood hazard and the mapping at Appendix D also demonstrates this information, where available with the relevant flood model.</p>  | <p>It was agreed following a meeting on 4<sup>th</sup> December 2024 that this comment applied only to specific sites, and this is addressed elsewhere in this document, with actions falling to the applicant rather than the SFRA. No further action required.</p>  |
| <p>We note that the Level 1 SFRA states <i>'It should be noted that this assessment only identifies areas likely to be at risk of groundwater emergence and where this water might flow. It does not predict the likelihood of groundwater emerging or attempt to quantify the volumes of groundwater that might be expected to emerge in a given area...In high-risk areas, a site-specific risk assessment for groundwater flooding may be required to fully inform the likelihood of flooding.'</i></p> <p>Where the SFRA states a site-specific risk assessment for groundwater flooding may be required. Does this imply at the planning application stage or at the Level 2 SFRA stage?</p> | <p>Yes, this would be for an application FRA to demonstrate the detail, noting SFRAs are strategic documents. The SFRA methodology uses the JBA groundwater map which, whilst it's still not detailed, is one of the best datasets available for groundwater. JBA used this to understand likely areas of emergence, and then used the surface water flow paths and topography to identify areas that could be at risk from groundwater. In these cases, where development is proposed in areas at higher risk of groundwater emergence, the site layout should take into account any</p> | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. The EA recognised that the SFRA and LLFA had taken a robust and proportionate approach to the consideration of groundwater flooding, and that the monitoring required through development guidelines for particular sites is acceptable. It was agreed that groundwater flooding is the remit of the LLFA who is satisfied with the approach taken. No further action required.</p> |

| Summary of EA comment   | WBC response   | Agreement or need for further discussion   |
|---|--|--|
| <p>Where the Level 1 SFRA states ‘A more formal assessment of these sources is undertaken in a Level 2 SFRA and involves a more detailed assessment of the implications of reservoir, sewer, and groundwater flood risk to establish that more appropriate locations at lower risk are not available’. This more detailed assessment within the Level 2 SFRA documents (August 2023 and November 2021) seems to be limited.</p> | <p>depressions in topography or potentially identified flow paths to determine where the groundwater might flow to or pool, with advice provided in the Level 2 SFRA. This is an approach that JBA uses across all its SFRA. WBC is the LLFA with jurisdiction for groundwater flooding. The LLFA has endorsed the approach taken in the SFRA and Sequential and Exception Test and raised no objection to the allocation of specific sites with development guidelines requiring appropriate monitoring.</p> <p>Observation noted, including the context that the soundness of the SFRA approach is not being questioned. WBC has engaged extensively on the SFRA to date, and this point has not been raised before. WBC and the EA have a signed MoU agreeing that the SFRA is robust for the purposes of plan making and that it takes account of flood risk from all sources.</p> |  |
| <i>Sequential and Exception test</i>  |  |  |
| <p>Number of sites identified as high risk of groundwater flooding in the ST/ET, which are listed in the response.</p>  | <p>Majority of the listed sites are not proposed for allocation. Of the 7 listed that are, 3 have planning permission (5SW019, 5TW005/009/010, 5WI006) already. The other 4 have specific development guidelines requiring ‘appropriate groundwater monitoring is carried out over the winter months (1 October – 31 March) to inform site development and sewerage). These are 5FI032, 5RU008, 5SH023 &amp; 27, 5WI008. As an action from the meeting of 4 December, the LLFA investigated its flood reports database and confirmed that no flood incidents had been recorded at any of these sites. A surface water flood incident had</p>   | <p>This approach was discussed and agreed at a meeting between the parties on 6 March 2025. The EA recognised that the SFRA and LLFA had taken a robust and proportionate approach to the consideration of groundwater flooding, and that the monitoring required through development guidelines for particular sites is acceptable. It was agreed that groundwater flooding is the remit of the</p> |

