



STATEMENT OF COMMON GROUND

BETWEEN

WEST BERKSHIRE DISTRICT COUNCIL

AND

ENVIRONMENT AGENCY

April 2024

1.0 Introduction

- 1.1 The purpose of this Statement of Common Ground (SoCG) is to set out areas of common agreement between West Berkshire District Council (WBDC) and the Environment Agency (EA) and any areas of disagreement relating to the West Berkshire Local Plan Review (WBLPR) as well key strategic matters affecting flood risk, biodiversity and the water environment, groundwater quality and contaminated land, water quality and water resources.
- 1.2 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 1.3 Whilst the duty to cooperate is not a duty to agree, local planning authorities are required to make every effort to secure the necessary cooperation on strategic and cross boundary matters to support the Local Plan and its examination.
- 1.4 In relation to strategic planning matters, section 33A(1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004. This approach is also a requirement of national planning policy. Paragraph 35(c) of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period, and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by a statement of common ground.
- 1.5 This Statement of Common Ground therefore provides the framework for West Berkshire Council's delivery of its duties and obligations under the Localism Act 2011 and accords with Paragraph 27 of the National Planning Policy Framework which requires LPA's to produce and publish one or more Statements of Common Ground. This is detailed further in the government's Planning Practice Guidance (PPG) on Plan-making.

2.0 Objective

- 2.1 West Berkshire is the Local Planning Authority for its administrative area and 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 West Berkshire District Council).

- 2.2 This Statement of Common Ground sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from the proposals in the submission WBLPR.

In order to meet the requirements of the duty to cooperate, during the preparation of the Local Plan Review West Berkshire has engaged constructively with the EA.

- 2.3 The Environment Agency is a key strategic partner in the preparation of the WBLPR. This SoCG is a written record of the key matters addressed.

3.0 West Berkshire Local Plan Consultations

- 3.1 The review of the Local Plan started in 2018 and included public consultation on the scope and content of the LPR, with a second round of consultation in November/December 2018. In December 2020 the Council published the full Regulation 18 emerging draft version of the LPR for public consultation from 11th December 2020 to 5th February 2021. All of the bodies and persons included on the planning policy consultation database were notified by email or letter and invited to comment. Between January and March 2023 the Council consulted on the Regulation 19 pre-submission Local Plan having considered comments and representations received at the Regulation 18 stage.

- 3.2 From an early stage in the Local Plan process, West Berkshire engaged with the EA about the range of issues around the Local Plan, including the Strategic Flood Risk Assessment and the Water Cycle Study. Comments and representations have been made on reviewing the evidence base, which in turn aids in developing a strategy and vision, site selection, policy formation, and SA/SEA.

- 3.3 In response to the Regulation 18 scoping statutory consultation in February 2018 the EA commented on the evidence base, buffer zones along the river corridor, flood risk, pollution control, water resources, biodiversity, green infrastructure, and updating saved Local Plan policies. The comments made were taken forward in the development of spatial strategy and both relevant strategic and local policies.

- 3.4 In response to the Regulation 18 statutory consultation in December 2020 the EA reviewed the policies and site allocations in relation to their remit on flood risk, biodiversity and conservation of fisheries and the water environment, groundwater quality and contaminated land, water quality and water resources. Specific concerns were raised with issues surrounding the water environment and water quality, and suggestions were given as to how the issues could be overcome.

- 3.5 The EA commented on the pre-submission draft of the West Berkshire Local Plan (Regulation 19) January 2023, in relation to the policies and site

allocations. Such comments are outlined in Appendix A, with the Council's response and suggested modifications.

4. On-going engagement between WBDC & the EA

- 4.1 Both parties met on 2nd February 2021, between the Regulation 18 and Regulation 19 stages to discuss buffers, a specific watercourse policy, and engagement moving forward. WBDC consider such discussions are reflected in the policies as submitted, and following the EA's comments from the Regulation 19 consultation, with amendments outlined in Appendix 1.
- 4.2 Appendix A lists the Council's comments and suggested policy amendments to each of the EA's representations submitted as part of the Regulation 19 consultation.

5. Matters on which the parties agree

- 5.1 WBDC and the EA agree to the suggestions and amendments outlined in Appendix A.

6.0 Areas for Future Review

- 6.1 The Strategic Flood Risk Assessment (November 2020 and November 2022 by JBA) is retaining the definition of Flood Zone 3b as the 1 in 20-year modelled flood extent (5% AEP). This is because the 1 in 30 year modelled flood extents are not currently available for most of the EA hydraulic models within West Berkshire. This is contrary to the August 2022 updates to the flood risk sections of the Planning Practice Guidance (PPG) which states that the functional floodplain should take account of local circumstances but will normally comprise land with a 1 in 30-year (3.3%) or greater chance of flooding.

Most of the modelling in West Berkshire does not currently have a 3.3% AEP model run, however the EA are currently updating both the Kennet and the Lambourn models and the new models will hold a 3.3% AEP model run. We anticipate these modelling projects to be complete within the next two years, after which the SFRA would need to be updated to reflect the required latest PPG update for the definition of Flood Zone 3b.

7.0 Timetable for review and ongoing cooperation

- 7.1 This SoCG will be kept under review and updated as necessary to reflect any change in circumstances or evidence as the plan progresses through the key stages to adoption.

