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Matter 10: Site-specific policies - Central Reading

Issue 1: Are the policies for Central Reading justified, deliverable and consistent with national policy?

We have focused on questions 10.8, 10.9, 10.10, 10.16, 10.17 and 10.18 and have provided the Inspector with answers below.

10.8 Is Policy CR11, justified and effective?
10.9 Is Policy CR12 justified and effective?
10.10 Is Policy CR13 justified and effective?

Environment Agency answer
All these policies state in points CR11 ix) CR12 viii) and CR13 x) respectively that developments would *"Give early consideration to the potential impact on water and wastewater infrastructure and electricity infrastructure in conjunction with relevant infrastructure providers and make provision for upgrades where required."*

Our answer to the above three questions is the same as we have provided for question 10.16 below.

10.16 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Environment Agency answer
Regarding infrastructure requirements, there is insufficient evidence of a suitable assessment of capacity for foul water/wastewater from all proposed developments on the sites below that would be adequately treated at Reading Sewage Treatment Works (STW).

These sites CR11a – CR11g, CR11i, CR12a – CR12e, CR13a – CR13d, CR14a, CR14d, CR14g – CR14j, CR14l – CR14ab (and CR11, CR12, and CR13 and other sites within the Central Reading Allocation that have not been listed in the Inspector's questions) connect to the Reading STW.

Any *additional flows* into an under-capacity network - Reading STW, can result in situations such as rising main or pumping station failures, which can cause significant environmental damage. There is currently evidence to show that Reading

STW discharges into the Foundry Brook which is it is at Poor status overall, and Poor for Phosphate. STW is also a ‘Reason for not achieving good’ (RNAG) status for the macrophyte element. This highlights the fact that improvements must be made to the network before new developments come online. Actions have been identified to resolve those issues, and we expect those to be in place before the STW is put under more pressure from additional development.

We requested that a Water Cycle Study is submitted to address this matter. We note that Reading Borough Council have produced a Water Quality Assessment. We are currently reviewing the Water Quality Assessment by Stantec -EV025 and would be happy to provide further comments in due course regarding the situation at the Reading STW.

10.17 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?

Environment Agency answer

Our answer to question 10.17 relates to the sites listed below being deliverable. Following a review of the Sequential Test Document and the SFRA Level 2, we do not consider the CR14n (Reading Central Library) and CR14x (Part of Tesco Car Park, Napier Rd) within the Central Reading allocation to be deliverable. We note that these two sites have not been listed in the Inspectors questions, however they are listed as passing the sequential test in the Sequential Test document (EV026) and as allocations in the local plan. As we stated under Matter 5, these sites are not supported by the policy as worded and so we do not consider these sites to be deliverable. Allocating these for development would not be justified and would be inconsistent with national policy NPPF Framework 14.

CR14n (Reading Central Library) 22- 32 dwellings

This site was included in the sequential test document and has been considered as passing the sequential test. The site is also listed in the Local Plan as an allocation. However, to our knowledge a Level 2 SFRA has not been produced to further justify this allocation as well as highlight the proposed mitigation measures to make this site deliverable and safe from flood risk for its lifetime.

The sequential test explains that the site has been allocated because development needs cannot be met on sequentially preferable sites. The sequential test as well as the Local Plan also mentions deculverting of the Holy Brook to reduce flood risk. However, this is not discussed in a Level 2 SFRA and so it is not clear what mitigation is proposed on site. For example, it would not appropriate to build over a culverted watercourse, and all development should be located a minimum of 8m from the watercourse.

At the Regulation 19 stage, our position was: *"Residential development is proposed which is an increase in vulnerability from the current less vulnerable state (library). This would be a policy objection as more vulnerable development in FZ3b is inappropriate, and increasing vulnerability on a developed site in FZ3b is also grounds for in-principle objection. The draft policy EN18 states they will avoid development in FZ3. This should be demonstrated in a Level 2 SFRA and the development must past the exception test before the site is allocated. " .* We maintain this position.

CR14x (Part of Tesco Car Park, Napier Rd) 57-85 dwellings

This site lies entirely within FZ2. 94% of the site lies within the design flood extent. The Level 2 SFRA acknowledges that "a significant amount of infrastructure may need to be raised to ensure it is safe for the development's lifetime" and that compensatory storage will be required. Given that only 6% of the site lies outside of the design flood extent and there is currently no built footprint on site (currently car parking), the amount of land outside of the design flood extent is likely insufficient to compensate for the loss of floodplain storage this development will cause.
It has not been demonstrated that any development on this site would be safe from flood risk to people and property and would not increase flood risk elsewhere.

10.18 Are there any main modifications required to the allocation for soundness?

Environment Agency answer

We do not consider these sites (CR14n and CR14x) within the Central Reading allocations in the Local Plan to be deliverable and developable. This is because of the points we have raised above and therefore these sites must be removed from the local plan as site allocations.