| Summary of EA comment  | WBC response  | Agreement or need for further discussion   |
|--|---|--|
| <p>Sequential and Exception Test document suggests that <i>'Mitigation measures are put in place due to the susceptibility of the site from groundwater flooding.'</i> We feel this need further consideration.</p> <p>What mitigation would be appropriate to mitigate potential risk from groundwater emergence?</p> <p>What is the confidence of being able to mitigate these risks at detailed design?</p> <p>Has the SFRA sufficiently considered these risks prior to allocation for these sites that show the majority of the sites at high risk?</p> | <p>been reported approx. 400m SW of 5WI008 in 2007. In relation to 5SH023 &amp; 027 a surface water flood incident had been reported on Reading Road in 2013, which is approx. 500m to the north. There is no data to suggest flood incidents have occurred due to groundwater flooding.</p> <p>This is a strategic recommendation. The Council's response, in consultation with LLFA, has been to propose appropriate monitoring through development guidelines.</p> <p>Dependent on the nature of flood risk following detailed investigation. Mitigation to be tailored based on the monitoring data and detailed FRA, with input of specialists, at the point of application.</p> <p>LLFA have reviewed and recommended the evidence that would need to be produced at detailed design stage. Noting the other sustainable development credentials of the sites, including use of PDL in some cases, they have not raised showstopping concerns. All available data suggests an absence of flood incidents at the sites due to groundwater flooding. WBC is confident mitigation can be achieved.</p> <p>Not considered to be the role of the SFRA. The SFRA has been produced following JBA's standard methodology which has informed hundreds of adopted development plans. The Sequential and Exception Tests have considered this and development guidelines suggested in consultation with LLFA.</p> | <p>LLFA who is satisfied with the approach take. No further action required.</p> <p>No further action required.</p> <p>No further action required.</p> <p>No further action required.</p> <p>No further action required.</p> |

| Summary of EA comment   | WBC response   | Agreement or need for further discussion                              |
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| <p>How have these high-risk sites been appropriately weighting within the Sequential Test?</p> <p>Do these sites require monitoring or further assessment prior to being allocated to be confident that this will not present an issue?</p> | <p>Methodology doesn't include a scoring system to weight sites based on type of flood risk. Classified as low or high risk and then put into tables based on fluvial flood risk. Where high risk of GW flooding, this has been considered in the exception test as appropriate.</p> <p>No. Further monitoring required prior to permission being granted. The JBA groundwater monitoring needs to be supplemented by detailed investigation. It would not be appropriate to remove sites from allocation pending this investigation, especially where they are sustainable in all other metrics and where there is a lack of evidence of historic groundwater flooding.</p> | <p>No further action required.</p> <p>No further action required.</p> |

**Appendix B: Summary of EA representations on the specific proposed allocations**

| Site   | Allocated dwellings | Site constraints   | Site requirements to ensure deliverability  | WBC response  | Agreement or need for further discussion   |
|--|---------------------|--|---|---|--|
| SS14.1 - High Barn Farm, Commonfield Lane, Barkham | 20                  | <ul style="list-style-type: none"> <li>• FZ1.</li> <li>• Secondary A aquifer,</li> <li>• Arborfield STW</li> </ul> | <ul style="list-style-type: none"> <li>• Wastewater from the proposal must be discharged at the mains foul infrastructure due to sensitive ground water receptors present on site.</li> </ul> | <p>The following development guideline applies to the site: <i>“That appropriate groundwater monitoring is carried out over the winter months (1 October – 31 March) to inform site development and sewerage”</i>. WBC considers this requirement for additional monitoring to inform site sewerage addresses the point and notes that detailed design of wastewater discharge will be a matter for the planning application stage, with associated consultation with the EA and Lead Local Flood Authority as appropriate. This approach was discussed at a meeting on 6 March and no objection raised. Subsequently the EA suggested via email on 11 March that the following modification be made to the plan:</p> <p>“That appropriate groundwater monitoring is carried out over the winter months (1 October – 31 March) to inform site development</p> | <p>The parties agree that the EA’s suggested modification would provide additional clarity regarding wastewater discharge from the proposed site allocation.</p> |