8.0 Agreement

Signed on behalf of West Berkshire District Council

Chief Planning Officer



Dated: 30 April 2024

Signed on behalf of the Environment Agency

Planning Specialist – Judith Montford



Dated: 30 April 2024

APPENDIX A

Environment Agency

Policy	Summary of representations from the Environment Agency (EA)	Council response
SP1: Spatial Strategy	<p>(Not justified): When taking the constraints listed in section 4.6 into consideration, policy needs to highlight how sensitive areas such as the River Kennet SSSI, River Lambourn SSSI, the River Lambourn SAC, and the Atomic Weapons Establishment will be protected and safeguarded from development pressures or competing development. how the constraints will affect the development goals highlighted in the policy. How the sensitive areas/protected areas and the AWE will be protected and safeguarded from development pressures or competing development should be highlighted in SP1.</p>	<p>Policy SP1 is a top-level overarching strategic policy. The constraints are embedded in the formulation of the policy and indeed the strategic policies of the Local Plan, as explained in paragraphs 4.6 to 4.17. As the Local Plan is to be read as a whole how the constraints have formulated the location and type of development across the District is clear and unambiguous. Other policies within the Plan manage development which is affected by the constraints listed. Namely SP2 (AONB), SP4 (AWE), SP11 (Biodiversity and geodiversity), and DM6 (water quality). No modification is required.</p>
<p>SP4: Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield</p> <p>DM33 Development within AWE</p>	<p>We make no comments or suggest amendments to policies SP4 or DM33 of the draft plan.</p> <p>The Environment Agency is part of an offsite planning group who are consulted by West Berkshire District Council on any development proposals in the Detailed Emergency Planning Zone (DEPZ) of the AWE sites. We have permitted a number of activities and installations within AWE sites under our regulatory requirements and influences and would expect that AWE, or any other organisation undertaking new activities in developments considered under DM33 to consult with us if their activities would require environmental permits.</p>	<p>Comments noted.</p>
SP5: Responding to Climate Change	<p>(Not consistent with national policy): additional criteria required to:</p> <ul style="list-style-type: none"> ensure flood risk is assessed against climate change; 	<p>Propose modification to criterion i): The Plan needs to be read as a whole. Criterion i) signposts the reader to Policy SP6, which requires that the impact of climate change.</p>

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	<ul style="list-style-type: none"> • ensure the water environment is protected in terms of protected and important species and habitats given the designations of the River Kennet (SSSI), River Lambourn (SSSI and SAC); and • have at least 10% BNG at every site to help mitigate against climate change mitigation effects. <p>Paragraph 5.1 should be amended to 'nitrous oxide' deleting 'nitrous monoxide'.</p>	<p>Propose no modification to criterion h) or I): The Plan needs to be read as a whole. Criterion I) refers to wildlife habitat and species conservation. SP11 seeks to protect biodiversity and geodiversity.</p> <p>Criterion I) references improvements to wildlife habitat and species conservation and as BNG is now mandatory under the Environment Act references have been removed from the Policy. It is not proposed to modify the policy further.</p> <p>Propose minor modification to paragraph 5.1: 'The gases emitted such as carbon dioxide, methane and nitrous <u>oxide</u> monoxide ...'</p>
SP6: Flood Risk	<p>Typo: Missing closed bracket in second line of policy: <i>Within Flood Zones 2 and 3 (and also on sites of 1 hectare or more in size, and in other circumstances as set out in the NPPF.</i></p> <p>Missing reference in penultimate paragraph of the policy text: empty closed brackets after reference to footnote 19.</p> <p>Acknowledge the benefits of the use of Natural flood management (NFM) measures, but it should be understood that NFM measures may not always be appropriate/possible. This should be acknowledged.</p> <p>We suggest adding the text below to Point 'd' of Policy SP6 'The development will be safe for its lifetime' and not increase flood risk elsewhere.'</p> <p>We suggest Paragraph 6 of Policy SP6 should be reworded from;</p>	<p>Propose minor modification to correct typo to include closed bracket: Within Flood Zones 2 and 3 (and also on sites of 1 hectare or more in size, and in other circumstances as set out in the NPPF).</p> <p>Propose main modification to criterion p): 'Natural flood management measures can be implemented <u>where possible</u>.'</p> <p>Propose main modification to criterion d) to add: 'The development will be safe <u>for its lifetime</u> and not increase flood risk elsewhere.</p> <p>Agree to main modification to paragraph 6 (above criterion d) to delete:</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
	<p>"In applying the Sequential Test, where development has to be located in flood risk areas, it should be demonstrated that..."</p> <p>To;</p> <p>'If the sequential test shows that it isn't possible for an alternative site to be used and therefore development has to be located in a flood risk area, it should be demonstrated that...'</p> <p>Paragraph 8 of Policy SP6 states "Where an Exception Test is required, in accordance with national policy and guidance, this should demonstrate how flood risk would be managed on site, including that the sustainability benefits of the site outweigh the flood risk and that the development will be safe for its lifetime, taking into account the vulnerability of its users and that it will not increase flood risk elsewhere."</p> <p>We suggest this is reworded to the following text for clarity:</p> <p>'In addition to the sequential test, the exception test must be applied in certain situations according to national policy. This includes highly vulnerable development in flood zone 2, essential infrastructure in flood zone 3a or 3b, and more vulnerable development in flood zone 3a. The exception test should demonstrate how flood risk would be managed on site so that the development is safe taking into account the vulnerability of its users, and that it will not increase flood risk elsewhere. The exception test will also need to show that the sustainability benefits of the development to the community outweigh the flood risk.'</p> <p>Point 'p' of Policy SP6 states "Natural flood management measures can be implemented".</p> <p>While we support the implementation of Natural flood management measures, it may not always be appropriate/possible to provide these. We suggest this is reworded and suggest the following text;</p> <p>'Natural flood management measures can be implemented wherever possible'</p> <p>Paragraph 5.17 of Policy SP6 states: "The sequential approach to the layout of a development site can reduce the risk of flooding from all sources and not increase flood risk overall, both off and on site. This approach also ensures that that the most vulnerable development is located within the areas of lowest risk of flooding."</p>	<p>"In applying the Sequential Test, where development has to be located in flood risk areas, it should be demonstrated that..."</p> <p>To add:</p> <p><u>'If the sequential test shows that it isn't possible for an alternative site to be used and therefore development has to be located in a flood risk area, it should be demonstrated that:'</u></p> <p>Propose main modification to paragraph 8 (relating to the Exception Test) to delete:</p> <p>"Where an Exception Test is required, in accordance with national policy and guidance, this should demonstrate how flood risk would be managed on site, including that the sustainability benefits of the site outweigh the flood risk and that the development will be safe for its lifetime, taking into account the vulnerability of its users and that it will not increase flood risk elsewhere."</p> <p>To add:</p> <p><u>'In addition to the sequential test, the exception test must be applied in certain situations according to national policy. This includes highly vulnerable development in Flood Zone 2, essential infrastructure in Flood Zone 3a or 3b, and more vulnerable development in flood zone 3a. The exception test should demonstrate how flood risk would be managed on site so that the development is safe taking into account the vulnerability of its users, and that it will not increase flood risk elsewhere. The exception test will also need to show that the sustainability benefits of the development to the community outweigh the flood risk.'</u></p>

