

Statement of Common Ground

between

Wokingham Borough Council

and

Thames Water

in relation to the

Wokingham Borough Local Plan Update 2023-2040

February 2025

1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Wokingham Borough Council (WBC) and Thames Water, collectively referred to as “the parties”. It sets out matters that are agreed between the parties in relation to the preparation of the Wokingham Borough Local Plan Update 2023 – 2040: Proposed Submission Plan.
- 1.2 WBC is preparing a new local plan to manage where and how development is delivered in the borough to 2040 – the Local Plan Update.

2. Background

- 2.1 The Duty to Cooperate, introduced by the Planning and Compulsory Purchase Act 2004 (amended by Section 33A of the Localism Act) places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis in the preparation of development plan documents and other documents. This is a test that local authorities need to satisfy prior to the local plan examination stage and is an additional requirement to the test of soundness.
- 2.2 The Duty to Cooperate specifically relates to ‘strategic matters’ which are defined as follows¹:
- Sustainable development or use of land that has or would have a significant impact on at least two planning areas, (in particular) in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas, and
 - Sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.
- 2.3 Paragraph 20 of the National Planning Policy Framework (NPPF) (2023)² (which is unchanged in the NPPF 2024) also outlines strategic priorities that a local plan should have strategic policies to cover. They include:
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- 2.4 This statement has been prepared in accordance with paragraph 27 of the NPPF and the section of the Planning Practice Guidance on Maintaining Effective Cooperation.

¹ Per Section 33A of the Planning and Compulsory Purchase Act 2004

² The plan is intended to be examined against the December 2023 NPPF, as enabled by transitional arrangements in the December 2024 NPPF. The text from paragraph 20 remains unchanged in the 2024 NPPF.

3. Context

Local Plan Update

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

Thames Water

- 3.4 Thames Water provides clean potable water in western and northern parts of the borough, including the areas of Woodley and Earley, and sewerage and wastewater treatment services to the entire borough.



Figure 1: Map of water supply company boundaries (Source: Water Cycle Study – Phase 1 (2019))

Strategic Geography

- 3.5 Wokingham Borough is located approximately 50km west of London, in the heart of the Thames Valley and within the Royal County of Berkshire. The borough covers an area of 17,892 hectares and is characterised by a variety of settlements with the largest being Earley, Winnersh and Woodley, which are in proximity to Reading Borough, and Wokingham.
- 3.6 Wokingham Borough contains several waste water treatment works, at Remenham, Wargrave, Ashridge, Longwater and Arborfield. Several treatment serving the borough works are also contained in surrounding local authorities.

4. Current position

- 4.1 WBC commenced evidence gathering to inform the Local Plan Update in 2016. The plan-making process has been informed by opinions expressed through various consultations, including Issues and Options Consultation (2016), Homes for the Future Consultation (2018), Draft Plan Consultation (2020) and Revised Growth Strategy Consultation (2021). A wide range of technical reports have also been completed, including reports relating to sustainability, landscape character, transport, flood risk, air quality, housing, economic and retail needs, and land supply.
- 4.2 Thames Water responded to several consultation stages of plan preparation, in addition to meetings and discussions outside of formal consultations. A summary of the representations received is available on the WBC website.
- 4.3 Thames Water were fully engaged with the preparation of the Phase 1 and Phase 2 Water Cycle Studies, including providing responses to key matters. Thames Water were also engaged in the preparation of the Infrastructure Delivery Plan (IDP), and similarly provided updated information to inform the projects identified, including phasing and funding. There has been regular engagement between Thames Water and WBC during the preparation of the local plan.
- 4.4 A Memorandum of Understanding between Thames Water and WBC was agreed in 2024.

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

- 4.5 WBC invited representations on the Local Plan Update Proposed Submission Plan between 30th September and 13th November 2024. The plan will be submitted to the Secretary of State after full consideration of the representations received. The plan is intended to be examined against the December 2023 NPPF, as enabled by transitional arrangements.
- 4.6 In autumn 2024 WBC published various evidence and information, including an IDP which identified upgrades to water supply and sewage treatment works, to mitigate the impact of development proposed.
- 4.7 Thames Water responded to the Proposed Submission Plan, as outlined in Appendix A.
- 4.8 Thames Water responded regarding the proposed wording of policies FD2: Sustainable drainage, and CE3: Environmental standards for residential development, the potential impacts of development at the Strategic Development Locations, and provided a high level review of infrastructure capacity for proposed allocations.

- 4.9 Comments by Thames Water on earlier local plan consultations were taken into account during the preparation of this policy.

