

22nd April 2026

Ms Joanna Gilbert, Planning Inspector
Via Programme Officer

Your contact is: Mark Worringham, Planning Section

Dear Ms Gilbert

Re. Examination of the Local Plan Partial Update – Outstanding Matters

I write with regard to the Further Post-Stage 2 Hearings Letter of 16 April 2026 regarding outstanding matters. In particular the letter asked for an update on the water quality matters by 23 April.

Main modifications

We have prepared an updated Schedule of Main Modifications and Schedule of Proposals Map Modifications. These take into account the contents of your most recent letter regarding the deletion of WR3s (Land at Kentwood Hill) and WR3t (Land at Armour Hill). They also take into account the combination of policy CC2 with the sustainability elements of policy H5 in an amended CC2, which has also been sent to you as a separate document (both tracked changes and clean copy) today. Other than anything related to water quality (see below) there should be no more outstanding modifications to include unless there is a further request from you.

Water quality - permitting

On 18 April, our consultants Stantec provided us with a revised draft of the Water Quality Assessment which picks up on the permitting issue identified by the Environment Agency. We have sent this draft over to the EA to check whether this addresses the issue and am waiting to hear back. We suggest that if we do not hear anything by Friday 1 May, we add this to the evidence list as a revised document.

The updated Assessment notes that Reading Sewage Treatment Works (STW) is currently using almost all (97%) of its volumetric permit and that by 2041, taking Local Plan development into account, it would exceed its volumetric permit capacity and would not be able to serve the proposed development before any upgrade takes place. The Assessment further notes that Thames Water Utilities Ltd is planning an upgrade for Reading STW to improve its ability to treat the volumes of incoming sewage, which is due to be completed in 2027.

We have written to the EA suggesting that on this basis a main modification is made to section 10 (Infrastructure Delivery Plan) which highlights the issue and the proposed upgrade, and points to policy EN16 which requires that adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support a proposed development prior to occupation. In our view this would resolve the issue, but we await the EA view before finalizing this as a proposed modification.

Water quality – modelling

We have enquired about the costs and likely deliverability of undertaking SIMCAT – SAGIS modelling of the LPPU development as sought by the EA. This has established that it would require a formal procurement exercise which would take considerable time (at least several months) and for which a budget has not yet been identified. We do not therefore consider that it can reasonably be included within the timescales of the examination.

During the hearings, you mentioned the possibility of this being picked up in an early review of the plan. Our suggestion would be that the Council would be committed to undertaking the modelling within, for instance, two years, and that any issues arising from the model would be addressed by updates to the Local Plan. The EA's concerns about water quality impacts of the Local Plan are not about the immediate effects of development (which in any case already largely has planning permission) but are more likely to arise further into the plan period, so an early review would still allow these matters to be addressed before they arise. In the meantime the Local Plan could be progressed with appropriate caveats around that early review.

On 13 March we wrote to the EA to seek their views on this matter. We received a response on 15 April which agreed that this approach was reasonable. The EA did ask that *"Please would it be possible to use a planning mechanism to ensure the risk of significant imminent harm to the water environment is low/avoided. Is there a way in which this could be included as a requirement in the local plan?"* However, we would suggest that policy EN16 already provides this mechanism and that developments that would cause significant harm would fail this policy test.

We therefore consider that an early review approach as outlined above would sufficiently address the modelling issue.

Therefore, we anticipate that all outstanding matters as far as we are aware should be resolved by the first week in May.

Please feel free to contact me if there are any queries.

Yours sincerely



Mark Worringham
Planning Policy Manager