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	<p>We suggest this is reworded and suggest the following text; 'The sequential approach should be taken when determining the layout of a development site, meaning the most vulnerable development should be sited in the areas of lowest flood risk within the site.'</p>	<p>Propose amendment to paragraph 5.17 of the supporting text to delete the paragraph and replace with: <u>'The sequential approach should be taken when determining the layout of a development site, meaning the most vulnerable development should be sited in the areas of lowest flood risk within the site.'</u></p> <p>In consideration of comments to site allocation policies it is proposed to add to 5.24 of the supporting text, which focuses on the advice of the Environment Agency: The Environment Agency's <u>guidance 'Approach to Groundwater Protection'</u> https://assets.publishing.service.gov.uk/media/5ab38864e5274a3dc898e29b/Environment-Agency-approach-to-groundwater-protection.pdf <u>should be referred to for developments which may impact groundwater.</u></p>
SP7: Design Quality	<p>Not justified: para 5.31 has regard to new waterside development adjacent to the Kennet and Avon Canal. As written, it contradicts policy SP6 (Flood Risk) which requires an undeveloped 10m buffer alongside and on both sides of main rivers. It should be revised to include reference to the 10m buffer to ensure consistency.</p>	<p>Propose minor modification to the supporting text. Add following sentence to the end of paragraph 5.31: <u>'In accordance with SP6, where practicable and appropriate, any development should include an undeveloped buffer zone of 10m on either side of the Canal.'</u></p>
SP10: Green Infrastructure	<p>Suggest the title is changed to 'Blue Green Infrastructure'. Criteria o: 'Buffer strips' should be changed to 'buffer zones' to match with the rest of the wording in the Plan. It will be useful to states that the buffer zones need to</p>	<p>The Council acknowledges the title of the policy and has previously considered the title as suggested. However, as the NPPF's definition of 'Green Infrastructure' encompasses water bodies</p>

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	<p>be at least 10m wide and should be planted with primarily local native species of UK genetic provenance and used to provide habitat and corridors for species which use the riverbank and the water.</p>	<p>under 'blue spaces' it is considered that the title of 'Green Infrastructure' is appropriate and unambiguous.</p> <p>Propose main modification to criterion o) to be consistent with wording in the Plan: '<u>Provide undeveloped buffer strips of vegetation zones along the banks of watercourses, in accordance with Policy SP6.</u>'</p>
<p>SP11: Biodiversity and Geodiversity</p>	<p>The policy does not adhere to the requirements of chapter 15 of the NPPF. Policy needs to be strengthened to provide more protection for the water environment as follows:</p> <ul style="list-style-type: none"> • The reference to an 'appropriate buffer' is ambiguous' and needs to be changed to a 10m buffer to be consistent with other policies. • A standalone policy specifically about the water environment is required given the internationally and nationally important protected sites that include the River Kennet SSSI, River Lambourn SAC and SSSI. 	<p>Propose main modification to criterion d): '<u>Provides or retains appropriate at least 10 metre buffer zones between development proposals and designated habitats...</u></p> <p>In response to the comment of a standalone policy for the water environment, as part of the Regulation 19 submission version of the Local Plan Review was strengthened following comments from the Environment Agency at the Regulation 18 stage and following a meeting between WBC and the EA in February 2021. Policy DM6 (Water quality) seeks to ensure development proposals will support the improvement of the status and overall health of the River Kennet and River Lambourn. The policy includes a requirement for proposals to demonstrate it is nutrient neutral when in the hydrological catchments of the River Lambourn SSSI/SAC or River Test (criterion c). The supporting text was also strengthened in support of the additional criteria. Policies SP6, SP10, SP11 contains criteria for buffer zones and biodiversity enhancements. Policies SP6 and</p>