Areas of Agreement

- 4.10 The parties have engaged effectively and on an on-going basis during the plan making process and WBC has fulfilled its duty to co-operate with Thames Water.
- 4.11 The parties agree that policies set out in the Local Plan Update, following clarifications, are sound, namely:
- SS11: Arborfield Green SDL.
 - SS12: South Wokingham SDL.
 - SS13: Loddon Valley SDL.
 - SS14: Sites allocated for residential, including residential as part of mixed use development.
 - CE3: Environmental standards for residential development.
 - FD2: Sustainable drainage.
- 4.12 There is no in principle objection to any of the sites allocated in the LPU.
- 4.13 There are no known significant water supply, waste water, or sewage treatment capacity issue that would be likely to prevent, or delay the delivery of the site allocations proposed in the plan. Thames Water will continue to request the inclusion of Grampian style Planning Conditions to align the occupation of properties with the delivery of infrastructure upgrades where they are necessary. Thames Water will continue to provide developers with a means of accessing pre-planning assessments of any short/medium term system constraints to support the timely delivery of upgrades to coincide with when developments are expected to come online.
- 4.14 The relevant projects set out in the 'Water and Utilities' section of the IDP reflect the latest information available from Thames Water.
- 4.15 Necessary engagement in relation to plan making will continue up to and beyond submission as appropriate and necessary.

5. Areas of Further Work / disagreement

- 5.1 WBC and Thames Water recognise that assessments of capacity are subject to change over time, and therefore cooperation will be required between WBC, Thames Water and developers to ensure development and necessary infrastructure is aligned.


6. Governance Arrangements Including Future Review

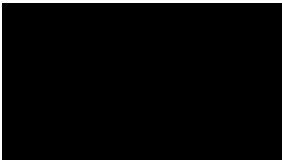
6.1 The parties agree to:

- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of the local plan;
- Review and update this Statement of Common Ground in the light of any material change in circumstance; and
- Maintain positive principles of cooperation.

Any proposals to vary or amend this Statement of Common Ground must be approved in writing by both parties.

Signatories

Signed on behalf of Thames Water	
	
By:	Chris Colloff
Title:	Planner
Date:	25/02/2025

Signed on behalf of Wokingham Borough Council	
	
By:	Trevor Saunders
Title:	Assistant Director, Planning
Date:	27/02/2025

Appendix A: Summary of Thames Water representations on the Proposed Submission Plan

Summary of Thames Water comment	WBC response	Agreement or need for further discussion
<p>Policy SS11: Arborfield Green SDL Policy SS12: South Wokingham SDL Policy SS13: Loddon Valley SDL</p> <p>The Strategic Development Locations (SDLs) are likely to require upgrades to existing infrastructure. We are keen to work closely with the Council and developers in relation to delivery of infrastructure for the SDLs to ensure any necessary upgrades align with the delivery of new development.</p>	<p>The council look forward to working with Thames Water and developers to ensure infrastructure is delivered in a timely manner.</p> <p>The Water Cycle Study (Phase 2) (p. 84) states that:</p> <p><i>TW have advised that a growth upgrade will be required at Arborfield WwTW in AMP8 (2025-30). This will improve the WwTWs ability to treat volumes of incoming sewage, reducing the need for untreated discharges in wet weather. Similar upgrades are also planned for Ashridge (Wokingham) and Wargrave WwTWs. In each case, the upgrades are subject to final PR24 determination (approval by Ofwat of TW's business plan - due to happen later in 2024). Where upgrades are required, no significant constraints to the provision of these upgrades have been identified by Thames Water. The remaining WwTWs have available capacity to serve the proposed growth and operate within their permits</i></p> <p>The IDP sets out anticipated upgrades to water supply, waste water and sewage treatment</p>	<p>Ongoing engagement with Thames Water to ensure the timely delivery of infrastructure capacity upgrades.</p>

Summary of Thames Water comment	WBC response	Agreement or need for further discussion
	works. This includes upgrades to Ashridge, Arborfield, Wargrave and Longwater STW, which reflects information provided by TW, and as set out in TW's five year plan (AMP 8).	
<p>RAG assessment of proposed allocations</p> <p>Thames Water have undertaken a high level review of the infrastructure capacity for the proposed housing allocations.</p> <p>This shows that all sites are assessed as green for 'waste network assessment' and 'STW assessment,' where the explanatory notes states 'on the information provided we do not envisage infrastructure concerns in relation to this development(s).'</p> <p>The 'water network assessment' assessed six sites as 'amber' where the explanatory notes state: 'On the information provided modelling may be required to understand the impact of development.'</p> <p>The 'water network assessment' also assessed two sites as 'red' where the explanatory notes state: On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary.'</p>	<p>The two sites assessed as red are:</p> <ul style="list-style-type: none"> • SS14.6 31-33 Barkham Ride, Finchampstead. • SS14.18 Land west of Trowes Lane, Swallowfield. <p>At the time of the Proposed Submission Plan consultation, part of the land at 31-33 Barkham Ride had a resolution to grant planning permission for 55 dwellings, with only a legal agreement outstanding. The application was submitted in November 2022.</p> <p>Planning permission for 25 (net) homes was granted in September 2024 on another part of the proposed allocation.</p> <p>Planning permission for the development of 81 homes at the site at Trowes Lane, Swallowfield, was allowed on appeal in July 2024.</p> <p>This information is set out in the housing trajectory, available on the council's website during the consultation of the Proposed Submission Plan.</p>	<p>Ongoing engagement with Thames Water to ensure the timely delivery of infrastructure capacity upgrades.</p>