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|   |    |  |  | <p>and sewerage. <b><u>In the first instance all developments must connect to the public sewer and only where this is not feasible would other options be considered.</u></b></p> <p>WBC has no objection to this suggestion, but notes the plan and schedule of proposed modifications have now been submitted.</p> <p>Capacity confirmed by Thames Water to WBC's satisfaction.</p> |   |
|   |    |  | <ul style="list-style-type: none"> <li>• Development must ensure there is sufficient capacity at the receiving STW to ensure no deterioration in the water quality of the receiving WFD waterbody (Barkham Brook)</li> </ul>   |   | <p>Action for the EA to engage with WBC and Thames Water and for the parties to continue engagement on this matter as and when additional information is available.</p>                                   |
| SS14.2 - Honeysuckle Lodge, Commonfield Lane, Barkham | 4  | <ul style="list-style-type: none"> <li>• FZ1.</li> <li>• Secondary A aquifer,</li> <li>• Arborfield STW</li> </ul> | <ul style="list-style-type: none"> <li>• Development must ensure there is sufficient capacity at the receiving STW to ensure no deterioration in the water quality of the receiving WFD waterbody (Barkham Brook)</li> </ul>   | <p>Capacity confirmed by Thames Water to WBC's satisfaction.</p>  | <p>Action for the EA to engage with WBC and Thames Water and for the parties to continue engagement on this matter as and when additional information is available.</p>                                   |
| SS14.3 - Woodlands Farm, Wood Lane, Barkham           | 15 | <ul style="list-style-type: none"> <li>• FZ1.</li> <li>• Secondary A aquifer,</li> <li>• Arborfield STW</li> </ul> | <ul style="list-style-type: none"> <li>• Development must ensure there is sufficient capacity at the receiving STW to ensure no deterioration in the water quality of the receiving WFD waterbody (Barkham Brook)</li> <li>• Ordinary watercourse(s) run through the site and therefore where possible we advise that</li> </ul> | <p>Capacity confirmed by Thames Water to WBC's satisfaction.</p> <p>Requirement for a buffer included within policy FD3: River corridors</p>  | <p>Action for the EA to engage with WBC and Thames Water and for the parties to continue engagement on this matter as and when additional information is available.</p> <p>No further action required</p> |

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|   |     |   | development buffers are incorporated either side of the watercourse(s)   | and watercourses, part 2. d). Plan should be read as a whole so no further reference considered necessary.  |  |
| SS14.4- Land west of Park Lane, Charvil                 | 61  | <ul style="list-style-type: none"> <li>• FZ 1</li> <li>• SPZ 3</li> <li>• Principal and Secondary A aquifer</li> </ul>          | <ul style="list-style-type: none"> <li>• Opportunities for enhancement of the ordinary watercourse running along the SE boundary of this site must not be missed and should be included within the masterplan to ensure that they are carried out as part of the development.</li> <li>• Not suitable for infiltration SuDs due to high groundwater levels. Any infiltration SuDs must be at surface or near surface.</li> </ul> | <p>Site has resolution to grant outline planning permission (reference 232704) for up to 75 dwellings, pending S106 agreement.</p> <p>WBC considers that this point is covered by proposed modifications to FD2, which provides flexibility for detailed investigation to inform the most appropriate SuDS strategy</p> | <p>No further action required</p> <p>No further action required</p>  |
| SS14.5 - 24 Barkham Ride, Finchampstead                 | 30  | <ul style="list-style-type: none"> <li>• FZ 1</li> <li>• Principal and Secondary A aquifer</li> <li>• Arborfield STW</li> </ul> | <ul style="list-style-type: none"> <li>• Development must ensure there is sufficient capacity at the receiving STW to ensure no deterioration in the water quality of the receiving WFD waterbody (Barkham Brook)</li> </ul>   | Capacity confirmed by Thames Water to WBC's satisfaction.   | Action for the EA to engage with WBC and Thames Water and for the parties to continue engagement on this matter as and when additional information is available. |
| SS14.7 - Greenacres Farm, Nine Mile Ride, Finchampstead | 100 | <ul style="list-style-type: none"> <li>• FZ1</li> <li>• Secondary A aquifer</li> <li>• Arborfield STW</li> </ul>                | <ul style="list-style-type: none"> <li>• Development must ensure there is sufficient capacity at the receiving STW to ensure no deterioration in the water quality of the receiving WFD waterbody (Barkham Brook)</li> </ul>   | Capacity confirmed by Thames Water to WBC's satisfaction.   | Action for the EA to engage with WBC and Thames Water and for the parties to continue engagement on this matter as and when additional information is available. |
| SS14.8- Hillside, Lower                                 | 15  | <ul style="list-style-type: none"> <li>• FZ1</li> </ul>   | <ul style="list-style-type: none"> <li>• Development must ensure there is sufficient capacity at the</li> </ul>  | Capacity confirmed by Thames Water to WBC's satisfaction.   | Action for the EA to engage with WBC and Thames Water and for  |