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		<p>SP10 discuss culverts. It is not considered that a standalone policy is needed as the points made are addressed in the proposed policies.</p>
<p>SP16: Sandleford Park Strategic Site Allocation</p>	<p>Environmental constraints not considered or listed. Inclusion of such information will provide perspective which then highlights the need for the necessary requirements to allow development on the site. It is suggested that the policy is updated to include a section on requirements and opportunities.</p>	<p>The Sandleford Supplementary Planning Document (SPD) requires the submission of a utilities plan, which would consider the water supply and wastewater network. The SPD, at paragraph 129, requires the submission of an Infrastructure Delivery Plan (IDP) to accompany a planning application.</p> <p>At paragraph 132, the SPD requires that 'an overarching utilities plan should also form part of the submitted IDP. This should set out the strategy for the installation and delivery of services including electricity, gas, water supply, waste, foul water and information technology'.</p> <p>As the SPD is to be read alongside the policy, and has status as a material consideration, this is considered an appropriate approach to the points made. However, for clarity and to be consistent with other policies, but to reflect the requirements of the SPD, it is proposed to amend the supporting text to add the following to the end of the final sentence of 6.48::</p> <p><u>' in line with the site's Infrastructure Delivery Plan as required in the Sandleford Park Supplementary Planning Document</u></p>
<p>SP17: North East Thatcham Strategic Site Allocation</p>	<p>Environmental constraints not considered or listed. Inclusion of such information will provide perspective which then highlights the need for the necessary requirements to allow development on the site. It is suggested that the policy is updated to include a section on requirements and opportunities.</p>	<p>The Thatcham Growth Study work (Thatcham Past SIT2a, Thatcham Present SIT2b, Thatcham Future SIT2c) and the North East Thatcham Landscape Character Assessment (LAN7e) have</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
		<p>aided in guiding the site allocation and the policy. The documents required as part of a planning application highlight the types of constraints and features to be aware of. No modification is considered necessary.</p>
<p>RSA1: Land north of Newbury College, Monks Lane, Newbury</p>	<ul style="list-style-type: none"> • Newbury Sewage Treatment Works (STW) is currently at around 98% of its dry weather flow (DWF) capacity. Development would drain into the STW and take it over capacity. • New DWF permit required to ensure no deterioration of any quality elements. Prior to any development taking place, EA need confidence that additional phosphorous load would not undermine the Asset Management Plan. • Newbury STW is a high spiller and additional developments and flows will increase the frequency of spilling. EA would not support any additional flows entering the STW until significant works have been undertaken to tackle the causes of the spills. • Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>Policy DM6 considers water quality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p> <p>A main modification is proposed. STW – criterion e) of the policy to be amended: ‘An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.’</p>
<p>RSA2: Land at Bath Road, Speen</p>	<ul style="list-style-type: none"> • FRA required to demonstrate requirements of NPPF and PPG due to site being greater than 1ha. • Newbury Sewage Treatment Works (STW) is currently at around 98% of its dry weather flow (DWF) capacity. Development would drain into the STW and take it over capacity. • New DWF permit required to ensure no deterioration of any quality elements. Prior to any development taking place, EA need confidence that additional phosphorous load would not undermine the Asset Management Plan. • Newbury STW is a high spiller and additional developments and flows will increase the frequency of spilling. EA would not support any additional flows 	<p>A main modification is proposed: Insert additional criterion (wording consistent with other RSA policies): <u>The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures;</u> DM6 considers water quality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the</p>

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	<p>entering the STW until significant works have been undertaken to tackle the causes of the spills.</p> <ul style="list-style-type: none"> • Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>comments made by the EA are satisfactorily addressed by other policies.</p> <p>A main modification is proposed: STW – criterion g) of the policy to be amended: 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p>
<p>RSA3: Land at Coley Farm, Newbury</p>	<ul style="list-style-type: none"> • Newbury Sewage Treatment Works (STW) is currently at around 98% of its dry weather flow (DWF) capacity. Development would drain into the STW and take it over capacity. • New DWF permit required to ensure no deterioration of any quality elements. Prior to any development taking place, EA need confidence that additional phosphorous load would not undermine the Asset Management Plan. • Newbury STW is a high spiller and additional developments and flows will increase the frequency of spilling. EA would not support any additional flows entering the STW until significant works have been undertaken to tackle the causes of the spills. • Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>The Policy is proposed to be removed as development has commenced on site and is at an advanced stage.</p>
<p>RSA4: Land off Greenham Road, Newbury</p>	<ul style="list-style-type: none"> • FRA required to demonstrate requirements of NPPF and PPG due to site being greater than 1ha. • Newbury Sewage Treatment Works (STW) is currently at around 98% of its dry weather flow (DWF) capacity. Development would drain into the STW and take it over capacity. 	<p>The Policy is proposed to be removed as the site is being built out.</p>

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	<ul style="list-style-type: none"> • New DWF permit required to ensure no deterioration of any quality elements. Prior to any development taking place, EA need confidence that additional phosphorous load would not undermine the Asset Management Plan. • Newbury STW is a high spiller and additional developments and flows will increase the frequency of spilling. EA would not support any additional flows entering the STW until significant works have been undertaken to tackle the causes of the spills. • Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	
RSA5: Land at Lower Way, Thatcham	<ul style="list-style-type: none"> • Historic landfill next to the site, thus any significant foundations/ground excavations may lead to pathway for pollutants. Developer needs to be aware of EA's 'Approach to Groundwater Protection' guidance. • Would not support any additional flows entering the Newbury STW., known as a high spiller. • Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>Criterion h) requires development to be informed by a phase 1 contamination assessment.</p> <p>A main modification is proposed: STW – criterion j) of the policy to be amended: 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p>
RSA6: Stoneham's Farm, Long Lane, Tilehurst	<ul style="list-style-type: none"> • Assume wastewater will be discharged at Reading STW. No concerns provided TW are not concerned with deterioration of phosphate classification. • Policy should include a requirement for developers to liaise with TW to discuss wastewater drainage for site. 	The Policy will be removed as development has commenced on site and is at an advanced stage.
RSA7: 72 Purley Rise, Purley on Thames	<ul style="list-style-type: none"> • Assume wastewater will be discharged at Reading STW. No concerns provided TW are not concerned with deterioration of phosphate classification. 	The Policy is proposed to be removed as development has commenced on site and is at an advanced stage.