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Matter 10: Site-specific policies - South Reading
Issue 2: Are the policies for South Reading justified, deliverable and consistent with national policy?
10.27 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
Environment Agency answer
Our comments here are similar to what we have said so far about wastewater infrastructure. There is currently insufficient evidence of a suitable assessment of capacity for foul water/wastewater from all proposed developments on the sites below that would be adequately treated at Reading Sewage Treatment Works (STW). Sites within **South Reading allocation including SR4e and** other South Reading allocated sites not listed in the Inspector's questions, connect to the Reading STW.

A few of the allocations in this area state that development should *"Take account of the potential impact on water and wastewater infrastructure and electricity infrastructure in conjunction with relevant infrastructure providers, and make provision for upgrades where required.".*
This is important because any *additional flows* to Reading STW, can result in situations such as rising main or pumping station failures, which can cause significant environmental damage. There is currently evidence to show that Reading STW discharges into the Foundry Brook which is it is at Poor status overall, and Poor for Phosphate. STW is also a 'Reason for not achieving good' (RNAG) status for the macrophyte element. This highlights the fact that improvements must be made to the network before new developments come online. Actions have been identified to resolve those issues, and we expect those to be in place before the STW is put under more pressure from additional development.
We requested that a Water Cycle Study is submitted to address this matter. We note that Reading Borough Council have produced a Water Quality Assessment. We are currently reviewing the Water Quality Assessment by Stantec -EV025 and would be happy to provide further comments in due course regarding the situation at the Reading STW.

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Matter 10: Site-specific policies - West Reading and Tilehurst

Issue 3: Are the policies for West Reading and Tilehurst justified, deliverable and consistent with national policy?

We have focused on questions 10.31,10.36,10.37,10.38 and 10.40 and have provided the Inspector with answers below.

10.31 Is Policy WR2 justified and effective?

10.40 Are the site allocations WR3s and WR3t justified and effective?

Environment Agency answer

Policies WR2, WR3s and WR3t both state that development at these sites should *"take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water and make provision for upgrades where required."* Our answer to the above question is the same as we have provided for question 10.36 below. This must be considered to make the allocation justified.

10.36 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Environment Agency answer

Regarding infrastructure requirements, there is currently a lack of evidence of a suitable assessment of capacity for foul water/wastewater from all proposed developments on the sites below that would be adequately treated at Reading Sewage Treatment Works (STW).

These sites WR3b, WR3f - WR3l, WR3n -WR3p, and WR3r - WR3y within the West Reading and Tilehurst Allocation (and other West Reading and Tilehurst allocated sites not listed in the Inspector's questions) connect to the Reading STW.

Any *additional flows* to Reading STW, can result in situations such as rising main or pumping station failures, which can cause significant environmental damage. There is currently evidence to show that Reading STW discharges into the Foundry Brook which is it is at Poor status overall, and Poor for Phosphate. STW is also a 'Reason for not achieving good' (RNAG) status for the macrophyte element. This highlights the fact that improvements must be made to the network before new developments come online. Actions have been identified to resolve those issues, and we expect those to be in place before the STW is put under more pressure from additional development.

We requested that a Water Cycle Study is submitted to address this matter. We note that Reading Borough Council have produced a Water Quality Assessment. We are currently reviewing the Water Quality Assessment by Stantec -EV025 and would be happy to provide further comments in due course regarding the situation at the Reading STW.

10.37 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?
Environment Agency answer
Our answer to question 10.37 relates to the site WR3i being deliverable.
Following a review of the Sequential Test Document (EV026) and the SFRA Level 2, we do not consider WR3i – Land at Portman Way within the West Reading and Tilehurst allocation to be deliverable. We note that this site has not been listed in the Inspectors questions, however it is considered as passing the sequential test in the Sequential Test -(EV026) document and as an allocation in the local plan. As we stated under Matter 5, this site is not supported by the policy as worded and so we do not consider this site to be deliverable. Allocating it for development would not be justified and would be inconsistent with national policy NPPF Framework 14.
WR3i (Land at Portman Way) 18-26 dwellings
This site lies entirely within FZ2 and the design flood extent. The Level 2 SFRA acknowledges that *"the provision of compensatory storage could be challenging"* and recommends that the lower dwelling amount (18) is considered for development. Whilst more vulnerable development in FZ2 is permissible, in this instance, it will not be possible to compensate for any increase in built footprint or other loss of floodplain storage within the design flood event that this development will bring. This will increase flood risk elsewhere, which is contrary to Local Plan policy EN18 and the NPPF Framework 14.
In answer to the Inspector's question 10.37, we do not consider site allocation WR3i deliverable for the reasons stated above.

10.38 Are there any main modifications required to the allocation for soundness?
Environment Agency answer
We do not consider this site within the West Reading and Tilehurst allocations in the Local Plan to be deliverable and developable. This is because of the points we have raised above and therefore this site must be removed from the local plan as a site allocation.