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| Wokingham Road, Finchampstead                            |     | <ul style="list-style-type: none"> <li>• Secondary A aquifer</li> <li>• Arborfield STW</li> </ul>  | receiving STW to ensure no deterioration in the water quality of the receiving WFD waterbody (Barkham Brook)  | Site has resolution to grant outline planning permission (reference 240803) for up to 18 dwellings, pending S106 agreement.  | the parties to continue engagement on this matter as and when additional information is available. |
| SS14.11 - Land north of Arborfield Road, Shinfield       | 191 | <ul style="list-style-type: none"> <li>• FZ 1, 2 and 3</li> <li>• Secondary A aquifer</li> <li>• Presence of an investigated site</li> </ul> | <ul style="list-style-type: none"> <li>• Site is located in the 1 in 100 year plus climate change flood extent therefore an assessment should be undertaken (in the SFRA) to determine if safe access and egress will be possible. Currently we are unsure if safe access and egress is achievable (as no hazard rating has been calculated) and therefore whether the exception test can be passed (we assume that the access/egress route will involve using the Eastern Relief Road which is impacted by Flood Zone 3).</li> </ul> | WBC considers that safe access and egress can be achieved based on the SFRA evidence. Whether the applicant's flood modelling is fit for purpose on live application (ref: 242484) is a matter for the EA and applicant. | No further action required.  |
| SS14.12 - Land east and west of Hyde End Road, Shinfield | 175 | <ul style="list-style-type: none"> <li>• FZ 1, 2 and 3</li> <li>• Secondary A aquifer</li> </ul>   | <ul style="list-style-type: none"> <li>• Site is located in the 1 in 100 year plus climate change flood extent therefore an assessment should be undertaken (in the SFRA) to determine if safe access and egress will be possible. As the development will all be steered to Flood Zone 1 and we assume that access/egress will be onto Hyde End Road (Flood Zone 1) we request that this information is detailed in the SFRA to</li> </ul>   | WBC notes the EA's latest position that safe access and egress can be achieved. A proposed modification to development guidelines suggested for additional clarity, as set out in Appendix A of this statement.          | No further action required.  |

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|   |     |  | demonstrate that the exception test can be passed and that the site is deliverable.  |   |                             |
| SS14.19 - Land at Bridge Farm, New Bath Road, Twyford | 200 | <ul style="list-style-type: none"> <li>FZ 1</li> </ul>   | <ul style="list-style-type: none"> <li>As the development will all be steered to Flood Zone 1 and we assume that access/egress will be onto New Bath Road – towards Hare Hatch (Flood Zone 1) we request that this information is detailed in the SFRA to demonstrate that the exception test can be passed and that the site is deliverable.</li> </ul>   | The site benefits from outline permission for up to 200 dwellings (reference 212720) granted July 2023.   | No further action required. |
| SS14.14 - 69 Kings Street, Sindlesham                 | 28  | <ul style="list-style-type: none"> <li>Secondary A aquifer,</li> <li>Presence of an investigated site</li> </ul> | <ul style="list-style-type: none"> <li>Not suitable for infiltration SuDs due to high groundwater levels. Any infiltration SuDs must be at surface or near surface.</li> <li>Ordinary watercourse(s) run through the site and therefore development buffers should be incorporated on either side of the watercourse(s)</li> <li>Opportunities environmental enhancements to reduce the risk of flooding on or off the site from all sources.</li> </ul> | <p>WBC considers that this point is covered by proposed modifications to FD2, which provides flexibility for detailed investigation to inform the most appropriate SuDS strategy</p> <p>Requirement for a buffer included within policy FD3: River corridors and watercourses, part 2. d). Plan should be read as a whole so no further reference considered necessary.</p> <p>The site benefits from outline permission for up to 28 dwellings (reference 231094) granted November 2024.</p> | No further action required. |
| SS14.21- Land off Poplar                              | 111 |  | <ul style="list-style-type: none"> <li>As the site is located in the 1 in 100 year plus climate change</li> </ul>  | The site benefits from outline permission for up to 234 dwellings   | No further access required. |