Policy	Summary of representations from the Environment Agency (EA)	Council response
	<ul style="list-style-type: none"> Policy should include a requirement for developers to liaise with TW to discuss wastewater drainage for site. 	
RSA8: Land adjacent to Bath Road and Dorking Way, Calcot	<ul style="list-style-type: none"> Assume wastewater will be discharged at Reading STW. No concerns provided TW are not concerned with deterioration of phosphate classification. Policy should include a requirement for developers to liaise with TW to discuss wastewater drainage for site. 	<p>Noted.</p> <p>Paragraph 10.71 in Policy DM7 highlights the need for early engagement with Thames Water. Therefore, this is not required in site allocation.</p> <p>A main modification is proposed: STW – criterion d) of the policy to be amended: ‘An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.’</p>
RSA9: Land between A340 and The Green, Theale	<ul style="list-style-type: none"> Historic landfill next to the site, thus any significant foundations/ground excavations may lead to pathway for pollutants. Developer needs to be aware of EA’s ‘Approach to Groundwater Protection’ guidance. Assume wastewater will be discharged at Reading STW. No concerns provided TW are not concerned with deterioration of phosphate classification. Policy should include a requirement for developers to liaise with TW to discuss wastewater drainage for site. 	<p>See inclusion of reference to the Environment Agency’s guidance on ‘Approach to Groundwater Protection’ in SP6. Do not propose to modify the policy.</p> <p>Paragraph 10.71 in Policy DM7 highlights the need for early engagement with Thames Water. Therefore, this is not required in site allocation.</p> <p>A main modification is proposed: STW: Criterion e) of the policy to be amended: ‘An integrated water supply and drainage strategy will</p>

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		<p>be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p>
RSA10: Whitehart Meadow	<ul style="list-style-type: none"> • Sulham Brook, running alongside the site, is home to Brown Trout and Bullhead, making it more ecologically importance. Therefore, apart from 10m buffer, an ecological assessment should be provided and approved before permission granted. This should be in the policy wording; • Assume wastewater will be discharged at Reading STW. No concerns provided TW are not concerned with deterioration of phosphate classification. • Policy should include a requirement for developers to liaise with TW to discuss wastewater drainage for site. • Support the limitation of development to FZ1. 	<p>Criterion m) requires that the development will be informed by an Ecological Impact Assessment, with avoidance and mitigation measures implemented.</p> <p>Paragraph 10.71 in Policy DM7 highlights the need for early engagement with Thames Water. Therefore, this is not required in site allocation.</p> <p>A main modification is proposed: Criterion l) of the policy to be amended: 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p>
RSA11: Former Theale sewage Treatment Works, Theale	<ul style="list-style-type: none"> • Sulham Brook, running alongside the site, is home to Brown Trout and Bullhead, making it more ecologically importance. Therefore, apart from 10m buffer, an ecological assessment should be provided and approved before permission granted. This should be in the policy wording; 	<p>Criterion m) requires that the development will be informed by an Ecological Impact Assessment, with avoidance and mitigation measures implemented.</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
	<ul style="list-style-type: none"> Assume wastewater will be discharged at Reading STW. No concerns provided TW are not concerned with deterioration of phosphate classification. Policy should include a requirement for developers to liaise with TW to discuss wastewater drainage for site. 	<p>Paragraph 10.71 in Policy DM7 highlights the need for early engagement with Thames Water. Therefore, this is not required in site allocation.</p> <p>A main modification is proposed: Criterion I) of the policy to be amended: 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p>
RSA12: Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common	<ul style="list-style-type: none"> Protected species survey required as well as ecological impact assessment. Burghfield STW is a high spiller, mostly due to groundwater infiltration. Would not support large development within the catchment. The STW does not have a permitted phosphorus discharge value presently. There are options to permit limits at Burghfield to mitigate the impact of development. 	The Policy is proposed to be removed as development has commenced on site and is at an advanced stage,
RSA13: Land north of A4 Bath Road, Woolhampton	EA: The site is on SPZ3.	Noted. Criterion f) of Policy DM7 manages development in relation to its impact on water quality, including SPZs.
RSA14: Land adjoining Lynch Lane, Lambourn	<ul style="list-style-type: none"> Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality, and additional loads would need to be offset elsewhere. NE better to advise. East Shefford STW is an exceptionally high spilling site, mostly due to groundwater infiltration. 	DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the