Summary of Thames Water comment	WBC response	Agreement or need for further discussion
	<p>As a result, the only two sites assessed as 'red' both benefit from planning permission. The council will continue to engage Thames Water on regarding these sites but consider that sufficient information is available for Thames Water to incorporate this development into their plans for network upgrades.</p> <p>The council will similarly work with Thames Water regarding all other sites, in particular the six sites assessed as 'amber.' It is noted that four of these sites benefit from planning permission (SS14.6, 14.19, 14.21 and 14.4).</p>	
<p>Policy FD2: Sustainable drainage</p> <p>Schedule 3 of the Flood and Water Management Act (2010) has not yet been implemented.</p> <p>The policy and supporting text need to be worded to ensure that the management of surface water does not have adverse impacts on the environment with within and without the implementation of Schedule 3 to ensure that it is effective.</p> <p>The following modifications are therefore suggested:</p> <p>Policy FD2, part 2(f) should be revised to read:</p>	<p>Noted.</p> <p>The policy wording and supporting text are proposed to be modified to reflect the suggestions.</p>	<p>Modifications are proposed to Policy FD2 and supporting text to incorporate the proposed changes.</p>

Summary of Thames Water comment	WBC response	Agreement or need for further discussion
<p><i>“f) Follow the following drainage hierarchy :1) Storing rainwater for later re-use; 2) Use infiltration techniques; 3) Attenuate rainwater in ponds or open water features for later gradual release; 4) Attenuate rainwater by storage for later gradual release; 5) Discharge rainwater directly to a watercourse; 6) Discharge rainwater to a land drain, highway drain or surface water sewer; 7) Discharge rainwater to a combined sewer.</i></p> <p><i>Development should avoid the use of underground tanks and conveyance, except when all other reasonable alternatives to provide a sustainable drainage solution have been exhausted, any discharge of surface water to a watercourse or sewer system is not to exceed predevelopment (greenfield) runoff rates or a maximum of 2/l/s/ha whichever is lower.”</i></p> <p>In addition, the supporting text in 10.29 should be amended as follows to make it clear that connection of surface water to foul networks will not be accepted. Without this Thames Water cannot prevent connection which could have adverse impacts on the environment.</p>		

Summary of Thames Water comment	WBC response	Agreement or need for further discussion
<p><i>10.29 Most sewers in the borough are public sewers owned by Thames Water. Applicants are required to provide evidence that capacity exists in the public sewerage network to serve their development in the form of written confirmation. The Flood and Water Management Act 2010 amends the Water Industry Act 1991, making the right to connect surface water runoff to public sewers conditional upon the drainage system being approved by the SuDS Approving Body subject to Schedule 3 of the Flood and Water Management Act 2010 being implemented. In any event, developers will be required to demonstrate that the drainage hierarchy has been followed and surface water connections to foul sewers will not be acceptable.</i></p>		
<p>Policy CE3: Environmental standards for residential development</p> <p>In relation to Policy CE3 we support the reference to water efficiency and would highlight that in the current system it is necessary for a planning condition requiring the optional water efficiency standard to be met. Thames Water consider that this should be met using the fittings based approach and this should be specifically referenced in all permissions for residential</p>	<p>The council will consider adding the proposed Condition onto relevant planning permissions.</p>	<p>Agree the council will consider adding the proposed Condition on relevant planning permissions.</p>

Summary of Thames Water comment	WBC response	Agreement or need for further discussion
<p>development through a condition stating the following:</p> <p><i>“The dwelling(s) shall be constructed to meet as a minimum the higher Building Regulation standard Part G for water consumption limited to 110 litres per person per day using the fittings approach.</i></p> <p><i>Reason: The site is in an area of serious water stress requiring water efficiency opportunities to be maximised; to mitigate the impacts of climate change; in the interests of sustainability; and to use natural resources prudently in accordance with the NPPF.”</i></p>		