|   |    |  |   |   |  |
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| Lane and Watmore Lane, Winnersh   |    |  | flood extent an assessment should be included within the Level 2 SFRA to determine if safe access and egress will be possible. As the development will all be steered to Flood Zone 1 and we assume that access/egress will be through Flood Zone 1 (we are unsure which road will be used for access/egress) we request that this information is detailed in the SFRA to demonstrate that the exception test can be passed and that the site is deliverable. | (reference 230208) granted March 2024.  |  |
| SS14.22 - Land rear of the Bulldog garage and BP garage, Reading Road, Winnersh | 34 | <ul style="list-style-type: none"> <li>• Secondary A aquifer</li> <li>• Investigated site present</li> </ul> | <ul style="list-style-type: none"> <li>• Contamination likely to be present at site. No infiltration SuDs should be proposed. Opportunity available to remediate contamination</li> </ul>   | WBC considers that this point is covered by proposed modifications to FD2, which provides flexibility for detailed investigation to inform the most appropriate SuDS strategy   | No further action required.  |
| SS14.23 - Winnersh Plant Hire, Reading Road, Winnersh                           | 60 | <ul style="list-style-type: none"> <li>• FZ 2 and 3</li> <li>• Secondary A aquifer</li> </ul>                | <ul style="list-style-type: none"> <li>• Contamination likely to be present at site. No infiltration SuDs should be proposed. Opportunity available to remediate contamination</li> <li>• Safe access and egress is achievable up to the appropriate 1 in 100 year plus appropriate allowance for climate change</li> </ul>   | <p>WBC considers that this point is covered by proposed modifications to FD2, which provides flexibility for detailed investigation to inform the most appropriate SuDS strategy.</p> <p>The following addition to development guidelines in Appendix E of the plan is proposed:</p> <ul style="list-style-type: none"> <li>- <b><u>Demonstrate that safe access and egress is</u></b></li> </ul> | WBC to explore additional evidence, including engagement with the landowner. |

|   |    |  | flood level (please update Table E).  | <b><u>achievable during surface water flood events for both residents and emergency vehicles</u></b>   |                             |
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| SS14.24 - Woodside, Blagrove Lane, Wokingham                | 4  | <ul style="list-style-type: none"> <li>FZ1</li> </ul>  | <ul style="list-style-type: none"> <li>Ordinary watercourse(s) run through the site and therefore development buffers should be incorporated on either side of the watercourse(s)</li> <li>Opportunities environmental enhancements to reduce the risk of flooding on or off the site from all sources.</li> </ul>  | <p>Requirement for a buffer included within policy FD3: River corridors and watercourses, part 2. d). Plan should be read as a whole so no further reference considered necessary.</p> <p>Requirements for natural enhancements also included in policy FD3: River corridors and watercourses, part 2.c). Plan should be read as a whole so no further reference considered necessary.</p> | No further action required. |
| SS14.26 - Bridge Retail Park, Finchampstead Road, Wokingham | 59 | <ul style="list-style-type: none"> <li>FZ 1 and 3b (5% AEP)</li> <li>Site approx 10 metres from Emm Brook</li> </ul> | <ul style="list-style-type: none"> <li>The site is located in the 1 in 100 year plus climate change flood extent therefore an assessment should be included within the Level 2 SFRA to determine if safe access and egress will be possible. As the development will all be located outside of the 1 in 100 year plus appropriate allowance for climate change flood extent and we assume that access/egress will be through Flood Zone 1 (along Finchampstead Road towards Wokingham town) we request</li> </ul> | WBC notes the EA's latest position that an assessment of safe access and egress is not required.   | No further action required. |

|   |    |   |   |   |                             |
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|   |    |   | that this information is detailed in the SFRA to demonstrate that the exception test can be passed and that the site is deliverable.  |   |                             |
| SS14.29 - Station Industrial Estate, Oxford Road, Wokingham | 40 | <ul style="list-style-type: none"> <li>Secondary A aquifer</li> </ul> | <ul style="list-style-type: none"> <li>Contamination likely to be present at site. No infiltration SuDs should be proposed. Opportunity available to remediate contamination</li> </ul> | WBC considers that this point is covered by proposed modifications to FD2, which provides flexibility for detailed investigation to inform the most appropriate SuDS strategy | No further action required. |