Policy	Summary of representations from the Environment Agency (EA)	Council response
	<ul style="list-style-type: none"> • Not support additional flows until work has been done to reduce the frequency of storm overflows. • Adequate wastewater treatment infrastructure must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>comments made by the EA are satisfactorily addressed by other policies.</p> <p>Policy SP11 seeks to ensure that developments are nutrient neutral.</p> <p>A main modification is proposed: Criterion f) of the policy to be amended: 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p>
RSA15: Land at Newbury Road, Lambourn	<ul style="list-style-type: none"> • Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality, and additional loads would need to be offset elsewhere. NE better to advise. • East Shefford STW is an exceptionally high spilling site, mostly due to groundwater infiltration. • Not support additional flows until work has been done to reduce the frequency of storm overflows. • Adequate wastewater treatment infrastructure must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p> <p>A main modification is proposed: Criterion h) of the policy to be amended: 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to</u></p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
		<p><u>consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p>
<p>RSA16: Land north of Southend Road, Bradfield Southend</p>	<ul style="list-style-type: none"> Assume wastewater will be discharged at Reading STW. No concerns provided TW are not concerned with deterioration of phosphate classification. Policy should include a requirement for developers to liaise with TW to discuss wastewater drainage for site. 	<p>Noted.</p> <p>Paragraph 10.71 in Policy DM7 highlights the need for early engagement with Thames Water. Therefore, not required in site allocation.</p>
<p>RSA17: Land at Chieveley Glebe, Chieveley</p>	<ul style="list-style-type: none"> FRA required due to size of site. To be listed in criteria. Developments connecting to Chieveley STW may be problematic as it discharges to River Lambourn SAC, an area of nutrient neutrality. NE better to advise. Adequate wastewater treatment infrastructure must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>A main modification is proposed: Insert additional criterion (wording consistent with other RSA policies): <u>The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures;</u></p> <p>DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p> <p>A main modification is proposed: Criterion i) requires the following: An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. A housing</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
		phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the Chieveley Sewage Treatment Works'. No modification is therefore necessary.
RSA18: Pirbright Institute Site, High Street, Compton	<ul style="list-style-type: none"> • Add to criterion k): iii) 'detailed computer modelling of the river Pang which runs to the south of the site will be required to inform development proposals, including the latest Climate Change Allowances'. • Refer to EA's Approach to Groundwater Protection guidance for type of development EA would object to within a Principal Aquifer. • Compton STW is a high spiller, and mitigation required, both in terms of increasing flows, and deterioration of phosphorous. • Wastewater drainage constraints should be highlighted in the policy. 	<p>A main modification is proposed: Add to criterion k): <u>iii) 'detailed computer modelling of the river Pang which runs to the south of the site will be required to inform development proposals, including the latest Climate Change Allowances'.</u></p> <p>A main modification is proposed: Criterion l) of the policy to be amended: 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p>
RSA19: Land west of Spring Meadows, Great Shefford	<ul style="list-style-type: none"> • Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality, and additional loads would need to be offset elsewhere. NE better to advise. • East Shefford STW is an exceptionally high spilling site, mostly due to groundwater infiltration. • Not support additional flows until work has been done to reduce the frequency of storm overflows. 	DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.

Policy	Summary of representations from the Environment Agency (EA)	Council response
	<ul style="list-style-type: none"> Adequate wastewater treatment infrastructure must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>Criterion i) detailed and does ensure that a phasing plan which considers the upgrades to the treatment works. No modifications necessary.</p>
<p>RSA20: Land off Charlotte close, Hermitage</p>	<ul style="list-style-type: none"> Developments connecting to Chieveley STW may be problematic as it discharges to River Lambourn SAC, an area of nutrient neutrality. NE better to advise. Adequate wastewater treatment infrastructure must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. Encourage the requirement to open up the culvert and contribute to biodiversity net gain. 	<p>DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p> <p>Criteria c) does encourage the opening up of the culvert and contribute to biodiversity net gain.</p> <p>Criterion e) requires an integrated water supply and drainage strategy to ensure that adequate infrastructure is in place.</p>
<p>RSA21: Land to the south east of the Old Farmhouse, Hermitage</p>	<ul style="list-style-type: none"> Developments connecting to Chieveley STW may be problematic as it discharges to River Lambourn SAC, an area of nutrient neutrality. NE better to advise. Adequate wastewater treatment infrastructure must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. Encourage the requirement to open up the culvert and contribute to biodiversity net gain. 	<p>DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p> <p>Criteria f) does encourage the opening up of the culvert and contribute to biodiversity net gain.</p> <p>Criterion h) requires an integrated water supply and drainage strategy to ensure that adequate infrastructure is in place.</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
<p>RSA22: Land adjacent Station Road, Hermitage</p>	<ul style="list-style-type: none"> • Developments connecting to Chieveley STW may be problematic as it discharges to River Lambourn SAC, an area of nutrient neutrality. NE better to advise. • Adequate wastewater treatment infrastructure must be available or provided to support all proposed development prior to occupation. This must be stated in the policy text. 	<p>DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p> <p>Criterion i) requires an integrated water supply and drainage strategy to ensure that adequate infrastructure is in place.</p>
<p>RSA23: Land adjoining The Haven, Kintbury</p>	<ul style="list-style-type: none"> • Site would require a FRA due to size of site. To be listed in criteria. • Kintbury STW is a high spilling site, and therefore actions required to address this. • Development will lead to a deterioration in phosphorus so a new and tighter permit will be required to prevent this from happening. All must be stated in the policy text. 	<p>A main modification is proposed:: Insert additional criterion (wording consistent with other RSA policies): <u>The scheme will be supported by a Flood Risk Assessment that will include the consideration of surface water flooding and will advise on any appropriate mitigation measures;</u></p> <p>The permit regime is outside of the planning process, and will be for the developer to apply away from the planning application.</p> <p>Criterion f) requires an integrated water supply and drainage strategy to ensure that adequate infrastructure is in place.</p> <p>DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
<p>RSA24: New Stocks Farm, Paices Hill, Aldermaston</p>	<ul style="list-style-type: none"> Historic landfill next to site which means any significant foundations or ground excavations may lead to pathway for pollutants in landfill to reach groundwater. EA guidance on Groundwater Protection should be referred to. Unclear that the site would connect to a STW as far from TW sewers. Any wastewater drainage proposal must be clearly stated as well as all mitigation measures proposed to ensure disposal will not have a negative impact. Secured before development commences. 	<p>See inclusion of reference to the Environment Agency's guidance on 'Approach to Groundwater Protection' in Policy SP6. Do not propose to modify the policy. <u>A main modification is proposed:</u> <u>'g) A drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate waste water infrastructure. The development will be occupied in line with this strategy'.</u></p>
<p>RSA25: Long Copse Farm, Enborne</p>	<ul style="list-style-type: none"> There is no flood zone 2/3 within the site, so query over criterion k); Unclear that the site would connect to a STW as far from TW sewers. Any wastewater drainage proposal must be clearly stated as well as all mitigation measures proposed to ensure disposal will not have a negative impact. Secured before devt commences. 	<p>Noted. Criterion k to be removed as a main modification. 'k) No caravans will be permitted within Flood Zones 2 and 3 at the northern edge of the site;'</p> <p>A main modification is proposed: <u>'n) A drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate waste water infrastructure. The development will be occupied in line with this strategy'.</u></p>
<p>ESA1: Land east of Colthrop Industrial Estate, Thatcham</p>	<ul style="list-style-type: none"> Not support any additional flows entering the Newbury STW, as a known high spiller until significant work has been done to tackle the causes of the spills. See comments on DM7. Constraints must be stated in the policy text (note the details provided under RSA1). 	<p>DM6 considers water quality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p> <p>A main modification is proposed: Criterion m) to be added: <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate</u></p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
		<p><u>infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'</u></p>
<p>ESA2: Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands</p>	<ul style="list-style-type: none"> • Developments connecting to East Shefford STW may be problematic. River Lambourn SAC is in an area of nutrient neutrality meaning any additional loads would need to be offset elsewhere. NE better placed to advise. • East Shefford STW exceptionally high spilling site, mostly due to groundwater infiltration. Not support additional flows to site until work has been done to reduce the frequency of storm overflows. • Constraints must be started in the policy text. 	<p>DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p> <p>A main modification is proposed: Criterion I) to be added: <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'</u></p>
<p>ESA3: Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands</p>	<ul style="list-style-type: none"> • Developments connecting to East Shefford STW may be problematic. River Lambourn SAC is in an area of nutrient neutrality meaning any additional loads would need to be offset elsewhere. NE better placed to advise. • East Shefford STW exceptionally high spilling site, mostly due to groundwater infiltration. Not support additional flows to site until work has been done to reduce the frequency of storm overflows. • Constraints must be started in the policy text. 	<p>DM6 considers water quality, including nutrient neutrality. It is proposed to produce an SPD on nutrient neutrality. DM7 deals with water resources and waste water. The Local Plan needs to be read as a whole, and therefore the comments made by the EA are satisfactorily addressed by other policies.</p>

