



Environment Agency comments regarding Water Quality at Wokingham Borough Council to be considered.

We would like to raise this point below for the Inspectors awareness. This is in relation to water quality and we have been working closely with the LPA to address the issue of water quality.

Waste water from development in Wokingham District discharges to the Arborfield Sewage Treatment Works (STW) and then it discharges to the Barkham Brook. This watercourse is at Moderate Status according to the Water Framework Directive ecological classification. Data from the Catchment Data Explorer shows that Phosphate, and Macrophytes and Phytobenthos Combined are some of the 'Reasons for not achieving good' (RNAG) and 'reasons for deterioration' (RFD). Water industry discharges are attributed as the activity responsible for these elements not meeting 'Good' status.

Under the Water Environment (Water Framework Directive) Regulations 2017, there is a requirement for water bodies not to deteriorate and to achieve 'good status' by 2027. Under Regulation 33, local planning authorities as 'public bodies and the Environment Agency as a planning advisor must have regard to these requirements as they are part of river basin management plans. Also under the National Planning Policy Framework, there is a requirement for plans and planning decisions to not result in unacceptable levels of water pollution (para 187e).

Through our engagement with the Wokingham Borough Council on their local Plan review process, we are aware that Thames Water confirmed in December 2024 that Arborfield Sewage Treatment Works (STW) has a growth scheme in AMP8 to build capacity up to 2036. Thames Water have since approached the Environment Agency for pre-application advice for Arborfield STW although they have not provided reassurance that their growth scheme in AMP8, to build capacity up to 2036, is still on track.

We stated at the local plan preparation stage that the Environment Agency needs assurance from Thames Water that the funds are available and that the proposed works will be completed before, or in line with, Wokingham Borough Council's allocations being built/prior to being occupied. Without this reassurance the

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Environment Agency cannot be satisfied that there is sufficient sewerage capacity available to facilitate the plan's proposed development. We therefore consider it is necessary for the plan to include a requirement for a planning condition to be imposed on all proposed development on all allocations in Wokingham which prevents occupation of any of the development until the planned upgrades at the Arborfield STW are completed to ensure that there is sufficient sewerage capacity to accommodate the development. This should be approved in writing by the local planning authority in consultation with the Environment Agency and the sewage undertaker.

It is important for the LPA to continue to liaise with the sewage undertaker -Thames Water to understand when improvement works will be undertaken and completed at Arborfield STW and plan growth that connects to it accordingly.

In the SoCG between the Environment Agency and Wokingham Borough Council - [SoCG WBC-EA March 2025 Redacted](#) it is stated that the LPA will ensure that that development does not outpace the delivery of necessary upgrades. We support this approach and advise that it should be ensured via planning conditions as stated previously. We would also like to highlight that on the planning applications which we have been consulted on for comments in Wokingham, we are already asking for planning conditions which prevents occupation of any of the development until the planned upgrades at the Arborfield STW are completed. This is to ensure that there is sufficient sewerage capacity to accommodate these development which in turn will protect the water environment.

We are currently in the process of developing a position statement regarding water quality risks due to wastewater capacity pressures related to the Arborfield Sewage Treatment Works (STW). The position statement would outline how the LPA should address the issues of water quality. We are happy to share this with the Inspector in due course.

Environment Agency
Sustainable Places, Thames Area