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Matter 10: Site-specific policies -
Caversham and Emmer Green
Issue 4: Are the policies for Caversham and
Emmer Green justified, deliverable and consistent with national policy?
We have focused on questions 10.48,10.49 and 10.50 and have provided the Inspector with answers below.

10.48 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
Environment Agency answer
Regarding infrastructure requirements, there is insufficient evidence of a suitable assessment of capacity for foul water/wastewater from all proposed developments on the sites below that would be adequately treated at Reading Sewage Treatment Works (STW). Wastewater flows from the additional proposed development will flow to Reading Sewage Treatment Works (STW) and the Reading STW require upgrades to accommodate further growth in Reading.

These sites CA1a, CA1c - CA1f, and CA1h within the Caversham and Emmer Green Allocation (and other Caversham and Emmer Green allocated sites not listed in the Inspector's questions) connect to the Reading STW.
Any *additional flows* to Reading STW, can result in situations such as rising main or pumping station failures, which can cause significant environmental damage. There is currently evidence to show that Reading STW discharges into the Foundry Brook which is it is at Poor status overall, and Poor for Phosphate. STW is also a 'Reason for not achieving good' (RNAG) status for the macrophyte element. This highlights the fact that improvements must be made to the network before new developments come online. Actions have been identified to resolve those issues, and we expect those to be in place before the STW is put under more pressure from additional development.
We requested that a Water Cycle Study is submitted to address this matter. We note that Reading Borough Council have produced a Water Quality Assessment. We are currently reviewing the Water Quality Assessment by Stantec -EV025 and would be happy to provide further comments in due course regarding the situation at the Reading STW.

10.49 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?
Environment Agency answer

Our answer to question 10.49 relates to the site CA1a – being deliverable. Following a review of the Sequential Test Document and the SFRA Level 2, we do not consider CA1a – Reading University Boat Club within the Caversham and Emmer Green allocation to be deliverable. Allocating the site for development would not be justified and would be inconsistent with national policy NPPF Framework 14.

CA1a (Reading University Boat Club) 18-28 dwellings

This majority of this site is within Flood Zone 3 (FZ3) in accordance with the sequential test, and 98% of the site is within the 1% Annual Exceedance Probability (AEP) plus a 35% allowance for climate change (the design flood extent). The Level 2 SFRA recommends that the lower dwelling amount (18) is considered for development, which would require 0.30ha of land. Of the land comprising the site, 0.37ha is within FZ3. Floodplain storage will be lost where development in FZ3 and/or the design flood extent is raised above the design flood level or built footprint is increased.

Policy CA1a in the Local Plan document states that development shall; *"Take account of the risk of flooding, and locate development only in the portion of the site in Flood Zone 2, closest to Abbotsmead Road;"* This will not be possible at the site, only 2% of which falls outside of FZ3. The amount of land outside of the design flood extent is likely insufficient to compensate for the loss of floodplain storage this development will cause. This will lead to an increase in flood risk elsewhere, which is contrary to Local Plan policy EN18 and Framework 14 of the NPPF.

In answer to the Inspector's question 10.49: we do not consider site allocation CA1a deliverable. Allocating it for development would not be justified and would be inconsistent with national policy.

10.50 Are there any main modifications required to the allocation for soundness?

Environment Agency answer

We do not consider these sites within the Caversham and Emmer Green allocations in the Local Plan to be deliverable and developable. This is because of the points we have raised above and therefore this site would have to be removed from the local plan as a site allocation.

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Matter 10: Site-specific policies - East Reading

Issue 5: Are the policies for East Reading justified, deliverable and consistent with national policy?

We have focused on question 10.58 and have provided the Inspector with an answer below.

10.58 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Environment Agency answer

Regarding infrastructure requirements, there is insufficient evidence of a suitable assessment of capacity for foul water/wastewater from proposed developments on the site below that would be adequately treated at Reading Sewage Treatment Works (STW).

Site ER1e within East Reading Allocation (and other East Reading allocated sites not listed in the Inspector's questions) connect to the Reading STW.

Any *additional flow* to Reading STW, can result in situations such as rising main or pumping station failures, which can cause significant environmental damage. There is currently evidence to show that Reading STW discharges into the Foundry Brook which is it is at Poor status overall, and Poor for Phosphate. STW is also a 'Reason for not achieving good' (RNAG) status for the macrophyte element. This highlights the fact that improvements must be made to the network before new developments come online. Actions have been identified to resolve those issues, and we expect those to be in place before the STW is put under more pressure from additional development.

We requested that a Water Cycle Study is submitted to address this matter. We note that Reading Borough Council have produced a Water Quality Assessment. We are currently reviewing the Water Quality Assessment by Stantec -EV025 and would be happy to provide further comments in due course regarding the situation at the Reading STW.