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		<p>A main modification is proposed: Criterion k) to be added: <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'</u></p>
<p>ESA4: Beenham Landfill, Pips Way, Beenham</p>	<ul style="list-style-type: none"> • Historic landfill next to site which means any significant foundations or ground excavations may lead to pathway for pollutants in landfill to reach groundwater. EA guidance on Groundwater Protection should be referred to. • Assume wastewater would be discharged to Reading STW. No comments, provided TW are content. 	<p>Criterion h) of the policy requires a desk based assessment detailing the likelihood and extent of land contamination, and where necessary an intrusive investigation with remediation. No modification necessary.</p> <p>A main modification is proposed: Criterion k) to be added: <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'</u></p>

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<p>ESA5: Northway Porsche, Grange Lane, Beenham</p>	<ul style="list-style-type: none"> • Historic landfill next to site which means any significant foundations or ground excavations may lead to pathway for pollutants in landfill to reach groundwater. EA guidance on Groundwater Protection should be referred to. • Assume wastewater would be discharged to Reading STW. No comments, provided TW are content. 	<p>See inclusion of reference to the Environment Agency's guidance on 'Approach to Groundwater Protection' in Policy SP6.</p> <p>A main modification is proposed, to include: <u>m) Development will be informed by a desk based assessment (as a minimum) detailing the likelihood and extent of land contamination, followed by, where necessary, an intrusive investigation and undertaking of appropriate remediation measures. Further monitoring may be required depending on the nature of contamination and remediation.'</u></p> <p><u>A main modification is proposed:</u> Criterion n) to be added: <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'</u></p> <p>Note: Thames Water are content with the above insertion.</p>
<p>ESA6: Land adjacent to Padworth IWMF, Padworth Lane, Padworth</p>	<ul style="list-style-type: none"> • Historic landfill next to site which means any significant foundations or ground excavations may lead to pathway for pollutants in landfill to reach groundwater. EA guidance on Groundwater Protection should be referred to. • Assume wastewater would be discharged to Reading STW. No comments, provided TW are content. 	<p>See inclusion of reference to the Environment Agency's guidance on 'Approach to Groundwater Protection'. Criterion h) of the policy requires a desk based assessment detailing the likelihood and extent of land contamination, and where</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
		<p>necessary an intrusive investigation with remediation. No modification necessary.</p> <p>A main modification is proposed: Criterion I) to be added: <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'</u></p> <p>Note: Thames Water are content with the above insertion.</p>
DM5: Environmental Nuisance & Pollution Control	Additional text required to ensure that ground and surface waters are protected from pollution as required by chapter 15 of the NPPF. Suggested text provided by the EA.	<p>Agree with the suggested wording. Proposed minor modification to the supporting text:</p> <p>Paragraph 10.49: To this end, appropriate conditions may be imposed requiring certain remedial measures prior to construction <u>and or</u> appropriate design <u>of and</u> wastewater <u>and surface water</u> run-off management schemes.'</p>
DM6: Water Quality	Additional wording and amendments required to ensure sensitive water resources and controlled waters are protected. This will ensure consistency with paras 170 and 178 of the NPPF. Suggested text provided by the EA.	<p>Agree with the suggested wording. Proposed minor modification to the supporting text: Paragraph 10.59: 'Most foul water is removed from a development site by a mains sewer. However, where this is not the case, foul water is usually treated on site and then discharged either to ground to filter away from the site, or into a</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
		<p>nearby watercourse. If the treated water <u>is discharged to ground</u>, it has the potential to impact on water quality sensitive features, <u>particularly by increasing the already high nitrate concentrations</u>. The Environment Agency's publication 'General binding rules: small sewage discharge to groundwater (2021) stipulates that the <u>general binding rules can only be met if the discharge is less than 2 cubic metres per day and via a shallow drainage field located, designed, and constructed in line with the recommendations in British Standard BS 6297:2007</u>. If it is identified that a planning application could affect groundwater, the potential impact on water quality will need to be investigated and include a mitigation strategy which demonstrates how the applicant will reduce the negative effects of their proposal and show how they will implement risk reduction measures.'</p>
DM7: Water Resources and Waste Water	<p>Chieveley, Hungerford and Newbury WWTW should be mentioned/included in the Plan. The draft Plan states that these need to be upgraded, as set out in 10.71. However, further details, such as the timeline and approach to ensure the needs of upcoming developments have not been provided. Proposed developments should not outpace required wastewater infrastructure provision or improvements. Developments should not go ahead when there is no wastewater drainage infrastructure in place or when the existing infrastructure will still be exceeding their permit limit.</p> <p>The text should therefore be amended:</p> <p><i><u>"In order to allow for water and wastewater infrastructure delivery national planning guidance stipulates that phasing new development should be considered to ensure that the 'infrastructure will be in place when and where needed and provided through the timely provision of new, or the enhancement of existing necessary strategic and local infrastructure to ensure that infrastructure is in place and available prior to the occupation of all developments.'</u> As the Water Cycle Study</i></p>	<p>Proposed minor modification to paragraph 10.71 of the supporting text:</p> <p>'In order to allow for water and wastewater infrastructure delivery national planning guidance stipulates that phasing new development should be considered to ensure that the 'infrastructure will be in place when and where needed <u>and provided through the timely provision of new, or the enhancement of existing necessary strategic and local infrastructure to ensure that infrastructure is in place and available prior to the occupation of all developments.'</u> As the Water Cycle Study (Phase 2) (2021) is showing the need for upgrades it may be necessary for development to be phased in</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
	<p><i>(Phase 2) (2021) is showing the need for upgrades it may be necessary for development to be phased in West Berkshire to allow for the delivery of this infrastructure.'</i></p> <p>Criterion a) should be amended to read: <i>'There is adequate water supply and wastewater treatment infrastructure capacity resources are available, or can be provided, to support the development proposed at the time of occupation prior to the occupation of all developments', and will be safeguarded from the potential impacts of development;'</i></p>	<p>West Berkshire to allow for the delivery of this infrastructure.'</p> <p>With regard to criteria a), for information, in agreement with Thames Water the Council propose main modifications to many of the site allocation policies (as set out for the relevant RSA/ESA proposed modifications above) to include the following:</p> <p>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. <u>Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure.</u> Development will be occupied in line with this strategy.'</p> <p>Additionally, and in agreement with Thames Water, criterion c) is proposed for modification to the following: 'Where upgrades to water supply and waste water are required and <u>where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</u> Consideration should be given to phasing the development so that the necessary infrastructure is in place.</p>

Policy	Summary of representations from the Environment Agency (EA)	Council response
		As this policy will be read together with the site allocation policies it is considered that proposed development allocations, as well as any windfall developments, will have the necessary infrastructure in place <u>prior to the occupation of any development</u> .
DM20: Gypsies, Travellers and Travelling Showpeople	Policy needs rewording to recognise that Table 2 of the PPG defines caravans as 'highly vulnerable', meaning that they are not permitted in Flood Zones 2 and 3. Suggested text provided by the EA.	A minor modification is proposed to add to the end of paragraph 11.24 of the supporting text: In consideration of location, <u>caravans are not permitted in Flood Zone 3 as per Table 2 of the Planning Practice Guidance</u> '.
DM24: Conversion of Existing Redundant or Disused Buildings in the Countryside to Residential Use	(Not consistent with national policy). Policy needs to include two additional criteria to ensure proposed conversion development is not at risk of flooding and would not cause any detrimental impacts sensitive receptors. The additional criteria are to ensure national policy is adhered to and that the development is sustainably viable. Suggested text provided by the EA.	The Local Plan is to be read as a whole. Comments are covered by Policies SP6, as an overarching strategic policy, and DM7.
DM25: Replacement of Existing Dwellings in the Countryside	(Not consistent with national policy). Policy needs to include two additional criteria to ensure proposed development is not at risk of flooding and would not cause any detrimental impacts sensitive receptors. The additional criteria are to ensure national policy is adhered to and that the development is sustainably viable. Suggested text provided by the EA.	The Local Plan is to be read as a whole. Comments are covered by Policies SP6, as an overarching strategic policy, and DM7.
DM28: Residential Extensions	(Not consistent with national policy). Policy needs to include two additional criteria to ensure proposed development is not at risk of flooding and would not cause any detrimental impacts sensitive receptors. The additional criteria are to ensure national policy is adhered to and that the development is sustainably viable. Suggested text provided by the EA.	The Local Plan is to be read as a whole. Comments are covered by Policies SP6, as an overarching strategic policy, and DM7.
DM29: Residential Annexes	(Not consistent with national policy). Policy needs to include two additional criteria to ensure proposed development is not at risk of flooding and would not cause any detrimental impacts sensitive receptors. The additional criteria are to ensure	The Local Plan is to be read as a whole. Comments are covered by Policies SP6, as an overarching strategic policy, and DM7.

Policy	Summary of representations from the Environment Agency (EA)	Council response
	national policy is adhered to and that the development is sustainably viable. Suggested text provided by the EA.	
DM37: Equestrian and Horseracing Industry	(Not consistent with national policy). Policy needs to include two additional criteria to ensure proposed development is not at risk of flooding and would not cause any detrimental impacts sensitive receptors. The additional criteria are to ensure national policy is adhered to and that the development is sustainably viable. Suggested text provided by the EA.	The Local Plan is to be read as a whole. Comments are covered by Policies SP6, as an overarching strategic policy, and DM7.